

RSPO PRINCIPLE AND CRITERIA –
4th ANNUAL SURVEILLANCE ASSESSMENT 1_4
Public Summary Report

Client Company name (Parent Company): SIPEF GROUP
Client company Address: <u>Forum Nine Building, 10th Floor, Suite 1-11</u> <u>Jl.Imam Bonjol No.9</u> <u>Medan – 20112</u> <u>Sumatera Utara Province</u> <u>Indonesia</u>
Certification Unit: PT. Tolan Tiga Indonesia – Perlabian POM Location of Certification Unit: Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province - 21463 Indonesia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0021-05-000-00	Membership Approval Date	7 th December 2005
Parent Company Name	SIPEF Group		
Address	Head Office: Forum Nine Building, 10 th Floor, Suite 1-11 Jl. Imam Bonjol No.9, Medan - 20112 Sumatra Utara Province Indonesia		
Subsidiary (Certification Unit Name)	PT. Tolan Tiga Indonesia – Perlabian Palm Oil Mill		
Address	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province – 21463 Indonesia		
Contact Name	Mr. Olivier Tichit		
Website	www.tolantiga.co.id	E-mail	ortichit@sipef.com
Telephone	+62 61 415 2043	Facsimile	+62 61 452 0908

2. Certification Information			
Certificate Number	RSPO 555208	Date of First Certification	17 May 2010
		Certificate Start Date	17 May 2015
		Certificate Expiry Date	16 May 2020
Scope of Certification	Production of crude palm oil and palm kernel at Perlabian palm oil mill with two (2) company-owned plantation namely Perlabian estate and Tolan estate, with marketing activities through SIPEF N.V. Mill capacity is 60 tonnes FFB/hour.		
Applicable Standards	RSPO P&C Indonesia National Interpretation, September 2016; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE101-17489433	ISCC EU	DQS-UL CFS GmbH	25 th November 2018

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4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Perlabian POM	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province, Indonesia	2° 3' 40.98" N	100° 4' 57.19" E
Perlabian Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province	2° 3' 37.60" N	100° 4' 52.40" E
Tolan Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Regency, Sumatera Utara Province, Indonesia	2° 0' 11.78" N	100° 2' 30.66" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Perlabian Estate	4,476.33	59.38	271.31	4,807.02	93.12
Tolan Estate	3,614.15	55.99	1.9	3,672.04	98.42
Total	8,090.48	115.37	273.21	8,479.06	95.41

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Perlabian Estate	519.22	2,057.55	1,027.83	871.73	0	3,957.11	519.22
Tolan Estate	0	388.99	2,543.35	681.81	0	3,614.15	0
Total (ha)	519.22	2,446.54	3,571.18	1,553.54	0	7,571.26	519.22

Note:
The immature oil palm is replanting.

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7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (May 2018 – April 2019)	Actual (March 2018 – Feb 2019)	Forecast (May 2018 – April 2019)
Perlabian Estate	103,259.95	104,475.56	110,175
Tolan Estate	105,759.61	103,784.33	110,212
Total	209,019.56	208,259.89	220,387
Note: Last audit March 2018.			

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (May 2018 – April 2019)	Actual (March 2018 – Feb 2019)	Forecast (May 2018 – April 2019)
Nil	N/A		N/A
Total			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (May 2018 – April 2019)	Actual (March 2018 – Feb 2019)	Forecast (May 2018 – April 2019)
Nil			
Total			

10. Certified Tonnage			
Mill Capacity: 60 MT/hr SCC Model: IP	Estimated (May 2018 – Apr 2019)	Actual (March 2018 – Feb 2019)	Forecast (May 2018 – Apr 2019)
	FFB	FFB	FFB
	209,019.56	208,259.89	220,387
	CPO (OER: 23.0%)	CPO (OER: 21,99%)	CPO (OER: 23.5%)
	50,074.50	45,807.00	51,790.95
PK (KER: 5.5%)	PK (KER: 5.62%)	PK (KER: 5.7%)	

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	12,446.08	11,702.98	12,562.06
Note: <i>Last audit March 2018; Volume extension applied and approved on 17 June 2019 for 2,000 MT CPO and 950 MT PK.</i>			

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	13,699.78	23,225.32	0	1,502.24	38,427.34

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	6,650.00	0	0	4,609.62	11,259.62

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	Nil	
IS-CSPKO		
IS-CSPKE		

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
Tel +603 2242 4211 Fax +603 2242 4218
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site annual surveillance assessment was conducted from 25-29 March 2019. The audit programme is included as Section 2.3. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on 3 May 2019. The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO P&C Indonesia National Interpretation, September 2016; and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

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Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

All the previous nonconformities are remains closed. The assessment findings for the annual surveillance assessment are detailed in Section 3.4.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

The following table would be used to identify the locations to be audited each year in the 5 year cycle

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Perlabian POM	x	X	x	x	x
Perlabian Estate	x	X	x	x	x
Tolan Estate	x	X	x	x	x

Tentative Date of Next Visit: March 9, 2020 - March 13, 2020

Total No. of Mandays: 14

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Pratama Agung Sedayu (PS)	Team Leader/ Lead Auditor	He graduated from University of Jenderal Soedirman on 2008, majoring in Social Economic of Agriculture. He involved in RSPO certification since 2009 as a team member subsequently as a Lead Auditor, covering assessment against RSPO P&C in Indonesia, Malaysia, Thailand, Papua New Guinea, and Liberia. He completed the ISO 9001, ISO 14001, OHSAS 18001 Lead Auditor Course, HCV Identification and Management; ISPO Lead Auditor Endorsed Course and RSPO P&C and RSPO SCCS Lead Auditor Endorsed Courses. During this assessment, he assessed on the aspects of estate and mill's best management practices, transparency, GHG, supply chain for CPO Mills audits. He is fluently speaking in English and Bahasa Indonesia.
Eko Purwanto (EP)	Team Member	He graduated as Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Agricultural University (IPB) in 2001. He owned working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implemented good agricultural practice including integrated pest management and limited pesticides uses. He has been trained for lead auditor of RSPO P&C (2013), ISO 9001:2008 (2012), ISO 14001:2004 (2013), ISPO (2012) and RSPO SCC (2012). He has also completed training course of ISO 14001 (2012), Minaut (Oil and Automotive) Indonesia (2011) and Introduction to HCV Toolkit HCV (2011). Since October 2012 he has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in Indonesia Sustainable Palm Oil (ISPO) and RSPO P&C audit for several plantations and mills, also RSPO Supply Chain audit for several KCP, Bulking and Refinery. During this assessment, he assessed on the aspects of estate best practices, environment audits and social audits.
Imam Fakhrurozi (IF)	Team Member	Imam holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta on 2011. He had 2 (two) years working experience related to oil palm industry, as a sustainability and HSE officer in oil palm Plantation Company in Indonesia. Imam has completed a number of relevant trainings, the training includes ISO 9001:2008 and EMS 14001:2004 Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed course. Currently he works for BSI Group based in Jakarta office. He is one of the BSI qualified RSPO auditor. He had been involved in RSPO auditing since 2015. During this assessment, he assessed on the aspects of mill and estate best practices, environment social and OHS.

Accompanying Persons:

No.	Name	Role
	Nil	

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2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects ASA1_4	PS	EP	IF
			PRSPOLA/ PRSPO- SC	PRSPO- EMS/SA	PRSPO- OHS/EM S
Monday, 25/03/2019	08.00 – 08.30	Opening Meeting - Presentation by client (Overview of PT. Tolan Tiga Indonesia – Perlabian POM and its supply base); - Presentation by BSI team (Objective, scope, audit plan, etc.)	√	√	√
	08.30 – 12.00	Field Visit (Perlabian Estate): Field observation and Worker interview - FFB harvesting, FFB loading, road maintenance, landfill (waste management), workshop, water management, etc.	√	-	-
		Field Visit (Perlabian Estate): Field observation and Worker interview - HCV's, riparian zones, boundaries inspection, housing, social amenities, school, clinic, etc	-	√	-
		Field Visit (Perlabian Estate): Field observation and worker interview – IPM, Herbicide application programmes, fertilizer application, chemical and fertilizer warehouse, hazardous waste storage, etc.	-	-	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	(Perlabian Estate): General information, Time bound plan, partial certification verification, RSPO P&C (for Principle 1, Principle 2, Principle 3, Principle 4)	√	-	-
		(Perlabian Estate): RSPO P&C (for Principle 2, Principle 5.2, Principle 6)	-	√	-
(Perlabian Estate): RSPO P&C (for Principle 4, Principle 5, Principle 8)		-	-	√	
Tuesday, 26/03/2019	08.00 – 12.00	(Perlabian POM): General information, Time bound plan, partial certification verification, RSPO P&C (for Principle 1, Principle 2, Principle 3, Principle 4), RSPO SCCS implementation	√	-	-
		(Perlabian POM): RSPO P&C (for Principle 2, Principle 6)	-	√	-
		(Perlabian POM): RSPO P&C (for Principle 4, Principle 5 and Principle 8)	-	-	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	Field Visit (Perlabian POM): RSPO SCCS implementation	√	-	-
		Field Visit (Perlabian POM): Visit and observing Best Management Practices, Interview with Perlabian POM workers,	-	√	-

Date	Time	Subjects ASA1_4	PS	EP	IF
			PRSPOLA/ PRSPOSC	PRSPO- EMS/SA	PRSPO- OHS/EM S
		Field Visit (Perlabian POM): Visit and observing Occupational Safety and Health management, Environmental management (including but not limited to: use of PPE, safe working environment, walk ways, signs, palm oil mill effluent, diesel tanks, fire extinguishers, emission, first aiders and boxes, etc),	-	-	√
Wednesday, 27/03/2019	08.00 – 12.00	Field Visit (Tolan Estate): Field observation and Worker interview - FFB harvesting, FFB loading, road maintenance, landfill (waste management), workshop, water management, etc.	√	-	-
		Stakeholder consultation: Visit and interview with government offices in Labuhanbatu Selatan Regency	-	√	-
		Field Visit (Tolan Estate): Field observation and worker interview – IPM, Herbicide application programmes, fertilizer application, chemical and fertilizer warehouse, hazardous waste storage, etc.	-	-	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	(Tolan Estate): General information, Time bound plan, partial certification verification, RSPO P&C (for Principle 1, Principle 2, Principle 3, Principle 4)	√	-	-
		Stakeholder Consultation: Visit to local communities (head of village, cooperatives, community leader, contractors)	-	√	-
(Tolan Estate): RSPO P&C (for Principle 4, Principle 5, Principle 8)		-	-	√	
Thursday, 28/03/2019	08.00 – 12.00	Visit to Bulking Station	√	-	-
		(Perlabian POM): Verification of outstanding information	-	√	-
		(Perlabian Estate): Verification of outstanding information	-	-	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	Visit to Bulking Station	√	-	-
		(Perlabian POM): Verification of outstanding information	-	√	-
(Tolan Estate): Verification of outstanding information		-	-	√	
Friday, 29/03/2019	08.00 – 10.00	Report Preparation	√	√	√
	10.00 – 10.30	Closing Meeting	√	√	√

Date	Time	Subjects RSPO NCR Close Out	PS
			PRSP0 LA/ PRSP0-SC
Friday, 03/05/2019	14.00 – 14.15	Opening Meeting	√
	14.15 – 15.15	NCR Close Out (Medan Head Office): RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement-Clause 5.7.2 .	√
	15.15 – 15.30	Closing Meeting	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- SIPEF Group Multiple Management Units / Time Bound Plan
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C INA-NIWG 2016

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	PT. Tolan Tiga Indonesia is an independent smallholder under guidance of SIPEF Group. SIPEF Group has disclose all of its companies, mills and estates. The timebound plan including un-certified units/companies.	Comply
Have all the estates and mills certified within five years after obtaining RSPO membership?	No. Not all the estates and mills certified within five years after obtaining RSPO membership. New estates and mills are under progress to be RSPO certified after RSPO NPP carried out in 2014.	Comply
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	The latest acquisition noted for PT. Asri Rimba Wirabhakti in Bengkulu, announced end of 2018. Certification plan have been prepared, awaiting for RSPO LUC, RSPO RACP and RSPO NPP.	Comply
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, there is changes from the last audit to include PT. Asri Rimba into timebound plan. Waiting for HCV ALS review, LUC review for preparation into RSPO NPP.	Comply
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No, there is no changes from the last audit.	Comply
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No, there is no changes from the last audit.	Comply
Have there been any stakeholder comments?	Yes. Stakeholder comments are noted. The assessment team has conducted a search in internet to confirm that there is a comment that was recorded as complaint under RSPO Case Tracker; raised by the individual on those units that have not been certified.	Comply

	<p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint.</p> <p>On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company.</p> <p>On 28 August 2017 - Secretariat received response from the company.</p> <p>On 5 September 2017 - Complainant failed to provide the document.</p> <p>On 11 September 2017 - Secretariat has sent an email to SIPEF.</p> <p>On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter.</p> <p>On 18 June 2018 – Complaint Panel to deliver a decision.</p> <p>On 25 July 2018 – Complaint Panel to deliver a decision.</p> <p>On 23 August 2018 – Draft decision letter to be reformatted.</p> <p>On 19 September 2018 – Decision Letter – Complaints Panel.</p> <p>On 26 September 2018 – The decision letter finalised and to be delivered to Parties.</p> <p>On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018.</p> <p>On 20 December 2018 – The complaint is officially closed.</p> <p>The case tracker available on link https://askrspo.force.com/Complaint/s/case/50090000028Es1JAAS/detail</p>	
<p>Un-Certified Units or Holdings</p>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	<p>Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and found note “The compensation plans for PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015”.</p>	<p>Comply</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>RSPO NPP for PT. Agro Muara Rupit, PT. Agro Kati Lama, PT. Agro Rawas Ulu have been published in RSPO website.</p> <p>RSPO NPP for PT. Asri Rimba is waiting for HCV ALS review and LUC review.</p>	<p>Comply</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be</p>	<p>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant</p>	<p>Comply</p>

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<p>checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</p>	<p>claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker: On 25 July 2017 - Secretariat to write to the company and inform them on the complaint. On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company. On 28 August 2017 - Secretariat received response from the company. On 5 September 2017 - Complainant failed to provide the document. On 11 September 2017 - Secretariat has sent an email to SIPEF. On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter. On 18 June 2018 – Complaint Panel to deliver a decision. On 25 July 2018 – Complaint Panel to deliver a decision. On 23 August 2018 – Draft decision letter to be reformatted. On 19 September 2018 – Decision Letter – Complaints Panel. On 26 September 2018 – The decision letter finalised and to be delivered to Parties. On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018. On 20 December 2018 – The complaint is officially closed. The case tracker available on link https://askrspo.force.com/Complaint/s/case/50090000028Es1JAAS/detail. Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and found note “The compensation plans for PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015”.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p>	<p>No labor dispute noted. The assessment team has conducted a search in internet to confirm that there is no new comments or dispute raised by the communities related to labor dispute on those units that have not been certified.</p>	<p>Comply</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>No non-legal compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities, related to legal non-compliance on those units that have not been certified.</p>	<p>Comply</p>
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>The internal audit has been conducted for all uncertified units: <ul style="list-style-type: none"> • PT. Agro Muara Rupit was conducted on 8-10 October 2018; • PT. Agro Kati Lama was conducted on 10-13 September 2018; • PT. Agro Rawas Ulu was conducted on 21-3 October 2018; Each company provide correction and corrective action on</p>	<p>Comply</p>

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	the base to ensure all RSPO P&C requirements are implemented.	
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3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>There was no obligation for PT. Tolan Tiga Indonesia to have scheme smallholder. PT. Tolan Tiga Indonesia does not received FFB from smallholders, therefore does not obliged to comply with the standard within three years of the mill's initial certification.</p>	<p>Not Applicable N/A</p>

3.4 Details of findings

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the Certification Assessment there were one (1) Major nonconformities raised. The PT. Tolan Tiga Indonesia – Perlakuan POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1754048-201903-M1	Clause & Category (Major / Minor)	RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement-Clause 5.7.2 - Major
Date Issued	29 March 2019	Due Date	26 June 2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	3 May 2019
Statement of Nonconformity:	PT. Tolan Tiga Indonesia - Perlakuan POM have not consistently demonstrated removal of RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage.		

<p>Requirement Reference:</p>	<p>RSPO SCCS, General Chain of Custody Requirements - Clause 5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> • Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. • Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. • Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. • Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.
<p>Objective Evidence:</p>	<p>PT. Tolan Tiga Indonesia – Perlabian POM demonstrated some of the CSPO and CSPK transaction for other scheme and/or conventional sales have been removed from PalmTrace. Period of transaction observed was May 2018 - 29 March 2019 (RSPO 555208 license period). However, the other transaction have not been removed:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia – Perlabian POM removed 4999.98 MT CSPO from PalmTrace through transaction ST-TR-297ef27e-eb48 dated 11 June 2018 (ISCC). - PT. Tolan Tiga Indonesia – Perlabian POM removed 1999.91 MT CSPO from PalmTrace through transaction ST-TR-b13ce282-9291 dated 11 June 2018 (ISCC). - PT. Tolan Tiga Indonesia – Perlabian POM removed 2999.98 MT CSPO from PalmTrace through transaction ST-TR-61c53804-824a dated 21 December 2018 (ISCC). - Another 14,547.55 MT CSPO from confirmed ISCC and/or conventional sales have not been removed from PalmTrace. - PT. Tolan Tiga Indonesia – Perlabian POM removed 3,500 MT CSPK from PalmTrace through transaction ST-TR-be688555-06a7 dated 28 March 2018. - Another 2,324.71 MT CSPK from confirmed ISCC and/or conventional sales have not been removed from PalmTrace.
<p>Corrections:</p>	<p>The ENC manager coordinated with Marketing and asked Antwerp to remove the quota CPO and PK on PT. Tolan Tiga Indonesia's PalmTrace account. Antwerp has removed the quota CPO of 14,547.63 MT from PT. Tolan Tiga Indonesia PalmTrace account: PalmTrace transaction No.ST-TR-94cf6eaf-92f3 dated 1 April 2019 for 3,499.94MT CSPO removed; PalmTrace transaction No.ST-TR-512d5a3c-cb27 dated 1 April 2019 for 6,299.95 MT CSPO removed; PalmTrace transaction No.ST-TR-5171a764-806d dated 3 April 2019 for 1.46 MT CSPO removed; PalmTrace transaction No.ST-TR-1d0c0d3f-2fd1 dated 1 April 2019 for 3,245.58 MT CSPO removed; PalmTrace transaction No.ST-TR-d47403d6-9b65 dated 1 April 2019 for 1,500.7 MT CSPO removed;</p> <p>Antwerp has removed the quota PK of 1,128.69 MT from PT. Tolan Tiga Indonesia PalmTrace account: PalmTrace transaction No.ST-TR-7a1c564b-7f13 dated 3 April 2019 for 1,128.69.7 MT CSPK removed;</p>

Root Cause Analysis:	The lack of communication between the marketing and Antwerp office, has caused no quota deduction on account PalmTrace of PT. Tolan Tiga Indonesia.
Corrective Actions:	<ul style="list-style-type: none"> - Team Marketing in Head Office Medan participated in training related to RSPO SCCS v.2014 rev.2017 organized by ENC team; - Team Marketing in Head Office Medan communicated through email for sending all information related to: volume of certified RSPO CPO and/or PK sold under other schemes or as conventional, or in case of production shortages, loss or damage to Antwerp for removing CPO and/or PK quota at PT. Tolan Tiga Indonesia PalmTrace account. - Antwerp inform every detail removing quota to the Team Marketing in Head Office Medan. - Manager ENC notified to Antwerp that the above procedure is mandatory.
Assessment Conclusion:	Audit team have reviewed the correction and corrective action taken, including minutes and material of training on RSPO SCCS. The audit team deems the action taken have sufficient to close out the NC. NC closed out on 3 May 2019.

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	PT. Tolan Tiga Indonesia demonstrate perseverance and consistency – in terms of provide positive response upon comments, claim, protest from community members.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity			
NCR Ref #	Nil	Clause & Category (Major / Minor)	
Closed (Yes / No)		Date of nonconformity Closure	
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrective Actions:			
Assessment Conclusion:			

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major/Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
032936M0	Major	RSPO P&C 2.1.1	15 March 2014	Closed on 14 May 2014
1032936M16	Major	RSPO P&C 5.3.2	15 March 2014	Closed on 14 May 2014
1032936M27	Major	RSPO P&C 5.6.2	15 March 2014	Closed on 14 May 2014
1032936N1	Minor	RSPO P&C 2.1.4	15 March 2014	Closed on 1 April 2015
1032936N11	Minor	RSPO P&C 4.7.3	15 March 2014	Closed on 1 April 2015
1032936N25	Minor	RSPO P&C 4.7.4	15 March 2014	Closed on 1 April 2015
1032936N26	Minor	RSPO P&C 4.7.5	15 March 2014	Closed on 1 April 2015
1032936N28	Minor	RSPO P&C 5.3.3	15 March 2014	Closed on 1 April 2015
1149548M1	Major	RSPO P&C 1.1.2	1 April 2015	Closed on 5 May 2015
1149548N2	Minor	RSPO P&C 2.1.3	1 April 2015	Closed on 16 March 2016
1149548N1	Minor	RSPO P&C 6.1.4	1 April 2015	Closed on 16 March 2016
1304318N1	Minor	RSPO P&C 4.7.6	16 March 2016	Closed on 23 February 2017
1754048-201903-M1	Major	RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement-Clause 5.7.2	30 March 2019	Closed on 3 May 2019

3.5. Stakeholders Consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT. Tolan Tiga Indonesia – Perlabian POM Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

List of Stakeholders Contacted	
Internal Stakeholders Komite Gender PT. Tolan Tiga Indonesia – Gender Committee	Union/Contractors/Local Communities Pengurus Serikat Pekerja PT. Tolan Tiga Indonesia – Worker Union Gunung Selamat Village Communities Perkebunan Perlabian Village Communities

<p>Government Departments</p> <p>Dinas Tenaga Kerja Kabupaten Labuhan Batu Selatan – Manpower Office</p> <p>Dinas Lingkungan Hidup Kabupaten Labuhan Batu Selatan – Environment Office</p> <p>Dinas Perkebunan dan Peternakan Kabupaten Labuhanbatu Selatan – Plantation and Husbandry Office</p>	<p>NGO</p> <p>Koordinator Daerah Pers Kabupaten Labuhanbatu Selatan - NGO</p>
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IS #	Description
1	<p>Feedbacks: Dinas Tenaga Kerja Kabupaten Labuhanbatu Selatan – Manpower Office</p> <ul style="list-style-type: none"> - The office has not received any negative issue on industrial relationship in PT. Tolan Tiga Indonesia; - In the past 1 years, there have been no industrial relation dispute in PT. Tolan Tiga Indonesia; - PT. Tolan Tiga Indonesia have consistently reports the manpower; - PT. Tolan Tiga Indonesia have paid the minimum wage as required by regulation; - PT. Tolan Tiga Indonesia have registered all workers into BPJS Ketenagakerjaan and BPJS Kesehatan. All workers have been provided with medical check up; - The manpower office understands PT. Tolan Tiga Indonesia outsourced the plantation security to PT. SSI. Manpower office received information the industrial relation between PT. SSI and its worker is a contract with certain period. Manpower office would like PT. Tolan Tiga Indonesia facilitated them to conduct socialization of manpower regulation for PT. SSI and its worker. <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia acknowledge the positive inputs and will continue to implement the obligation according with applicable regulations. - With regards to the PT. SSI and its worker, PT. Tolan Tiga Indonesia have communicated the request from manpower office and will further coordinates the socialization. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Positive comments noted. - Audit team have verified the company follow up communication with PT. SSI.
2	<p>Feedbacks: Dinas Lingkungan Hidup Kabupaten Labuhanbatu Selatan – Environment Office</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia have issued with environment permit; - PT. Tolan Tiga Indonesia have regularly report the environment management performance; - PT. Tolan Tiga Indonesia have permits for hazardous waste storage and regularly reports the management of hazardous waste; - Environment office received reports from community of Tanjung Medan village related to indication of river water pollution because of land application pipe leakage. Environment office have made inspection onsite. - Environment office expected the HCV program implementation could be reported into RKL-RPL. <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia acknowledged the positive inputs and will continue reporting the environment management performance to environment office (DLH). - PT. Tolan Tiga Indonesia have addressed the concerns related to river pollution allegation: Company have made communication with all stakeholders and interested parties: Kampung Rakyat Police Office, DPK BKPRMI, KNPI and Impakar from Kampung Rakyat District and Environment Office from Labuhanbatu Selatan Regency. The meeting carried out on 24 January 2019 in Environment Office – Labuhanbatu Selatan Regency. Company explained the liquid effluent treatment system. There have been joint-field inspection with

	<p>Labuhan Batu Police, Kampung Rakyat Police and Environment Office – Labuhanbatu Selatan Regency – to Tanjung Medan river, Perlabian POM location and the POME treatment plant. Based on joint-inspection can clearly no indication of pollution sourced from PT.Tolan Tiga Indonesia – Perlabian POM. The interested parties attended the meeting acknowledge and understand PT.Tolan Tiga Indonesia – Perlabian POM have managed and treated the POME in accordance to laws and regulation. The allegation was not evident.</p> <p>To demonstrate care and commitment to improve wellbeing of Tanjung Medan village – company gave donation for purchase of tools for fisheries.</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia have treated the HCV area by enrichment of species. Company will take the input, and implement local timber species as per HCV Management Plan 2018. - PT. Tolan Tiga Indonesia have reported the tree sapling planting in HCV area into RKL/RPL report. In RKL-RPL report for second semester year 2018 company had 259 trees planted, consist of 58 <i>Adenantara pavorina</i> trees, 91 <i>Salam</i> trees, 110 Mahogany trees. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Positive comments noted. - Audit team have verified all relevant documentation related to river pollution in Tanjung Medan village. - Audit team have verified the RKL-RPL report. - Audit team accepted company response.
<p>3</p>	<p>Feedbacks: Dinas Pertanian dan Perkebunan Kabupaten Labuhanbatu Selatan – Agriculture and Plantation Office</p> <ul style="list-style-type: none"> - There has been no significant issues related to plantation management. - PT. Tolan Tiga Indonesia have consistently reports “Laporan Perkembangan Usaha Perkebunan (LPUP)” each semester. - No land dispute case noted. - PT. Tolan Tiga Indonesia have been issued with “Kelas Kebun II”. <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia acknowledged the positive inputs and will continue reporting the plantation management performance to agriculture and plantation office. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Positive comments noted.
<p>4</p>	<p>Feedbacks: Pengurus Serikat Pekerja PT. Tolan Tiga Indonesia – Worker Union</p> <ul style="list-style-type: none"> - Meeting between worker union and company carried out every month. - Company has implemented minimum wage in 2018, as in “Upah Minimum Sektoral Kabupaten” for salary payment standard. Company has asked worker union for meeting on minimum wage 2019; - Company has registering all worker under “BPJS Ketenagakerjaan” and “BPJS Kesehatan” for insurance; - Company has provided facility for the worker, housing with clean water and electricity, medical clinic, school bus, religious house, sport facility. - Company provides the facility for the worker including clean water. However, lately worker feels the clean water condition was not suitable for cooking. - There has been no case of industrial relation dispute between employees and company; - Company has communicated the OHS plan; provided medical check up on annual basis; provided PPE for each risk; provided working tool as appropriate; provided onsite first aid kit; - Company has communicated the complaint and grievance settlement mechanism. - Company has communicated the policy on protection of flora and fauna, as well as high conservation value area; <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia acknowledge the positive comment and will continue to improve. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Positive comments noted.

	<ul style="list-style-type: none"> - Last year (ASA 1_3), audit team received comments related to water analysis result from well. Audit team provides follow up on water quality analysis under indicator 4.4.
5	<p>Feedbacks: Komite Gender PT. Tolan Tiga Indonesia – Gender Committee</p> <ul style="list-style-type: none"> - Gender committee has been established. The regular program is monthly meeting. - No sexual harassment case and/or violence case noted and/or recorded up to date. - Company has implementing the female worker’s right such as regular medical checkup for female sprayers, menstrual leave right, maternal leave and breast-feeding leave, gender equality in payment. - Company has conveyed the mechanism for complaint and grievance settlement for any sexual harassment case. - There are more company policy’s dissemination in 2018. <p>Management Responses: PT. Tolan Tiga Indonesia will continue the good practice with regards to gender equality treatment.</p> <p>Audit Team Findings: Positive comments.</p>
6	<p>Feedbacks: Gunung Selamat Village Communities</p> <ul style="list-style-type: none"> - The communication between company and local communities are good. - Communities have hope for socialization of CSR and/or community development program. <p>Management Responses: - PT. Tolan Tiga Indonesia will socialize the CSR/Community development program.</p> <p>Audit Team Findings: - Audit team have verified the CSR plan from PT. Tolan Tiga Indonesia, confirmed planning for economy empowerment.</p>
7	<p>Feedbacks: Perkebunan Perlabian Village Communities</p> <ul style="list-style-type: none"> - Communication between village and PT. Tolan Tiga Indonesia was good. - There is a report that one community member whose had cattle, taking into the plantation block for herding. While it has been agreed between company and village community that it is not allowed to cattler herding inside company’s plantation block. However company allowed community to cut grass for cattle feeding. <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia acknowledge there is a farmer herding their cattle through road from kampung Sri Pinang. Because of the breach, company closed the access (temporarily) from kampung Sri Pinang. Meanwhile, Sri Pinang community is worried with the cattle entering company’s plantation block. This had causing the grass availability depleted for Sri Pinang farmer. - Company have conducted meeting with representative of community Air Merah village, kampung Sri Pinang, Tanjung Hilir village, Tanjung Selamat village, House of Representative member from Labuhanbatu Selatan Regency, the said farmer, and Tolan Estate representative – on 20 March 2019, meeting location Perkebunan Perlabian village office. - As a result from the meeting, consensus achieved that company provide access for grass cutting only. - Company will open the access to kampung Sri Pinang to Tolan Estate once it has been conducive. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Positive comments noted. - Audit team have reviewed the comments and verified all relevant records and statement. Company demonstrate communication and consultation process being implemented. No further action.
8	<p>Feedbacks: Koordinator Daerah Pers Kabupaten Labuhanbatu Selatan - NGO</p> <ul style="list-style-type: none"> - The focus of organization is to encourage the CSR/community development program developed by company to surrounding community. - Throughout 2018, there is no negative reports related to CSR program implementation. - Press acknowledge the issue on January 2019 related to allegation PT. Tolan Tiga Indonesia have

	<p>polluted river in Tanjung Medan village, coming from leaking effluent pipe.</p> <ul style="list-style-type: none"> - However the issue have been resolved, through mediation by "Dinas Lingkungan Hidup kabupaten Labuhanbatu Selatan".
	<p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia confirmed. Similar response provided as for "Dinas Lingkungan Hidup kabupaten Labuhanbatu Selatan".
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team have verified the CSR plan from PT. Tolan Tiga Indonesia, confirmed planning for economy empowerment. - Audit team noticed similar comment related to communication. Audit team have verified the records related to pollution case. No further action.

Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that PT. Tolan Tiga Indonesia – Perlakuan POM has complied with the RSPO P&C Indonesia National Interpretation, September 2016; and RSPO Supply Chain Certification Standard 2017 and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of PT. Tolan Tiga Indonesia – Perlakuan POM is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Pratama Agung Sedayu	Name: Mr. Hamdani
Company Name: On behalf of BSI Malaysia Services Sdn Bhd,	Company Name: PT. Tolan Tiga Indonesia
Title: Lead Auditor	Title: Senior Manager ENC
Signature: 	Signature: <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
Date: 17 May 2019	Date: 10 June 2019

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Appendix A: Summary of Findings RSPO P&C Indonesia National Interpretation (September 2016)

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Commitment to Transparency			
Criterion 1.1:			
Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available. - Minor compliance -	See 1.2.1	Comply
1.1.2	Records of requests for information and responses to the information requested shall be available. - Major compliance -	<p>Each management unit have recorded request for information. In Perlabian POM records all information inquiry under logbook "Rekaman Permintaan Informasi & Tanggapan". In 2018 there were 1 information request; and in period January – March 2019, there were 2 information requests. Sample seen:</p> <ul style="list-style-type: none"> - Incoming letter from "Yayasan Gerakan Peduli Kanker Indonesia" dated 19 September 2018 related to invitation for socialization related to cervical cancer. The letter received and responded on same date. Perlabian POM manager responded cannot attend at the moment. <p>In Perlabian Estate, the information request and response recorded under "Rekaman Permintaan Informasi dan Tanggapan". There were 5 information request for Perlabian Estate, period January – December 2018. There was 2 information request for period January – March 2019. Sample taken: Incoming letter from "Kepala Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat No.400/20/PPL/I/2019" dated 21 January 2019, whereby the village head request for dispensation to attend "Pertemuan Sinkronisasi CSR Perusahaan terhadap Peningkatan Kesejahteraan Masyarakat" planned for 23 January 2019 in Regent's Office. Management responded and gives approval for dispensation to the said worker.</p> <p>Another logbook was recording the verbal communication as in "Buku Permintaan Informasi yang Disampaikan Secara Lisan". Sample taken: phone call from Mr. Wawan Surbakti, dated 26 February 2019, looking for job vacancy. Estate manager responded immediately and stating no vacant job at the moment. Closed.</p> <p>In Tolan Estate, the information request and response recorded under "Rekaman Permintaan Informasi dan Tanggapan". There were 34 information request for Tolan Estate, period January – December 2018. Sample taken: On 24 October 2018, received letter</p>	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>from "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/BagOps tentang Undangan". Management responded by attending the mediation meeting invitation on 29 October 2019.</p>	
<p>Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>		
<p>1.2.1</p> <p>Publicly available documents shall include, but are not necessarily limited to:</p> <ul style="list-style-type: none"> a) Land titles/user rights (Criterion 2.2) b) Occupational health and safety plans (Criterion 4.7) c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8) d) HCV documentation (Criteria 5.2 and 7.3) e) Pollution prevention and reduction plans (Criterion 5.6) f) Details of complaints and grievances (Criterion 6.3) g) Negotiation procedures (Criterion 6.4) h) Continual improvement plans (Criterion 8.1) i) Public summary of certification assessment report j) Human Rights Policy (Criterion 6.13). <p>- Major Compliance -</p>	<p>Perlabian Estate has identified and determined document that available for public, as in "Dokumen-dokumen yang tersedia untuk Umum" dated 5 January 2019. The list consist of:</p> <ul style="list-style-type: none"> - "Pemberian Hak Guna Usaha PT. Tolan Tiga Indonesia No.80/HGU/BPN/97" year 1997 – decree for land title issuance; - "Surat Pendaftaran Usaha Perkebunan sebagai Izin Usaha Perkebunan No.213/Menhutbun-VII/2000" year 2000 – Plantation Business Registration; - "Sertifikat Tanda Bukti Hak BPN No.02 tanggal 17 September 1997" year 1997 – Land certificate; - "Analisis Mengenai Dampak Lingkungan/ANDAL No.49/RKL-RPL" – Social and Environmental Impact Assessment; - "Penyajian Evaluasi Lingkungan" – Environment document; - "Rencana Pengelolaan Lingkungan/RKL No.49/RKL-RPL" year 2006 – environment management plan; - "Rencana Pemantauan Lingkungan/RPL No.49/RKL-RPL" year 2006 – environment monitoring plan; - "Kelayakan Lingkungan Hidup Adendum ANDAL PT. Tolan Tiga Indonesia No.660/55/BLH/2/2016" year 2016 – Environmental document - addendum; - "Izin Lingkungan NO.503/981/BPPTPM-LS/PI/2016" year 2016 – environmental permit; - "Penilaian NKT/HCV PT. Tolan Tiga Indonesia, Perlabian Estate" year 2009 – by YASBI; - "Laporan Penilaian Dampak Sosial dan Lingkungan" by YASBI year 2010 – SEIA; - "Izin Pengkajian Pemanfaatan Air Limbah Industri Minyak Sawit pada Tanahdi PKS PT. Tolan Tiga Indonesia No.503/641/BPPTPM-LS/P.I/2016" year 2016 – land application permit; - "Izin Tempat Penyimpanan Sementara Limbah B3 No.503/319/BPPTPM-LS/P.I/2015" year 2015 – permit for hazardous waste storage; - "Program Kesehatan dan Keselamatan Kerja" – health and safety plan; - "Rangkuman Publik dan Laporan Hasil Sertifikasi" – Public Summary from CB; - "Kebijakan-kebijakan Perusahaan" – Company Policies; - "Rekaman Keluh Kesah Internal dan Eksternal" – internal and external grievance record. - "Rencana Pengurangan dan Pencegahan Polusi" – Pollution mitigation and precention plan; 	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - "Prosedur Ganti Rugi Lahan" – land compensation procedure; - "Rencana Perbaikan Berkelanjutan" – continuous improvement plan; - "Laporan Community Development/CSR – CSR and community development report"; - "Laporan-laporan Pelaksanaan RKL/RPL setiap semester" – Report of Environmental management and monitoring; - "Ijin Pengambilan Air Bawah Tanah" – ground water extraction permit. <p>Tolan Estate has identified and determined document that available for public, as in "Dokumen-dokumen yang tersedia untuk Umum" dated 29 January 2018. The list consist of:</p> <ul style="list-style-type: none"> - "Akta Perusahaan PT. Tolan Tiga Indonesia No.AHU-7859.AH.01.02" year 2016; - "Pemberian Hak Guna Usaha PT. Tolan Tiga Indonesia No.80/HGU/BPN/97 and No.86/HGU/BPN/97 year 1997 – decree for land title issuance; - "Surat Pendaftaran Usaha Perkebunan sebagai Izin Usaha Perkebunan No.213/Menhutbun-VII/2000" year 2000 – Plantation Business Registration; - "Sertifikat Tanda Bukti Hak BPN No.02 tanggal 17 September 1997" year 1997 – Land certificate; - "Analisis Mengenai Dampak Lingkungan/ANDAL No.49/RKL-RPL" – Social and Environmental Impact Assessment year 2010; - "Rencana Pengelolaan Lingkungan/RKL No.49/RKL-RPL" year 2006 – environment management plan; - "Rencana Pemantauan Lingkungan/RPL No.49/RKL-RPL" year 2006 – environment monitoring plan; - "Kelayakan Lingkungan Hidup Adendum ANDAL PT. Tolan Tiga Indonesia No.660/55/BLH/2/2016" year 2016 – Environmental document - addendum; - "Izin Lingkungan NO.503/981/BPPTPM-LS/PI/2016" year 2016 – environmental permit; - "Penilaian NKT/HCV PT. Tolan Tiga Indonesia, Perlamban Estate" year 2009 – by YASBI; - "Laporan Penilaian Dampak Sosial dan Lingkungan" by YASBI year 2010 – SEIA; - "Izin Pengkajian Pemanfaatan Air Limbah Industri Minyak Sawit pada Tanahdi PKS PT. Tolan Tiga Indonesia No.503/641/BPPTPM-LS/P.I/2016" year 2016 – land application permit; - "Izin Tempat Penyimpanan Sementara Limbah B3 No.503/319/BPPTPM-LS/P.I/2015" year 2015 – permit for hazardous waste storage; - "Program Kesehatan dan Keselamatan Kerja" – health and safety plan; - "Rangkuman Publik dan Laporan Hasil Sertifikasi" – Public Summary from CB; - "Kebijakan-kebijakan Perusahaan" – Company Policies; - "Rekaman Keluh Kesah Internal dan Eksternal" – 	

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	<p>internal and external grievance record.</p> <ul style="list-style-type: none"> - "Rencana Pengurangan dan Pencegahan Polusi" – Pollution mitigation and prevention plan; - "Prosedur Ganti Rugi Lahan" – land compensation procedure; - "Rencana Perbaikan Berkelanjutan" – continuous improvement plan; <p>Perlabian POM has identified and determined document that available for public, as in "Dokumen-dokumen yang Tersedia untuk Umum" dated 1 March 2018. The list consist of:</p> <ul style="list-style-type: none"> - "Izin Usaha Tetap (IUT) atas nama PT. Tolan Tiga Indonesia sesuai Keputusan Menteri Negara Investasi/Kepala Badan Koordinasi Penanaman Modal No.394/T/Kehutanan-Perkebunan/1998" year 1998 – business permit; - "Surat Pendaftaran Usaha Perkebunan sebagai Izin Usaha Perkebunan atas nama PT. Tolan Tiga Indonesia sesuai Keputusan Menteri Kehutanan dan Perkebunan No.213/Menhutbun-VII/2000 – plantation business permit; - "Sertifikat Tanda Bukti Hak No.2" year 1997 – land title; - "Revisi Dokumen Rencana Pengelolaan Lingkungan (RKL) dan Rencana Pemantauan Lingkungan (RPL) No.660/242/BPDL-LB/Set/2006" year 2006 – Environmental management and monitoring matrix; - "Penyajian Evaluasi Lingkungan (PEL)" year 1994; - "Izin Penyimpanan Sementara Limbah B3 PT. Tolan Tiga Indonesia Kebun/PKS Perlabian No.503/319/BPPTPM-LS/P.I/2015" year 2015 – permit for hazardous waste storage; - "Laporan-laporan Pelaksanaan RKL/RPL setiap semester" – Report for environmental management and monitoring plan implementation; - "Program Kesehatan dan Keselamatan Kerja" – OHS Plan; - "Rencana Perbaikan Berkelanjutan" – Continuous Improvement Plan; - "Kebijakan-kebijakan Perusahaan" – Company policies; - "Rencana Pengurangan dan Pencegahan Polusi" – Pollution prevention plan; - "Rangkuman Publik dan Laporan Hasil Sertifikasi" – Public Summary from CB; <p>"Rekaman Keluh Kesah Internal dan Eksternal" – Internal and external grievance record.</p> <p>Perlabian POM has identified and determined document that available for public, as in "Dokumen-dokumen yang Tersedia untuk Umum" dated 1 March 2018. The list consist of:</p> <ul style="list-style-type: none"> - "Izin Usaha Tetap (IUT) atas nama PT. Tolan Tiga Indonesia sesuai Keputusan Menteri Negara Investasi/Kepala Badan Koordinasi Penanaman Modal No.394/T/Kehutanan-Perkebunan/1998" year 	

Criterion / Indicator	Assessment Findings	Compliance	
	<p>1998 – business permit;</p> <ul style="list-style-type: none"> - “Surat Pendaftaran Usaha Perkebunan sebagai Izin Usaha Perkebunan atas nama PT. Tolan Tiga Indonesia sesuai Keputusan Menteri Kehutanan dan Perkebunan No.213/Menhutbun-VII/2000 – plantation business permit; - “Sertifikat Tanda Bukti Hak No.2” year 1997 – land title; - “Revisi Dokumen Rencana Pengelolaan Lingkungan (RKL) dan Rencana Pemantauan Lingkungan (RPL) No.660/242/BPDL-LB/Set/2006” year 2006 – Environmental management and monitoring matrix; - “Penyajian Evaluasi Lingkungan (PEL)” year 1994; - “Izin Penyimpanan Sementara Limbah B3 PT. Tolan Tiga Indonesia Kebun/PKS Perlabian No.503/319/BPPTPM-LS/P.I/2015” year 2015 – permit for hazardous waste storage; - “Laporan-laporan Pelaksanaan RKL/RPL setiap semester” – Report for environmental management and monitoring plan implementation; - “Program Kesehatan dan Keselamatan Kerja” – OHS Plan; - “Rencana Perbaikan Berkelanjutan” – Continuous Improvement Plan; - “Kebijakan-kebijakan Perusahaan” – Company policies; - “Rencana Pengurangan dan Pencegahan Polusi” – Pollution prevention plan; - “Rangkuman Publik dan Laporan Hasil Sertifikasi” – Public Summary from CB; - “Rekaman Keluh Kesah Internal dan Eksternal” – Internal and external grievance record. 		
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>			
<p>1.3.1</p>	<p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions along with the documentation of socialisation process of the policy to all levels of the workers and operations.</p> <ul style="list-style-type: none"> - Minor compliance – 	<p>Company has a policy for code of conduct, under “Code of Conduct” signed by President Director, on 28 September 2018. The code of conduct consist of internal guidance on good corporate governance, also cover work ethics – basic individual attitude, individual behaviour inside and outside of company; conduct as supervisor, behaviour as subordinate.</p> <p>Commitment to specific things: Company records, documents, and information should be accountable, accurate and timely; All individuals to realize the responsibility to secure company’s assets; To never tolerance insider trading in accordance with applicable regulations; all individual to avoid conflict of interest; Regulating gifts, souvenirs, donations, commission, bribery.</p> <p>Perlabian Estate, communication of Code of Ethical Conduct Policy to worker dated 16 February 2019 to 3 harvest mandores, 57 harvesters, 3 tally clerks, 44 loose fruit collectors; 1 water supply operator, 1 land application operator, 1 pest and disease officer, 3 loose fruit collector’s supervisors; 5 circle raking workers from Division V.</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	Tolan Estate, communication of Code of Ethical Conduct Policy to worker dated 12 March 2019 to 2 harvest mandores; 32 harvesters; 2 loose fruit collector supervisor; 32 loose fruit collectors; 1 water supply operator; 4 FFB transporters; 3 upkeep boundary; 2 upkeep block boundary; from Division I.	
Principle 2: Compliance with applicable laws and regulations		
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.		
2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance –	PT. Tolan Tiga Indonesia has demonstrated the document relevant legal requirement, such as: 1. Land Title Right documents: - Hand over Agreement between Indonesian Government and Societe Internationale de Plantations Et de Finance S.A-SIPEF (Belgium), dated 19 April 1968 for 3,000 Ha and 7,031.27 Ha. - "Risalah Pemeriksaan Tanah dari Panitia "B" No. 40/PPT/B/69", dated 17 December 1968 and "Risalah Pemeriksaan Tanah dari Panitia "B" No. 48/PPT/B/71", dated 7 December 1971. - "Fatwa Tata Guna Tanah berdasarkan Surat Kepala Inspeksi Badan Pertanahan Nasional Sumatera Utara", dated 18 April 1970. - Land Title rights (HGU) from Badan Pertanahan Nasional/BPN (National Land Body) No.SK.80/HGU/DA/97, dated 16 July 1997 (6,042.44 Ha), consist of 4,807.02 Ha (Perlabian Estate) dan 1,235.42 Ha (Tolan Estate). - Land title rights (HGU) from BPN (National Land Body) No.86/HGU/BPN/97, dated 23 July 1997 (2,436.62 Ha) for Tolan Estate. 2. Social and Environment documents - SEIA and environmental permit in form of "Surat Keputusan Menteri Pertanian Republik Indonesia No.RC.220/472/B/III/1994 tentang Penyajian Evaluasi Lingkungan/PEL Perkebunan Kelapa Sawit, Karet dan Kakao serta Pabrik Kelapa Sawit dan Pabrik Sheet Rubber Kebun Perlabian Group, Kabupaten Labuhan Batu, Propinsi Sumatera Utara", dated 17 March 1994. - Renewal SEIA (AMDAL) was approved by "Surat Badan Pengendalian Dampak Lingkungan Daerah Kabupaten Labuhan Batu No. 660/328/BPDL-LB/Set/2006", dated 21 July 2006. 3. The other document of legal requirement: - The last renewal "Ijin Usaha Tetap-IUT No. 394/T/Kehutanan-Perkebunan/1998", dated 21 Agustus 1998, for 8,479.06 Ha. - "Surat Pendaftaran Usaha Perkebunan (Operational Busines permit) No.	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>213/Menhutbun-VII/2000”, dated 10 March 2000 for 8,479.06 Ha with Mill capacity 75 tonnes FFB/hour and Mill capacity permit 60 tonnes FFB/hour.</p> <ul style="list-style-type: none"> - Water extraction permit – “Izin Pengusahaan Sumber Daya Air No.610/38/DIS PM PPTSP/6/XI.1/I/2018”, dated 9 January 2018. The permit valid until 8 Januari 2021. - Permit for machineries: Perlabian Mill has list of machineries: Boiler (2 units), Hoisting Cranes (4 units), Sterilizer (5 units), Genset (4 units), Turbine Steam (4 units). The list of mil machineries is documented in “Evaluasi Rekaman pemenuhan, 2016 – Perlabian POM”. Akte Izin is available, e.g.: “Izin Bejana Uap - Sterilizer No.1 No.678/62.09/2006; “Izin Bejana Uap - Sterilizer No.2, No.02/1.0056.A tahun 1990”; “Izin Turbine No.1, No.275/PTP/W2/1996”; “Izin Turbine No.2, No.273/PTP/W2/1996”. - The mil machineries inspection was conducted regularly from “Pengawas keselamatan Kerja, Dinas Tenaga Kerja Kabupaten Labuhan Batu Selatan”. The last inspection for “Izin Bejana Uap, Sterilizer No.2” was conducted on 13 March 2017 (the next inspection 13 March 2021), regular inspection every 4 years. - Deed of establishment “Akta Perubahan No.2 tentang Pernyataan Keputusan Rapat Umum Pemegang Saham Tahunan Perseroan Terbatas PT. Tolan Tiga Indonesia” dated 6 January 2017. Detailing the revision in deed of establishment, whereby the shareholders are SIPEF NV and Dana Pensiun Bank Mandiri. 	
<p>2.1.2</p> <p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <ul style="list-style-type: none"> - Minor compliance – 	<p>PT. Tolan Tiga Indonesia have evaluated 252 applicable laws and regulations, comprise of:</p> <ol style="list-style-type: none"> a. 42 types of act such as “Undang-undang (UU) No.39 Tahun 2014 tentang Perkebunan” – plantation act, “UU No.7 tahun 2012 tentang Penanganan Konflik Sosial” – social conflict, “UU No.19 Tahun 2009 tentang Konvensi Stokholm” – Stockholm convention, “UU No.7 Tahun 2006 tentang Pengesahan Konvensi PBB Melawan Korupsi” – UN convention against corruption, “UU No.11 tahun 2005 tentang Ratifikasi Internasional Covenant on Economic, Social and cultural Right (ICESCR)”. b. 54 types of government regulation “Peraturan Pemerintah (PP)” such as “Peraturan Pemerintah No.41 Tahun 1999 tentang Pengendalian Pencemaran Udara” – control on air pollution, “PP No.24 tahun 1997 tentang Pendaftaran Tanah” – Land registration, “PP No.13 tahun 1994 tentang Perburuan Satwa” – animal hunting”, “PP No.57 tahun 2016 tentang Perubahan PP No.71 tahun 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>2014 tentang Perlindungan dan Pengelolaan Ekosistem Gambut” – protection of peat ecosystem.</p> <p>c. 3 types of President Instruction such as “Instruksi Presiden No.10 tahun 2011 tentang Penundaan Pemberian Izin Baru dan Penyempurnaan Tata Kelola Hutan Alam Primer dan Gambut” – moratorium on new permit for primary forest and peat, “Instruksi Presiden No.1 tahun 2006 tentang Biofuel”, “Instruksi Presiden No.1 tahun 2013 tentang Aksi pencegahan dan Pemberantasan Korupsi” – Corruption Prevention and Eradication.</p> <p>d. 7 types of President Decree such as “Keputusan Presiden No.83 tahun 1998 tentang Ratifikasi Konvensi ILO No.87 tahun 1984 tentang Kebebasan Berserikat dan Perlindungan Hak untuk Berorganisasi” – ILO Convention for freedom to organize, “Keputusan Presiden No.92 tahun 1998 tentang Pengesahan Montreal Protocol on Substance that Deplete Ozone Layer, Copenhagen 1992”.</p> <p>e. 8 President Regulation such as “Peraturan Presiden No.12 tahun 2013 tentang Jaminan Kesehatan” – health insurance.</p> <p>f. 133 types of jenis minister regulations, minister decree, such as “Peraturan Menteri Pertanian No.39 tahun 2015 tentang Peredaran Pestisida” – pesticide distribution, “Peraturan Menteri Tenaga Kerja No.7 tahun 2013 tentang Upah Minimum” – minimum wage.</p> <p>g. 3 Keputusan Bappedal;</p> <p>h. 1 Governor decree as “Keputusan Gubernur Sumatera Utara No.188.44-10/10/KPTS/2018 tentang Upah Minimum Sektoral Kabupaten Labuhanbatu Selatan tahun 2019”</p> <p>Companies also evaluating the lecal regulation issued by Sumatera Utara Province; for example decree on minimum wage for Labuhanbatu Selatan Regency.</p>	
<p>2.1.3</p> <p>A mechanism for ensuring compliance shall be implemented. - Minor compliance –</p>	<p>Company has developed a mechanism for ensuring compliance to regulation as stated in document CA/SOP/1 issued date 1 November 2011 (Prosedur Informasi Perubahan Undang-Undang dan Peraturan Pemerintah).</p> <p>Procedure has regulated each of operation unit head shall be monitored and visited site location to check implementation of regulation. Company has developed a mechanism for ensuring compliance to regulation under document “Evaluasi Pemenuhan Peraturan Perundang-Undangan”. In these documents, company has evaluated in detail for each clause dan the evidence for compliance is available. Verified activity to demonstrate compliance against new regulation, as in: Peraturan Menteri Pertanian No.5 tahun 2018 tentang Pembukaan dan/atau Pengolahan Lahan Perkebunan Tanpa Membakar</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>sebagai Pengganti Peraturan Menteri Pertanian No. 47 tahun 2014 tentang Brigade dan Pedoman Pelaksanaan Pencegahan serta Pengendalian Kebakaran Lahan dan Kebun” – ministry of agriculture regulation related to zero burning. The implementation from company was to conduct replanting without using fire/zero burning.</p>	
<p>2.1.4</p> <p>A system for tracking any changes in the law shall be available and implemented.</p> <p>- Minor compliance –</p>	<p>Company has developed a mechanism for tracking any changes in the law as stated in document No.SOP/TDI/22 titled “Prosedur Informasi Perubahan Undang-Undang dan Peraturan Pemerintah” issued date 1 February 2019. The company has evaluated and updated on compliance annually, as in document “Pemantauan Penambahan atau perubahan Undang-Undang/Peraturan”.</p> <p>As evidence, company demonstrate legal compliance review for 14 new and applicable regulations issued during 2018. December 2018 for new regulation:</p> <ul style="list-style-type: none"> - “Peraturan Presidaen No.82 tahun 2018 tentang Jaminan Kesehatan” updated on 10 December 2018 – this is applicable for company; <p>January 2019 for new regulation:</p> <ul style="list-style-type: none"> - “Peaturan Presiden No.7 tahun 2019 tentang Penyakit Akibat Kerja” – evaluated in January 2019. 	<p>Comply</p>
<p>Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>		
<p>2.2.1</p> <p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.</p> <p>- Major compliance -</p>	<p>PT. Tolan Tiga Indonesia has demonstated the document relevants legal requirement, such as:</p> <ol style="list-style-type: none"> 1. Land Title Right documents: <ul style="list-style-type: none"> - Hand over Agreement between Indonesian Government and Societe Internationale de Plantations Et de Finnance S.A-SIPEF (Belgium), dated 19 April 1968 for 3,000 Ha and 7,031.27 Ha. - “Risalah Pemeriksaan Tanah dari Panitia “B” No. 40/PPT/B/69”, dated 17 December 1968 and “Risalah Pemeriksaan Tanah dari Panitia “B” No.48/PPT/B/71”, dated 7 December 1971. - “Fatwa Tata Guna Tanah berdasarkan Surat Kepala Inspeksi Badan Pertanahan Nasional Sumatera Utara”, dated 18 April 1970. - The last renewal “Ijin Usaha Tetap-IUT No.394/T/Kehutanan-Perkebunan/1998”, dated 21 Agustus 1998, for 8,479.06 Ha. - “Surat Pendaftaran Usaha Perkebunan (Operational Busines permit) No.213/Menhutbun-VII/2000”, dated 10 March 2000 for 8,479.06 Ha with Mill capacity 75 tonnes FFB/hour and Mill capacity permit 60 tonnes FFB/hour. - Land Title rights (HGU) from Badan Pertanahan Nasional/BPN (National Land Authority) No.SK.80/HGU/DA/97, dated 16 July 1997 (6,042.44 Ha), this was divided into 4,807.02 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>Ha as Perlabian Estate and 1,235.42 Ha for Tolan Estate.</p> <ul style="list-style-type: none"> - Land title rights (HGU) from BPN (National land Authority) No.86/HGU/BPN/97, dated 23rd July 1997 for 2,436.62 Ha in the entirety under Tolan Estate. <p>The total certified land; from the Hak Guna Usaha/HGU for Perlabian Estate was 4,807.02 Ha and for Tolan Estate was 3,672.04 Ha – as documented in Section 1.</p>	
<p>2.2.2 Legal boundaries are demonstrated clearly and maintained. - Minor compliance -</p>	<p>Perlabian Estate demonstrated “Blangko Patok HGU periode Februari 2019” in Division I, checking on “Patok HGU No.XVI, XVII, XVIII, XIX, XX, XXI, XXII, XXIII, XXIV, XXV, XXVI, XXVII”; in Division II, checking “Patok HGU No.XXVIII, XXIX, XXX, XXXI, XXXII, XXXIII, XXXIV, XXXV, XI, XII, XIII, XIV, XV”; in Division III checking “Patok HGU No.XXXVI and XXVII”.</p> <p>The management noted “Patok HGU XV” in broken condition, and will request/report for repair to BPN.</p> <p>There were 86 HGU boundary poles in Tolan Estate. Tolan Estate monitored the condition of each boundary poles on monthly basis. Period January 2019, from 5-26 January 2019, Mr. SA Ginting monitored the condition of 86 boundary poles. Based on field visit, boundary poles PT.TTI No.50 was in good condition, visible, block 02F27 neighboring with PT. Perkebunan Nusantara III, near boundary trench; 1^o 58’ 23.42” N and 100^o 3’ 7.96” E. boundary poles PT.TTI No.51 was in good condition, visible, block 01F33 neighboring with PT. Perkebunan Nusantara III, near boundary trench; 1^o 57’ 43.57” N and 100^o 2’ 44.30” E.</p>	<p>Comply</p>
<p>2.2.3 In the event that there is a dispute or a dispute has occurred, adequate evidence of legitimate acquisition and compensation or compensation settlement process through conflict resolution which has been received through Free, Prior and Informed Consent by all related parties shall be provided. - Minor compliance -</p>	<p>Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.</p> <p>The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.</p> <p>Based on stakeholder consultation with head of surroundings village, eg: Pekan Tolan village, Meranti village, Perlabian village, “Desa Persiapan Losari” and interview with NGO Tim 10, there are no report from local community on land conflict between company and community.</p> <p>Based on consultation with local governments</p>	<p>Comply</p>

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	Kabupaten Labuhan Batu Selatan, surrounding villages, reported that in 2017 there are no report from local community on land conflict between company and community.	
<p>2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. - Major compliance –</p>	<p>Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party. The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot appoint the exact location of disputed area. Document sighted: - "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha. - Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan", dated 29 October 2018. Conclusion: "Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif" – police will made subsequent</p>	<p>Comply</p>

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	<p>coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</p> <ul style="list-style-type: none"> - Copy of State Court Decision for the same case in 2014, which resulted in have been sighted "Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankijke ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya" dated 16 September 2014 – repudiate plaintiff claim. 	
<p>2.2.5</p> <p>For any conflict or dispute over the land, the evidence of the extent of disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities and local government where applicable), shall be available.</p> <ul style="list-style-type: none"> - Minor compliance – 	<p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot appoint the exact location of disputed area.</p> <p>Document sighted:</p> <ul style="list-style-type: none"> - "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha. - Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan", dated 29 October 2018. Conclusion: "Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif" – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation. - Copy of State Court Decision for the same case in 2014, which resulted in have been sighted "Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankijke ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya" dated 16 September 2014 – repudiate plaintiff claim..</p>	
<p>2.2.6</p> <p>To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and/or planned operations.</p> <p>- Major compliance –</p>	<p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate. The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.</p> <p>Based on document review, the case have been decided by the court back in 2014.</p> <p>Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan", dated 29 October 2018. Conclusion: police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</p> <p>As above, additional infomation gathered that company never instigate violence in resolving issues.</p>	<p>Comply</p>
<p>Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.</p>		
<p>2.3.1</p> <p>Maps with appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).</p> <p>- Major compliance -</p>	<p>PT. Tolan Tiga Indonesia be able to demonstrate plantation's operation map for Perlabian Estate and Tolan Estate. The maps have been overlaid against the HGU map.</p> <ul style="list-style-type: none"> - Land Title rights (HGU) from Badan Pertanahan Nasional/BPN (National Land Authority) No.SK.80/HGU/DA/97, dated 16 July 1997 (6,042.44 Ha), this was divided into 4,807.02 Ha as Perlabian Estate and 1,235.42 Ha for Tolan Estate. - Land title rights (HGU) from BPN (National land 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>Authority) No.86/HGU/BPN/97, dated 23 July 1997 for 2,436.62 Ha in the entirety under Tolan Estate.</p> <p>The total certified land; from the Hak Guna Usaha/HGU for Perlabian Estate was 4,807.02 Ha and for Tolan Estate was 3,672.04 Ha – total 8,479.06 as documented in Section 1.</p>	
<p>2.3.2</p> <p>Copies of negotiated agreements including the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and these include:</p> <ul style="list-style-type: none"> a) Evidence of consultation b) Statement of transfer of rights c) Evidence of compensation <p>See specific guidance 2.3.2</p> <p>- Minor compliance -</p>	<p>PT. Tolan Tiga Indonesia has demonstrated the document relevant legal requirement, such as:</p> <p>1. Land Title Right documents:</p> <ul style="list-style-type: none"> - Hand over Agreement between Indonesian Government and Societe Internationale de Plantations Et de Finnance S.A-SIPEF (Belgium), dated 19 April 1968 for 3,000 Ha and 7,031.27 Ha - "Risalah Pemeriksaan Tanah dari Panitia "B" No. 40/PPT/B/69", dated 17 December 1968 and "Risalah Pemeriksaan Tanah dari Panitia "B" No.48/PPT/B/71", dated 7 December 1971. - "Fatwa Tata Guna Tanah berdasarkan Surat Kepala Inspeksi Badan Pertanahan Nasional Sumatera Utara", dated 18 April 1970. - Land Title rights (HGU) from Badan Pertanahan Nasional/BPN (National Land Authority) No.SK.80/HGU/DA/97, dated 16 July 1997 (6,042.44 Ha), consist of 4,807.02 Ha (Perlabian Estate) dan 1,235.42 Ha (Tolan Estate). - Land title rights (HGU) from BPN (National land Authority) No.86/HGU/BPN/97, dated 23 July 1997 (2,436.62 Ha) for Tolan Estate. <p>The land compensation process have been completed since mid 1960s.</p>	<p>Comply</p>
<p>2.3.3</p> <p>Relevant information shall be available in appropriate forms and languages, including analysis of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.</p> <p>The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter. All procedures/information available in Bahasa Indonesia.</p> <p>The land compensation process have been completed since mid 1960s.</p>	<p>Comply</p>
<p>2.3.4</p> <p>Evidence shall be available to show that communities are represented through institutions or representatives of their own</p>	<p>Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.</p> <p>The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The</p>	<p>Comply</p>

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3.1.1	A documented management plan, a minimum of three years shall be available, including, where appropriate, plan for scheme smallholders. - Major compliance-	Business Plan 2018-2028, prepared 15 May 2018: <table border="1" data-bbox="715 927 1299 1167"> <thead> <tr> <th></th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>FFB Perlabian</td> <td>98,862</td> <td>97,834</td> <td>97,867</td> <td>98,678</td> <td>98,754</td> </tr> <tr> <td>FFB Tolar</td> <td>95,498</td> <td>95,677</td> <td>92,328</td> <td>86,801</td> <td>83,046</td> </tr> <tr> <td>Total FFB</td> <td>194,360</td> <td>193,511</td> <td>190,195</td> <td>185,479</td> <td>181,800</td> </tr> <tr> <td>OER</td> <td>22.5%</td> <td>23.0%</td> <td>23.0%</td> <td>23.0%</td> <td>23.0%</td> </tr> <tr> <td>CPO</td> <td>43731</td> <td>44,508</td> <td>43,745</td> <td>42,660</td> <td>41,814</td> </tr> <tr> <td>KER</td> <td>5.6%</td> <td>5.6%</td> <td>5.7%</td> <td>5.8%</td> <td>5.8%</td> </tr> <tr> <td>PK</td> <td>10,884</td> <td>10,837</td> <td>10,841</td> <td>10,758</td> <td>10,554</td> </tr> </tbody> </table> <p data-bbox="715 1200 1299 1256">Exchange rate applied for 2018 onwards USD1=IDR13,300.</p> <p data-bbox="715 1290 1299 1491">Company demonstrates Financial Statements PT. Tolan Tiga Indonesia for the year ended 31 December 2017 by Satrio Bing Eny & Rekan – Registered Public Accountants (Deloitte). The Independent Auditor’s Report No.GA1180685 TTI PDS dated 30 May 2018. The financial report indicating company financial performance was good.</p> <p data-bbox="715 1525 1299 1581">Perlabian Estate have been prepared with business plan 2019-2024.</p> <p data-bbox="715 1592 1299 1671">2019: Production 103,561 MT; sot general field work IDR.255/kg; cost harvesting IDR.140/kg; cost general charges IDR.185/kg.</p> <p data-bbox="715 1682 1299 1760">2020: Production 98,251 MT; sot general field work IDR.255/kg; cost harvesting IDR.140/kg; cost general charges IDR.185/kg.</p> <p data-bbox="715 1771 1299 1850">2021: Production 97,541 MT; sot general field work IDR.255/kg; cost harvesting IDR.140/kg; cost general charges IDR.185/kg.</p> <p data-bbox="715 1861 1299 1939">2022: Production 97,583 MT; sot general field work IDR.255/kg; cost harvesting IDR.140/kg; cost general charges IDR.185/kg.</p> <p data-bbox="715 1951 1299 2029">2023: Production 98,670 MT; sot general field work IDR.255/kg; cost harvesting IDR.140/kg; cost general charges IDR.185/kg.</p>		2019	2020	2021	2022	2023	FFB Perlabian	98,862	97,834	97,867	98,678	98,754	FFB Tolar	95,498	95,677	92,328	86,801	83,046	Total FFB	194,360	193,511	190,195	185,479	181,800	OER	22.5%	23.0%	23.0%	23.0%	23.0%	CPO	43731	44,508	43,745	42,660	41,814	KER	5.6%	5.6%	5.7%	5.8%	5.8%	PK	10,884	10,837	10,841	10,758	10,554	Comply
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	<p>Tolan Estate have been prepared with business plan 2019-2024.</p> <p>2019: Production 104,439 MT; cost general field work IDR.156/kg; cost harvesting IDR.126/kg; cost general charges IDR.130/kg.</p> <p>2020: Production 100,261 MT; cost general field work IDR.164/kg; cost harvesting IDR.132/kg; cost general charges IDR.137/kg.</p> <p>2021: Production 95,248 MT; cost general field work IDR.164/kg; cost harvesting IDR.132/kg; cost general charges IDR.137/kg.</p> <p>2022: Production 89,533 MT; cost general field work IDR.164/kg; cost harvesting IDR.132/kg; cost general charges IDR.137/kg.</p> <p>2023: Production 85,056 MT; cost general field work IDR.164/kg; cost harvesting IDR.132/kg; cost general charges IDR.137/kg.</p>																																																				
<p>3.1.2</p> <p>An annual replanting program projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.</p> <p>- Minor compliance-</p>	<p>Perlabian Estate:</p> <table border="1" data-bbox="716 913 1294 1189"> <thead> <tr> <th>Year</th> <th>Hectare</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>195.93 Ha</td> <td>OP 1992, 1993, 1996</td> </tr> <tr> <td>2020</td> <td>165.77 Ha</td> <td>OP 1993, 1996</td> </tr> <tr> <td>2021</td> <td>178.60 Ha</td> <td>OP 1992, 1994, 1996</td> </tr> <tr> <td>2022</td> <td>220.71 Ha</td> <td>OP 1993, 1995</td> </tr> <tr> <td>2023</td> <td>190.52 Ha</td> <td>OP 1995</td> </tr> <tr> <td>2028</td> <td>171.67 Ha</td> <td>OP 2003</td> </tr> <tr> <td>2029</td> <td>162.31 Ha</td> <td>OP 2003</td> </tr> <tr> <td></td> <td>1,285.51 Ha</td> <td></td> </tr> </tbody> </table> <p>Tolan Estate:</p> <table border="1" data-bbox="716 1245 1294 1487"> <thead> <tr> <th>Year</th> <th>Hectare</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>Nil</td> <td></td> </tr> <tr> <td>2020</td> <td>Nil</td> <td></td> </tr> <tr> <td>2021</td> <td>173.33 Ha</td> <td>OP 1994</td> </tr> <tr> <td>2022</td> <td>167.61 Ha</td> <td>OP 1994</td> </tr> <tr> <td>2023</td> <td>161.96 Ha</td> <td>OP 1996</td> </tr> <tr> <td>2024</td> <td>178.91 Ha</td> <td>1997</td> </tr> <tr> <td>Total</td> <td>681.81 Ha</td> <td></td> </tr> </tbody> </table> <p>Prior to land preparation on the replanting area, a planting plan review must take place by ENC department. The planting plan review comprise of extensive document and field check: summary of plans – stating the area is suitable for intended land use; general map of management unit; map of area intended for replanting; soil maps; peat depth map (if applicable); peat drainability assessment (if applicable); topography map; slope class map; map of planned roads, bridges, culverts, etc; map of HCV/conservation area; planting material documentation; working schedule. The output is approval to continue the re-planting plan.</p> <p>Audit team noted dynamics in planned-for-replanting area from 2017 allocated as 188.54 Ha in Infrastructure and others; while immature area of 635.95 Ha (in pubclis summary report 2017).</p>	Year	Hectare	Remarks	2019	195.93 Ha	OP 1992, 1993, 1996	2020	165.77 Ha	OP 1993, 1996	2021	178.60 Ha	OP 1992, 1994, 1996	2022	220.71 Ha	OP 1993, 1995	2023	190.52 Ha	OP 1995	2028	171.67 Ha	OP 2003	2029	162.31 Ha	OP 2003		1,285.51 Ha		Year	Hectare	Remarks	2019	Nil		2020	Nil		2021	173.33 Ha	OP 1994	2022	167.61 Ha	OP 1994	2023	161.96 Ha	OP 1996	2024	178.91 Ha	1997	Total	681.81 Ha		<p>Comply</p>
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	<p>In 2018, the immature area was down to 317.33 Ha, with allocation for felling and preparation area of 225 Ha (including 122.09 Ha to-be-replant) included into area of 393.40 Ha into Infrastructure and others (in public summary report 2018). Additional information that with current progeny, PT. Tolan Tiga's immature palm transitioned into mature (producing FFB) by age of 26-28 months.</p> <p>In 2019, the immature area was 519.13 Ha, whereby after replanting done in 2019, the additional replanted area was 122.9 Ha (after RSPO annual surveillance 2018). And the Infrastructure and others area was 271.31 Ha.</p>		
<p>Principle 4: Use of appropriate best practices by growers and millers</p>			
<p>Criterion 4.1:</p>			
<p>Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
<p>4.1.1</p>	<p>Standard Operating Procedures (SOPs) for estates (land clearing to harvesting) and SOP for mills (reception of FFB to dispatch of CPO and PKO) shall be available.</p> <p>- Major compliance -</p>	<p>The procedures documented in "Oil Palm Agricultural Manual" where it contains all sub section of the process, such as: Nursery, land clearing, planting in peat soil and mineral soil with zero burning, planting legume cover crops, terracing, upkeep (fertilizer and pesticides, included safe working practices), water level management, riparian and watercourse management, harvesting, replanting and FFB transport. Interviews with the employees indicate satisfactory level of understanding and implementation in relation to their respective job function. Such as:</p> <ol style="list-style-type: none"> 1. "Biology of Oil Palm No.OPM-01-00/02-10-2017/Rev.2 dated 20 November 2017"; 2. "Oil Palm Nursery No.OPM-02-00/02-10-2017/rev.2 dated 20 November 2017"; 3. "Land Preparation of Oil Palm Nursery No.OPM-02-01/02-10-2017/Rev.2"; 4. "Oil Palm Pre-Nursery No.OPM-02-02/02-10-2017/Rev.2"; 5. "Oil Palm Main Nursery No.OPM-02-03/02-10-2017/Rev.2"; 6. "New Development Area and Replanting No.OPM-03-00/02-10-2017/Rev.2"; 7. "Surveys and Mapping No.OPM-03-01/02-10-2017/Rev.2"; 8. "Land Clearing No.OPM-03-02/02-10-2017/Rev.2"; 9. "Land Preparation No.OPM-03-03/02-10-2017/Rev.2"; 10. "Legume Cover Crop No.OPM-03-04/02-10-2017/Rev.2"; 11. "Field Planting No.OPM-03-05/02-10-2017/Rev.2"; 12. "Density Management No.OPM-04-00/02-10-2017/Rev.2"; 13. "Palm Supplying No.OPM-04-01/02-10-2017/Rev.2"; 14. "Thinning Out and Removing Palm No.OPM-4-02/02-10-2017/Rev.2"; 15. "Fruit Production No.OPM-05-00/02-10- 	<p>Comply</p>

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	<p>2017/Rev.2";</p> <p>16. "Ablation, Castration and Sanitation No.OPM-05-01/02-10-2018/Rev.3";</p> <p>17. "Harvesting No.OPM-05-02/02-10-2018/Rev.3";</p> <p>18. "FFB and Loose Fruit Delivery No.OPM-05-03/02-10-2018/Rev.3";</p> <p>19. "Froned Pruning No.OPM-05-04/02-10-2017/Rev.2";</p> <p>20. "Black Bunch Count No.OPM-05-02/02-10-2017/Rev.2";</p> <p>21. "<i>Elaeobius kamerunicus</i> Management No.OPM-05-06/02-10-2017/Rev.2";</p> <p>22. "Fertilizer No.OPM-06-00/02-10-2017/Rev.2";</p> <p>23. "Inorganic Fertilisers No.OPM-06-01/02-10-2017/Rev.2";</p> <p>24. "Organic Fertilisers No.OPM-06-02/02-10-2017/Rev.2";</p> <p>25. "Leaf Sampling Unit and Rachis Sample Unit No.OPM-06-03/02-10-2017/Rev.2";</p> <p>26. "Pest and Disease No.OPM-07-00/02-10-2017/Rev.2";</p> <p>27. "Detection and Census No.OPM-07-01/02-10-2018/Rev.3";</p> <p>28. "Pest Control No.OPM-07-02/02-10-2017/Rev.2";</p> <p>29. "Disease Control No.OPM-07-03/02-10-2017/Rev.2";</p> <p>30. "Integrated Pest Management No.OPM-07-04/02-10-2017/Rev.2";</p> <p>31. "Weeds in Oil Palm Plantation No.OPM-08-00/02-10-2017/Rev.2";</p> <p>32. "Weeds Control No.OPM-08-01/02-10-2018/Rev.3";</p> <p>33. "Environmental Management No.OPM-09-00/02-10-2017/Rev.2";</p> <p>34. "Water Management in Coastal Soil No.OPM-09-01/02-10-2017/Rev.2";</p> <p>35. "Management of Riparian Area No.OPM-09-02/02-10-2017/Rev.2";</p> <p>36. "The Use, Store and Discard Pesticide No.OPM-09-03/02-10-2017/Rev.2";</p> <p>For Perlabian Mill: Palm Oil Palm Manual Part 1-3</p> <p>1. Introduction to Palm Oil Mill SOP No.POM-00-00</p> <p>2. General Information of Reception No.POM-01-00</p> <p>3. Reception in Perlabian POM No.POM-01-02</p> <p>4. Work Instruction Penimbangan Truk FFB dan Berondolan No.POM-01-02-W01</p> <p>5. WI Penimbangan Truk Tangki CPO No.POM-01-02-W02;</p> <p>6. WI Penimbangan Truk Kernel No.POM-01-02-W03;</p> <p>7. WI Pengisian FFB ke dalam Lori No.POM-01-02-W04;</p> <p>8. WI Pengoperasian Capstand dan Chain Man No.POM-01-02-W05;</p> <p>9. WI Pemindahan FFB ke Railtrack Belakang Sterilizer No.POM-01-02-W06;</p> <p>10. General Information of Sterilizer No.POM-02-00</p>	

Criterion / Indicator	Assessment Findings	Compliance
	11. WI Sterilizer in Perlabian POM No.POM-02-02 rev.01 12. WI Cara Mengeluarkan dan Memasukkan Lori ke Dalam Sterilizer No.POM-02-02-W01 13. WI Pengoperasian Sterilizer No.POM-02-02-W02 14. General Information on Pressing No.POM-03-00 15. Pressing in Perlabian POM No.POM-03-02 16. WI Pengoperasian Hoisting Crane No.POM-03-02-W01; 17. General Information of Pressing No.POM-04-00 18. Pressing in Perlabian POM No.POM-04-02 19. WI Pengoperasian Threshing Machine No.POM-04-02-W01 20. WI Pengoperasian Digester No.POM-04-02-W01; 21. WI Pengoperasian Screw Press No.POM-04-02-W02; 22. WI Pengoperasian Sandtrap Tank dan Vibrating Screen No.POM-04-02-W03 23. WI Pengoperasian Crude Oil Tank No.POM-04-02-W04; 24. General Information on Clarification No.POM-05-00 25. Clarification on Perlabian POM No.POM-05-02 26. WI Pengoperasian Continuous Settling Tank No.POM-05-02-W01; 27. WI Pengoperasian Clean Oil Tank No.POM-05-02-W02; 28. WI Pengoperasian Sludge Tank No.POM-05-02-W03; 29. WI Pengoperasian Oil Purifier No.POM-05-02-W04; 30. WI Pengoperasian Vacuum Drier No.POM-05-02-W05 31. WI Pengoperasian Sludge Centrifuge No.POM-05-02-W06; 32. WI Pengoperasian Sludge Decanter No.POM-05-02-W06; 33. General Information Kernel Plant No.POM-06-00 34. Kernel Plant in Perlabian Palm Oil Mill No.POM-06-02; 35. WI Pengoperasian Depericarper No.POM-06-02-W01; 36. WI Pengoperasian Rippler Mill No.POM-06-02-W02; 37. WI Pengoperasian Winnowing No.POM-06-02-W03; 38. WI Pengoperasian Claybath Separator No.POM-06-02-W04; 39. WI Pengoperasian Kernel Silo Drier No.POM-06-02-W05; 40. Steam Plant in Perlabian POM No.POM-07-02; 41. WI Pengoperasian Steam Boiler No.POM-07-02-W03	
4.1.2	Checking or monitoring of operations procedures is conducted at least once a year.	Comply

Criterion / Indicator	Assessment Findings	Compliance
<p>- Minor compliance -</p>	<p>bunches in block 16E17 and 623 bunches in block 16E15; weigh 5,960 kg. Delivery FFB from field No.PLE/025928; division IV; block 16E17 (483 bunches) and block 16E15 (623 bunches) – total 1106 bunches; dated 15 March 2019; Mandor: Komando K; Stamp: RSPO 555208, FFB IP. FFB Receiving Slip Ticket No.FFB18023957W dated 15 March 2019 issued by Perlabian POM, Estate: from Perlabian Estate; Vehicle BK9716YE; Transporter: Perlabian Estate; Product: FFB; DO No.025978; Nett weight: 5,69 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 555208.</p> <p>Replanting in Perlabian Estate: - Planting Plan Review for 203.24 Ha replanting oil palm in Perlabian Estate. Date sent by estate 28 June 2018; date ENC review 17 July 2018; ENC recommendation: approved. -</p>	
<p>4.1.3 Records of monitoring and any follow-up actions shall be available. - Minor compliance -</p>	<p>Perlabian Estate visited by General Manager North Sumatra on 15 January 2019, report shows 9 comments related to field issues. Sampled: mandores and assistants does not brought herbicide recommendation table from Agronomist – therefore cannot explained the concentration required. Action plan: Spraying mandor and assistant brought herbicide concentration table recommendation from Agronomist on 16 January 2019. 5 comments closed, 4 comments on progress up to 16 July 2019.</p> <p>Prior to land preparation on the replanting area, a planting plan review must take place by ENC department. The planting plan review comprise of extensive document and field check: - summary of plans: replanting for 132.27 Ha in Division III and 70.97 Ha in Division IV for OP1992, 1993, 1996, due to yield per hectare 15.10-26.69 ton/Ha; planting material proposed DxP BLRS; - general map of management unit “Rencana Replanting 2019 Perlabian Estate”, scale 1:14,860, prepared 1 March 2018; - map of area intended for replanting; - topography map; - slope class map – indicated the proposed replanting area slope 0-8% and 8-15%, dated 12 June 2018; - map of planned roads, bridges, culverts, etc. – indicated plan for collection road (width 4m) of 6,891.04 meters, control road (width 4 m) of 5,784.82 meters, main road (width 6 m) of 1,327.68 meters, drain size 1.5x1x1.5 meters of 16,939.99 meters, drain size 2.5x2x2 meters of 5,315.42 meters, ; - map of HCV/conservation area – “Overlay Peta NKT by YASBI dengan Perlabian Estate”, scale 1:62,500 dated 11 June 2018 indicated there is a potential HCV (previously planted area) sets up to be HCV</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>area, no felling of oil palms;</p> <ul style="list-style-type: none"> - planting material documentation: "Sertifikat Kecambah Kelapa Sawit Bah Lias Research Station – Sumatra Bioscience No.6173/SumBio/TTI" dated 6 November 2018 for 37,915 oil palm seeds to PT. Tolan Tiga Indonesia; "Surat Perintah Pengambilan Barang No.1804/SSO/TTI/X/18" collect order for sales of 35,270 germinated oil palm seeds to PT. Tolan Tiga Indonesia dated 27 October 2018. "Surat Dinas Perkebunan dan Peternakan Pemerintah Kabupaten Labuhanbatu Selatan No.525/368/Bunnak/2018 tentang Surat Persetujuan Penyaluran Benih Kelapa Sawit (SP2B-KS)" dated 30 August 2018 for approval of oil palm seeds distribution (35,270 germinated oil palm seeds from PT. PP London Sumatera Indonesia; - working schedule as in "Program Replanting Oil Palm 2019". <p>First Planting Plan Review carried out on 30 May 2018. Revised Planting Plan submitted on 12 June 2018. The output is approval to continue the re-planting plan on 17 July 2018.</p>	
<p>4.1.4</p>	<p>Records of the origins of all third-party FFB sourced (collector, deliver, Cooperative, Farmers Association and outgrower) shall be available.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>Not Applicable N/A</p>
<p>Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>		
<p>4.2.1</p>	<p>A record of SOP implementation to maintain soil fertility that ensures optimal and sustained yield, shall be available.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>Comply</p>
<p>4.2.2</p>	<p>Records of fertilizer inputs shall be available.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Comply</p>

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	<p>by Verdant Bioscience.</p> <p>Application record available under "Monthly Manuring Programme", such as:</p> <ul style="list-style-type: none"> - Block 05D02 (20.34 Ha) date of application 15 January 2019 for Urea (2,488 Kg), dated 18 March for RP (2,488 Kg), dated 6 March 2019 for MOP (2,488 kg) - Block 05E07 (24.48 Ha) date of application 11 January 2019 for Urea (3,901 Kg), dated 11 March 2019 for MOP (3,121 Kg). 	
<p>4.2.3</p> <p>Records of periodical leaf, soil and visual analysis shall be available.</p> <p>- Minor compliance -</p>	<p>JH Agriculture Service conducted the Semi-Detailed Soil Survey in October 2009 for PT. Tolan Tiga Indonesia, within the semi-detailed soil survey report, topographic condition, soil fertility status and other information has been accounted into.</p> <p>Report of periodical leaf, soil and visual analysis was conducted by Verdant Plant and Soil Nutrition Laboratory Soil Analysis Report, document number PSNL/TTI/III/18/287 dated 18 December 2018.</p> <p>In Tolan Estate, as follow:</p> <ul style="list-style-type: none"> - Block D5-D6 (plant year 2005) total area 49.49 Ha, result (% dry matter): N (2.37), P (0.151), K (0.87), Mg (0.23), Ca (0.8) - Block C21A (plant year 1999) total area 40.53 Ha, result (% dry matter): N (2.36), P (0.150), K (0.77), Mg (0.24), Ca (0.92) 	<p>Comply</p>
<p>4.2.4</p> <p>A nutrient recycling strategy is recorded, including use of Empty Fruit Bunches (EFB), land application, and palm residues after replanting.</p> <p>- Minor compliance -</p>	<p>Nutrient recycling strategy is present. The company using all palm by-products for soil nutrient, such as: EFB and POME (is applied to palm nearby mill) and frond stacking.</p> <p>Permit for land application:</p> <ul style="list-style-type: none"> - "Keputusan Kepala Badan Pelayanan Perizinan Terpadu dan Pernamanan Modal Kabupaten Labuhanbatu Selatan No.503/641/BPPTPM-LS/2016 tentang Izin Pemanfatan Air Limbah Industri Minyak Kelapa Sawit pada Tanah di Perkebunan Kelapa Sawit PT. Tolan Tiga Indonesia" dated 27 July 2016. - Document of land application has shown as per "Data Volume of Land Application year 2019", e.g: in block 05C12A (21.06 Ha) total volume to date 95,169.37 M3, block 05C11A (27.67 Ha) total volume to date 120,310,19 M3, block 05C10A (29.39 Ha) total volume to date (159,746.23 M3 and block 05C09A (17.49 Ha) total volume to date 31,038.04 m³. <p>Record of EFB application year 2019 as per "Realisasi Aplikasi Janjang Kosong Tahun 2019", e.g:</p> <ul style="list-style-type: none"> • In division I, total area EFB application 95.72 Ha (3,325,790 tonnes of EFB) • In division II, total area EFB application 75.06 Ha (3,771,050 tonnes of EFB) 	<p>Comply</p>
<p>Criterion 4.3: Practices minimise and control erosion and degradation of soils.</p>		

Criterion / Indicator	Assessment Findings	Compliance
4.3.1 Maps of any fragile soils shall be available. - Major compliance -	There is no fragile soil reported in the soil survey carried out 2009 by JH Agriculture. Recent maps are available of all soils in all estates. Limitation in form of sandy soil and surface run-off of top soil, as well as steeper terrain on Tolan Estate.	Comply
4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	No planting since 2007 on slopes in excess of 250. There is in fact very little planting on sloped land throughout PT. Tolan Tiga Indonesia. Planting on steeper terrain prepared with infrastructure such as terrace or individual terrace.	Comply
4.3.3 A road maintenance program shall be in place. - Minor compliance -	Tolan Estate has shown the document of road as per "Road Maintenance Program year 2019", such as: - Division I (road length is 50,100 meters); planned in January 2019 is 4,000 meters (realization 2,500 meters), planned in February 2019 is 4,000 meters (realization 1,500 meters) - Division III (road length is 51,006 meters); planned in January & February 2019 are 6,000 meters (realization is 3,700 meters). - Division V (road length is 52,000 meters); planned in February 2019 is 4,500 meters (realization is 2,900 meters).	Comply
4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Major compliance -	Based on JH Agriculture Semi-detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlavian and Tolan estate.	Not Applicable N/A
4.3.5 Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	There is no indication of area with fragile soil in the estates.	Not Applicable N/A
4.3.6 A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	Based on JH Agriculture Semi-detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlavian and Tolan estate.	Comply
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.		
4.4.1 An implemented water management plan shall be in place. - Minor compliance -	PT. Tolan Tiga Indonesia – Perlavian POM was updated their "Water management Plan", last updated on 29 April 2013 PT. Tolan Tiga Indonesia has in place a policy with regards to the protection of watercourses and wetlands which includes dedicated buffer zones and riparian areas – including establishing buffers along rivers in accordance with Indonesian laws - 50 meters buffer on each side for small rivers. It is the policy of PT. Tolan Tiga Indonesia that all	Comply

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	<p>buffer zones as stipulated by Indonesian law are re-established at re planting. PT. Tolan Tiga Indonesia has also Water Management Plan and implemented. This was in evidence during replanting, presently in Perlabian and Tolan estates. The required buffer zones were seen to have been established during this process. The buffer zones are in places, to prevent run off, coming from nutrients and chemicals through the planting upkeep.</p> <p>Data seen:</p> <ul style="list-style-type: none"> - "Keputusan Gubernur Sumatera Utara nomor 546.2/421/BPPTSU/2/XI.3b/IX/2016 tentang Izin Pengambilan Air Bawah di PT. Tolan Tiga Indonesia" dated 19 September 2019, location in sumur bor in employee housing division TTS Sripinang. - Surat Ketetapan Pajak Daerah (SKPD ABT) for month January 2019 was paid to Badan Pengelola Pajak Daerah in Labuhanbatu Selatan Regency on 6 February 2019 amount Rp X,763,900;- - The company has shown the document of Water Management Plan year 2019, describing the water for mill process and domestic use are from Perlabian river. Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation. <p>Water quality analysis for Tolan Estate – Sripinang housing water well, by PT. Mutuagung Lestari (No.3168/SL/VIII/18), dated 20 August – 12 September 2018:</p> <table border="1" data-bbox="715 1375 1310 1980"> <thead> <tr> <th>Parameter</th> <th>Max. limit</th> <th>Analysis result</th> </tr> </thead> <tbody> <tr> <td>Temperature</td> <td>± 3</td> <td>24.0⁰ C</td> </tr> <tr> <td>pH</td> <td>6.5 – 9.0</td> <td>8.2</td> </tr> <tr> <td>Total dissolved solid (TDS)</td> <td>1,500 mg/L</td> <td>208 mg/L</td> </tr> <tr> <td>Color (PtCo)</td> <td>15</td> <td>13.2</td> </tr> <tr> <td>Total Colliform</td> <td>0 apm/100ml</td> <td><2</td> </tr> <tr> <td>Hg</td> <td>0.001 mg/L</td> <td><0.000022 mg/L</td> </tr> <tr> <td>Arsen</td> <td>0.05 mg/L</td> <td><0.00039 mg/L</td> </tr> <tr> <td>Fe</td> <td>0.3 mg/L</td> <td><0.0057 mg/L</td> </tr> <tr> <td>Fluoride (F)</td> <td>1.5 mg/L</td> <td><0.049 mg/L</td> </tr> <tr> <td>Cadmium (Cd)</td> <td>0.005 mg/L</td> <td><0.0015 mg/L</td> </tr> <tr> <td>CaCO₃</td> <td>500 mg/L</td> <td>10.4 mg/L</td> </tr> <tr> <td>Chloride (Cl₂)</td> <td>250 mg/L</td> <td>8.7 mg/L</td> </tr> <tr> <td>Chromium (Cr ⁶)</td> <td>- mg/L</td> <td>0.0010 mg/L</td> </tr> <tr> <td>Mangan (Mn)</td> <td>0.1 mg/L</td> <td><0.0066 mg/L</td> </tr> <tr> <td>Nitrate (NO₃)</td> <td>10 mg/L</td> <td>0.087 mg/L</td> </tr> <tr> <td>Selenium (Se)</td> <td>0.01 mg/L</td> <td><0.0040 mg/L</td> </tr> <tr> <td>Zinc (Zn)</td> <td>5.0 mg/L</td> <td><0.0023 mg/L</td> </tr> <tr> <td>Cyanide (Cn)</td> <td>0.1 mg/L</td> <td>0.0033 mg/L</td> </tr> <tr> <td>Sulphate (SO₄)</td> <td>400 mg/L</td> <td>2.68 mg/L</td> </tr> <tr> <td>(Pb)</td> <td>0.05 mg/L</td> <td>0.0014 mg/L</td> </tr> </tbody> </table> <p>The analysis report No.4488/SL/XII/18 by Laboratory</p>	Parameter	Max. limit	Analysis result	Temperature	± 3	24.0 ⁰ C	pH	6.5 – 9.0	8.2	Total dissolved solid (TDS)	1,500 mg/L	208 mg/L	Color (PtCo)	15	13.2	Total Colliform	0 apm/100ml	<2	Hg	0.001 mg/L	<0.000022 mg/L	Arsen	0.05 mg/L	<0.00039 mg/L	Fe	0.3 mg/L	<0.0057 mg/L	Fluoride (F)	1.5 mg/L	<0.049 mg/L	Cadmium (Cd)	0.005 mg/L	<0.0015 mg/L	CaCO ₃	500 mg/L	10.4 mg/L	Chloride (Cl ₂)	250 mg/L	8.7 mg/L	Chromium (Cr ⁶)	- mg/L	0.0010 mg/L	Mangan (Mn)	0.1 mg/L	<0.0066 mg/L	Nitrate (NO ₃)	10 mg/L	0.087 mg/L	Selenium (Se)	0.01 mg/L	<0.0040 mg/L	Zinc (Zn)	5.0 mg/L	<0.0023 mg/L	Cyanide (Cn)	0.1 mg/L	0.0033 mg/L	Sulphate (SO ₄)	400 mg/L	2.68 mg/L	(Pb)	0.05 mg/L	0.0014 mg/L	
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	<p>"PT. Mutuagung Lestari" against "Peraturan Menteri Kesehatan No.32 tahun 2017" at Perlarian Estate, Division II. Sampled and analysis on 27 December - 17 January 2019.</p> <table border="1" data-bbox="715 510 1305 1111"> <thead> <tr> <th>Parameter</th> <th>Max. limit</th> <th>Analysis result</th> </tr> </thead> <tbody> <tr><td>Temperature</td><td>± 3</td><td>22.9^o C</td></tr> <tr><td>pH</td><td>6.5 – 9.0</td><td>8.53</td></tr> <tr><td>Total dissolved solid (TDS)</td><td>1,500 mg/L</td><td>255 mg/L</td></tr> <tr><td>Color (PtCo)</td><td>15</td><td>4</td></tr> <tr><td>Total Colliform</td><td>0 apm/100ml</td><td><2</td></tr> <tr><td>Hg</td><td>0.001 mg/L</td><td><0.000022 mg/L</td></tr> <tr><td>Arsen</td><td>0.05 mg/L</td><td><0.00039 mg/L</td></tr> <tr><td>Fe</td><td>0.3 mg/L</td><td><0.0057 mg/L</td></tr> <tr><td>Fluoride (F)</td><td>1.5 mg/L</td><td>0.74 mg/L</td></tr> <tr><td>Cadmium (Cd)</td><td>0.005 mg/L</td><td><0.0015 mg/L</td></tr> <tr><td>CaCO₃</td><td>500 mg/L</td><td>64 mg/L</td></tr> <tr><td>Chloride (Cl₂)</td><td>250 mg/L</td><td>8.7 mg/L</td></tr> <tr><td>Chromium (Cr ⁶)</td><td>- mg/L</td><td>0.0016 mg/L</td></tr> <tr><td>Mangan (Mn)</td><td>0.1 mg/L</td><td><0.0066 mg/L</td></tr> <tr><td>Nitrate (NO₃)</td><td>10 mg/L</td><td>0.080 mg/L</td></tr> <tr><td>Selenium (Se)</td><td>0.01 mg/L</td><td><0.004 mg/L</td></tr> <tr><td>Zinc (Zn)</td><td>5.0 mg/L</td><td><0.0023 mg/L</td></tr> <tr><td>Cyanide (Cn)</td><td>0.1 mg/L</td><td>0.0033 mg/L</td></tr> <tr><td>Sulphate (SO₄)</td><td>400 mg/L</td><td>1.52 mg/L</td></tr> <tr><td>(Pb)</td><td>0.05 mg/L</td><td><0.0014 mg/L</td></tr> </tbody> </table> <p>Sampled and analysis from Hulu Sungai Bakaran Batu, on 27 December - 17 January 2019. The analysis report No.4494/SL/XII/18 by Laboratory "PT. Mutuagung Lestari" against "Peraturan Pemerintah RI No.82 tahun 2001 Kelas II".</p> <table border="1" data-bbox="715 1283 1305 1805"> <thead> <tr> <th>Parameter</th> <th>Max. limit</th> <th>Analysis result</th> </tr> </thead> <tbody> <tr><td>Temperature</td><td>± 3</td><td>22.8^o C</td></tr> <tr><td>pH</td><td>6.5 – 9.0</td><td>6.64</td></tr> <tr><td>Total Colliform</td><td>5000 apm/100ml</td><td>170</td></tr> <tr><td>Hg</td><td>0.001 mg/L</td><td><0.000024 mg/L</td></tr> <tr><td>Arsen</td><td>0.05 mg/L</td><td><0.00042 mg/L</td></tr> <tr><td>Fe</td><td>0.3 mg/L</td><td>0.27 mg/L</td></tr> <tr><td>Fluoride (F)</td><td>1.5 mg/L</td><td>17.8 mg/L</td></tr> <tr><td>Cadmium (Cd)</td><td>0.005 mg/L</td><td><0.002 mg/L</td></tr> <tr><td>Chloride (Cl₂)</td><td>250 mg/L</td><td>0.073 mg/L</td></tr> <tr><td>Chromium (Cr ⁶)</td><td>- mg/L</td><td>0.011 mg/L</td></tr> <tr><td>Mangan (Mn)</td><td>0.1 mg/L</td><td><0.007 mg/L</td></tr> <tr><td>Nitrate (NO₃)</td><td>10 mg/L</td><td>0.92 mg/L</td></tr> <tr><td>Selenium (Se)</td><td>0.01 mg/L</td><td><0.004 mg/L</td></tr> <tr><td>Zinc (Zn)</td><td>5.0 mg/L</td><td><0.0028 mg/L</td></tr> <tr><td>Cyanide (Cn)</td><td>0.1 mg/L</td><td><0.0033 mg/L</td></tr> <tr><td>Sulphate (SO₄)</td><td>400 mg/L</td><td>9.27 mg/L</td></tr> <tr><td>(Pb)</td><td>0.05 mg/L</td><td><0.0016 mg/L</td></tr> </tbody> </table>	Parameter	Max. limit	Analysis result	Temperature	± 3	22.9 ^o C	pH	6.5 – 9.0	8.53	Total dissolved solid (TDS)	1,500 mg/L	255 mg/L	Color (PtCo)	15	4	Total Colliform	0 apm/100ml	<2	Hg	0.001 mg/L	<0.000022 mg/L	Arsen	0.05 mg/L	<0.00039 mg/L	Fe	0.3 mg/L	<0.0057 mg/L	Fluoride (F)	1.5 mg/L	0.74 mg/L	Cadmium (Cd)	0.005 mg/L	<0.0015 mg/L	CaCO ₃	500 mg/L	64 mg/L	Chloride (Cl ₂)	250 mg/L	8.7 mg/L	Chromium (Cr ⁶)	- mg/L	0.0016 mg/L	Mangan (Mn)	0.1 mg/L	<0.0066 mg/L	Nitrate (NO ₃)	10 mg/L	0.080 mg/L	Selenium (Se)	0.01 mg/L	<0.004 mg/L	Zinc (Zn)	5.0 mg/L	<0.0023 mg/L	Cyanide (Cn)	0.1 mg/L	0.0033 mg/L	Sulphate (SO ₄)	400 mg/L	1.52 mg/L	(Pb)	0.05 mg/L	<0.0014 mg/L	Parameter	Max. limit	Analysis result	Temperature	± 3	22.8 ^o C	pH	6.5 – 9.0	6.64	Total Colliform	5000 apm/100ml	170	Hg	0.001 mg/L	<0.000024 mg/L	Arsen	0.05 mg/L	<0.00042 mg/L	Fe	0.3 mg/L	0.27 mg/L	Fluoride (F)	1.5 mg/L	17.8 mg/L	Cadmium (Cd)	0.005 mg/L	<0.002 mg/L	Chloride (Cl ₂)	250 mg/L	0.073 mg/L	Chromium (Cr ⁶)	- mg/L	0.011 mg/L	Mangan (Mn)	0.1 mg/L	<0.007 mg/L	Nitrate (NO ₃)	10 mg/L	0.92 mg/L	Selenium (Se)	0.01 mg/L	<0.004 mg/L	Zinc (Zn)	5.0 mg/L	<0.0028 mg/L	Cyanide (Cn)	0.1 mg/L	<0.0033 mg/L	Sulphate (SO ₄)	400 mg/L	9.27 mg/L	(Pb)	0.05 mg/L	<0.0016 mg/L	
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<p>4.4.2</p>	<p>Protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones, at the time of or prior to replanting shall be demonstrated.</p> <p>- Major compliance -</p>	<p>Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation of river buffer zone.</p> <p>Perlarian Estate has identified the river flows during HCV assessment and reported in HCV identification, for example: Perlarian river, Tolan river, Alangan</p>	<p>Comply</p>																																																																																																																				

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	<p>river. Estate management has shown effort to minimize erosion impacts. For example: planting trees in river buffer for second semester 2015 planted division II, block I13 and I14; planting 80 saplings of <i>Adenanthera pavonina</i> and also 23 saplings of Mahogany.</p>																																																																																																																																			
<p>4.4.3 Records for monitoring of effluent especially BOD (Biochemical Oxygen Demand) and efforts to comply with legal requirements, shall be available (see criteria 2.1 and 5.6). - Minor compliance –</p>	<p>The company (Perlabian POM) has CDM Project and discharge effluent to block land applications, effluent sampling is taken regularly every month by independent third party (PT. Mutuagung Lestari), e.g. water sample in "Effluent Final Discharge Pond". Result of BOD sampling analysis has shown that no more than 5,000 mg/Liter as regulated in "Peraturan Menteri Lingkungan Hidup No. 28, year 2003". Records for monitoring/test result of effluent especially BOD for year 2018 available as below:</p> <table border="1" data-bbox="715 853 1193 1216"> <thead> <tr> <th>Month /Year</th> <th>BOD (mg/L)</th> <th>COD (mg/L)</th> <th>Oil& Grease (mg/L)</th> <th>Pb (mg/L)</th> <th>Cu (mg/L)</th> </tr> </thead> <tbody> <tr><td>Jan 2018</td><td>161</td><td>322</td><td>0.8</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Feb 2018</td><td>2181</td><td>3951</td><td>0.4</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Mar 2018</td><td>1862</td><td>3712</td><td>0.6</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Apr 2018</td><td>2246</td><td>4027</td><td>0.6</td><td><0.0017</td><td><0.015</td></tr> <tr><td>May 2018</td><td>16.5</td><td>51.7</td><td>5.2</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Jun 2018</td><td>1543</td><td>3520</td><td>6.1</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Jul 2018</td><td>2760</td><td>4135</td><td>9.6</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Aug 2018</td><td>947</td><td>1857</td><td>5.0</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Sep 2018</td><td>782</td><td>1466</td><td>5.0</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Oct 2018</td><td>485</td><td>960</td><td>5.0</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Nov 2018</td><td>412</td><td>788</td><td>5.0</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Dec 2018</td><td>14.8</td><td>50.3</td><td>5.0</td><td><0.0017</td><td><0.015</td></tr> </tbody> </table> <table border="1" data-bbox="715 1243 1007 1592"> <thead> <tr> <th>Month /Year</th> <th>Cd (mg/L)</th> <th>Zn (mg/L)</th> <th>pH</th> </tr> </thead> <tbody> <tr><td>Jan 2018</td><td><0.0022</td><td>0.22</td><td>7.21</td></tr> <tr><td>Feb 2018</td><td><0.0022</td><td>0.02</td><td>7.47</td></tr> <tr><td>Mar 2018</td><td><0.0022</td><td>0.0098</td><td>7.32</td></tr> <tr><td>Apr 2018</td><td><0.0022</td><td>0.0099</td><td>7.42</td></tr> <tr><td>May 2018</td><td><0.0022</td><td>0.14</td><td>7.96</td></tr> <tr><td>Jun 2018</td><td><0.0022</td><td>0.042</td><td>7.85</td></tr> <tr><td>Jul 2018</td><td><0.0022</td><td>0.13</td><td>7.36</td></tr> <tr><td>Aug 2018</td><td><0.0022</td><td>0.081</td><td>7.32</td></tr> <tr><td>Sep 2018</td><td><0.0022</td><td>0.062</td><td>7.36</td></tr> <tr><td>Oct 2018</td><td><0.0022</td><td>0.71</td><td>7.4</td></tr> <tr><td>Nov 2018</td><td><0.0022</td><td>0.0099</td><td>7.22</td></tr> <tr><td>Dec 2018</td><td><0.0022</td><td>0.08</td><td>6.13</td></tr> </tbody> </table> <p>From the test result, the effluent quality meets the parameter sets by government.</p>	Month /Year	BOD (mg/L)	COD (mg/L)	Oil& Grease (mg/L)	Pb (mg/L)	Cu (mg/L)	Jan 2018	161	322	0.8	<0.0017	<0.015	Feb 2018	2181	3951	0.4	<0.0017	<0.015	Mar 2018	1862	3712	0.6	<0.0017	<0.015	Apr 2018	2246	4027	0.6	<0.0017	<0.015	May 2018	16.5	51.7	5.2	<0.0017	<0.015	Jun 2018	1543	3520	6.1	<0.0017	<0.015	Jul 2018	2760	4135	9.6	<0.0017	<0.015	Aug 2018	947	1857	5.0	<0.0017	<0.015	Sep 2018	782	1466	5.0	<0.0017	<0.015	Oct 2018	485	960	5.0	<0.0017	<0.015	Nov 2018	412	788	5.0	<0.0017	<0.015	Dec 2018	14.8	50.3	5.0	<0.0017	<0.015	Month /Year	Cd (mg/L)	Zn (mg/L)	pH	Jan 2018	<0.0022	0.22	7.21	Feb 2018	<0.0022	0.02	7.47	Mar 2018	<0.0022	0.0098	7.32	Apr 2018	<0.0022	0.0099	7.42	May 2018	<0.0022	0.14	7.96	Jun 2018	<0.0022	0.042	7.85	Jul 2018	<0.0022	0.13	7.36	Aug 2018	<0.0022	0.081	7.32	Sep 2018	<0.0022	0.062	7.36	Oct 2018	<0.0022	0.71	7.4	Nov 2018	<0.0022	0.0099	7.22	Dec 2018	<0.0022	0.08	6.13	<p>Comply</p>
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<p>4.4.4 Monitoring of mill water use per ton of FFB shall be recorded. - Minor compliance –</p>	<p>Perlabian POM recording the mill water use per tonne FFB. The record of water use available in "Pemakaian air dan HSD Oil per metrik FFB". The budget of water use for FFB process sets at 1 m³/ton FFB processed. Record for year 2018 seen:</p> <table border="1" data-bbox="715 1794 1257 2031"> <thead> <tr> <th>Month</th> <th>FFB Processed (tons)</th> <th>Water usage (m³)</th> <th>Water usage (m³/ton FFB)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>19,141</td><td>18,184</td><td>0.95</td></tr> <tr><td>Feb</td><td>15,130</td><td>13,617</td><td>0.90</td></tr> <tr><td>Mar</td><td>16,748</td><td>12,603</td><td>0.75</td></tr> <tr><td>Apr</td><td>16,520</td><td>14,022</td><td>0.85</td></tr> <tr><td>May</td><td>17,731</td><td>17,572</td><td>0.99</td></tr> <tr><td>Jun</td><td>12,621</td><td>16,288</td><td>1.29</td></tr> </tbody> </table>	Month	FFB Processed (tons)	Water usage (m ³)	Water usage (m ³ /ton FFB)	Jan	19,141	18,184	0.95	Feb	15,130	13,617	0.90	Mar	16,748	12,603	0.75	Apr	16,520	14,022	0.85	May	17,731	17,572	0.99	Jun	12,621	16,288	1.29	<p>Comply</p>																																																																																																						
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		Jul	22,166	22,219	1.00	
		Aug	19,127	14,470	0.76	
		Sep	19,727	16,207	0.82	
		Oct	22,311	20,063	0.90	
		Nov	15,954	14,408	0.90	
		Dec	16,408	14,964	0.91	
		Total	213,591	194,617	0.91	
Criterion 4.5:						
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.						
4.5.1	Monitoring of Integrated Pest Management (IPM) plan implementation shall be available. - Major compliance -	<p>PT. Tolan Tiga Indonesia is able to demonstrate Integrated Pest Management under "Program Pengendalian Hama Terpadu 2019", updated on 25 January 2019. These plans comprise of biological, physical and chemical treatment to control pest attack.</p> <p>Integrated Pest Management was documented and retrievable including building and maintenance of barn owl boxes, planting and maintenance of beneficial plants, pest and diseases census such as for ganoderma census. PT. Tolan Tiga Indonesia was implementing early warning system through regular pest monitoring (census) for rat and boar attack, leaf eating pest, etc. Reports are produced and maintained, chemical pesticide will only used if the pests attack above the economic threshold. Once implemented, management performs monitoring to re-check the program effectiveness.</p> <p>In Tolan Estate, the program and implementation of monitoring of integrated pest management has shown as per "Program Pengendalian Hama Terpadu (PHT)" year 2019, such as:</p> <ul style="list-style-type: none"> - Maintain and monitoring of Gupon (owl) planned in June 2019; - Census of Ganoderma (planned in May and December 2019); <p>Record of its implementation:</p> <ul style="list-style-type: none"> - Owl monitoring dated 26 February 2019 location in block C4/OP2006, reported: feces (yes), feather (yeas), voice (none) - Report of census of Ganoderma for second semester year 2018; location block 05D02 (20.34 Ha) total % of tase ganoderma is 4.34%; location in block 05E07 (24.28 Ha) total % of tase ganoderma is 4.56%. 				Comply
4.5.2	Training records of Integrated Pest Management (IPM) shall be available. - Minor compliance -	<p>There are training records for training of staff in regards to IPM and these are now formally recorded on all occasions. IPM training provided for field operators in all estates. The training was conducted by "Verdant Bioscience Indonesia".</p> <p>In Perlabian Estate;</p> <ul style="list-style-type: none"> - Record of training of IPM conducted on 21 August 2018 was attended by 16 workers. Record seen: photograph, training material, attendance list. - Refresment training of handling pesticides and spraying equipment dated 18 April 2018 was 				Comply

Criterion / Indicator	Assessment Findings	Compliance																																				
	<p>attended by 55 workers.</p> <p>In Tolan Estate, record of IPM training has shown, e.g: refresh training on census of ganoderma was conducted on 24 October 2018 – attendende by 15 workers.</p>																																					
<p>Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment</p>																																						
<p>4.6.1</p> <p>Documented evidence shall be available to show that pesticide used based on regulations and the use of pesticide is specific to target species with appropriate dosage which have minimal impact on non-target species.</p> <p>- Major compliance -</p>	<p>PT. Tolan Tiga Indonesia has shown that all pestecedes which used by the company included in approved registered pesticide by Agriculture Ministry – 2018. The use of pesticide is under strict requirement, only in the case of pest attack past the economic threshold. The justification of pesticide used is explained under Agricultural Manual General Section 12 Pest and Disease – and use of herbicide under Section 17 Weed Controls. The procedures explain the identification of target species, agrochemical to be used, and dosage and area per application in general. A further dosage reduction controlled through budget. Visit to chemical store and record review shows company chemical product for specific target species (weed).</p> <p>Perlabian Estate and Tolan Estate have listed all pesticide and herbicide used on the field as per “Daftar Pestisida Yang Dipakai di ditahun 2019”, dated 15 February 2019. All the pesticide and herbicide have valid license from government, e.g:</p> <table border="1" data-bbox="715 1238 1305 2022"> <thead> <tr> <th>Trademark</th> <th>Active Ingredients</th> <th>Register number</th> </tr> </thead> <tbody> <tr> <td>Smart 486 AS</td> <td>Isopropil amina glifosat 486 gr/ltr</td> <td>RI 01030119971313 – valid until 12th November 2023</td> </tr> <tr> <td>BecAno 500L</td> <td>Indazilflam 500gr/ltr</td> <td>RI 01030120124279 – valid 5th May 2022</td> </tr> <tr> <td>Garlon 670 EC</td> <td>Trilokpir butoksi etil ester 670 gr/ltr</td> <td>RI 0103012015514 8– valid until 13th May 2020</td> </tr> <tr> <td>Starane 290 EC</td> <td>Fluroksipir 290 gr/ltr</td> <td>RI 0103011988854 – valid until April 2019</td> </tr> <tr> <td>Elang 480 SL</td> <td>Isopropil amina glifosat 486 gr/ltr</td> <td>RI 01020119941170 – valid until 30th December 2021</td> </tr> <tr> <td>Metsulindo 20 WP</td> <td>Metil Metsulfuron 20%</td> <td>RI 01030119991484– valid until May 2021</td> </tr> <tr> <td>Marshal 5 gr</td> <td>Karbosulfan 5%</td> <td>RI 01010119771279 – valid until October 2022</td> </tr> <tr> <td>Tikumin</td> <td>Kumatetralil 0.0375%</td> <td>RI 0112012004670 – valid until 5th May 2020</td> </tr> <tr> <td>Regent 50 SC</td> <td>Fipronil 50 gr/Liter</td> <td>RI 01010119951192 – valid until 31th December 2020</td> </tr> <tr> <td>Marathon 500 SL</td> <td>Dimehipo 500 gr/Liter</td> <td>RI 01010120103769 – valid until 13th May 2020</td> </tr> <tr> <td>Omite 570 ec</td> <td>Propargit</td> <td>RI 011401982588 – valid until 7th July 2019</td> </tr> </tbody> </table>	Trademark	Active Ingredients	Register number	Smart 486 AS	Isopropil amina glifosat 486 gr/ltr	RI 01030119971313 – valid until 12 th November 2023	BecAno 500L	Indazilflam 500gr/ltr	RI 01030120124279 – valid 5 th May 2022	Garlon 670 EC	Trilokpir butoksi etil ester 670 gr/ltr	RI 0103012015514 8– valid until 13 th May 2020	Starane 290 EC	Fluroksipir 290 gr/ltr	RI 0103011988854 – valid until April 2019	Elang 480 SL	Isopropil amina glifosat 486 gr/ltr	RI 01020119941170 – valid until 30 th December 2021	Metsulindo 20 WP	Metil Metsulfuron 20%	RI 01030119991484– valid until May 2021	Marshal 5 gr	Karbosulfan 5%	RI 01010119771279 – valid until October 2022	Tikumin	Kumatetralil 0.0375%	RI 0112012004670 – valid until 5 th May 2020	Regent 50 SC	Fipronil 50 gr/Liter	RI 01010119951192 – valid until 31th December 2020	Marathon 500 SL	Dimehipo 500 gr/Liter	RI 01010120103769 – valid until 13 th May 2020	Omite 570 ec	Propargit	RI 011401982588 – valid until 7 th July 2019	<p>Comply</p>
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<p>4.6.2 Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications shall be available. - Major compliance -</p>	<p>Record of pesticed use year 2018 and 2019 availabe under document "Rekapitulasi Penggunaan Pestisida tahun 2018" such as in Perlabian Estate:</p> <table border="1" data-bbox="715 479 1284 965"> <thead> <tr> <th>Description</th> <th>active ingredients (gr or liter / Ha)</th> </tr> </thead> <tbody> <tr> <td>SMART (Isopropil amina glyphosate)</td> <td>713 gram/Ha</td> </tr> <tr> <td>Garlon (Triclophyr)</td> <td>36.92 gram/Ha</td> </tr> <tr> <td>Becano 500 SC (Indaziflam 500 g/l)</td> <td>3.4 gram/Ha</td> </tr> <tr> <td>Starane 75WG</td> <td>23.9 gram/Ha</td> </tr> <tr> <td>Metsulindo 20 WP (Metil Metsulfuron)</td> <td>0.96 gram/Ha</td> </tr> <tr> <td>Tukimun</td> <td>45 gram/Ha</td> </tr> <tr> <td>Marshall 5G (Karbosulfan 5%)</td> <td>7.3 gram/Ha</td> </tr> <tr> <td>Basta 150 SL</td> <td>14.8 gram/Ha</td> </tr> <tr> <td>Strathane 75 WG</td> <td>23.9 gram/Ha</td> </tr> </tbody> </table>	Description	active ingredients (gr or liter / Ha)	SMART (Isopropil amina glyphosate)	713 gram/Ha	Garlon (Triclophyr)	36.92 gram/Ha	Becano 500 SC (Indaziflam 500 g/l)	3.4 gram/Ha	Starane 75WG	23.9 gram/Ha	Metsulindo 20 WP (Metil Metsulfuron)	0.96 gram/Ha	Tukimun	45 gram/Ha	Marshall 5G (Karbosulfan 5%)	7.3 gram/Ha	Basta 150 SL	14.8 gram/Ha	Strathane 75 WG	23.9 gram/Ha	<p>Comply</p>
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<p>4.6.3 Any use of pesticides shall be minimized as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in Indonesia Best Practice guidelines. - Major compliance -</p>	<p>Based on interview and document review with IPM team, there are no used of prophylactic use of pesticides throughout the company estate. The only use of pesticide after early warning system/census indicated pest attack above threhold.</p>	<p>Comply</p>																				
<p>4.6.4 The evidence shall be available to demonstrate that use of Pesticides, categorized in Class 1A or 1B by World Health Organization, or those are listed in the Stockholm and Rotterdam Conventions, and paraquat are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -</p>	<p>There is no use of WHO Class 1A or 1 B pesticide in company operation. The use of paraquat has been reduced over time. Based on document review, it was noted that paraquat was no longer used. There is Memorandum from Director Estates Departements No.09/CIR-ESD/IV/15 dated 1 April 2015 to stop the use of paraquat by 1 January 2017.</p> <p>Based on visit in Perlabian Estate and Tolan Estate and interview with herbicides applicator, there were no paraquat stocked in chemicals storage.</p>	<p>Comply</p>																				
<p>4.6.5 Evidence of pesticide application by trained person and in accordance with application guidelines in product label and storage guidelines shall be available. Appropriate safety equipment shall be provided and utilized. All precautions attached to the products shall be properly observed, applied, and understood</p>	<p>Perlabian Estate and Tolan Estate have provided basic training related to pesticide, understanding material safety data sheet/MSDS, limited pesticide training, emergency condition training and first aid training.</p> <p>Chemical warehouse and its infrastructure is ready (see criterion 4.6.6).</p> <p>Standard PPE for sprayer: goggle, masker, apron, rubber glove, rubber boot. Standard PPE for chemical</p>	<p>Comply</p>																				

Criterion / Indicator	Assessment Findings	Compliance
	<p>by workers (see Criterion 4.7). - Major compliance -</p>	
<p>4.6.6</p>	<p>Storage of pesticides shall be according to recognised best practices. All pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers (see criterion 5.3). - Major compliance -</p> <p>Based on visit to Perlabian Estate storage for all pesticide is in good condition. A standard storage system appears to be implemented across the company. The storage is equipped with sufficient air ventilation to provide air circulation. Hazard signs, emergency shower, secondary containment, spill kit, appropriate PPE (face shield, permeable gloves, apron and mask) is available and ready for use.</p> <p>Working instruction for pre-mixing, stacking and storing pesticide is current, MSDS is also readily available. Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the areas of mixing. These were all seen be controlled by date and were readily available. No concentrates are taken into the field as all spray solutions are pre-mixed in a designated area.</p> <p>Empty pesticide container was triple rinsed before sent for temporary hazardous waste storage.</p> <p>Overalls are washed at the pesticide mixing areas in specially constructed wash areas so that sprayers and mixers do not need to take them home and therefore the risk of cross contamination with family members is reduced and eliminated.</p>	<p>Comply</p>
<p>4.6.7</p>	<p>Application of pesticides shall be by proven methods that minimize risk and negative impacts. - Minor compliance -</p> <p>Pesticides used were mixed accordingly as per mixing instructions. Procedure no TTI/PROS/IMP/14 revision 01 dated on 1st December 2013 was established and approved related pesticides usage, storage, mixing and handling of container properly to minimise risk and impact.</p> <p>Applications of pesticide shall be approved by manager based on action plan from each FA (Field Assistant), reviewed by Field Head assistant. FA made pesticide plan referred to result of pest census.</p>	<p>Comply</p>
<p>4.6.8</p>	<p>Pesticides may only be applied aerially where there is a documented justification. Surrounding communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -</p> <p>There was no aerial application of pesticide throughout PT. Tolan Tiga Indonesia.</p>	<p>Not Applicable N/A</p>
<p>4.6.9</p>	<p>Evidence of training on handling pesticide for workers and scheme smallholder (if any) shall be available. - Minor compliance -</p> <p>In Perlabian Estate, the refreshment training of handling pesticides and spraying equipment dated 18 April 2018 was attended by 55 workers.</p> <p>In Tolan Estate, the record of refreshment training on handling of pesticides and MSDS dated 22 March 2019, was attended by 12 workers.</p>	<p>Comply</p>
<p>4.6.10</p>	<p>Proof that pesticide waste has been</p> <p>PT. Tolan Tiga Indonesia has shown the the record of</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance	
	<p>handled as per legal regulations and understood by worker and manager, shall be demonstrated.</p> <p>- Minor compliance -</p>	<p>disposal of hazardous waste to third party licensed waste collector (PT. Amindy Barokah) on 3 months base. The Manifest documents and receipts were available and properly recorded,</p> <p>Procedure on Management of Hazardous Waste Materials nomor: 01-10/02-10-2017 revision 0 dated 2 November 2017. The procedure was regulated to ensure a proper system for handling and storage of hazardous waste and toxic waste (LB3) to mitigate the risks of the danger and pollution that can be generated.</p> <p>Data verified: "Berita Acara Serah Terima Limbah Bahan Berbahaya dan Beracun to PT. Amindy Barokah" dated 7 January 2019, consist of oils used (1,729 liters), battery used (118 liters), fuel filter used (483 kg), breaker used (80 kg), cartridge used (10 kg), empty chemical container (35 kg), medical waste (4.5 kg) and laboratorium wastes (4 Kg).</p>	
<p>4.6.11</p>	<p>Annual medical records of pesticide operators, and follow-up treatment of medical results, shall be available.</p> <p>- Major compliance -</p>	<p>PT. Tolan Tiga Indonesia has provided medical checkup for all sprayers and fertilizer-related work, this includes sprayer/operator, supervisor, water-man, warehouse supervisor and truck driver. The result from medical check up has been communicated to each workers – countersigned. The result of medical check up also acknowledged by the line manager in order to take precaution on any intoxication or un-fit worker.</p> <p>Beside annual medical checkup, specific medical checkup was also done for pesticide and chemical operator at least once a year by external clinic "Klinik Spesialis Anugerah Ibu", record of medical checkup was evident as per record "formulir pemeriksaan medis pekerja pemakai pestisida/bahan kimia" and Specific medical checkup</p> <p>Data seen:</p> <ul style="list-style-type: none"> - Tolan Estate - Record on special medical check up for pesticides operator (annually) under "Berita Acara Pemeriksaan Kesehatan Periode 2018" dated 13 July 2018 conducted by Klinik Spesialis Anugerah Ibu – Medan, was attended by 59 workers. - Record of communication and followed up of the MCU result dated 20 October 2018. In the communication, no worker with intoxication sign/cholinesterase above level. 	<p>Comply</p>
<p>4.6.12</p>	<p>Records shall be available to show that spraying is not conducted by pregnant or breast-feeding women.</p> <p>- Major compliance -</p>	<p>PT. Tolan Tiga Indonesia established the policy related to pesticides application be undertaken by no pregnant or no breast-feeding women (the mechanism explained in SOP No.TTI/PROS/IMP/14, revision 01, dated 1 December 2013).</p> <p>Records that spraying is not conducted by pregnant</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>or breast-feeding women under “Daftar Absensi Tenaga Kerja Wanita Tidak Hamil dan Menyusui di Tolan Estate”, for month february 2019 there were no pregnant, no breastfeeding for spraying team. Sample verified: Mrs Sri Hartini, Mr Mulyani, Mrs Liliani Pratama, Mrs Yanti, Mrs Elmiati, Mrs Siti Aminah.</p>	
<p>Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>		
<p>4.7.1 A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>PT. Tolan Tiga Indonesia has established an Occupational Health and Safety Policy, issued and signed by the President Director dated 1 March 2014. In point 1. Mentioned the company supports the implementation of all relevant laws and regulations of the Republic of Indonesia, and of applicable international agreements and standards. In poin 2.b mentioned that the company committed to provision of adequate resources fro effective implementation of the occupational healt and safety (OHS) program and procedure, including strict compliance reviews.</p> <p>PT. Tolan Tiga Indoneisa has also prepared the procedures related to OHS, such as:</p> <ol style="list-style-type: none"> 1. Procedure of Occupational Health and Safety, document number: ENC-01-09, revision 0 dated 2 October 2017. The procedure serves as a management manual to provide a safety, healthy and consistent to work environment fro all workers, contractors and others in the works environment and workplace. The procedure has covered for: <ol style="list-style-type: none"> a. Equipment consist of PPE, emergency response equipment and other OHS equipment. b. OHS competency c. Loyalty and Commitment d. Preliminary overview of OHS condition – OHS aspect e. Monitoring of OHS implementation f. Reviewing of OHS implementation g. Implementation of OHS hazard elimination h. Emergency and disaster response procedure i. Record of minute of P2K3LHS Meetings 2. Procedure of Hazard Identification and Control of Occupational Health and Safety Risks, document number: ENC-01-04, revision 0 dated 10 October 2017. The procedure is designed to provided guidance on identifying potential hazards and determining occupational health and safety (OHS) risk and controls. <p>Perlabian POM and all estate have prepared the OHS Program as in Program P2K3 year 2019, prepared on 31 January 2019 such as:</p> <ul style="list-style-type: none"> - Safety committee (P2K3) meeting (monthly) - Report of P2K3 to manpower Agency in South 	<p>Comply</p>

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	<p>Labuhanbatu Regency (three months bases)</p> <ul style="list-style-type: none"> - Maintenance and inspection of OHS equipment, fire extinguisher, gydrant, first aid box (monthly) - Annual Medical check up - Inspection on using the PPE (monthly) - Review on risk assessment (annually) - Accident investigation (if any) - Fire Drill (annually) - Review and updated the legal and other requirement related to OHS; <p>Records of implementation and monitoring of effectiveness the OHS program available in indicator 4.7.3</p>	
<p>4.7.2</p> <p>A documented risk assessment shall be available and its implementation shall be recorded.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>PT. Tolan Tiga Indonesia has shown the procedure of Hazard Identification and Control of Occupational Health and Safety Risks, document number: ENC-01-04, revision 0 dated 10 October 2017. The procedure is designed to provided guidance on identifying potential hazards and determining occupational health and safety (OHS) risk and controls.</p> <p>Data verified: Perlabian POM has determined the document of risk assessment last review on 15 March 2019, covering all activities in Perlabian POM based on location / workplace, e.g: Security, Office and weighbridge, loading ramp, sterilizer, chain/capstand, hoisting crane, screw press, water treatment plant, workshop, laboratorium, biogas plant, and other areas or activities.</p> <p>In Perlabian Estate, the Risk Assessment has provided under "Daftar Penilaian dan Pengendalian Resiko K3", last review on March 2019 was covered for all activities in estate, such as: office, harvesting, manuring, IPB, spraying, transport of FFB.</p> <p>The document has communicated to all workers dated 19 March 2019, and was attended by 38 workers.</p>	<p>Comply</p>
<p>4.7.3</p> <p>Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>Record of implementation the OHS program has demonstrated. In Perlabian POM, such as:</p> <ul style="list-style-type: none"> - Record of master chit on safety induction and using of PPE, dated 29 January 2019 was attended by 48 workers and on 20 January 2019 was attended by 52 workers. - Fire drill was conducted on 18 February 2019, location in Perlabian POM. Data verified: Scenario, attendance list, photograph, analysis and evaluation performance. - Report of special MCU for workers in high risk area dated 12 July 2018 was attended by 42 workers conducted by Klinik Spesialis Anugerah Ibu – Medan. - Record of followed up the MCU result under "Surat Tindak Lanjut Hasil Medical Check-Up Karyawan Beresiko Tinggi" document no: 01/PLM-1/2019, dated 7 January 2019, e.g: name Mr C**** 	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>S*****, Mr M*****, Mr S*** S*****, Mr A**** S*****, Mr J*** S*****.</p> <ul style="list-style-type: none"> - Record of general MCU for all workers under "Laporan Hasil Pemeriksaan Kesehatan Berkala Tenaga Kerja tahun 2018" was carried out in August, October and November 2018 was attended 56 workers. - Monitoring of using of PPE for contractor (daily), e.g: for contractor CV. Mutu Pratama dated 14th March 2019 and PT. Triroyal dated 17 March 2019. - Report of machinery inspection by Manpower Agency in North Sumatera, e.g: <ul style="list-style-type: none"> • Certificate of machinery inspection for steam vessel "bejana uap", register No.678/48.03/2006, last inspection on 20 February 2017; • Certificate of machinery inspection for lift and carry machine "pesawat angkat dan angkut", register No.377/PAA/W2/1992, last inspection on 7 July 2018; • Certificate of machinery inspection for "instalasi penyalur petir", register No. 01/W2/PPT/NR/1993, last inspection on 7 July 2018. Result 1.8 ohm; • License of OHS overhead crane operator under name Mr. Santano Adha, register No. 1425008-OPK3-PAA/IV/2014, dated 14 April 2014; • License of OHS boiler operator 2nd grade under name Mr. Sukerno, register No. 6157/OPK3-PUBT-B.II/IV/2014, dated 9 April 2014; • License of OHS boiler operator 1st grade under name Mr M Syahrudin Nur, register No.10095.OPK3-PUBT-B.I/IX/2016, dated 23 September 2016; <p>In Perlavian Estate, the implementation as follows:</p> <ul style="list-style-type: none"> - Checklist on monitoring of readiness the fire extinguisher (monthly), dated 7 January 2019, 16 February 2019 and 4 March 2019; - Special medical checkup (MCU) for chemical/pesticides handler (annually), dated 27 June 2018; - Training on emergency response and preparedness dated 10 February 2019, location in TTS Plank, attended by 18 workers; - Monitoring on PPE using for workers in circle raking and packing of manuring, month January 2019 -> reported OK; - Handover of PPE (providing of PPE), dated 9 October 2018 (PPE: safety gloves with anti fog, face mask). 	
<p>4.7.4</p>	<p>The responsible person(s) for occupational health and safety shall be identified and there shall be records of periodical meetings on health and safety issues.</p>	<p>Comply</p>
	<p>PT. Tolan Tiga Indonesia has appointment a person who has responsible in identified and to ensuring the implementation of OHS program (see indicator 4.7.1). Safety and Health Committee has been established and approved by Ministry of Manpower. In Perlavian POM, as follow:</p>	

Criterion / Indicator	Assessment Findings	Compliance
<p>- Major compliance -</p>	<ul style="list-style-type: none"> - Safety Committee has established as per "Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Kabupaten Labuhan Batu Selatan Nomor: KEP.30/P2K3/Naker/IX/2018", dated 3 September 2018. - Safety Officer; namely Mr. Dita Zakaria, certificated as "Ahli Keselamatan dan Kesehatan Kerja" register No.53580/PK3/AJ/12/2018/PO, dated 2 May 2018 valid until 3 years. - Report of OHS performance under "Laporan Triwulan P2K3 period October – December 2018, was sent to Manpower Agency in Labuhanbatu Selatan Regency (Dinas Tenaga Kerja dan Transmigrasi), dated 8 February 2019. - Record of minute of P2K3LHS meeting (monthly), e.g: dated 22 March 2019, agenda: review of the result last meeting, review of OHS inspection and accidents. <p>In Perlarian Estate, as follow:</p> <ul style="list-style-type: none"> - OHS committee (P2K3) has registered in Manpower Agency (Dinas Tenaga Kerja dan Transmigrasi) in Labuhan Baru Selatan Regency based on Surat Keputusan Kepala Dinas Ketenagakerjaan Kabupaten Labuhanbatu Selatan Nomor: KEP.06/P2K3/2019 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja, dated 8th February 2019 - Certificate of OHS expert, No. Reg: 2610/PK3/AJ/12/2017/P1 namely Mr Sony Liston Tarigan, dated 20th September 2017 – valid until 3 years. - Report of OHS performance for period October – December 2018, was sent to Dinas Tenaga Kerja dan Transmigrasi Kabupaten Labuhanbaru Selatan dated 20th February 2019 (doc reference: G/13/PLE/2019). 	
<p>4.7.5</p> <p>A procedure for emergency and work accident shall be available in Indonesian Language; and the workers, who have attended First Aids training, are available in the working areas.</p> <p>- Minor compliance -</p>	<p>A set of emergency response procedure is available.</p> <ul style="list-style-type: none"> - Accident response procedure under "Prosedur Penanganan, Pelaporan dan Penyelidikan Kecelakaan Kerja" No.TTI/PROS/IMP/25 dated 1 July 2009. - First aid during accident under "Prosedur Pertolongan Pertama pada Kecelakaan" No.TTI/PROS/IMP/24. "Prosedur Tanggap Darurat" No.TTI/PROS/IMP/23 dated 1 July 2009, covering fire, earthquake, social unrest. - Emergency situation under "Instruksi Kerja Tanggap Darurat", dated 17 February 2017. <p>In Perlarian POM:</p> <ul style="list-style-type: none"> - License for first aider, namely Mr. Muhammad Rivai No.668/DTK/P3K/2014, and namely Mr. Susanto, license No.657/DTK/P3K/2014. - Refresh of internal training of first aid has conducted on 18 February 2019. 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.6 All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3). - Minor compliance –</p>	<p>In Perlabian Estate, license of first aid at the workplace officer No.560/031/DSTKT/P3K/2016 under name Mr Supriadi, dated 14 October 2016.</p> <p>PT. Tolan Tiga Indonesia has been implemented the Medical Checkup covering all employees. All employees covered by social insurance as per government regulation, BPJS – covering health insurance, accident insurance and pension fund. This scheme applicable to the dependent of the worker. Company clinics are licensed to provide medical service that meets the insurance requirements</p> <p>In Perlabian POM, the implementation: – Bill payment of BPJS Ketenagakerjaan month February 2019 reference No. 19030096606, total payment IDR X5,297,743 dated 12 March 2019, covering for 98 workers. Status paid. – Total 98 workers</p> <p>In Perlabian Estate, the payment record of BPJS Ketenagakerjaan, month February 2018, total of payment Rp *96,260,826 dated 12 March 2019 (reference number 109/2019, status: paid).</p>	<p>Comply</p>
<p>4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. - Minor compliance</p>	<p>All occupational injuries case was recorded in the “Laporan Kecelakaan Kerja” and summary monthly in the “Rekapitulasi Kecelakaan Kerja”. Based on procedure No.TTI/PROS/IMP/25 rev.00 dated on 1 July 2009 shall be measure LTFR (lost time frequency rate)/AFR (Accident Frequency rate), RIR (Recordable injury rate), Incident Rate (IR) and Total Accident Rate (TAR).</p> <p>In Perlabian POM, based on record “Rekapitulasi Laporan Kehilangan Waktu Kerja tahun 2018”, there was a accident reported with lost time by accidents 3 days. – Report of accidents dated 30 August 2018, namely Mr Parluhutan Sitompul (register number: 4820) location in boiler station. – Supervisor investigation accident report dated 30 August 2018 namely Mr Parluhutan Sitompul (register number: 4820). The recommendation has been followed up.</p> <p>In Perlabian Estate, there was a report of accidents (formulir 3KK1 – BPJS Ketenagakerjaan), dated 10 December 2018 under name Mr Ponidi (harvester).</p> <p>In Tolan Estate, based on record “Rekapitulasi Laporan Kehilangan Waktu Kerja tahun 2018”, there were reported 8 accidents with lost time by accidents 35 days – Report of accidents (formulir Jamsostek 3b) dated 15 January 2019, namely Mr Dedi Purwanto (register number: 0716), location od incidents in block B5-6.</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> – Supervisor investigation accident report dated 15 January 2019 namely Mr Dedi Puranto (register number: 0716). The recommendation has been followed up. 	
<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>		
<p>4.8.1 Records of training program related to the aspects of RSPO Principles and Criteria shall be available. - Major compliance -</p>	<p>PT. Tolan Tiga Indonesia has kept the record of training program as per document "Program Pelatihan Tahun 2019", prepared on 31 January 2019, consist of:</p> <ul style="list-style-type: none"> – Training on SCCS RSPO – planned February 2019; – Training on implementation of ISO 9001:2015 – planned on February 2019; – OHS training – planned February 2019; – Training on implementation of ISPO – planned March 2019; – Training of MSDS for chemical material – planned March 2019; – Training of maintenance of POM equipment – planned April 2019; – Training on mill processing – planned in July, August, September, October, November and December 2019. <p>Record of implementation the training program, e.g:</p> <ul style="list-style-type: none"> – Training attendance list of water management plan, dated 16 October 2018; – Training attendance list of MSDS was conducted on 21 March 2018; – Training attendance list of Kernel Plant was conducted on 19 October 2018; <p>Perlabian Estate record of implementation the training program year 2018, such as:</p> <ul style="list-style-type: none"> – Training of risk assessment, dated 15 March 2018 was attended by 25 workers, location in FHA room. – Refreshment training of handling of herbisided was conducted on 18 April 2018 was attended by 30 workers, location in balai karyawan . – Training of emergency situation (BAKORTIBA), dated 15 August 2018 was attended by 84 workers, location in division 4. – Training of integrated pest management dated 21 August 2018 was attended by 15 workers, location in division 3. – Training of MSDS dated 10 December 2018 was attended by 24 workers. 	<p>Comply</p>
<p>4.8.2 Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>Record of training for each employee has shown as per Employee Training and Education Record.</p> <p>Data seen: Namely Mr Aga Jiawara (sparyers), division I Tolan Estate. Detail of training record, e.g:</p> <ul style="list-style-type: none"> – Date 20 February 2018 on training of calibration of spraying equipment (knapsack SA15); 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Date 20 March 2018 on company policies; - Date 15 November 2018 on refreshment training on handling of pesticides and MSDS; - Dated 22 March 2019 on training of calibration of spraying equipment (knapsack SA15); <p>Namely Mr Juliadi, position: Store material officer in Tolan Estate, the record of training e.g:</p> <ul style="list-style-type: none"> - Date 28 September 2016 on training of MSDS; - Date 18 February 2017 in training of company policies; - 12 November 2018 on training of emergency response and preparedness ; - Date 15 December 2018 on training on management of hazardous waste 12 November 2018; 	
Principle 5: Environmental responsibility and conservation of natural resources and biodiversity		
Criterion 5.1:		
Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.		
5.1.1 Environmental impact assessment document(s) shall be available. - Major compliance -	PT. Tolan Tiga Indonesia has shown the environmental document (environmental permit), under: <ul style="list-style-type: none"> - AMDAL document is available and approved by Agriculture Ministry No.PEL.No.RC.220/472/B/III/1994, dated 17 March 1994. The impact assessment for Perlabian mill and its supply base was "Revisi Dokumen Rencana Pengelolaan Lingkungan (RKL) dan Rencana Pemantauan Lingkungan (RPL)" approved by "Surat Kepala Badan Pengendalian Dampak Lingkungan Daerah (Bapedalda) Kabupaten Labuhan Batu No.660/326/BPDL-LB/Set/2006" dated 21 July 2006. All environmental impact assessments have been carried when and where appropriate. Records of all impact assessments carried out are readily available. All operational areas have undertaken reviews of the environmental impacts on at least an annual basis. - Addendum to the initial environmental document: "Adendum ANDAL, RKL-RPL, Perkebunan Kelapa Sawit, Pabrik Kelapa Sawit, Pabrik Kernel Crushing Plant (KCP) 20 ton/jam dan Pengolahan Limbah Cair PKS menjadi Biogas untuk Pembangkit Listrik (+/- 3 MW) PT. Tolan Tiga Indonesia di Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupten Labuhanbatu Selatan, Propinsi Sumatera Utara", approved through letter "Keputusan Badan Lingkungan Hidup Kabupaten Labuhanbatu Selatan No.660/55/BLH/2/2016", dated 16 November 2016. - "Izin Lingkungan Perkebunan Kelapa Sawit, Parbrik Kelapa Sawit, Pabrik Kernel Krushing Plant (KCP) 20 Ton/Jam dan Pengolahan Limbah Cair PKS menjadi Biogas untuk Pembangkit Listrik (+/- 3 MW) PT. 	Comply

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	<p>Tolan Tiga Indonesia No. 503/981/BPPTPM-LS.1/2016”.</p> <p>The environmental impact, both positive and negative impact were measured to mitigate the negative impact and increasing the positive impact, e.g.</p> <ul style="list-style-type: none"> - Air quality management: installation of dust collector, machinery service and maintenance, planting trees, road maintenance, all worker using ear plug. - Water quality: waste water management, Clean Development Mechanism (biogas plant) project, Land Application. - Biodiversity: maintenance of sign board of HCV area, maintenance of HCV boundary, planting trees, patrol in HCV area. - Economic wellbeing in the region: Community Development. - Job opportunity: for local communities, etc. 	
<p>5.1.2</p> <p>Environment management plan document to prevent negative impacts, its implementation report and revision (if the identification of impact requires changes in current company’s practices) shall be available. The company’s management shall appoint the responsible person(s) for the implementation of the document.</p> <p>- Minor compliance -</p>	<p>PT. Tolan Tiga Indoneisa has prepared report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester), e.g RKL-RPL report semester II 2018 (Period July – December 2018) as per document “Laporan Pelaksanaan Rencana pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) semester II tahun 2018”.</p> <p>PT. Tolan Tiga Indonesia has also appointed the Estate Manager – POM Manager who responsible on implementation of the environmental management and monitoring plan, as mentioned in Job description, point 12. Responsible on implementation of sustainability system and the other applicable requirement in the organization.</p> <p>The evidence of submitted report to the government is available, e.g.</p> <ul style="list-style-type: none"> – Acceptance RKL/RPL report, letter no G/7/PLE/2018 to “Badan Lingkungan Hidup Kabupaten Labuhan Batu Selatan” on 21 March 2018, by BLH Labuhanbatu Selatan officer, namely Mrs Uswatun Karimah – Tanda Terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL), no ID TTE: 1521774828-2171, dated 23 March 2018. 	<p>Comply</p>
<p>5.1.3</p> <p>Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly basis.</p>	<p>Data verified of the monitoring and implementation the environment document, such as:</p> <ul style="list-style-type: none"> – Certificate of analysis No:1 322A/LHU-LK/BK3-MDN/XII/2018, parameter of test: noise, dated 31 December 2019 was conducted by Balai Keselamatan dan Kesehatan Kerja Medan. The result: employee housing (52.1 dBA), boiler station (90.2 dBA), power house station (92.4dBA), 	<p>Comply</p>

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<p>- Minor compliance –</p>	<p>depericarping (90.8 dBA), kernel plant (92.5 dBA), cracking station (90.9 dBA), workshop (83.4 dBA), clarification ststaion (85.6 dBA), pressing station (89.5 dBA), sterilizer station (84.0 dBA) and loading ramp station (80.9 dBA).</p> <ul style="list-style-type: none"> - Certificate of analysis No.322G.1/LHU-LK/BK3-MDN/XII/2018, parameter of test: air emission for Generator no 1, dated 31 December 2018, was conducted by Balai Keselamatan dan Kesehatan Kerja Medan. The result shown comply with Decree of Environment ministry of Republic of Indonesia No.13 year 2009. - Certificate of analysis No.322H/LHU-LK/BK3-MDN/XII/2018, parameter of test: air quality location in front of boiler station, dated 31 December 2018, was conducted by “Balai Keselamatan dan Kesehatan Kerja Medan”. The result shown comply with decree of manpower Ministry of Republic of Indonesia No.5 year 2018. - Certificate of analysis No.322K/LHU-LK/BK3-MDN/XII/2018, parameter of test: ambient air location in employee housing, dated 31 December 2018, was conducted by Balai Keselamatan dan Kesehatan Kerja Medan. The result shown comply with government regulation No. 41 year 1999. - Report of Testing No. 4060/SL/XII/18, sample type: waste water, location in Land Application – Outlet Perlambian POM /12, conducted by PT Mutu Agung Lestari, dated 4 December 2018. The result was shown comply with Degree of Enviornment Ministry No.28 year 2003 on “Pedoman Teknis Pengkajian Pemanfaatan Limbah Industri Minyak Sawit di Perkebunan Kelapa Sawit (Pasal 3)”. - Report of Testing No: 4061/SL/XII/18, sample type: domestic water waste, conducted by PT Mutu Agung Lestari, dated 4 December 2018. The result was shown comply with Degree of Enviornment Ministry No.68 year 2016 on “Baku Mutu Air Limbah Domestik” - Report of Testing No.3168/SL/VIII/18, sample type: ground water quality, conducted by PT. Mutu Agung Lestari, dated 2nd August 2018. The result was shown comply with Degree of Healthy Ministry No.31 year 2017. - Form Interview with local community fo social aspect, e.g: Mr Ita Saptia (address: Persiapan Losari Village dated 8 March 2018), Mr Ismail Nasution (address: Gunung Selamat Village, dated 8 March 2018), Mrs Dewi Liana (address: Perkebunan Tolan I/II Village, dated 12 April 2018). 	
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>		
<p>5.2.1</p>	<p>Record(s) on the results of High PT. Tolan Tiga Indonesia have conducted the HCV</p>	<p>Comply</p>

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<p>Conservation Value (HCV assessment) that includes both the planted area and the relevant wider landscape-level considerations (such as wildlife corridors) shall be available.</p> <p>- Major compliance -</p>	<p>assessment for Perlabian Estate in cooperation with “Yayasan Kelapa Sawit Berkelanjutan” in 2009 based on Indonesian Toolkit – 2008. The assessment team comprise of: Ir Purwo Susanto, (Team Leader, RSPO approved HCV Assessor); Dr. Kunkun Jaka Gurmaya, (biodiversity, RSPO approved HCV Assessor); Neny Indriyana, S.Hut, M.T, (Biodiversity); Ir. Riswan SHut, (GIS); Dr. Edy Syahputra, (environmental service); Dr. Asril Darussamin, (HCV Trainer). At the time of the preparation of HCV documents there has been no scheme related ALS, however, team leader has qualified as an "assessor RSPO HCV Approved".</p> <p>The HCV assessment exercise carried out on 23-29 July 2009 with involvement from surrounding community through focuse group discussion and interviews. The public consultation process done in 3 August 2009, with 36 representatives from surrounding village, individuals, traditional leaders, district head, NGO presence.</p> <p>Based on HCV assessment, there was no primary forest and/or peat ecosystem in the estate; mainly cultivated with oil palm and the rest was road infrastructure, housing, and other worker facilities.</p> <p>Based on document and field verification, HCV area identified:</p> <ul style="list-style-type: none"> a. Area HCV 1 of 30.67 Ha in form of Reservoir Pond, whereby overlapping with; b. Area HCV 4 of 30.67 Ha in form of Reservoir Pond. c. Area Potency HCV 1 and HCV 4 of 188.16 Ha in form of riparian zone of Alangan III River, Tolan River and Perlabian River. Note: Potency HCV means HCV that might present inside planted area; as recommended by YASBI, potency HCV becomes HCV after the planted area being replanted. Potency HCV in planted area treated same as HCV area, whereby no chemical regime, upkeep, etc. d. Area HCV 6 of 3.45 Ha in form of graveyard In Division I (Block L08), Division II (Block I09), Division III (Block E05) and Division V (Block B12 dan E17). <p>Total HCV Area identified in Perlabian Estate was 59.38 Ha, comprise of area of HCV 1 (overlapping with) and HCV 4 of 30.67 Ha; and HCV 6 of 3.45 Ha. An additional HCV 1 and 4 of 25.26 Ha comes from potency HCV.</p> <p>PT. Tolan Tiga Indonesia have conducted the HCV assessment for Tolan Estate in cooperation with “Yayasan Kelapa Sawit Berkelanjutan” in 2009 based on Indonesian Toolkit – 2008. The assessment team comprise of: Ir Purwo Susanto, (Team Leader, RSPO approved HCV Assessor); Dr. Kunkun Jaka Gurmaya, (biodiversity, RSPO approved HCV Assessor); Neny Indriyana, S.Hut, M.T, (Biodiversity); Ir. Riswan SHut,</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>(GIS); Dr. Edy Syahputra, (environmental service); Dr. Asril Darussamin, (HCV Trainer). At the time of the preparation of HCV documents there has been no scheme related ALS, however, team leader has qualified as an "assessor RSPO HCV Approved".</p> <p>The HCV assessment exercise carried out on 29-31 July 2009 with involvement from surrounding community through focus group discussion and interviews. The public consultation process done in 3 August 2009, with 36 representatives from surrounding village, individuals, traditional leaders, district head, NGO presence.</p> <p>Based on HCV assessment, there was no primary forest and/or peat ecosystem in the estate; mainly cultivated with oil palm and the rest was road infrastructure, housing, and other worker facilities.</p> <p>Based on document and field verification, HCV area identified:</p> <ul style="list-style-type: none"> - Area HCV 1 of 32.99 Ha in form of forested land, riparian to Kwan Heng Lake and end of ex-airstrip; - Area HCV 4 of 50.78 Ha in form of riparian to water spring, riparian to Kwan Heng Lake, and hilly area in block F36. - Area Potency HCV 1 of 248.18 Ha in form of riparian zone to Perlavian River, riparian zone to Tolan River, riparian zone Sisumut River, riparian zone of Merbau/Sosopan River. Note: Potency HCV means HCV that might present inside planted area; as recommended by YASBI, potency HCV becomes HCV after the planted area being replanted. Potency HCV in planted area treated same as HCV area, whereby no chemical regime, upkeep, etc. - Area HCV 6 of 0.19 Ha in form of graveyard in Division II (Block E10), Division V (Block C33). <p>Total HCV Area in Tolan Estate was 55.99 Ha comprise of HCV 1 on 32.99 Ha and (some overlapping with) HCV 4 of 50.78 Ha; and area HCV 6 of 0.19 Ha. HCV 1, 4 and 6 of 51.06 Ha, and additional HCV 1 of 4.93 Ha from potency HCV 1.</p> <p>Total HCV area in PT. Tolan Tiga Indonesia are 115.37 Ha; this figure was comprise of HCV area in Perlavian Estate of 59.38 Ha and HCV area in Tolan Estate of 55.99 Ha (total 115.37 Ha). Audit team verified during field visit, even after replanting in Perlavian Estate, the HCV area maintained with boundary.</p>	
<p>5.2.2</p>	<p>Where rare, threatened or endangered (RTE) species and or other HCVs are present or affected by the plantation and mill operations, an appropriate measures that are</p>	<p>Comply</p>

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<p>expected to maintain or enhance them shall be implemented through a management plan. - Major compliance -</p>	<p><i>Beringin</i> (<i>Ficus benjamina</i>), <i>Asam-asaman</i> (<i>Phyllanthus amarus</i>), <i>Jambu Biji</i> (<i>Psidium guajava</i>), <i>Manii</i> (<i>Maesopsis manii</i>), <i>Jati</i> (<i>Tectona grandis</i>), <i>Cemara</i> (<i>Casuarina equisetifolia</i>), <i>Nangka</i> (<i>Artocarpus heterophyllus</i>), <i>Melinjo</i> (<i>Gnetum gnemon</i>), <i>Coklat</i> (<i>Theobroma cacao</i>), <i>Durian</i> (<i>Durio zibethinus</i>), <i>Cempedak</i> (<i>Artocarpus integer</i>).</p> <p>Animals/fauna: Mammals; identified 5 mammals species such as <i>Babi Hutan</i> (<i>Sus verucosus</i>), <i>Beruk</i> (<i>Macaca nemestrina</i>), <i>Monyet Ekor Panjang</i> (<i>Macaca fascicularis</i>). From the identified list, there was no mammals status under CR (based on IUCN Redlist), or CITES Appendix I or protected under "Peraturan Pemerintah No. 7 tahun 1999".</p> <p>Reptils and amphibia: Identified 9 species such as <i>Ular Gendang</i> (<i>Python curtus</i>), <i>Ular Jali</i> (<i>Ptyas korros</i>), <i>Biawak</i> (<i>Varanus salvator</i>). From the identified list, there was reptile or amphibia with status under CR (based on IUCN Redlist), or CITES Appendix I or protected under "Peraturan Pemerintah No. 7 tahun 1999".</p> <p>Bird/Aves: identified 27 species such as <i>Perkutut</i> (<i>Geopelia striata</i>), <i>Bubut</i> (<i>Centropus bengalensis</i>), <i>Cucuk Urang</i> (<i>Halcyon cyanoventris</i>), <i>Bangau Putih</i> (<i>Bubulcus ibis</i>), <i>Ayam hutan</i> (<i>Gallus gallus</i>), <i>Kepodang</i> (<i>Oriolus chinensis</i>). From the identified list, there was no bird with status under CR (based on IUCN Redlist). 1 species with status Vu under CITES Appendix I. And 3 species with status protected under "Peraturan Pemerintah No. 7 tahun 1999": <i>Tengkek</i> (<i>Halcyon pileata</i>), <i>Bangau Putih</i> (<i>Bubulcus ibis</i>) dan <i>Cucuk Urang</i> (<i>Halcyon cyanoventris</i>).</p> <p>Implementation and monitoring of HCV for Perlabian Estate reported on the Implementation and Monitoring of HCV in 2017. In 2017 there is a change of identity of HCV potential become HCV actual for 2.11 Ha. This is due to replanting activities that have been considering the presence of HCV where previously a potential of HCV, then turned into HCV actual.</p> <p>Based on the verification of documents Identification of HCV in 2009 states that no protected areas around the concession area of PT. Tolan Tiga Indonesia, which has connectivity with a concession area.</p> <p>Based on the results of monitoring in 2017, the described species of flora and fauna are protected.</p> <p>The company has prepared a program for the management of HCV, such as:</p> <ol style="list-style-type: none"> Monitoring of HCV including the presence of protected fauna and flora. Socialization information related to HCV Upkeep the plants in HCV areas Monitoring/replacement the signboard of HCV Training for conservation officers, <p>Perlabian Estate has realized the HCV program 2017,</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>e.g:</p> <ul style="list-style-type: none"> - Monitoring of flora and fauna carried out every month and the results are set in "HCV monitoring checklist" no Doc: ENS/DOC.08. revision 03, 2011. - Training for conservation officer, on 12 December 2017 - Mointoring the signboard of HCV performed consistently every month, e.g repair the signboard of HCV on March 30, 2017 and November 23, 2017. <p>Based on field visit in block I13/14, Divison II Perlavian Estate (Sempadan Sungai Tolan 2) shown these HCV area has planted with woody plants, e.g: Trembesi (<i>Samanea saman</i>), Bambu (<i>Bambusa</i> sp), Saga (<i>Adenanthera pavonina</i>), Salam (<i>Eugenia aperculata</i>), Gmelina (<i>Gmelina arborea</i>).</p> <p>Based on field observation in block N15, Divison 1 (PLE) which become part of 2017 replanting activity, no replanting in radius 50 meters to the both side of the river; further verification against replanting document, the area have been excised from planted hectarage.</p> <p>Based on the HCV assessment 2009 for Tolan Estate, there are some flora and fauna species found. Plants/flora: 57 species of plants/flora with no status under CR (based on IUCN Redlist), or CITES Appendix I or protected under "Peraturan Pemerintah No. 7 tahun 1999". The type of plants/flora identified: <i>Beringin</i> (<i>Ficus benjamina</i>), <i>Asam-asaman</i> (<i>Phyllanthus amarus</i>), <i>Jambu Biji</i> (<i>Psidium guajava</i>), <i>Manii</i> (<i>Maesopsis manii</i>), <i>Jati</i> (<i>Tectona grandis</i>), <i>Cemara</i> (<i>Casuarina equisetifolia</i>), <i>Nangka</i> (<i>Artocarpus heterophyllus</i>), <i>Rambutan</i> (<i>Nephelium lappaceum</i>), <i>Waru</i> (<i>Hibiscus</i> sp).</p> <p>Animals/fauna: Mammals; identified 5 mammals species such as <i>Babi Hutan</i> (<i>Sus verucosus</i>), <i>Beruk</i> (<i>Macaca nemestrina</i>), <i>Monyet Ekor Panjang</i> (<i>Macaca fascicularis</i>). From the identified list, there was no mammals status under CR (based on IUCN Redlist), or CITES Appendix I. However, one species protected under "Peraturan Pemerintah No. 7 tahun 1999" which is <i>Musang</i> (<i>Paradoxurus hermaphroditus</i>).</p> <p>Reptils and amphibia: Identified 6 species such as <i>Ular Cobra</i> (<i>Naja sputatrix</i>), <i>Ular Jali</i> (<i>Ptyas korros</i>), <i>Biawak</i> (<i>Varanus salvator</i>). From the identified list, there was reptile or amphibia with status under CR (based on IUCN Redlist), or CITES Appendix I or protected under "Peraturan Pemerintah No. 7 tahun 1999".</p> <p>Bird/Aves: identified 17 species such as <i>Perkutut</i> (<i>Geopelia striata</i>), <i>Bubut</i> (<i>Centropus bengalensis</i>), <i>Cucuk Urang</i> (<i>Halcyon cyanoventris</i>), <i>Bangau Putih</i> (<i>Bubulcus ibis</i>), <i>Ayam hutan</i> (<i>Gallus gallus</i>), <i>Kepodang</i> (<i>Oriolus chinensis</i>). From the identified list, there was no bird with status under CR (based on IUCN Redlist). 1 species with status Vu under CITES</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>Appendix I. And one species with status protected under "Peraturan Pemerintah No. 7 tahun 1999": <i>Cucuk Urang</i> (<i>Halcyon cyanoventris</i>).</p> <p>In Tolan Estate, company has prepared a program for the management of HCV, such as:</p> <ul style="list-style-type: none"> a. HCV monitoring including wildlife monitoring (recorded on "Checklist HCV dan Form Pemantauan Satwa") b. HCV information dissemination. c. Maintain local tree species for HCV area. <p>Tolan Estate has realized the program Monitoring of flora and fauna carried out every month and the results are set in "HCV monitoring checklist" no Doc: ENS/DOC.08. revision 03, 2011. Based on the results of monitoring in 2017 described species of flora and fauna are protected.</p> <p>Based on field inspection to block D19, E18 (HCV 6) shows that company consistent to maintain signboard of HCV identification. No sign of tree standing damage, animal trap in the area.</p>	
<p>5.2.3</p> <p>Program(s) to socialize the status of protected, rare, threatened or endangered (RTE) to all workers shall be available, including records of appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance –</p>	<p>Based on field verification shows that the types of protected animals have been socialized through the installation of leaflets at the estate office, installation of signboard at the site of HCV and dissemination directly to the employee during the "Apel Pagi".</p> <p>Based on interviews with workers and with the surrounding villages stated that the company had socialized HCV management, protection of wildlife species, a ban on hunting, poison fish, cut trees, etc. in the area of PT. Tolan Tiga Indonesia.</p> <p>Implementation:</p> <p>Tolan Estate communicates the presence of HCV to their stakeholders on October 2018. "Sosialisasi Pengelolaan Kawasan Bernilai Konservasi Tinggi di Tolan Estate", to Meranti village on 22 October 2018 whereby attended by 34 farmers, housewives, paramedic.</p> <p>"Sosialisasi Pengelolaan Kawasan Bernilai Konservasi Tinggi di Tolan Estate", to Perkebunan Perlambian village on 26 October 2018 whereby attended by 26 farmers, students, blue collar, housewives, paramedic.</p> <p>PT. Tolan Tiga Indonesia communicated the status and condition of HCV/conservation area period 2018 to stakeholder, such as "Badan Konservasi Sumber Daya Alam Provinsi Sumatera Utara" through letter No.002/II/TLE/2019, dated 7 February 2019.</p>	<p>Comply</p>
<p>5.2.4</p> <p>Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of</p>	<p>As outlined in the indicator 5.2.3 which states that the company has drafted a management plan and monitoring of HCV in which the results are available in the "Report on the Implementation and Monitoring of HCV" and evaluated in the Report of the RKL-RPL annually.</p> <p>Management of HCV have also been included in the plan and the operational implementation of replanting</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance	
<p>monitoring are to be used to follow-up on the improvement of the management plan. - Minor compliance –</p>	<p>in PT. Tolan Tiga Indonesia. Tolan Estate have monitored the status and condition of HCV. "Checklist Pemantauan Area NKT periode July 2018" indicated on 31 July 2018 - Mr. Shuaimi, HCV cadet monitor the condition of HCV 4.1 river buffer zone along block 03C36; HCV 6 cemetery in block 03C33 and 94E10; HCV 4.1 Kwangheng lake in block 00C30-00C29; HCV 1.1 protected forest in block 98D19 – 98D20. The condition HCV status signboards - OK; buffer boundary (red paint on palm) – OK; no sign of encroachment, no burning, no <i>Mucuna</i> creeper, no hunting. Flora sighted: Mahogany (<i>Swietenia macrophylla</i>), pohon Lamtoro/white leadtree (<i>Leucaena leucocephala</i>), pohon Beringin/weeping fig (<i>Ficus benjamina</i>), pohon Saga/red lucky seed (<i>Adenanthera pavonina</i>), pohon Jati/teak (<i>Tectona grandis</i>), pohon Sungkai (<i>Peronema canescens</i>). Fauna sighted: burung seriti/Glossy swiflet (<i>Collocalia esculenta</i>), burung kepodang/Black-naped oriole (<i>Oriolus chinensis</i>), burung kacer/Oriental magpie robin (<i>Copsychus saularis</i>), burung perkutut/Zebra dove (<i>Geopelia striata</i>), tupai/Pygmy treeshrew (<i>Tupaia minor</i>), biawak (<i>Varanus salvator</i>).</p> <p>"Checklist Pemantauan Area NKT periode February 2019" - Mr. Suhaimi, HCV cadet monitor the condition of HCV 4.1 river buffer zone along block 03C36; HCV 6 cemetery in block 03C33 and 94E10; HCV 4.1 Kwangheng lake in block 00C30-00C29; HCV 1.1 protected forest in block 98D19 – 98D20. The condition HCV status signboards - OK; buffer boundary (red paint on palm) – OK; no sign of encroachment, no burning, no <i>Mucuna</i> creeper, no hunting. Flora sighted: Mahogany (<i>Swietenia macrophylla</i>), pohon Lamtoro/white leadtree (<i>Leucaena leucocephala</i>), pohon Beringin/weeping fig (<i>Ficus benjamina</i>), pohon Saga/red lucky seed (<i>Adenanthera pavonina</i>), pohon Jati/teak (<i>Tectona grandis</i>), pohon Sungkai (<i>Peronema canescens</i>). Fauna sighted: burung seriti/Glossy swiflet (<i>Collocalia esculenta</i>), burung balam/Spotted dove (<i>Streptopelia chinensis</i>), burung kacer/Oriental magpie robin (<i>Copsychus saularis</i>), burung perkutut/Zebra dove (<i>Geopelia striata</i>), tupai/Pygmy treeshrew (<i>Tupaia minor</i>), biawak (<i>Varanus salvator</i>).</p> <p>The cadet, Suhaimi participated in training "Pendidikan Kader Konservasi Tingkat Pemula di SIPEF Training Center" and certified "Sertifikat Kader Konservasi Alam No.695/2/BBKSDA/PI/IX/2009" dated 11 September 2009.</p>		
5.2.5	<p>Where HCV areas overlapped with an identified local community's land, there shall be evidence of a negotiated agreement that optimally safeguard their HCVs and the local</p>	<p>Based on the verification of legal documents, identification of HCV as well as the area of the statement indicates that the entire HCV area HCV was under company concession. Based on the results of public consultation with relevant agencies as well as the surrounding rural</p>	Comply

Criterion / Indicator	Assessment Findings	Compliance	
community's rights. - Minor compliance –	communities, stating that the HCV area under control of PT. Tolan Tiga Indonesia.		
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			
5.3.1	A documented identified source of all waste and pollution, shall be available. - Major compliance -	PT. Tolan Tiga Indonesia has maintained a document of identification source of all waste and pollution as in "Rencana Pengelolaan Limbah PT. Tolan Tiga Indonesia", last review on January 2019, such as: – "Limbah padat dan limbah tajam poliklinik" – solid waste and sharp waste from clinic; – "Limbah cair rumah tangga" - black water and grey water from domestic disposal; – "Limbah padat rumah tangga" - organic and anorganic waste from domestic disposal; – "Limbah bahan berbahaya beracun" – hazardous waste from power generator and vehicle such as waste lubricants, old battery and waste oil filter; – "Kemasan bekas bahan kimia ukuran kecil dan kemasan jerigen bekas bahan kimia" – empty chemical container/jerry can; – "Karung bekas pupuk" – empty fertilizer inner bag; – "Wadah toner photocopy, cartridge printer" – photocopy machine toner and printer cartridges.	Comply
5.3.2	There shall be evidence that all chemicals and their empty containers are disposed of responsibly. - Major compliance -	All chemical and hazardous waste from Perlavian POM and Perlavian Estate are stored in temporary hazardous waste storage in Perlavian Estate and the chemical and hazardous water from Tolan Estate is stored in temporary hazardous waste storage. The storage permit, such as: – "Keputusan Kepala Badan Pelayanan Perizinan Terpadu dan Penanaman Modal Kabupaten Labuhanbatu Selatan No.503/318/BPPTPM-LS/P.I/2015 tentang Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT. Tolan Tiga Indonesia Kebun Tolan" dated 22 June 2015 and valid for 5 years. Location in Tolan Estate. – "Keputusan Kepala Badan Pelayanan Perizinan Terpadu dan Penanaman Modal Kabupaten Labuhanbatu Selatan No.503/319/BPPTPM-LS/P.I/2015 tentang Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT. Tolan Tiga Indonesia Kebun/PKS Perlavian" dated 22 June 2015 and valid for 5 years. Location in Pelabian Estate. – "Surat Perjanjian Kerjasama No 232/TTI-ABS/SPK-LB3/III/2018" on agrrement of handing on hazardous waste, dated 7 March 2018. Third party licensed waste collector (PT. Amindy Barokah) have valid permit "Surat Keputusan Menteri Kehutanan dan Lingkungan Hidup No.SK.353.Menlhk.Setjen/2015 tentang Izin Pengelolaan Limbah Bahan Berbahaya dan Beracun untuk Kegiatan Pengumpulan Limbah B3", dated 31 August 2015 valid until 5 years.	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>Third party licensed waste collector's (PT. Amindy Barokah) permit to collect waste in Sumatera Utara Province based on "Surat Keputusan Gubernur Sumatera Utara No. 188.44/452/KPTS/2014 tentang Izin Pengumpul Limbah Bahan Berbahaya dan Beracun", dated 19 June 2014 valid until 5 years.</p> <p>Based on visit in Temporary Hazardous Waste Storage in Perlabian Estate there was provided with consideration of safety and environmental aspects such as second containment, spill-kit, warning signs, PPE, firefighting, alarm and first-aid kit. Review of records showed all hazardous waste has been identified and properly monitored, such as used oil, used oil filter, used batteries, empty chemical container from Perlabian Estate and Mill activities, contaminated materials, etc. Monitoring was recorded in document "Neraca Limbah B3".</p>	
<p>5.3.3</p> <p>A documented waste management plan to avoid or reduce pollution and its implementation shall be available.</p> <p>- Minor compliance –</p>	<p>PT. Tolan Tiga Indonesia has shown the the record of disposal of hazardous waste to third party licensed waste collector (PT. Amindy Barokah) on 3 months base. The Manifest documents and receipts were available and properly recorded,</p> <p>Data verified:</p> <ul style="list-style-type: none"> - Handover minutes "Berita Acara Serah Terima Limbah Bahan Berbahaya dan Beracun PT. Tolan Tiga Indonesia kepada PT Amindy Barokah" dated 7 January 2019, consist of oils used (1,729 liters), battery used (118 liters), fuel filter used (483 kg), breaker used (80 kg), catridge used (10 kg), empty chemical container (35 kg), medical waste (4.5 kg) and laboratorium wastes (4 Kg). - Hazardous waste manifest Nomor AVT 0008297, item: oil used (1.729 liters), vehicle number: BK9552 MN to PT. Amindy Barokah Medan dated 7 January 2019. - Hazardous waste manifest Nomor AVT 0008298, item: accu used (118 kg), vehicle number: BK9552 MN to PT. Amindy Barokah Medan dated 7 January 2019. - Hazardous waste manifest Nomor AVT 0008299, item: oil filter used (483 kg), vehicle number: BK9552 MN to PT. Amindy Barokah Medan dated 7 January 2019. - Laporan Pengelolaan Limbah Bahan Berbahaya dan Beracun (Three months bases) was sent to Environment Agency (DLH) in Labuhanbaru Selatan Regency for period October – December 2018, report number No.G/01/PLE/2019 dated 10 January 2019. 	<p>Comply</p>
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		
<p>5.4.1</p>	<p>A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy shall be in place and monitored.</p>	<p>The Perlabian POM has demonstrated the record on improving efficiency of the use of fossil fuels and to optimize renewable energy, e.g:</p> <p>Comply</p>

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Criterion / Indicator	Assessment Findings				Compliance																																																	
- Minor compliance –	Month (2018)	HSD fuel use genset (liter)	FFB production (ton)	HSD oil (liter) / FFB (ton)																																																		
	Jan	24,949	19,141	1.3																																																		
	Feb	17,300	15,130	1.14																																																		
	Mar	17,915	16,748	1.07																																																		
	Apr	8,820	16,520	0.53																																																		
	May	12,670	17,731	0.71																																																		
	Jun	13,590	12,621	1.08																																																		
	Jul	31,885	22,166	1.44																																																		
	Aug	47,830	19,127	2.5																																																		
	Sep	23,800	19,727	1.21																																																		
	Oct	29,575	22,311	1.33																																																		
	Nov	23,045	15,954	1.44																																																		
	Dec	23,075	16,408	1.41																																																		
	Total	274,454	213,591	1.28																																																		
	In Perlavian Estate, the records of use of fossil fuel are maintained by estate management. The HSD fuel used mainly for dump trucks, tractors, school bus, road grader, JCB:																																																					
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Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.																																																																				
5.5.1	Records of land clearing with zero burning shall be available, referring to the ASEAN Policy on Zero Burning (2003) or other recognised techniques based on the existing regulations. - Major compliance -	<p>No open burning was noted during field visit and interviewed with local communities and workers. "Prosedur Pencegahan dan Pengendalian Kebakaran Lahan" No.ENC/SOP/10 dated 1 February 2014 for prevention and control of fire. PT. Tolan Tiga Indonesia was using fire danger rating; risk categorized through a number of factorial: by number of rainy day, rain fall intensity, and/or occurrence of fire at boundary.</p> <p>A system is in place to monitor fire risk in plantation. The fire risk monitoring is based on rainfall measurement and number of raining day; the result recorded under "Status Resiko kebakaran" and exposed on fire risk notice board. Fire patrol carried out on regular basis.</p> <p>Data seen: Patrol report "Laporan Patroli Ranger" in 2018 and January-February 2019, there were shown no fire reported.</p>	Comply																																																																	
5.5.2	Where fire has been used for eradication of pest during replanting, the records of the analysis of the use of fire and permit from the authorised agency shall be available. - Minor compliance -	No open burning was noted for replanting. Contractor was using mechanical method.	Comply																																																																	
Criterion 5.6:																																																																				
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.																																																																				
5.6.1	Document(s) assessing pollution and	The company has developed pollution and emission reduction plan. The plan covers planning,	Comply																																																																	

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<p>emission sources, including gaseous, particles, soot emissions and effluent, shall be available. (see Criterion 4.4) - Major compliance -</p>	<p>implementing plans and monitoring activities generating pollution and emission. PT. Tolan Tiga Indonesia’s plantation are located on 100% mineral soil. POME application/Land application permitted for plantation in mineral soil. Identification of pollution and emission sources recorded under Environmental Aspect & Impact List (Daftar Aspek & Pengaruh Lingkungan). The identification listed all relevant activities that generate pollution and emission from office, plantations, palm oil mill, mill effluent treatment up to workers activities. Test by “Balai Keselamatan dan Kesehatan Kerja Medan”. In Perlabian POM, the emission test for Genset No.1 and No.2:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Parameter</th> <th>Limit</th> <th>Result Genset #1</th> <th>Result Genset #3</th> </tr> </thead> <tbody> <tr> <td>NO₂</td> <td>1000 mg/Nm³</td> <td>118.60 mg/Nm³</td> <td>106.54 mg/Nm³</td> </tr> <tr> <td>SO₂</td> <td>800 mg/Nm³</td> <td>4.81 mg/Nm³</td> <td>4.15 mg/Nm³</td> </tr> <tr> <td>CO</td> <td>600 mg/Nm³</td> <td>56.92 mg/Nm³</td> <td>43.21 mg/Nm³</td> </tr> <tr> <td>Particulate</td> <td>150 mg/Nm³</td> <td>58.33 mg/Nm³</td> <td>58.00 mg/Nm³</td> </tr> </tbody> </table> <p>Sample tested against “Peraturan Menteri Negara Lingkungan Hidup No.13 tahun 2009”.</p> <p>Emission test for Boiler No.1 dan No.2 on 6 June 2018:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Parameter</th> <th>Limit</th> <th>Result Boiler #1</th> <th>Result Boiler #2</th> </tr> </thead> <tbody> <tr> <td>NO₂</td> <td>800 mg/Nm³</td> <td>38.51 mg/Nm³</td> <td>40.51 mg/Nm³</td> </tr> <tr> <td>SO₂</td> <td>600 mg/Nm³</td> <td>59.66 mg/Nm³</td> <td>61.03 mg/Nm³</td> </tr> <tr> <td>HCl</td> <td>5 mg/m³</td> <td>0.05 mg/Nm³</td> <td>0.05 mg/Nm³</td> </tr> <tr> <td>Cl₂</td> <td>5 mg/m³</td> <td>0.04 mg/Nm³</td> <td>0.05 mg/Nm³</td> </tr> <tr> <td>NH₃</td> <td>1 mg/Nm³</td> <td>0.29 mg/Nm³</td> <td>0.30 mg/Nm³</td> </tr> <tr> <td>HF</td> <td>8 mg/m³</td> <td>0.006 mg/Nm³</td> <td>0.0071 mg/Nm³</td> </tr> <tr> <td>Opacity</td> <td>30 %</td> <td>11.6 %</td> <td>13.60 %</td> </tr> <tr> <td>Particulate</td> <td>300 mg/Nm³</td> <td>100.02 mg/Nm³</td> <td>100.54 mg/Nm³</td> </tr> </tbody> </table> <p>Sample tested against regulation “Peraturan Menteri Negara Lingkungan Hidup No.7 tahun 2007”.</p> <p>Ambient air analysis dated 6 June 2018:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Parameter</th> <th>Limit</th> <th>Front of boiler</th> <th>Worker housing</th> </tr> </thead> <tbody> <tr> <td>NO₂</td> <td>150 µg/Nm³</td> <td>2.88 µg/Nm³</td> <td>115.39 µg/Nm³</td> </tr> <tr> <td>SO₂</td> <td>365 µg/Nm³</td> <td>0.02 µg/Nm³</td> <td>17.25 µg/Nm³</td> </tr> <tr> <td>CO</td> <td>10,000 µg/Nm³</td> <td>2.466 µg/Nm³</td> <td>2335.93 µg/Nm³</td> </tr> <tr> <td>HC</td> <td>160 µg/Nm³</td> <td>0.02 µg/Nm³</td> <td>54.22 µg/Nm³</td> </tr> <tr> <td>PM</td> <td>65 µg/Nm³</td> <td>- µg/Nm³</td> <td>52.18 µg/Nm³</td> </tr> <tr> <td>Pb</td> <td>2 µg/Nm³</td> <td>TTD µg/Nm³</td> <td>0.0008 µg/Nm³</td> </tr> </tbody> </table> <p>Sample tested against regulation “Peraturan Menteri Tenaga Kerja dan Transmigrasi No.41 tahun 1999”.</p> <p>Noise level measurement 6 June 2018:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Location</th> <th>Noise level (dB)</th> </tr> </thead> <tbody> <tr> <td>Power house</td> <td>90.2 dBA</td> </tr> <tr> <td>Pressing station</td> <td>88.8 dBA</td> </tr> </tbody> </table> <p>Sample tested against regulation “Peraturan Menteri Tenaga Kerja dan Transmigrasi No.13 tahun 2011”.</p> <p>Odor analysis 6 June 2018</p>	Parameter	Limit	Result Genset #1	Result Genset #3	NO ₂	1000 mg/Nm ³	118.60 mg/Nm ³	106.54 mg/Nm ³	SO ₂	800 mg/Nm ³	4.81 mg/Nm ³	4.15 mg/Nm ³	CO	600 mg/Nm ³	56.92 mg/Nm ³	43.21 mg/Nm ³	Particulate	150 mg/Nm ³	58.33 mg/Nm ³	58.00 mg/Nm ³	Parameter	Limit	Result Boiler #1	Result Boiler #2	NO ₂	800 mg/Nm ³	38.51 mg/Nm ³	40.51 mg/Nm ³	SO ₂	600 mg/Nm ³	59.66 mg/Nm ³	61.03 mg/Nm ³	HCl	5 mg/m ³	0.05 mg/Nm ³	0.05 mg/Nm ³	Cl ₂	5 mg/m ³	0.04 mg/Nm ³	0.05 mg/Nm ³	NH ₃	1 mg/Nm ³	0.29 mg/Nm ³	0.30 mg/Nm ³	HF	8 mg/m ³	0.006 mg/Nm ³	0.0071 mg/Nm ³	Opacity	30 %	11.6 %	13.60 %	Particulate	300 mg/Nm ³	100.02 mg/Nm ³	100.54 mg/Nm ³	Parameter	Limit	Front of boiler	Worker housing	NO ₂	150 µg/Nm ³	2.88 µg/Nm ³	115.39 µg/Nm ³	SO ₂	365 µg/Nm ³	0.02 µg/Nm ³	17.25 µg/Nm ³	CO	10,000 µg/Nm ³	2.466 µg/Nm ³	2335.93 µg/Nm ³	HC	160 µg/Nm ³	0.02 µg/Nm ³	54.22 µg/Nm ³	PM	65 µg/Nm ³	- µg/Nm ³	52.18 µg/Nm ³	Pb	2 µg/Nm ³	TTD µg/Nm ³	0.0008 µg/Nm ³	Location	Noise level (dB)	Power house	90.2 dBA	Pressing station	88.8 dBA	
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<p>5.6.2 Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plan to reduce or minimize them implemented. - Major compliance -</p>	<p>In Perlavian Estate, management have prepared identification and management plan for estate/plantation:</p> <table border="1" data-bbox="719 566 1297 2027"> <thead> <tr> <th>Activity</th> <th>Program</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td colspan="3"><u>Reduce use of herbicide and pesticide</u></td> </tr> <tr> <td>No application of herbicide in riparian area</td> <td>To implement in all block</td> <td>Implemented. No herbicide spraying on riparian.</td> </tr> <tr> <td>Planting beneficial plant such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptosus</i></td> <td>To implement in all replanting with oil palm area.</td> <td></td> </tr> <tr> <td>Spraying tool calibration.</td> <td>Calibration on monthly basis</td> <td></td> </tr> <tr> <td>Conduct spraying on area with weed growth over 45%.</td> <td>To implement in all block</td> <td></td> </tr> <tr> <td>Reduce use of <i>paraquat</i></td> <td>No use of <i>paraquat</i></td> <td></td> </tr> <tr> <td colspan="3"><u>Reduce fossil fuel use</u></td> </tr> <tr> <td>Conduct vehicle and generator set inspection</td> <td>To reduce excessive emission</td> <td></td> </tr> <tr> <td>Transportation arrangement</td> <td>To reduce fossil fuel use</td> <td></td> </tr> <tr> <td>Road maintenance</td> <td>Implement road maintenance plan</td> <td></td> </tr> <tr> <td colspan="3"><u>Efficiency in use of fertilizer</u></td> </tr> <tr> <td>Conduct fertilizer application as per recommendation</td> <td>To implement in all block</td> <td></td> </tr> <tr> <td>Planting <i>Mucuna</i></td> <td></td> <td></td> </tr> <tr> <td>Prohibit fertilizer application on river buffer zone/water body</td> <td>Prevent leaching. Maintain water quality.</td> <td></td> </tr> <tr> <td colspan="3"><u>Planting trees</u></td> </tr> <tr> <td>Planting trees around housing</td> <td>To control microclimate</td> <td></td> </tr> <tr> <td>Planting trees around HCV area and river buffer zone</td> <td>Enrichment</td> <td>Upkeep 36 trees in area near office and worker house</td> </tr> <tr> <td colspan="3"><u>Recycle and reuse empty chemical container</u></td> </tr> <tr> <td>Hazardous waste collected and disposed off responsibly</td> <td>Controlled disposal of hazardous waste</td> <td></td> </tr> <tr> <td>Handing over hazardous waste to licensed contractor</td> <td>Every three months</td> <td></td> </tr> </tbody> </table>	Activity	Program	Remarks	<u>Reduce use of herbicide and pesticide</u>			No application of herbicide in riparian area	To implement in all block	Implemented. No herbicide spraying on riparian.	Planting beneficial plant such as <i>Turnera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptosus</i>	To implement in all replanting with oil palm area.		Spraying tool calibration.	Calibration on monthly basis		Conduct spraying on area with weed growth over 45%.	To implement in all block		Reduce use of <i>paraquat</i>	No use of <i>paraquat</i>		<u>Reduce fossil fuel use</u>			Conduct vehicle and generator set inspection	To reduce excessive emission		Transportation arrangement	To reduce fossil fuel use		Road maintenance	Implement road maintenance plan		<u>Efficiency in use of fertilizer</u>			Conduct fertilizer application as per recommendation	To implement in all block		Planting <i>Mucuna</i>			Prohibit fertilizer application on river buffer zone/water body	Prevent leaching. Maintain water quality.		<u>Planting trees</u>			Planting trees around housing	To control microclimate		Planting trees around HCV area and river buffer zone	Enrichment	Upkeep 36 trees in area near office and worker house	<u>Recycle and reuse empty chemical container</u>			Hazardous waste collected and disposed off responsibly	Controlled disposal of hazardous waste		Handing over hazardous waste to licensed contractor	Every three months		<p>Comply</p>
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	<p>Minimizing the emission from POME (methane gas), Perlabian POM implemented a methane capture installation. The record of methane gas flow recorded on monthly basis;</p> <table border="1" data-bbox="715 533 1043 913"> <thead> <tr> <th>Year 2018</th> <th>Gas flow (m³)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>368,698</td></tr> <tr><td>Feb</td><td>252,526</td></tr> <tr><td>Mar</td><td>353,871</td></tr> <tr><td>Apr</td><td>337,665</td></tr> <tr><td>May</td><td>347,790</td></tr> <tr><td>Jun</td><td>301,136</td></tr> <tr><td>Jul</td><td>484,293</td></tr> <tr><td>Aug</td><td>542,727</td></tr> <tr><td>Sep</td><td>554,800</td></tr> <tr><td>Oct</td><td>424,254</td></tr> <tr><td>Nov</td><td>168,637</td></tr> <tr><td>Dec</td><td>5,254</td></tr> <tr><td></td><td>4,141,650</td></tr> </tbody> </table>	Year 2018	Gas flow (m ³)	Jan	368,698	Feb	252,526	Mar	353,871	Apr	337,665	May	347,790	Jun	301,136	Jul	484,293	Aug	542,727	Sep	554,800	Oct	424,254	Nov	168,637	Dec	5,254		4,141,650	
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<p>5.6.3 A monitoring plan and results of regular reporting on emission and pollutants from estate and mill operations using appropriate methods, shall be available. - Minor compliance –</p>	<p>Perlabian POM, Perlabian Estate, Tolan Estate: monitoring through calculation of GHG has been demonstrated. The data input submitted for calculation in palmGHG ver.3.0 has been verified and found to be in line with data produced on the field (Perlabian POM, Perlabian Estate and Tolan Estate). Result of GHG calculation is attached as part of public summary report <i>Appendix C – PalmGHG Calculation</i>.</p> <p>Action plan for boiler repair: “Berita Acara Perbaikan Transmitter untuk Control Water Level Boiler SFMW 35T/hour-SH-VG PT. Tolan Tiga Indonesia”, dated 19 December 2018. Repair carried out by PT. Atmino Tbk.</p> <p>Action plan for power generator service: “Berita Acara Serah Terima Pekerjaan Perbaikan Genset Engine Model 3412 (500 KVA), S/No.81214889; note: recommendation for overhaul” dated 13 December 2018.</p>	<p>Comply</p>																												
<p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers</p>																														
<p>Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>																														
<p>6.1.1 A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -</p>	<p>PT. Tolan Tiga Indonesia has the environmental document, as per “Dokumen Revisi Pengelolaan Lingkungan (RKL) for plantation area 8,479.06 Ha and POM with a capacity of 60 tons FFB/hour, in accordance with “Surat Persetujuan Kepala Badan Pengendalian Dampak Lingkungan Daerah No. 660/326/BPDLLB/Set/2006” dated 21 July 2006.</p> <p>The company also has conducted social impact assessment was conducted by “YASBI” in 2010. The process of preparing social impact assessment in March 2010 has actively involving stakeholders through guided interview, questionnaires and focus</p>	<p>Comply</p>																												

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<p>6.1.2</p> <p>There shall be evidence that the assessment has been conducted with the participation of affected parties. - Major compliance -</p>	<p>group discussion.</p> <p>Based on document verification, social impact assessment done by Yayasan Kelapa Sawit Berkelanjutan Indonesia (YASBI) – demonstrates participation of communities through interview, focus group discussion and questionnaires and filling the questionnaire, it was also confirmed from the results of interviews with the surrounding villages, which states that the village government involved in data collection for social studies in 2010.</p> <p>In each year the Company also conducts social data collection as part of the monitoring of social impacts.</p>	<p>Comply</p>
<p>6.1.3</p> <p>Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties, shall be available, documented and timetabled, including responsibilities for implementation. - Major compliance -</p>	<p>PT. Tolan Tiga Indonesia has established Impact Management and Monitoring Plan as outlined in the Matrix of Environmental Management and Monitoring EIA documents. The period for implementation of the management and monitoring including social impacts regulated in detail in the matrix. The evaluation and reporting period is done every six months, while for social impacts, monitoring and evaluation carried out annually</p> <p>Within the AMDAL and SIA document, the negative and positive impact of oil palm development has been explained. The environmental management and monitoring plan document has lined out effort that company should carry out in order to minimize negative impact and promote positive impact from oil palm development.</p> <p>The Social Impact Assessment document has explained the recommendation that should be done by company to minimize negative impact and promote positive impact from social impact management. Audit team also note, there was no recommendation for revision, since no significant activity, additional land clearing took place.</p>	<p>Comply</p>
<p>6.1.4</p> <p>The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties. - Minor compliance -</p>	<p>Review of document of plan for management and monitoring of social impact has shown under "Laporan Pelaksanaan Penilaian Aspek Dampak Sosial", latest edition in year 2018.</p> <p>Based on questionnaire with surrounding communities, on March – April 2018, summarized:</p> <ul style="list-style-type: none"> - Company have given work opportunity for surrounding communities. Based on review and verification, the spread of workforce demographic 2018 shows the general proportion of workforce absorption from local/surrounding village in Tolan Estate (188 workers – 55%), Perlabian Estate (410 workers and Perlabian POM (65 workers – 66%) - 85% of respondents says the presence of PT. Tolan Tiga Indonesia brought positive impact to the communities. - 100% of respondents says the environmental impact from company operation was little; - 12% respondents says there is a potency for 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance	
	<p>conflict as a result from company policy to prohibit cattle to enter plantation. It is also known there was a collective agreement to minimize conflict potency from the company's policy.</p> <p>Data verified: Form Interview with local community for social aspect, namely Mr Welly Elfian (address: Air Merah Village, date of interview 12 April 2018), Mr Suratin Subur (address: Air Merah Village, date of interview 12 April 2018), Mr Ade Andriansari (address: Perlabian Village, date of interview 12 April 2018), Mr Kisman (address: Tolan Village, date of interview 12 April 2018),</p>		
<p>6.1.5</p>	<p>Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance –</p>	<p>PT. Tolan Tiga does not have smallholder scheme.</p> <p>Not Applicable N/A</p>	
<p>Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.</p>			
<p>6.2.1</p>	<p>Communication and consultation procedures shall be documented. - Major compliance -</p>	<p>Communication and consultation with stakeholder is regulated under:</p> <ul style="list-style-type: none"> - Procedure for receiving and providing response upon information request "Prosedur Pemberian dan Tanggapan terhadap Permintaan Informasi" Dok.No.ENC/SOP/08 dated 6 April 2015. In the procedure regulates mechanism for providing and responding to information request, from stakeholder. - Procedure for internal complaint and grievance "Prosedur Keluh Kesah dengan Pihak Internal" Dok.No.SOP/025/Dept dated 27 March 2015. The procedure explains steps to convey complaint and receive complaint from internal party, as well providing appropriate response. The document complemented with flow chart. <p>Procedure for external complaint and grievance "Prosedur Keluh Kesah dengan Pihak Eksternal" Dok.No.SOP/026/HRA, dated 27 March 2015. The procedure explains steps to convey complaint and receive complaint from internal party, as well providing appropriate response. The document complemented with flow chart.</p>	<p>Comply</p>
<p>6.2.2</p>	<p>The company shall have official(s) who is responsible for consultation and communications with parties. - Minor compliance -</p>	<p>Perlabian Estate appoints Estate Manager for consultation and communicates with stakeholders. This is available under "Estate Job Description" for Estate Manager, section Tugas Pokok "5. Membina hubungan baik dengan serikat pekerja dengan karyawan; 6. Membina hubungan dengan masyarakat dan pemerintahan; 7. Melakukan konsultasi dan komunikasi dengan masyarakat" – to carried out 5. Nurture good relationship with worker union and employees; 6. Nurture good relationship with communities and government agencies; 7. Conduct</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>6.2.3</p> <p>The company shall have a list of stakeholders, records of communications, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders.</p> <p>- Minor compliance -</p>	<p>consultation and communication with communities.</p> <p>PT. Tolan Tiga Indonesia was able to show list of stakeholders, latest update on 20 February 2019, e.g:</p> <ul style="list-style-type: none"> - Authorities of Labuhanbatu Selatan regency comprise of 7 offices: Regent office, Manpower office, Land office, Plantation services, Environmental Monitoring Body, Regent Secretary. Sampled: Sekretaris Daerah: Zulkifli, SIP; address: Jl. Prof. H. Yamin SH, Kota Pinang; - District level authorities: District head, police office, military office. Sampled: Camat: Ismail Sawito Harahap; address: Tanjung Medan; - Surrounding villages, comprise of eight (8) villages for example: Desa Kebun Perlabian, Desa Tolan, Desa Perlabian, Desa Persiapan Lohsari, Desa Tanjung Selamat, Desa Tanjung Medan, Desa Persiapan Suka Jadi, Desa Air Merah, Desa Tolan Pekan and Desa Gunung Selamat; - NGO/Pers; - Worker union of Serikat Pekerja Tolan Tiga Mandiri covering 5 committees; - Contractors, consist 1 contractor; <p>List of stakeholder Tolan Estate, latest update on 28 February 2019, e.g:</p> <ul style="list-style-type: none"> - Authorities of Labuhanbatu Selatan regency comprise of 7 offices: Regent office, Manpower office, Land office, Plantation services, Environmental Monitoring Body; - District level authorities: District head, police office, military office. Sampled: Camat Kampung Rakyat: Wahdi Pohan; address: Tanjung Medan; - Surrounding villages, comprise of 8 parties for example: Desa Pekan Tolan, Desa Perlabian, Desa Meranti, Desa Sidoarjo, - NGO; - Worker union of Serikat Pekerja Tolan Tiga Mandiri; - Contractors, consist 1 contractor; - Hospital; <p>Record of communication between company and stakeholder are available.</p>	<p>Comply</p>
<p>Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.</p>		
<p>6.3.1</p> <p>The mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested, as long as that information is supported with adequate initial evidence.</p> <p>- Major compliance -</p>	<p>PT. Tolan Tiga Indonesia have a mechanism to resolve dispute, which consist of: Land dispute referring to land conflict resolution "Prosedur Ganti Rugi Lahan No.SOP/CA/02" dated 1 July 2012. The procedure demonstrates that company has provides effective land conflict resolution:</p> <ul style="list-style-type: none"> - Company communicating the permit/HGU to community. - Should there be claim from community, company will receive the claim if complemented with 	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>evidence of land ownership.</p> <ul style="list-style-type: none"> - Status verification of the said land, with involvement of company personnel, claimant/community and government representative. - Field visit and measurement to the claimed land. Minutes of land measurement then produced, with information on hectarage and coordinate points of claimed land, signed by all parties. - Final verification based on measurement result and map, to ensure the land is clean and clear, no overlapping with other ownership/other right and no claim from other party. - Should the final verification demonstrated that the land has no overlapping with other ownership/other right and no claim from other party – company will negotiate the price and carried out the compensation. - Once price agreed, based on negotiation, company will pay the claimant/land owners. <p>Internal dispute/complaint resolution referring to "Mekanisme Keluh Kesah dengan Pihak Internal rev.II Doc.No.SOP/025/Dept" dated 27 March 2015.</p> <p>External dispute/complaint resolution referring to "Mekanisme Keluh Kesah dengan Pihak Eksternal rev.II Doc.No.SOP/026/HRA" dated 27 March 2015. Within these documents, company has indicated policy to protect anonymity of whistleblower, if requested.</p>	
<p>6.3.2</p> <p>There shall be records of process and outcome of dispute resolution.</p> <p>- Major compliance -</p>	<p>Based on document verification and/or stakeholder consultation with relevant authorities and surrounding villages, it was known that there was no land dispute between company and surrounding community. Internal and external complaint/dispute has been documented by company.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot appoint the exact location of disputed area.</p> <p>Document sighted:</p> <ul style="list-style-type: none"> - "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlavian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha. 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Minutes of mediation meeting “Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan”, dated 29 October 2018. Conclusion: “Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif” – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation. - Copy of State Court Decision for the same case in 2014, which resulted in have been sighted “Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankikje ver klaard). Dalam Rekompensi: Menolak Gugatan Rekompensi Penggugat untuk seluruhnya” dated 16 September 2014 – repudiate plaintiff claim. 	
<p>Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>		
<p>6.4.1</p>	<p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be available, referring to decision of the Constitution Court.</p> <p>- Major compliance –</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>dispute, "Surat Pernyataan Pengakuan Hak" – statement letter on right acknowledgement, "Surat Pernyataan Ahli Waris" – statement letter for heir/next of kin, "Surat Pernyataan Lahan Pemilik Tanah/Lahan untuk Plasma" – Statement letter landowner/land for scheme smallholder (if any), "Surat Pelepasan Hak Menggarap atas Tanah Garapan" – statement letter on release of arable land, "Surat Ganti Rugi Tanah Garapan" – compensation letter.</p> <p>Company demonstrated state court decision upon claim over land.</p>	
<p>6.4.2</p> <p>A procedure for calculating and distributing fair compensation shall be established, implemented, monitored and evaluated in a participatory way. Corrective actions are taken as a result of this evaluation.</p> <p>- Minor compliance –</p>	<p>As explained in criterion 2.2, PT. Tolan Tiga Indonesia has obtained the legal ownership of the land since long time ago. The legal ownership of the land granted by Republic of Indonesia through "Konversi Hak Barat/Erfpacht" right. Based on document review upon area statement PT. Tolan Tiga Indonesia shows no land under conflict status with other party.</p> <p>Up to ASA3_2, PT. Tolan Tiga Indonesia does not have new land clearing/expansion. However, company does have mechanism for land compensation, "Prosedur Ganti Rugi Lahan No.SOP/CA/02" dated 1 July 2012. The procedure comprise of compensation mechanism through communication, FPIC, document verification, evaluation upon land ownership document, participatory land measurement, price negotiation.</p> <p>The documentation for land compensation consist of measurement application document, minutes of land measurement, "Surat Keterangan Tanah", "Surat Keterangan Tidak Sengketa" – statement letter no dispute, "Surat Pernyataan Pengakuan Hak" – statement letter on right acknowledgement, "Surat Pernyataan Ahli Waris" – statement letter for heir/next of kin, "Surat Pernyataan Lahan Pemilik Tanah/Lahan untuk Plasma" – Statement letter landowner/land for scheme smallholder (if any), "Surat Pelepasan Hak Menggarap atas Tanah Garapan" – statement letter on release of arable land, "Surat Ganti Rugi Tanah Garapan" – compensation letter.</p> <p>Company demonstrates all claim over land being treated accordingly.</p>	<p>Comply</p>
<p>6.4.3</p> <p>Compensation claims, process and outcome of any negotiated agreements shall be documented, with evidence of the participation of affected parties.</p> <p>- Major compliance –</p>	<p>As explained in criterion 2.2, PT. Tolan Tiga Indonesia has obtained the legal ownership of the land since long time ago. The legal ownership of the land granted by Republic of Indonesia through "Konversi Hak Barat/Erfpacht" right. Based on document review upon area statement PT. Tolan Tiga Indonesia shows no land under conflict status with other party.</p> <p>Up to ASA3_2, PT. Tolan Tiga Indonesia does not have new land clearing/expansion. However, company does have mechanism for land compensation, "Prosedur Ganti Rugi Lahan No.SOP/CA/02" dated 1 July 2012. The procedure comprise of compensation mechanism through</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>communication, FPIC, document verification, evaluation upon land ownership document, participatory land measurement, price negotiation.</p> <p>The documentation for land compensation consist of measurement application document, minutes of land measurement, "Surat Keterangan Tanah", "Surat Keterangan Tidak Sengketa" – statement letter no dispute, "Surat Pernyataan Pengakuan Hak" – statement letter on right acknowledgement, "Surat Pernyataan Ahli Waris" – statement letter for heir/next of kin, "Surat Pernyataan Lahan Pemilik Tanah/Lahan untuk Plasma" – Statement letter landowner/land for scheme smallholder (if any), "Surat Pelepasan Hak Menggarap atas Tanah Garapan" – statement letter on release of arable land, "Surat Ganti Rugi Tanah Garapan" – compensation letter.</p> <p>Company demonstrates all claim over land being treated accordingly. Company demonstrated state court decision upon claim over land.</p>	
<p>Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.</p>		
<p>6.5.1 Documentation of pay and conditions for employees based on the existing manpower regulations shall be available. - Major compliance -</p>	<p>Collective work agreement – "Perjanjian Kerja Bersama" has regulated the salary payment. As stated "Pekerja Harian Tetap dan Pekerja Bulanan Tetap diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama antara manajemen dengan SPTTM sesuai dengan undang-undang dan peraturan yang berlaku dengan mengingat situasi ekonomi dan kemampuan perusahaan" – daily worker and monthly worker paid in cash, based on common agreement determined between management and worker union, in accordance to relevant regulations, considering economic situation and company's ability.</p> <p>The minimum wage was based on "Keputusan Gubernur Sumatera Utara No. 188.44/1577/KPTS/2018 tentang Penetapan Upah Minimum Kabupaten Labuhanbatu Selatan Tahun 2019" dated 31 December 2018. The minimum wage Labuhanbatu Selatan year 2019 sets at Rp. 3,025,000 per month. Data verified: Payslip record month February 2019 e.g:</p> <ul style="list-style-type: none"> - Namely Mr C***** L M (register number: 04845), in detail: Basic salary: Rp. 2,572,000 Overtime: Rp. 1,119,695 Rice: Rp. 366,600 Total salary: Rp 4,358,605 - Namely Mr A***** A**** P**** (register number: 05108), in detail: Basic salary: Rp. 2,568,000 Overtime: Rp. 2,370,784 Rice: Rp. 296,100 Total salary: Rp. 5,490,097 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Namely Mr E** S***** (register number: 04808), in detail: Basic salary: Rp. 2,710,000 Overtime: Rp. 1,893,552 Rice: Rp. 366,552 Total salary: Rp. 5,344,308 	
<p>6.5.2</p>	<p>Collective Labor Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the workers.</p> <p>- Major compliance -</p>	<p>Comply</p>
<p>6.5.3</p>	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where such public facilities are unavailable or inaccessible.</p> <p>- Minor compliance -</p>	<p>Comply</p>
<p>6.5.4</p>	<p>There shall be demonstrable efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Comply</p>
<p>Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>		
<p>6.6.1</p>	<p>A record of the company's policy in</p>	<p>In Perlabian Estate, communication of policy in</p> <p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance	
	<p>understandable language recognising freedom of association, shall be available.</p> <p>- Major compliance –</p>	<p>recognising freedom of association to worker dated 28 August 2018. Communication to Division VI workers comprise of 48 harvesters, 3 mandors, 3 loose fruit collection mandor, 35 loose fruit collection, 4 helper dump truck, 4 FFB clerks, 2 SSI (security), 7 sprayers, 5 other workers (water supply, mudim, teacher).</p> <p>In Tolan Estate, communication of policy in recognising freedom of association to worker dated 19 February 2019. Communication to Division IV workers comprise of 29 harvesters, 2 harvest mandors, 2 loose fruit collection mandors, 30 loose fruit collection, 6 FFB transport truck, 2 FFB clerks.</p>	
<p>6.6.2</p> <p>Records of meetings with labor unions or workers representatives shall be available.</p> <p>- Minor compliance –</p>	<p>Meeting between management PT. Tolan Tiga Indonesia and Worker Union "Serikat Pekerja Tolan Tiga Mandiri (SPTTM)" in Medan, 26 February – 1 March 2019. The meeting resolution related to "Perjanjian Bersama" on merit increment/salary increment to comply with latest minimum wage regulation, 2019. The decision effective 1 January 2019 (difference will be compensated).</p> <p>Meeting management Perlabian Estate - PT. Tolan Tiga Indonesia and the worker union, dated 19 January 2019. The meeting attended by 3 management and 5 worker union representative. The meeting discussed: planning for the general assembly for cooperative "Koperasi Serba Usaha Tolan Tiga Mini Market OMI".</p> <p>Meeting management Tolan Estate - PT. Tolan Tiga Indonesia and the worker union, dated 7 December 2018. The meeting attended by 3 management and 10 worker union representative. The meeting discussed: temporary worker move back to free labour, to meet Indonesia regulation and will be promoted into permanent worker after contracted; overtime for water supply operator in Sri Pinang housing due to longer work hour in the well – approved; to reduce collective rate for OP1994, management responded the collective target reduced automatically in line with crop potential; "titi panen"/harvesting bridge in OP2012 have aged, management responded FHA and FA will compile the data and to repair in phases; Worker union committee asked for another 2 committee in order to absorb more aspiration from Division II and Division I; the worker union committee have been communicated and accepted by all employees. Minutes and attendance list – evident.</p> <p>Action plan/follow up: on 8 December 2018, management listed the requirement for "harvesting bridge" in block D28, F30, F33, E29, E28, E30, E32, E31: 3 meters bridge: 8 pieces, 4 meters bridge: 3 pieces, 6 meters bridge: 2 pieces.</p>	<p>Comply</p>	
<p>Criterion 6.7:</p>			

Criterion / Indicator	Assessment Findings	Compliance
Children are not employed or exploited.		
<p>6.7.1</p> <p>There shall be documented evidence that minimum age requirements are met.</p> <p>- Major compliance –</p>	<p>In Perlabian Estate, communication of policy in prohibit child worker dated 28 August 2018. Communication to Division VI workers comprise of 48 harvesters, 3 mandors, 3 loose fruit collection mandor, 35 loose fruit collection, 4 helper dump truck, 4 FFB clerks, 2 SSI (security), 7 sprayers, 5 other workers (water supply, mudim, teacher). Based on verification upon estate employee register, no worker under 18 years old.</p> <p>In Tolan Estate, communication of policy in prohibit child worker dated 20 March 2018. Communication to Division IV workers comprise of 31 harvesters, 2 mandors, 2 loose fruit collector supervisors, 2 harvest clerks. Based on verification upon estate employee register, no worker under 18 years old.</p>	<p>Comply</p>
<p>Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p>		
<p>6.8.1</p> <p>A company's policy on equal opportunity and treatment for work shall be available and documented.</p> <p>- Major compliance –</p>	<p>In Tolan Estate, communication of policy on equal opportunity and treatment for work dated 8 February 2019. Communication to Division II workers comprise of 29 harvesters, 2 mandors, 1 loose fruit collection supervisor, 23 loose fruit collection, 2 division clerks, 4 FFB transport dumptruck, 10 sprayers.</p> <p>In Perlabian Estate, communication of policy on equal opportunity and treatment for work dated 26 May 2018. Communication to Division V workers comprise of 47 harvesters, 2 mandors, 2 loose fruit collection supervisor, 35 loose fruit collection, 2 division clerks, 1 manuring supervisor, 4 helper dumptruck, 3 other workers (pest and disease, water supply, mudim), 1 gardener, 8 circle raking free labour, 4 creeper weeding free labour.</p>	<p>Comply</p>
<p>6.8.2</p> <p>Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated.</p> <p>- Major compliance –</p>	<p>The spread of workforce demographic 2018 shows the general proportion of workforce absorption from local/surrounding village in Tolan Estate (188 workers – 55%), Perlabian Estate (410 workers and Perlabian POM (65 workers – 66%).</p> <p>PT. Tolan Tiga Indonesia made job vacancy for payroll clerk for Perlabian POM on 4 December 2018. The job vacancy leaflet made available to surrounding villages. After interview, one male applicant from Perkebunan Perlabian village, Kampung Rakyat District - accepted. Temporary work agreement sighted: "Perjanjian Kerja Waktu Tertentu PT. Tolan Tiga Indonesia dan Benny Andrico Aritonang", dated 1 December 2018, effective 2 January 2019 – 2 January 2020.</p> <p>PT. Tolan Tiga Indonesia - Perlabian POM made equal treatment in terms of promotion from temporary</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>worker into permanent worker. Decree sighted: "Memorandum HRAD No.127/JWB-PLM/VII/2018 tentang Pengangkatan Karyawan" dated 27 July 2018. The letter appointed 10 temporary worker into permanent worker and promoting permanent worker for higher grade, effective 1 August 2018.</p> <p>Tolan Estate made equal treatment in terms of promotion from temporary worker into permanent worker. Decree sighted: "Memorandum HRAD No.202/JWB-NS/X/18 tentang Pengangkatan PKWT menjadi SKU-H Perlabian Estate" dated 23 October 2018. The letter appointed 4 harvesters into permanent worker, effective 1 November 2018. The harvesters coming from Kampung Perlabian village and Perkebunan Perlabian village – surrounding village near Perlabian Estate.</p> <p>Tolan Estate made equal treatment in terms of promotion from temporary worker into permanent worker. Decree sighted: "Memorandum HRAD No.151/JWB-NS/VIII/2018 tentang Pengangkatan Karyawan" dated 6 September 2018. The letter appointed 8 harvesters, 1 transport FFB, 1 manuring as temporary worker into permanent worker and promoting 25 permanent workers for higher grade, effective 1 September 2018. The 8 harvesters coming from Kampung Menanti village, TTS Perlabian village, Sri Pinang village, Wonorejo village – surrounding village near Tolan Estate.</p>	
<p>6.8.3</p>	<p>Records of evidence that equal opportunity and treatment for work shall be available. – Minor compliance -</p> <p>Perlabian Estate demonstrates equal treatment in term of PPE provision (rubber boot) and working tool for 16 temporary worker circle raking (under Koperasi Jasa Karyawan Tolan Tiga), latest handover dated 21 March 2019 – sampled worker: Mrs. Sukinem, Mrs. Budi Lestari, Mrs. Ponisah. The temporary worker observed performed loose fruit collection. Confirmed with rubber boot issue from warehouse record: "Koperasi Jasa Karyawan Tolan Tiga Indonesia Berita Acara Serah terima Sepatu Kerja Merk Tayoko" dated 21 March 2019 for issuance of 41 pairs of rubber boots in Division IV.</p> <p>Tolan Estate demonstrates equal treatment in term of PPE provision (rubber boot) and working tool for 31 temporary worker loose fruit collector (under Koperasi Jasa), latest handover dated 27 February 2019 – sampled worker: Mrs. Melasi, Mrs.Supriati. The temporary worker observed performed loose fruit collection. Confirmed with rubber boot issue from warehouse record: "Berita Acara Serah terima Sepatu Kerja Merk Tayoko" dated 21 March 2019 for issuance of 202 pairs of rubber boots.</p>	<p>Comply</p>

Criterion 6.9:
There is no harassment or abuse in the work place, and reproductive rights are protected.

Criterion / Indicator	Assessment Findings	Compliance
<p>6.9.1 A policy to prevent sexual and all other forms of harassment and violence, shall be documented, implemented and communicated to all levels of the workforce. - Major compliance –</p>	<p>In Perlavian Estate, communication of policy prohibit sexual harassment and to protect reproductive rights dated 28 August 2018. Communication to Division VI workers comprise of 48 harvesters, 3 mandors, 3 loose fruit collection mandor, 35 loose fruit collection, 4 helper dump truck, 4 FFB clerks, 2 SSI (security), 7 sprayers, 5 other workers (water supply, mudim, teacher).</p> <p>In Tolan Estate, communication of policy prohibit sexual harassment dated 20 March 2018. Communication to Division IV workers comprise of 31 harvesters, 2 mandors, 2 loose fruit collector supervisors, 2 harvest clerks.</p> <p>Based on interview with gender committee in PT. Tolan Tiga Indonesia, there have been no case of sexual harassment.</p>	<p>Comply</p>
<p>6.9.2 A policy to protect the reproductive rights, shall be documented, implemented and communicated to all levels of the workforce. - Major compliance –</p>	<p>In Perlavian Estate, communication of policy prohibit sexual harassment and to protect reproductive rights dated 21 September 2018. Communication to Division IV workers comprise of 27 harvesters, 2 mandors, 4 helpers dump truck, 2 divisional clerks, 2 upkeep mandors, 8 gardeners, 2 raking free labor, 2 imbibition free labor and 1 mudim;</p> <p>In Tolan Estate, communication of policy to protect reproductive rights dated 20 March 2018. Communication to Division IV workers comprise of 31 harvesters, 2 mandors, 2 loose fruit collector supervisors, 2 harvest clerks.</p> <p>PT. Tolan Tiga Indonesia established the policy related to pesticides application be undertaken by no pregnant or no breast-feeding women (the mechanism explained in SOP No.TTI/PROS/IMP/14, revision 01, dated 1 December 2013).</p> <p>Records that spraying is not conducted by pregnant or breast-feeding women under "Daftar Absensi Tenaga Kerja Wanita Tidak Hamil dan Menyusui di Tolan Estate", for month february 2019 there were no pregnant, no breastfeeding for spraying team. Sample verified: Mrs Sri Hartini, Mr Mulyani, Mrs Liliani Pratama, Mrs Yanti, Mrs Elmiati, Mrs Siti Aminah.</p>	<p>Comply</p>
<p>6.9.3 A specific grievance mechanism which respects anonymity of complainants where requested, and as long as they are supported with adequate information, shall be documented, implemented, and communicated to all workforce. - Minor compliance –</p>	<p>The company has provided the "Pedoman Pengelolaan Gender" under memorandum, No.ENC/Pedoman/GC/01 dated 21 April 2011.</p> <p>Based on interview with gender committee in PT. Tolan Tiga Indonesia; company has a specific mechanism to handle sexual harassment case or another gender related cases through gender committee. The procedure has covers protection of anonymity of complainants.</p> <p>Based on interview with female worker (sprayers team), they understand the grievance mechanism.</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>PT. Tolan Tiga Indonesia has a policy to prevent sexual and all other forms of harassment and violence, approved and signed by President Director on 1 March 2014. mentioned that all report of sexual harassment will be dealt with in a sympathetic and confidential manner to help achieve fair hearing of the reports. No employee is to be victimized for reporting sexual harassment. The policy also guarantees anonymity and confidentiality of reporter.</p> <p>Based on interview with female workers in Perlabian POM, Perlabian and Tolan Estate (sprayers and manuring workers), shows understanding of mechanism to report on sexual harassment/domestic violence or other gender-related issues. Based on notulen of Gender Committee meeting there is no form of sexual harassment occurred in Perlabian POM, Perlabian and Tolan Estate.</p>	
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.		
6.10.1 Current and past prices paid for Fresh Fruit Bunches (FFB), shall be publicly available. - Minor compliance -	Perlabian POM does not received and/or process FFB from third-party sources. Perlabian POM was receiving FFB only from certified source, Perlabian Estate and Tolan Estate. This indicator was not applicable for Perlabian POM.	Not Applicable N/A
6.10.2 Pricing mechanisms for Fresh Fruit Bunches (FFB) and inputs/services shall be explained and documented (where these are under the control of the mill or plantation). - Major compliance -	Perlabian POM does not received and/or process FFB from third-party sources. Perlabian POM was receiving FFB only from certified source, Perlabian Estate and Tolan Estate. This indicator was not applicable for Perlabian POM.	Not Applicable N/A
6.10.3 Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	PT. Tolan Tiga Indonesia made work agreement with contractor for replanting: "Surat Perjanjian Kerja No.10/GMO-PLE/TG/V/2018 antara PT. Tolan Tiga Indonesia dengan CV. Tua Gabe tentang Replanting OP 2019", dated 18 May 2018. Work agreement covers obligation of both parties, governing policies in PT. Tolan Tiga Indonesia (no child worker, HSE, legal compliance, etc.), work schedule, payment terms, sanction, dispute. Work specification in "Lampiran Spesifikasi Pekerjaan Replanting 2019 di BME atas kontrak No.03/GMO-BME/ASA/X/2019" whereby stipulates closing sanitation hole, ripping 2 rounds, felling, holing, hole closing, chipping, spreading palm stump. Replanting work schedule in "Program Replanting Oil Palm 2019".	Comply
6.10.4 Agreed payments shall be made in a timely manner. - Minor compliance -	PT. Tolan Tiga Indonesia made scheduled payment for replanting contractor based on work progress. Record sighted: invoice "Permohonan Pembayaran CV. Tua Gabe No.97/TG/PLE/2018 atas SPK No.10/GMO-PLE/TG/V/2018" dated 20 December 2018. Payment for CV. Tua Gabe dated 23 January 2019.	Comply
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.		

Criterion / Indicator	Assessment Findings	Compliance
6.11.1 Records of contributions to local development based on the results of consultation with local communities shall be available. - Minor compliance -	Perlarian Estate and Tolan Estate in 2017 and 2018, there are 8 types Program Community Development, e.g. in Education, Infrastructure, Agriculture, entrepreneurship, sports, arts, religious and social-economics. Record of implementation the program of CSR documented by company.	Comply
6.11.2 Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve scheme smallholder productivity. - Minor compliance -	No smallholder scheme in PT. Tolan Tiga Indonesia. Not applicable.	Not Applicable N/A
Criterion 6.12: No forms of forced or trafficked labour are used.		
6.12.1 There shall be evidence that no forms of forced or trafficked labor are used. - Major compliance -	The company has had a policy against Forced Labour or Labour traded (Company Policy or trafficked Against Forced Labour) adopted by President Director dated 1 March 2014, that is: <ul style="list-style-type: none"> - The Company does not use forced labor or trafficked workers either directly or through a third party. - The Company acknowledged that slave labor or trafficked labor can take many forms, all of which are equally unacceptable. Debt bondage or bonded labor employment relationship because the debt is considered forced labor. - The alleged use of forced labor or labor which are traded by the company's employees if proven would result in disciplinary action up to termination of employment and also can result in legal action. - Companies that do business with PT. Tolan Tiga Indonesia required adhering to this policy. Violation of this policy if proven would result in disciplinary action up to termination of employment and also can result in legal action. This policy applies to PT. Tolan Tiga Indonesia and for the entire company under the management of PT. Tolan Tiga. The policy has been disseminated to stakeholders through the installation of such policies on the notice board, in their respective Estate offices and dissemination directly to the employees, for example: In Tolan Estate, communication of policy to protect reproductive rights dated 11 February 2019. Communication to Division V workers comprise of 36 harvesters, 2 mandors, 21 loose fruit collectors, 4 FFB transport truck, 1 harvest clerk, 1 mudim, 1 water supply, 1 baby nurse.	Comply
6.12.2 It shall be demonstrated that no contract substitution has occurred. - Minor compliance -	In Perlarian Estate, company entrust the management of temporary worker through cooperative "Koperasi Jasa PT. Tolan Tiga Indonesia". Cooperative have working agreement with individual worker whose appointed their	Comply

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Criterion / Indicator	Assessment Findings	Compliance
	<p>representative. Sample: "Kesepakatan Kerja Ketua Koperasi Jasa PT. Tolan Tiga Indonesia dengan Pekerja Harian Lepas No.02/KJ/01/2019" signed by cooperative leader and Mr. Anto on 2 February 2019. The work agreement for 159 temporary workers (not work in all the same time).The work agreement stipulated type of industrial relation, type of work, salary, religious benefit, contract timeline, regulation. Based on document review and interview with workers and labour union, confirmed that no contract substitution was noted.</p>	
<p>6.12.3 Where migrant/foreign/honorary workers are employed, a special worker policy and procedures and the evidence of implementation shall be available. - Major compliance -</p>	<p>In Kerasaan Estate, payment to temporary worker was done. Record seen: Name: Mrs.Sukinem; Work: supervision for upkeep, rate: IDR.11,514/hour; Work: creeper weeding, rate Rp.33,409/Ha; Absence record: 18 mandays; Total salary IDR.1,333,898; Name: Mrs.Budi Lestari; Work: manuring with dosage <1kg, rate: IDR.12,779/Ha; Absence record: 9 mandays; Total salary IDR.357,718;</p> <p>Rate loose fruit IDR.260/kg set based on "Perjanjian Bersama antara Management PT. Eastern Sumatra Indonesia dengan Serikat Pekerja Bukit Maradja Mandiri (SP-BUMM) di Candi Hotel – Medan Sumatera Utara", dated 27-30 October 2015. The premium for loose fruit sets from IDR.160 to IDR.260 per kg loose fruit. The agreement signed by management and worker union representatives.</p> <p>"Perjanjian Kerja Waktu Tertentu PT. Tolan Tiga Indonesia dan Benny Andrico Aritonang", dated 1 December 2018, effective 2 January 2019 – 2 January 2020. The work agreement stipulated the contract timeline for 1 year, position as office clerk, salary payment, rights, obligations, medication, annual leave, benefit, contract termination,</p>	<p>Comply</p>
<p>Criterion 6.13: Growers and millers respect human rights.</p>		
<p>6.13.1 A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations. - Major compliance -</p>	<p>Company has a policy in protection of human rights under "Kebijakan Perusahaan tentang Hak Asasi Manusia", signed by President Director on 1 March 2014, consist of, among other:</p> <ul style="list-style-type: none"> - The company acknowledges human rights are universal; this applicable to all operation. - The company support implementation of human rights and ILO declaration related to principles and basic rights in working place that has been ratified by Republic of Indonesia. - Charges against violation of human rights, if proven, resulted in disciplinary action up to termination of work relation, and could cause legal action. - This Policy applies to PT Tolan Tiga Indonesia and to all companies under the management of PT Tolan Tiga Indonesia. 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance	
	<p>The policy has been disseminated to all employees through the installation of related policies on the notice board, in the In Tolan Estate, communication of policy to respect human rights dated 20 March 2018. Communication to Division IV workers comprise of 31 harvesters, 2 mandors, 2 loose fruit collector supervisors, 2 harvest clerks.</p>		
Principle 7: Responsible development of new plantings			
Criterion 7.1:			
<p>A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.</p>			
<p>7.1.1</p>	<p>An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented. - Major compliance -</p>	<p>There was no new planting after November 2005. The criterion 7.1 was not applicable.</p>	<p>Not Applicable N/A</p>
<p>7.1.2</p>	<p>Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts. - Minor compliance -</p>	<p>See Criterion 7.1.1</p>	<p>Not applicable N/A</p>
<p>7.1.3</p>	<p>Where the development includes an outgrower scheme, the impacts of the scheme and the implications of the way it is managed shall be given particular attention. - Minor compliance -</p>	<p>See Criterion 7.1.1</p>	<p>Not applicable N/A</p>
Criterion 7.2:			
<p>Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			
<p>7.2.1</p>	<p>Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations. - Major compliance -</p>	<p>There was no new planting after November 2005. The criterion 7.2 was not applicable.</p>	<p>Not applicable N/A</p>
<p>7.2.2</p>	<p>Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available and taken into account in plans and operations. - Minor compliance -</p>	<p>See Criterion 7.2.1</p>	<p>Not applicable N/A</p>
Criterion 7.3:			
<p>New plantings since November 2005 have not replaced primary forest or any area required to maintain or</p>			

Criterion / Indicator		Assessment Findings	Compliance
enhance one or more High Conservation Values.			
7.3.1	There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2). - Major compliance –	There was no new planting after November 2005. The criterion 7.3 was not applicable.	Not applicable N/A
7.3.2	Reports of comprehensive HCV assessment, which involves stakeholder consultation and includes record of land-use change since November 2005, shall be available. This HCV assessment shall be conducted prior to any conversion or new planting. - Major compliance –	See Criterion 7.3.1	Not applicable N/A
7.3.3	Records of land preparation and clearing dates shall be available. - Minor compliance –	See Criterion 7.3.1	Not applicable N/A
7.3.4	An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower's relevant operational procedures. (see Criterion 5.2) - Major compliance –	See Criterion 7.3.1	Not applicable N/A
7.3.5	Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2). - Minor compliance -	See Criterion 7.3.1	Not applicable N/A
Criterion 7.4:			
Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.			
7.4.1	Maps identifying marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. - Minor compliance -	There was no new planting after November 2005. The criterion 7.4 was not applicable.	Not applicable N/A
7.4.2	Where limited planting on fragile and marginal soils, including peat, is	See Criterion 7.4.1	Not applicable

Criterion / Indicator		Assessment Findings	Compliance
	proposed, plans shall be developed and implemented to protect them without incurring adverse impacts. - Major compliance -		N/A
Criterion 7.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
7.5.1	Evidence shall be available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the grower/miller is signed and ratified by these local peoples. - Major compliance -	There was no new planting after November 2005. The criterion 7.5 was not applicable.	Not applicable N/A
Criterion 7.6: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.			
7.6.1	Documented identification and assessment of demonstrable legal, customary and user rights shall be available. - Major compliance -	There was no new planting after November 2005. The criterion 7.6 was not applicable.	Not applicable N/A
7.6.2	A system for identifying people entitled to compensation shall be in place. - Major compliance -	See Criterion 7.6.1	Not applicable N/A
7.6.3	A system for calculating and distributing fair compensation (monetary or otherwise) shall be in place. - Major compliance -	See Criterion 7.6.1	Not applicable N/A
7.6.4	Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development. - Minor compliance -	See Criterion 7.6.1	Not applicable N/A
7.6.5	The process and outcome of any compensation claims shall be documented and made publicly available. - Minor compliance -	See Criterion 7.6.1	Not applicable N/A
7.6.6	Evidence shall be available that the	See Criterion 7.6.1	Not

Criterion / Indicator	Assessment Findings	Compliance
	<p>affected communities and rights holders have access to information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>applicable N/A</p>
<p>Criterion 7.7: No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.</p>		
<p>7.7.1</p>	<p>There shall be no land preparation by burning, other than in specific situations, as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>- Major compliance -</p>	<p>There was no new planting after November 2005. The criterion 7.7 was not applicable.</p> <p>Not applicable N/A</p>
<p>7.7.2</p>	<p>In exceptional cases where fire has to be used for preparing land for planting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>- Minor compliance -</p>	<p>See Criterion 7.7.1</p> <p>Not applicable N/A</p>
<p>Criterion 7.8: New plantation developments are designed to minimise net greenhouse gas emissions.</p>		
<p>7.8.1</p>	<p>The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated.</p> <p>- Major compliance -</p>	<p>There was no new planting after November 2005. The criterion 7.8 was not applicable.</p> <p>Not applicable N/A</p>
<p>7.8.2</p>	<p>There shall be a plan to minimise net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options.</p> <p>- Minor compliance -</p>	<p>See Criterion 7.8.1</p> <p>Not applicable N/A</p>
<p>Principle 8: Commitment to continual improvement in key areas of activity</p>		
<p>Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.</p>		
<p>8.1.1</p>	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main</p>	<p>PT. Tolan Tiga Indonesia has shown the document of a continuous improvement plan has been prepared and internal audit conducted to identify compliance to</p> <p>Comply</p>

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<p>social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>the RSPO P&C. Internal audit has been conducted to monitor implementation of RSPO P&C, based on consideration of social and environment impact, good agriculture practice for estate, best manufacturing practice for mill and OHS aspect. E.g: for environment impacts, such as:</p> <ol style="list-style-type: none"> 1. Continuing dispose hazardous waste to the approval collector. 2. Improvement in monitoring of fuel consumption by calibrating fuel injection pumps and check fuel nozzle pipe. 3. Improvement in monitoring of domestic water consumption by installing flow meter to monitor water consumption in housing 4. Recycle the water cooler turbine discharge water basin; 5. Recycle the condensate water discharge water dilution; <p>Perlabian POM the Internal Audit RSPO dated 29-30 June and 2 July 2018. There were 12 nonconformities raised related to RSPO P&C. All of the recommendation has been followed up and effective implemented. Status: closed. Management review carried out 29 August 2018. Location in meeting room.</p> <p>In Tolan Estate, the internal audit report "Laporan Internal Audit RSPO" dated 26 – 29 June 2018. There were 7 nonconformities raised related to RSPO P&C. All of the recommendation has been followed up and effective implemented. Status: closed. Management review dated 23 August 2018. Location in meeting room.</p>	

Appendix B: Approved Time Bound Plan

Name of company	Name of Mill	Location	Supply Base	Time Bound Plan	Target Year for RSPO
PT. Agro Muko	Muko Muko Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Muko Muko estate, Sei Betung estate, Tanah Rekah estate, Talang Petai estate, Sei Kiang estate and KMD	2011	Certified
	Bunga Tanjung Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Bunga Tanjung estate, Air Bikuk estate, Air Buluh estate and KMD	2011	Certified
			PT. Mukomuko Agro Sejahtera: - Air Manjunta estate - Malin Deman estate	2014	Certified
			Ex. PT. Asri Rimba Wirabhakti	2020	A new NPP will be submitted waiting for HCV, LUC review
PT. Tolan Tiga	Bukit Maradja Mill	Simalungun Regency, North Sumatera, Indonesia	- Bukit Maradja Estate (PT. Eastern Sumatra Indonesia) - Kerasaan Estate (PT. Kerasaan Indonesia) - PT. Timbang Deli Indonesia	2010	Certified May 2010
				2018	Certified in 2018 as supply base of Bukit Maradja POM, PT Eastern Sumatra Indonesia
	Perlabian Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	Perlabian estate and Tolan estate.	2010	Certified May 2010
PT. Umbul Mas Wisesa	Umbul Mas Wisesa Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South estate, UMW North estate and Toton Usaha Mandiri estate	2014	Certified in March 2015
PT. Agro Kati Lama		Musirawas Regency, South Sumatera, Indonesia		2021	developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014.
PT. Agro Rawas Ulu		Musirawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014.
PT. Agro Muara Rupit		Musirawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014.
Hargy Oil Palm Limited (HOPL)	Hargy Mill	East of Bialla, West New Britain Province, PNG	Hargy Estate	2009	Certified in April 2009
	Navo Mill	50 Kms East of Bialla, West New Britain Province, PNG	Navo Estate, Bakada Estate and Mengen Estate	2009	Certified in April 2009
	Barema Mill	30 km East of Bialla, West New Britain Province, PNG	Barema Estate	2014	RSPO Certified in April 2014
PT. Dendy Maker Indah Lestari	Dendy Maker Mill	Musirawas Utara Regency, South Sumatera Province, Indonesia	Sei Mandang Estate, Sei Liam Estate	2015	Acquired on 1 August 2017. RSPO certified in 2015.

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **February 2018 – January 2019** for **Perlabian POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **February 2018 – January 2019** for **Perlabian POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.46
PKO	0.46

Extraction	%
OER	21.75
KER	5.61

Production	t/yr
FFB Process	211761
CPO Produced	46052
PKO Produced	11885

Land Use	Ha
OP Planted Area	8090.48
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	115.37
Total	8205.85

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	70744.22	0.31	0	0	0	0	70744.22	0.31
CO ₂ Emission from fertilizer	7367.02	0.03	0	0	0	0	7367.02	0.03
NO ₂ Emmision	7780.83	0.03	0	0	0	0	7780.83	0.03
Fuel Consumption	991.28	0	0	0	0	0	991.28	0
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-68946.17	-0.3	0	0	0	0	-68946.17	-0.3

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Conservation Sequestration	0	0	0	0	0	0	0	0
Total	17937.18	0.08	0	0	0	0	17937.18	0.08

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	4320.74	0.02
Fuel Consumption	931.35	0
Grid Electricity Utilisation	3408.12	0.02
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	8660.21	0.04

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	5461.99
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	100
Divert to methane captured (energy generation) (%)	0

Appendix D: General Chain of Custody Requirements for the Supply Chain

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	PT. Tolan Tiga Indonesia – Perlabian POM is part of the RSPO supply chain, as the organization takes legal ownership and physically handles RSPO Certified Sustainable oil palm products – therefore this requirements is applicable.	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	PT. Tolan Tiga Indonesia – Perlabian POM is not a trader or distributor. Not applicable.	N/A
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	PT. Tolan Tiga Indonesia is subsidiary of SIPEF Group, a member of RSPO, with RSPO membership No.1-0021-05-000-00 since 7 December 2005. RSPO IT Platform account RSPO_PO1000000099.	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	PT. Tolan Tiga Indonesia – Perlabian POM does not include any processing aid into scope of certification. Not applicable.	N/A
5.2 Supply chain model			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can	PT. Tolan Tiga Indonesia – Perlabian POM is certified against RSPO P&C Indonesia National Interpretation, September 2016 and RSPO Supply Chain	Yes

	only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	<p>Certification Standard, June 2017 Module D - CPO Mills: Identity Preserved. Perlabian POM received certified raw material (Fresh Fruit Bunch) from its own estate:</p> <ul style="list-style-type: none"> - Perlabian Estate; - Tolan Estate; <p>All of the supply base are RSPO P&C certified.</p> <p>The certification of estates under PT. Tolan Tiga Indonesia – Perlabian POM with certificate number RSPO 555208, expired on 15 May 2020. Management of PT. Tolan Tiga Indonesia aware that they can claim their product (CPO and PK) as Identity Preserved or downgrading in the following order Identity Preserved -> Segregated -> Mass Balance.</p>	
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	<p>PT. Tolan Tiga Indonesia – Perlabian POM uses Module D of RSPO Supply Chain Certification Standard, June 2017. Therefore, Perlabian POM uses Identity Preserved (IP) as the supply chain model.</p> <p>Based on review of Contract documents, Shipping Instruction, Packing List and Bill of Lading, PT. Tolan Tiga Indonesia – Perlabian POM uses Segregation (SG) as the supply chain model.</p> <p>For shipping by trucking, PT. Tolan Tiga Indonesia – Perlabian POM uses Identity Preserved (IP) as the supply chain model.</p>	Yes
5.3. Documented Procedures			
5.3.1	<p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	<p>PT. Tolan Tiga Indonesia demonstrates a set of procedure for implementation of RSPO SCCS, June 2017: Procedure Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019. The scope of procedure applicability covers estate operation, mill operation and marketing activity.</p> <p>5.1 Transporting Palm Products from Estate to Mill;</p> <p>5.2 Production Process in the Mill;</p> <p>5.3 Coordinatoin between Customer and the Mill – covers local sales of CPO and PK, CPO export sales, shipment schedule, shipping CPO to storage tanks for export purposes, transportation record, receiving CPO at tank terminal, instruction for shipping and preparation of goods;</p> <p>5.4 Evaluation – covers record reconciliation, internal control for estate performance, mill operation and process of transporting;</p>	Yes

	<ul style="list-style-type: none"> Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	The site has complete and up to date records and reports that demonstrated compliance with the supply chain model requirements.	Yes
	<ul style="list-style-type: none"> Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard. 	The organization has stated in the Job Description that responsible person over the implementation of supply chain and traceability in Perlabian POM is the Mill Manager, currently held by Mr. Sarwedi Sitorus. Document verified: Job Description Mill Manager Bukit Maradja Palm Oil Mill; section 3. Supervisory Responsibility 5. RSPO, ISCC, ISO9001 and Rainforest Alliance – ensure certification activity for RSPO, ISCC, ISO9001 and Rainforest Alliance.	Yes
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	Procedure for Routine Visit and Internal Audit No.ENC-01-02/04-03-2019. The procedure covers internal audit planning, internal audit communication, internal audit team competence, internal audit execution, implementation of corrective action plan and management review. Section 6. Frequency and Timing stipulated the internal audit carried out minimum once per year; management review minimum once per year.	Yes
	ii) effectively implements and maintains the standard requirements within its organization	The latest internal audit carried out on 7-8 February 2019. The ENC team have checked all requirements of RSPO Supply Chain Certification Standard, June 2017. Sampled verification made, as seen on internal audit report, ENC team verified the PalmTrace transaction from Perlabian POM against RSPO General Chain of Custody indicator 5.6.1.	Yes
5.4. Purchasing and goods in			
5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment/delivery date; The date on which the documents were issued; 	<p>Company demonstrated Procedure Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019. Chapter 5.2 of the procedure indicates the Weighbridge Clerk has responsibility to input data and print “Receiving Slip” based on FFB Delivery Note, covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>Document FFB Delivery Note and FFB Receiving Slip described identity and location of FFB source and other item required e.g.:</p> <ul style="list-style-type: none"> FFB Delivery Note No.PLE/009210 dated 25 September 2018; issued by Perlabian Estate, Division F5; block 95D02A; Vehicle BK9716YE; Mandor: 	Yes

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<ul style="list-style-type: none"> • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<p>Tumijan; Year of planting 1995; Volume 250 bunches; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 555208.</p> <ul style="list-style-type: none"> - FFB Receiving Slip Ticket No.FFB18023957W dated 25 September 2018 issued by Perlavian POM, Estate: from Perlavian Estate; Vehicle BK 9716YE; Transporter: Perlavian Estate; Product: FFB; DO No.09210; Nett weight: 5,46 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 555208. - FFB Delivery Note No.TLE/040381 dated 25 September 2018; issued by Tolan Estate, Division F4; Vehicle BK8298YS; Mandor: Nanda; Block: 01E29 (267 bunches); stamped as Sustainable Product – IP, RSPO certificate No. RSPO 55208. <p>FFB Receiving Slip Ticket No.FFB18023956W dated 25 September 2018 issued by Perlavian POM, Estate: from Tolan Estate; Vehicle BK8298YG; Transporter: Tolan Estate; Product: FFB; DO No.TLE/040381; Nett weight: 6 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 555208.</p>	
<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>Information shall be complete and can be presented across a range of documents issued for RSPO certified oil palm products such as: FFB Delivery Note and FFB Receiving Slip which described identity and location of FFB source and other item required:</p> <ul style="list-style-type: none"> - FFB Delivery Note No.PLE/009210 dated 25 September 2018; issued by Perlavian Estate, Division F5; block 95D02A; Vehicle BK9716YE; Mandor: Tumijan; Year of planting 1995; Volume 250 bunches; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 555208. - FFB Receiving Slip Ticket No.FFB18023957W dated 25 September 2018 issued by Perlavian POM, Estate: from Perlavian Estate; Vehicle BK 9716YE; Transporter: Perlavian Estate; Product: FFB; DO No.09210; Nett weight: 5,46 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 555208. - FFB Delivery Note No.TLE/040381 dated 25 September 2018; issued by Tolan Estate, Division F4; Vehicle BK8298YS; Mandor: Nanda; Block: 01E29 (267 bunches); stamped as Sustainable Product – IP, RSPO certificate No. RSPO 55208. <p>FFB Receiving Slip Ticket No.FFB18023956W dated 25 September 2018 issued by Perlavian POM, Estate: from Tolan Estate; Vehicle BK8298YG; Transporter:</p>	<p>Yes</p>

		Tolan Estate; Product: FFB; DO No.TLE/040381; Nett weight: 6 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 555208.	
	<ul style="list-style-type: none"> The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. 	PT. Tolan Tiga Indonesia – Perlabian POM received certified FFB from its own plantation: Perlabian Estate and Tolan Estate.	Yes
	<ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	PT. Tolan Tiga Indonesia – Perlabian POM with RSPO P&C Certificate No.RSPO 555208 are certified until 15 May 2020.	Yes
	<ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	PT. Tolan Tiga Indonesia – Perlabian POM is not a trader. The marketing was done by the parent company, SIPEF NV. The marketing agreement between PT. Tolan Tiga Indonesia and SIPEF NV was signed on 18 September 1990. The scope of marketing agreement covers appointment and duration, obligation of SIPEF, obligaton PT. Tolan Tiga, remuneration, rebates, termination, return of property, non-assignment, non-disclosure, notices, etc.	Yes
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	<p>The procedure for handling non-conforming product regulated under Supply Chain and Traceability of Palm Products No.MKT-03-06/04-2019 dated 18 March 2019 – Section 5.4 Evaluation by the Certification Body, stating control of non-conforming product refer to Procedure Customers Complaints Handling No.MKT-03-02/02-10-2017.</p> <p>Procedure Customers Complaints Handling No.MKT-03-02/02-10-2017 explains the flow process comprise of review the buyer complaint, verifies the buyer complaint, decision making, payment, inform the buyer.</p>	Yes
5.5. Outsourcing activities			

<p>5.5.1</p>	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>PT. Tolan Tiga Indonesia using the service for storage tank, and transporter from independent third party. In all agreement with independent third party:</p> <ul style="list-style-type: none"> - The ownership of product is within PT. Tolan Tiga Indonesia; - The control over product movement is within PT. Tolan Tiga Indonesia; - The independent third party physically handles the RSPO-certified palm products; -This clause is applicable to scope of certification. 	<p>Yes</p>
<p>5.5.2</p>	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	<p>PT. Tolan Tiga Indonesia using the service for storage tank, and transporter from independent third party. In all agreement with independent third party states clearly that ownership of product is within PT. Tolan Tiga Indonesia.</p>	<p>Yes</p>
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>PT. Tolan Tiga Indonesia have contract/agreement with all the independent third party storage tank and transporters. The contract enforce that certificatoin bodies (CB) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>Agreement between PT. Tolan Tiga Indonesia with storage tank facility sighted: "Perjanjian Sewa Menyewa Tangki Timbun PT. Dumai Paricipa Abadi dan PT. Eastern Sumatra Indonesia No.001/DPA/I/2019", signed 3 January 2019. The contract valid from 1 January – 31 December 2019. Chapter 5. Right and Obligation of the Parties – Section 5 stated whenever necessary, PT. Tolan Tiga Indonesia will arrange for certification audits and inform the PT. Dumai Paricipa Abadi (storage tank facility) of audit schedule and requirements. Section 6 stated PT. Dumai Paricipa Abadi (storage tank facility) will cooperate for the audit purpose. PT. Tolan Tiga Indonesia will provide training as necessary.</p>	<p>Yes</p>

		<p>Agreement between PT. Tolan Tiga Indonesia with transporters:</p> <p>a. "Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan Pengangkutan Sahabat No.2015/Angkutan/CPO/PL-Dumai/01" signed on 1 February 2016. CV. Angkutan Sahabat issued a statement letter signed by Mr. Gunawan Ruslan, dated 11 January 2018. The statement "CV Angkutan Sahabat bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan CV Angkutan Sahabat bersedia dilakukan audit jika badan sertifikasi memerlukannya" – CV Angkutan Sahabat is following requirement from RSPO Supply chain, and CV Angkutan Sahabat available for audit if needed by certification body.</p> <p>b. "Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan CV. Jasa Sahabat Abadi No.2015/Angkutan/CPO/PL-Dumai/06" signed on 1 December 2016. CV. Jasa Sahabat Abadi issued a statement letter signed by Mr. Darmin Tanjudjaja, dated 23 March 2018. The statement "CV Jasa Sahabat Abadi bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan CV Jasa Sahabat Abadi bersedia dilakukan audit jika badan sertifikasi memerlukannya" – CV Jasa Sahabat Abadi is following requirement from RSPO Supply chain, and CV Jasa Sahabat Abadi available for audit if needed by certification body.</p> <p>c. "Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan CV. Sejahtera Abadi No.2015/Angkutan/CPO/PL-DUMAI/02" dated 1 February 2016. CV. Sejahtera Abadi issued a statement letter signed by Mr.Harsono Sukijung, dated 26 February 2019. The statement "CV. Sejahtera Abadi bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan CV. Sejahtera Abadi bersedia dilakukan audit jika badan sertifikasi memerlukannya" – CV. Sejahtera Abadi is following requirement from RSPO Supply chain, and CV. Sejahtera Abadi available for audit if needed by certification body.</p> <p>d. "Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan Pengangkutan Felindo No.2015/Angkutan/CPO/PL-Dumai/04" signed on 1 February 2016. Pengangkutan Felindo issued a statement letter signed by Drs. Sutrisno Sukijung, dated 1 March 2019. The statement "Pengangkutan Felindo bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan Pengangkutan Felindo bersedia dilakukan audit jika badan sertifikasi</p>	
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		memerlukannya” – Pengangkutan Felindo is following requirement from RSPO Supply chain, and Pengangkutan Felindo available for audit if needed by certification body.													
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	<p>The control through contract between company and the tank storage.</p> <p>PT. Tolan Tiga Indonesia conducted internal audit to the storage tank facility. Internal audit to PT. Dumai Paricippta Abadi carried out in 7-8 February 2019, ENC team verified the traceability of transaction No.TR-6e4671a7-4688 for sales of 500 MT CSPO SG. ENC team made sample of delivery to PT. Dumai Paricippta Abadi:</p> <table border="1" data-bbox="1028 651 1774 735"> <thead> <tr> <th>Date</th> <th>Truck ID</th> <th>Transporter</th> <th>Quantity</th> </tr> </thead> <tbody> <tr> <td>1 February 2018</td> <td>BK8077ME</td> <td>Sahabat</td> <td>25.03 MT</td> </tr> <tr> <td>1 February 2018</td> <td>BK8004CP</td> <td>Felindo</td> <td>27.88 MT</td> </tr> </tbody> </table> <p>Records sighted and verified: email correspondence between ENC and Marketing Department; Contract No.PTLO-10102;</p>	Date	Truck ID	Transporter	Quantity	1 February 2018	BK8077ME	Sahabat	25.03 MT	1 February 2018	BK8004CP	Felindo	27.88 MT	Yes
Date	Truck ID	Transporter	Quantity												
1 February 2018	BK8077ME	Sahabat	25.03 MT												
1 February 2018	BK8004CP	Felindo	27.88 MT												
	d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	<p>PT. Tolan Tiga Indonesia have contract/agreement with all the independent third party storage tank and transporters. The contract enforce that certificatoin bodies (CB) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>Agreement between PT. Tolan Tiga Indonesia with storage tank facility sighted: “Perjanjian Sewa Menyewa Tangki Timbun PT. Dumai Paricippta Abadi dan PT. Eastern Sumatra Indonesia No.001/DPA/I/2019”, signed 3 January 2019. The contract valid from 1 January – 31 December 2019. Chapter 5. Right and Obligation of the Parties – Section 5 stated whenever necessary, PT. Tolan Tiga Indonesia will arrange for certification audits and inform the PT. Dumai Paricippta Abadi (storage tank facility) of audit schedule and requirements. Section 6 stated PT. Dumai Paricippta Abadi (storage tank facility) will cooperate for the audit purpose. PT. Tolan Tiga Indonesia will provide training as necessary.</p> <p>Agreement between PT. Tolan Tiga Indonesia with transporters:</p> <p>e. “Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan Pengangkutan Sahabat No.2015/Angkutan/CPO/PL-Dumai/01” signed on 1 February 2016. CV. Angkutan Sahabat issued a statement letter signed by Mr. Gunawan Ruslan, dated 11 January 2018. The statement “CV Angkutan Sahabat bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria</p>	Yes												

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		<p>supply chain RSPO dan CV Angkutan Sahabat bersedia dilakukan audit jika badan sertifikasi memerlukannya” – CV Angkutan Sahabat is following requirement from RSPO Supply chain, and CV Angkutan Sahabat available for audit if needed by certification body.</p> <p>f. “Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan CV. Jasa Sahabat Abadi No.2015/Angkutan/CPO/PL-Dumai/06” signed on 1 December 2016. CV. Jasa Sahabat Abadi issued a statement letter signed by Mr. Darmin Tanjudjaja, dated 23 March 2018. The statement “CV Jasa Sahabat Abadi bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan CV Jasa Sahabat Abadi bersedia dilakukan audit jika badan sertifikasi memerlukannya” – CV Jasa Sahabat Abadi is following requirement from RSPO Supply chain, and CV Jasa Sahabat Abadi available for audit if needed by certification body.</p> <p>g. “Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan CV. Sejahtera Abadi No.2015/Angkutan/CPO/PL-DUMAI/02” dated 1 February 2016. CV. Sejahtera Abadi issued a statement letter signed by Mr.Harsono Sukijung, dated 26 February 2019. The statement “CV. Sejahtera Abadi bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan CV. Sejahtera Abadi bersedia dilakukan audit jika badan sertifikasi memerlukannya” – CV. Sejahtera Abadi is following requirement from RSPO Supply chain, and CV. Sejahtera Abadi available for audit if needed by certification body.</p> <p>h. “Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan Pengangkutan Felindo No.2015/Angkutan/CPO/PL-Dumai/04” signed on 1 February 2016. Pengangkutan Felindo issued a statement letter signed by Drs. Sutrisno Sukijung, dated 1 March 2019. The statement “Pengangkutan Felindo bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan Pengangkutan Felindo bersedia dilakukan audit jika badan sertifikasi memerlukannya” – Pengangkutan Felindo is following requirement from RSPO Supply chain, and Pengangkutan Felindo available for audit if needed by certification body.</p>	
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	<ul style="list-style-type: none"> - PT. Dumai Paricipa Abadi (bulking storage) – Mr. Usman Sarsi, address: Jl. Pematang Pasir No.27 Tanjung Mulia, Medan 20241; - CV. Sejahtera Abadi (transporter) – Mr. Harsono Sukijung, address: J. Jati No.65 Pulo Brayon Bengkel, Kecamatan Medan Timur, Medan 20239; 	Yes

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		<ul style="list-style-type: none"> - Pengangkutan Felindo (transporter) – Drs. Sutrisno Sukijung (Director), address: Jl. Gunung Krakatau Ujung No.62, Medan; - CV. Jasa Sahabat Abadi (transporter) – Darmin Tanudjaja (Director), address: Jl. Besar Kisaran Medan km.5 Sidomulyo, Pulo Bandring, Kisaran, Kabupaten Asahan; - CV. Pengangkutan Sahabat (transporter) – Mr. Gunawan Ruslan, address: Jl. Petumbukan Dusun III, Jaharun B-Galang, Deli Serdang; <p>Interview via phonecall with Mr. Udin - Humas, representative from CV. Sejahtera Abadi – transporter. Based on interview, the transporter have provides service for 20 years to PT. Tolan Tiga Indonesia. The transporter have armada of 120 tanks. CV. Sejahtera Abadi have been trained by PT. Tolan Tiga Indonesia and implement: all tanks shall be clean; all truck crew shall use appropriate PPE; CV. Sejahtera Abadi shall prevent any contamination to the transported product (CPO), maintain quality and quantity during delivery from Perlabian POM to bulking tank in Dumai.</p>	
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	Perlabian POM updates the names and contact details of all transporters and bulking storage tank.	Yes
5.6. Sales and goods out			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); 	<ul style="list-style-type: none"> • Kontrak Jual Beli No.2018/PL-PK/12 between Seller: PT. Tolan Tiga Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: "Buyer NBJ", address: Jl. Sultan Iskandar Muda No.107, Medan. Product: Palm Kernel – Mass Balance. Volume 500 MT. Dated 31 July 2018. • Delivery Order PT. Tolan Tiga Indonesia No.2018/PL-PK/DO/12 dated 7 August 2018. Seller: PT. Tolan Tiga Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: "Buyer NBJ", address: Jl. Sultan Iskandar Muda No.107, Medan. Product: Palm Kernel – MB. Volume 500 MT. Product delivery, loko PKS Perlabian. • 20 deliveries made to fulfil the Delivery Order No.2018/PL-PK/DO/12 for total PK volume of 500 MT from source: Perlabian POM; destination: "Buyer NBJ". • Sampled PK delivery: Weighbridge Despatch Slip Perlabian POM 	Yes

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<ul style="list-style-type: none"> • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	<p>No.PK18000303W; DO No.2018/PL-PK/DO/12; contract No.2018/PL-PK/12; Product: Palm Kernel; Module: IP; Volume 25.63 MT; Cert. No.RSPO 555208; Transporter PT. Mulia Berjaya Abadi (buyer’s transporter), vehicle No.BK9372BK – dated 28 August 2018. Recorded as transaction in PalmTrace TR-f568171a-e50a dated 9 October 2018; buyer “Buyer NBJ”; Product: CSPK-IP; Quantity 500 MT;</p> <ul style="list-style-type: none"> • Contract No.PTLO-10108 dated 1 November 2017 between Seller: PT. Tolan Tiga Indonesia Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Medan 20112. Buyer:“Buyer OS”, CH-1180 Rolle. Product: CSPO SG. Volume 499.914 MT. • Delivery Order: No.2018/PL-CPO/DO/Dumai/No.86, 88, 89, 90, 92, 93, 95, 97, 99, 101, 102, 104, 106, 107, 110. Delivery Order No.2018/PL-CPO/DO/DUMAI/106 dated 30 July 2018. Delivery Order No.2018/PL-CPO/DO/DUMAI/108 dated 6 August 2018. • 104 deliveries made to fulfil the contract for total CPO volume of 2500 MT from source: Perlabian POM; delivery period: 18 July – 11 August 2018; destination: PT. Dumai Paricipa Abadi (bulking storage), Dumai. Note: total 2,500 MT party was comprise of 3 contracts. • Sampled delivery: Weighbridge Despatch Slip No.CPO18000917W; DO No.2018/PL-CPO/DO/DUMAI/94; Product: Crude Palm Oil; Module: IP; Volume 27.85 MT; Cert. No.RSPO 555208; Transporter: CV. Sejahtera Abadi, vehicle No.BK8121CU – dated 18 July 2018. Received in PT. DPA (bulking tank) with Receipt No.DPA.IN.180721033, vehicle BK8766CS; receipt 28.25 MT dated 21 July 2018. • Shipping Instruction No.2018/TTI-SI/08 dated 8 August 2018; for contract No.PTLO-10108 of volume: 500 MT; product: CPO SG; shipper: PT. Tolan Tiga Indonesia; address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Medan 20112; Notify: “Buyer OS”; address: Rotterdam, The Netherlands. • Bill of Lading No.NVT471802 dated 18 August 2018. Shipper: PT. Tolan Tiga Indonesia; Notify Address:“Buyer OS”; Port of Loading: Dumai; Port of delivery: Rotterdam, The Netherlands; Tanker: MT Nina Victory V47/18; Commodity: Indonesian CSPO SG; quantity 499.914 MT; Remarks: RSPO SG, Certificate No.RSPO555208, expiry date 16 May 2020.
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		Recorded as transaction in PalmTrace TR-c7cf2527-f449 dated 23 September 2018; buyer: "Buyer OS"; Product: CSPO-SG; Quantity 499.91 MT;	
	<ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>As seen above, the information have been attached in various document: Contract: Contract number (unique ID), Name of seller, address of seller, name of buyer, address of buyer, type of commodity, quantity of product, supply chain module, date of document; Delivery orders: Contract number (unique ID), Name of seller, address of seller, name of buyer, address of buyer, type of commodity, supply chain module, quantity of commodity (divided), date of document; Weighbridge ticket: Contract number (unique ID), Name of seller, address of seller, name of buyer, address of buyer, type of commodity, supply chain module, quantity of commodity (divided), date of document, RSPO certificate number, transport detail;</p>	Yes
	<ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	Company announce their transaction into PalmTrace.	Yes
5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	PT. Tolan Tiga Indonesia – Perlabian POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK). RSPO IT Platform account RSPO_PO100000099.	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products 	<p>PT. Tolan Tiga Indonesia – Perlabian POM made shipping announcement inside PalmTrace transaction:</p> <ul style="list-style-type: none"> TR-f568171a-e50a dated 9 October 2018; buyer "Buyer NBJ"; Product: CSPK-IP; Quantity 500 MT; Kontrak Jual Beli No.2018/PL-PK/12 between Seller: PT. Tolan Tiga 	Yes

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	<p>that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</p>	<p>Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: "Buyer NBJ", address: Jl. Sultan Iskandar Muda No.107, Medan. Product: Palm Kernel – Mass Balance. Volume 500 MT. Dated 31 July 2018.</p> <ul style="list-style-type: none"> - Delivery Order PT. Tolan Tiga Indonesia No.2018/PL-PK/DO/12 dated 7 August 2018. Seller: PT. Tolan Tiga Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: "Buyer NBJ", address: Jl. Sultan Iskandar Muda No.107, Medan. Product: Palm Kernel – MB. Volume 500 MT. Product delivery, loko PKS Perlabian. - 20 deliveries made to fulfil the Delivery Order No.2018/PL-PK/DO/12 for total PK volume of 500 MT from source: Perlabian POM; destination: "Buyer NBJ". - Sampled PK delivery: Weighbridge Despatch Slip Perlabian POM No.PK18000303W; DO No.2018/PL-PK/DO/12; contract No.2018/PL-PK/12; Product: Palm Kernel; Module: IP; Volume 25.63 MT; Cert. No.RSPO 555208; Transporter PT. Mulia Berjaya Abadi (buyer's transporter), vehicle No.BK9372BK – dated 28 August 2018. - TR-b83a8679-893a dated 4 February 2019; buyer: "Buyer MNA"; Product: CSPK-IP; Quantity 400 MT; - Kontrak Jual Beli No.2018/BM-PK/05 between Seller: PT. Tolan Tiga Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: "Buyer MNA", address: Gedung B&G Tower 9th Floor, Jl. Putri Hijau No.10, Kesawan, Medan Barat, 20111. Product: Palm Kernel – IP. Volume 400 MT. Dated 13 November 2018. - Delivery Order PT. Tolan Tiga Indonesia No.2018/PL-PK/DO/18 dated 3 December 2018. Seller: PT. Tolan Tiga Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: "Buyer MNA", address: Gedung B&G Tower 9th Floor, Jl. Putri Hijau No.10, Kesawan, Medan Barat, 20111. Product: Palm Kernel – IP. Volume 400 MT. Product delivery, loko PKS Perlabian. - 23 deliveries made to fulfil the Delivery Order No.2018/PL-PK/DO/18 for total PK volume of 400 MT from source: Perlabian POM; destination: "Buyer 	
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		<p>MNA", Kuala Tanjung.</p> <ul style="list-style-type: none"> - Sampled delivery: Weighbridge Despatch Slip No.PK18000480W; DO No.2018/PL-PK/DO/18; contract No.2018/PL-PK/18; Product: Palm Kernel; Module: IP; Volume 16.14 MT; Cert. No.RSPO 555208; Transporter PT. Sumatera Sarana Sekar Sakti, vehicle No.BK8498RO – dated 8 December 2018. - TR-c7cf2527-f449 dated 23 September 2018; buyer"Buyer OS"; Product: CSPO-SG; Quantity 499.91 MT; - Contract No.PTLO-10108 dated 1 November 2017 between Seller: PT. Tolan Tiga Indonesia Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Medan 20112. Buyer:"Buyer OS", CH-1180 Rolle. Product: CSPO SG. Volume 499.914 MT. - Delivery Order: No.2018/PL-CPO/DO/Dumai/No.86, 88, 89, 90, 92, 93, 95, 97, 99, 101, 102, 104, 106, 107, 110. Delivery Order No.2018/PL-CPO/DO/DUMAI/106 dated 30 July 2018. Delivery Order No.2018/PL-CPO/DO/DUMAI/108 dated 6 August 2018. - 104 deliveries made to fulfil the contract for total CPO volume of 2500 MT from source: Perlabian POM; delivery period: 18 July – 11 August 2018; destination: PT. Dumai Paricippta Abadi (bulking storage), Dumai. Note: total 2,500 MT party was comprise of 3 contracts. <p>Sampled delivery: Weighbridge Despatch Slip No.CPO18000917W; DO No.2018/PL-CPO/DO/DUMAI/94; Product: Crude Palm Oil; Module: IP; Volume 27.85 MT; Cert. No.RSPO 555208; Transporter: CV. Sejahtera Abadi, vehicle No.BK8121CU – dated 18 July 2018. Received in PT. DPA (bulking tank) with Receipt No.DPA.IN.180721033, vehicle BK8766CS; receipt 28.25 MT dated 21 July 2018.</p> <ul style="list-style-type: none"> - Shipping Instruction No.2018/TTI-SI/08 dated 8 August 2018; for contract No.PTLO-10108 of volume: 500 MT; product: CPO SG; shipper: PT. Tolan Tiga Indonesia; address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Medan 20112; Notify:"Buyer OS"; address: Rotterdam, The Netherlands. - Bill of Lading No.NVT471802 dated 18 August 2018. Shipper: PT. Tolan Tiga Indonesia; Notify Address:"Buyer OS"; Port of Loading: Dumai; Port of delivery: Rotterdam, The Netherlands; Tanker: MT Nina Victory V47/18; 	
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		<p>Commodity: Indonesian CSPO SG; quantity 499.914 MT; Remarks: RSPO SG, Certificate No.RSPO555208, expiry date 16 May 2020.</p> <ul style="list-style-type: none"> - TR-27fdc712-1c61 dated 27 December 2018; buyer: "Buyer OS"; Product: CSPO-SG; Quantity 500 MT; - Contract No.PTLO-10112 dated 1 November 2017 between Seller: PT. Tolan Tiga Indonesia Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Medan 20112. Buyer: "Buyer OS", CH-1180 Rolle. Product: CSPO SG. Volume 500 MT. - Delivery Order: 2018/PL-CPO/DO/Dumai/166, 168 169, 170, 171, 172, 174, 176, 177, 179. Delivery Order No.2018/PL-CPO/DO/DUMAI/166 dated 21 November 2018 for 250 MT CPO IP. - 56 deliveries made to fulfil the contract for total CPO volume of 1,500 MT from source: Perlabian POM; delivery period: 11-19 December 2018; destination: PT. Dumai Paricippta Abadi (bulking storage), Dumai. Note: total 1,500 MT party was comprise of 2 RSPO contracts. Sampled delivery: Weighbridge Despatch Slip No.CPO18001646W; DO No.2018/BM-CPO/DO/DUMAI/166; Product: Crude Palm Oil; Module: IP; Volume 25.25 MT; Cert. No.RSPO 555208; Transporter: Pengangkutan Sahabat vehicle No.BL9025U – dated 11 December 2018. Received in PT. DPA (bulking tank) with Receipt No.DPA.IN.181212035, vehicle BL9025U; receipt 25.25 MT dated 12 December 2018. - Shipping Instruction No.2018/TTI-SI/13 dated 11 December 2018; for contract No.PTLO-10112 of volume: 500 MT; product: CPO SG; shipper: PT. Tolan Tiga Indonesia; address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Medan 20112; Notify:"Buyer OS"; address: Rotterdam, The Netherlands. Bill of Lading No.KAS/DUM-RDM/22 dated 23 December 2018. Shipper: PT. Tolan Tiga Indonesia; Notify Address:"Buyer OS"; Port of Loading: Dumai; Port of delivery: Rotterdam, The Netherlands; Tanker: MT Kastav Voy.28; Commodity: Indonesian CSPO SG; quantity 1,499.98 MT; Remarks: RSPO SG, Certificate No.RSPO555208, expiry date 16 May 2020. 	
	<ul style="list-style-type: none"> • Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the 	<p>Not applicable for CPO Mills. Not applicable (N/A)</p>	<p>N/A</p>

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	<p>generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</p>		
<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 		<p>PT. Tolan Tiga Indonesia – Perlabian POM removed 4,999.98 MT CSPO from PalmTrace through transaction ST-TR-297ef27e-eb48 dated 11 June 2018 (ISCC).</p> <p>PT. Tolan Tiga Indonesia – Perlabian POM removed 1,999.91 MT CSPO from PalmTrace through transaction ST-TR-b13ce282-9291 dated 11 June 2018 (ISCC).</p> <p>PT. Tolan Tiga Indonesia – Perlabian POM removed 2,999.98 MT CSPO from PalmTrace through transaction ST-TR-61c53804-824a dated 21 December 2018 (ISCC).</p> <p>Another 13,045.39 CPO from ISCC sales have not been removed from PalmTrace.</p> <p>Another 1,502.16 MT CSPO from local/conventional sales have not been removed from PalmTrace.</p> <p>PT. Tolan Tiga Indonesia – Perlabian POM removed 3,500.00 MT CSPO from PalmTrace through transaction ST-TR-be688555-06a7 dated 24 September 2018 (local/conventional).</p> <p>Correction: The ENC manager coordinated with Marketing and asked Antwerp to remove the quota CPO and PK on PT. Tolan Tiga Indonesia's PalmTrace account. Antwerp has removed the quota CPO of 14,547.63 MT from PT. Tolan Tiga Indonesia PalmTrace account: PalmTrace transaction No.ST-TR-94cf6eaf-92f3 dated 1 April 2019 for 3,499.94MT CSPO removed; PalmTrace transaction No.ST-TR-512d5a3c-cb27 dated 1 April 2019 for 6,299.95 MT CSPO removed; PalmTrace transaction No.ST-TR-5171a764-806d dated 3 April 2019 for 1.46 MT CSPO removed; PalmTrace transaction No.ST-TR-1d0c0d3f-2fd1 dated 1 April 2019 for 3,245.58 MT CSPO removed; PalmTrace transaction No.ST-TR-d47403d6-9b65 dated 1 April 2019 for 1,500.7 MT CSPO removed;</p>	<p>NC Major Yes</p>

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		Antwerp has removed the quota PK of 1,128.69 MT from PT. Tolan Tiga Indonesia PalmTrace account: PalmTrace transaction No.ST-TR-7a1c564b-7f13 dated 3 April 2019 for 1,128.69.7 MT CSPK removed;	
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	PT. Tolan Tiga Indonesia – Perlabian POM did not buy any CSPO and/or CSPK both through physical or credit. Not applicable (N/A)	N/A
5.8. Training			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	<p>Procedure Training Carried by OU No.HRA-02-05/09-08-2018/rev.0 dated 1 November 2018, explains activity covering distribute training curriculum; create annual training schedule; compile training schedule; training execution; create and send training report; record training documentation;</p> <p>Based on "Program Training Karyawan & Staff PL POM 2018", Supply Chain Training planned for October 2018 - implemented 9 February 2018. Implementation of training "Supply Chain RSPO Certification Standar 2017, dated 10 March 2018. Training attended by weighbridge officer, security, document control, laboratory superintendent, laboratory analyst, and mill head assisstant.</p> <p>Inside "Program Training Karyawan & Staff Perlabian POM 2019", Supply Chain Training planned for February 2019.</p>	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	<ul style="list-style-type: none"> - Angga Ariadi (laboratory - despatch) have participated in trainings: Sosialisasi RSPO Supply Chain Standard 2017 dated 4 February 2019; - Fironica Julianti (weighbridge officer) have participated in trainings: RSPO Supply Chain dated 20 December 2016; Sosialisasi RSPO/Supply Chain dated 10 March 2018; - Rusmiati (weighbridge officer) have participated in trainings: RSPO RSPO Supply Chain dated 20 December 2016; Sosialisasi RSPO/Supply Chain dated 10 March 2018; 	Yes
5.9. Record Keeping			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these	PT. Tolan Tiga Indonesia – Perlabian POM maintains accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements.	Yes

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	RSPO Supply Chain Certification Standard requirements.		
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	<p>Procedure Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/rev.0 – Section 5.2 Production Process in Mill stipulated storage and control of records related to production process in the mill are kept for shelf life of at least five (5) years or determined by operating unit.</p> <p>PT. Tolan Tiga Indonesia – Perlabian POM have determined the retention time for all records and reports related to implementation of RSPO SCCS in “Daftar Induk Masa Simpan Dokumen” dated 18 September 2017:</p> <ul style="list-style-type: none"> - Dokumen terkait Traceability 10 years; - FFB receiving report 10 years; - Weighbridge ticket for CPO and PK 10 years; - Delivery Order from Marketing Department for CPO and PK 10 years; - Monthly Progress Report 10 years; - Production Report, Despatch CPO & PK 10 years; - Mill Processing Data 10 years; - Processing Daily Report 10 years; - Surat Pengantar FFB 10 years; <p>Weighbridge ticket for FFB receipt kept for 10 years;</p>	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	<p>PT. Tolan Tiga Indonesia – Perlabian POM is able to provide estimate volume of CPO and PK in 12 months period as in “Budget Produksi Bulanan” consists estimate of FFB receiving from Perlabian Estate and Tolan Estate.</p> <p>Estimate of FFB volume received and processed in Perlabian POM for period May 2019 to April 2020 is 208,928 MT. Estimated volume for CPO is 50,143 MT and estimated volume for PK is 12,257 MT.</p>	Yes
5.10. Conversion factors			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as	<p>Conversion rate is applied to provide reliable estimation of CPO and PK produced. For year 2019, the budget for conversion from FFB into CPO is 22.22%, whilst from FFB to PK is 5.5%.</p> <p>PT. Tolan Tiga Indonesia – Perlabian POM reported the conversion factors based on averaged actual monthly OER and KER.</p>	Yes

	used in the oleochemical and personal care industries.																																						
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	<p>The actual conversion rates in form of Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in Daily Production Report. The actual OER and KER updated on each month:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>OER (%)</th> <th>KER (%)</th> </tr> </thead> <tbody> <tr> <td>Apr 2018</td> <td>22.30</td> <td>5.67</td> </tr> <tr> <td>May 2018</td> <td>21.92</td> <td>5.64</td> </tr> <tr> <td>Jun 2018</td> <td>21.39</td> <td>5.65</td> </tr> <tr> <td>Jul 2018</td> <td>22.01</td> <td>5.12</td> </tr> <tr> <td>Aug 2018</td> <td>21.45</td> <td>5.65</td> </tr> <tr> <td>Sep 2018</td> <td>20.33</td> <td>5.65</td> </tr> <tr> <td>Oct 2018</td> <td>21.80</td> <td>5.65</td> </tr> <tr> <td>Nov 2018</td> <td>21.72</td> <td>5.91</td> </tr> <tr> <td>Dec 2018</td> <td>21.87</td> <td>5.56</td> </tr> <tr> <td>Jan 2019</td> <td>21.45</td> <td>5.65</td> </tr> <tr> <td>Feb 2019</td> <td>17.19</td> <td>4.67</td> </tr> </tbody> </table>	Month	OER (%)	KER (%)	Apr 2018	22.30	5.67	May 2018	21.92	5.64	Jun 2018	21.39	5.65	Jul 2018	22.01	5.12	Aug 2018	21.45	5.65	Sep 2018	20.33	5.65	Oct 2018	21.80	5.65	Nov 2018	21.72	5.91	Dec 2018	21.87	5.56	Jan 2019	21.45	5.65	Feb 2019	17.19	4.67	
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5.11. Claims																																							
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	PT. Tolan Tiga Indonesia – Perlavian POM has not made any claim regarding the use of or support of RSPO certified oil palm products. The organization has good understanding on the RSPO Rules on Market Communications and Claims.	Yes																																				
General corporate communications																																							
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	PT. Tolan Tiga Indonesia – Perlavian POM is a subsidiary of RSPO registered member, SIPEF Group. SIPEF Group, the parent company of PT. Tolan Tiga Indonesia – Perlavian POM is highlighting its commitment to the principles of RSPO – therefore making an off product communication. The corporate communication of SIPEF Group can be seen in the corporate website: www.sipef.com .	Yes																																				
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status	Corporate communication in SIPEF Group website: a. Display its RSPO membership status: No, SIPEF did not display its RSPO membership status.	Yes																																				

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	<p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>	<p>b. Display the RSPO web address: Not in direct manner. SIPEF made a link to RSPO website.</p> <p>c. State the member supports the work of the RSPO: Not in direct manner. In the website, SIPEF wrote “We believe in a landscape approach to new oil palm developments, guided by the methodology endorsed by the RSPO”.</p> <p>d. State the member’s history with regards to the RSPO: No. SIPEF did not state their history with regards to the RSPO.</p> <p>Use of RSPO Trademark to promote its membership of the RSPO: No, SIPEF did not use RSPO trademark in its corporate communication such in website.</p>	
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	No, SIPEF did not display its RSPO membership status. It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Yes
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	No, SIPEF did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the SIPEF’s own products.	Yes
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, SIPEF Group did not display the RSPO Corporate Logo in the website as well as in the correspondence letter.	Yes
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	PT. Tolan Tiga Indonesia – Perlabian POM stating RSPO IP/SG/MB in the sales document based on buyer requirement. The RSPO SG notation adhere to the requirements of RSPO SCCS. PT. Tolan Tiga Indonesia – Perlabian POM is certified against RSPO P&C and comply to the RSPO SCCS for CPO Mills – Module D: Identity Preserved. All of the palm oil mills managed to demonstrate integrity of supply chain against the identity preserved system. During sales of CSPO and CSPK, PT. Tolan Tiga Indonesia – Perlabian POM made clear the product is Segregated. Because at the point of shipping, all identity preserved oil	Yes

5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	palm product have been mixed between Certificate Holder’s palm oil mills. PT. Tolan Tiga Indonesia – Perlabian POM stating RSPO IP/SG/MB in the sales document based on buyer requirement. The RSPO SG notation adhere to the requirements of RSPO SCCS. PT. Tolan Tiga Indonesia – Perlabian POM is certified against RSPO P&C and comply to the RSPO SCCS for CPO Mills – Module D: Identity Preserved. All of the palm oil mills managed to demonstrate integrity of supply chain against the identity preserved system. During sales of CSPO and CSPK, PT. Tolan Tiga Indonesia – Perlabian POM made clear the product is Segregated. Because at the point of shipping, all identity preserved oil palm product have been mixed between Certificate Holder’s palm oil mills.	Yes
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	PT. Tolan Tiga Indonesia – Perlabian POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFB into CPO and PK. Not Applicable.	N/A
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification. For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product	PT. Tolan Tiga Indonesia – Perlabian POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached. Not applicable.	N/A

	and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.		
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	PT. Tolan Tiga Indonesia – Perlabian POM is an RSPO certificate holder with certificate number RSPO 555208 valid until 16 May 2020. The certificate holder sold its oil palm product in bulk, no product label attached. No 'product-specific' claims are used. Not applicable.	N/A
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	PT. Tolan Tiga Indonesia – Perlabian POM is an RSPO certificate holder with certificate number RSPO 555208 valid until 16 May 2020. The certificate holder sold its oil palm product in bulk, no product label attached. No 'product-specific' claims are used. Not applicable.	N/A
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	PT. Tolan Tiga Indonesia – Perlabian POM sold its oil palm product in bulk, no product pack are used. Not applicable.	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	PT. Tolan Tiga Indonesia – Perlabian POM communication has not stated information about the claimant's RSPO membership status.	Yes
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	PT. Tolan Tiga Indonesia – Perlabian POM is certified RSPO P&C, selling CSPO and CSPK. PT. Tolan Tiga Indonesia – Perlabian POM and the parent compant - SIPEF Group did not make any communication about their supplier's RSPO membership status.	Yes
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	The site sold its oil palm product in bulk, up to this moment, PT. Tolan Tiga Indonesia – Perlabian POM has not use RSPO trademark.	Yes
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised	Up to this moment, PT. Tolan Tiga Indonesia – Perlabian POM has not use any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products.	Yes

	product-specific claim.		
6.8	<p>RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>	<p>PT. Tolan Tiga Indonesia – Perlabian POM is not a retailer or food service company. Not applicable.</p>	N/A

MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES

Certified oil palm content (IP)

	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	PT. Tolan Tiga Indonesia – Perlabian POM did not received FFB from non-certified source, therefore implement Module D – Identity Preserved (IP).	Yes
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	PT. Tolan Tiga Indonesia – Perlabian POM did not received FFB from non-certified source, therefore implement Module D – Identity Preserved (IP).	Yes
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in	PT. Tolan Tiga Indonesia – Perlabian POM did not received FFB from non-certified source, therefore implement Module D – Identity Preserved (IP).	Yes

	<p>accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>		
Labelling and trademark (IP)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ol style="list-style-type: none"> RSPO trademark which includes the tag 'CERTIFIED' or RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	<p>PT. Tolan Tiga Indonesia – Perlabian POM did not received FFB from non-certified source, therefore implement Module D – Identity Preserved (IP). However, PT. Tolan Tiga Indonesia – Perlabian POM did not use on-product labelling/RSPO trademark. Not Applicable.</p>	<p>N/A</p>
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org 	<p>PT. Tolan Tiga Indonesia – Perlabian POM did not received FFB from non-certified source, therefore implement Module D – Identity Preserved (IP). However, PT. Tolan Tiga Indonesia – Perlabian POM did not use on-product labelling/RSPO trademark. Not Applicable.</p>	<p>N/A</p>

	<ul style="list-style-type: none"> • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content (MB)			
	95% or above of the oil palm content must be RSPO MB-certified.	PT. Tolan Tiga Indonesia – Perlabian POM did not received FFB from non-certified source, therefore implement Module D – Identity Preserved (IP). PT. Tolan Tiga Indonesia – Perlabian POM did not implement Module E – Mass Balance (MB). Not Applicable.	Yes
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	PT. Tolan Tiga Indonesia – Perlabian POM did not received FFB from non-certified source, therefore implement Module D – Identity Preserved (IP). PT. Tolan Tiga Indonesia – Perlabian POM did not implement Module E – Mass Balance (MB). Not Applicable.	Yes
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: ‘Certified sustainable palm oil’. • The RSPO label MUST contain the tag ‘MIXED’. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag ‘MIXED’ on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. 	PT. Tolan Tiga Indonesia – Perlabian POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module D - CPO Mills: Identity Preserved. Not applicable.	N/A

	<ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. • In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed. 	<p>PT. Tolan Tiga Indonesia – Perlabian POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module D - CPO Mills: Identity Preserved. Not applicable.</p>	<p>N/A</p>
	<p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <p>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p>	<p>PT. Tolan Tiga Indonesia – Perlabian POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module D - CPO Mills: Identity Preserved. Not applicable.</p>	<p>N/A</p>
MODULE C – PARTIAL PRODUCT CLAIMS			

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	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> • The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. • At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. • The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. • The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. • The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim. 	<p>PT. Tolan Tiga Indonesia – Perlabian POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module D - CPO Mills: Identity Preserved. Not applicable.</p>	<p>N/A</p>
MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES			
	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made</p>	<p>PT. Tolan Tiga Indonesia – Perlabian POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module D - CPO Mills: Identity Preserved. Not applicable.</p>	<p>N/A</p>
	<p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p>	<p>PT. Tolan Tiga Indonesia – Perlabian POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module D - CPO Mills: Identity Preserved.</p>	<p>N/A</p>

	95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made	Preserved. Not applicable.	
5.12. Complaints			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	The procedure for handling non-conforming product regulated under Supply Chain and Traceability of Palm Products No.MKT-03-06/04-2019 dated 18 March 2019 – Section 5.4 Evaluation by the Certification Body, stating control of non-conforming product refer to Procedure Customers Complaints Handling No.MKT-03-02/02-10-2017. Procedure Customers Complaints Handling No.MKT-03-02/02-10-2017 explains the flow process comprise of review the buyer complaint, verifies the buyer complaint, decision making, payment, inform the buyer. Based on interview with marketing staff, Mr. Irzal, throughout 2018, there is no complaint received against PT. Tolan Tiga Indonesia – Perlabian POM.	Yes
5.13. Management Review			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	Procedure for Routine Visit and Internal Audit No.ENC-01-02/04-03-2019. The procedure covers internal audit planning, internal audit communication, internal audit team competence, internal audit execution, implementation of corrective action plan and management review. Section 6. Frequency and Timing stipulated the internal audit carried out minimum once per year; management review minimum once per year.	Yes
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. 	Management review dated 16 March 2019: <ul style="list-style-type: none"> - Results of internal audits covering RSPO Supply Chain Certification Standard: Internal audit have been carried out on 7-8 February 2019, resulted in 4 findings; - Process performance and product conformity: ENC team made traceability exercise from sampled PalmTrace transaction; - Customer feedback: based on customer satisfaction survey conducted by marketing department, no complaints referring to sales of palm product from PT. Tolan Tiga Indonesia – Bukit Maradja POM; - Status of preventive and corrective actions: All findings from internal audit 	Yes

	<ul style="list-style-type: none"> Recommendations for improvement. 	<p>process have been closed out;</p> <ul style="list-style-type: none"> Follow-up actions from management reviews: there was no follow up action required from previous management review; Changes that could affect the management system: There is a revised SOP related to supply chain – required socialization; <p>Recommendations for improvement: Suggestion that subsequent management review covers all unit operational for RSPO SCCS implementation (Marketing dept., Perlabian POM and bulking storage tank in Dumai).</p>	
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> Improvement of the effectiveness of the management system and its processes. Resource needs. 	<p>Management review dated 16 March 2019:</p> <ul style="list-style-type: none"> Improvement of the effectiveness of the management system and its processes: <p>Resource needed:</p>	Yes

Appendix E: CPO Mill Supply Chain Assessment Report (Module D - CPO Mills: Identity Preserved)

D.1 Definition			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
D.1.1	A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.	Management decided PT. Tolan Tiga Indonesia – Perlabian POM to implement RSPO Supply Chain Module D CPO Mills: Identity Preserved. With the implementation of Module D CPO Mills: Identity Preserved, the POM only received and process FFB from certified company-owned estate. PT. Tolan Tiga Indonesia – Perlabian POM implemented the procedure of supply chain and traceability based on The procedure is Procedure Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019. The scope of procedure applicability covers estate operation, mill operation and marketing activity. Procedure completed with the flow diagram of FFB receiving, processing in POM, CPO shipping to tank terminal; Receiving and shipping of CPO from tank terminal. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager.	Yes
D.2 Explanation			
D.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimate annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases. PT. Tolan Tiga Indonesia – Perlabian POM received certified raw material (Fresh Fruit Bunch) from its own estate: - Perlabian Estate; - Tolan Estate;	Yes

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D.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	PT. Tolan Tiga Indonesia – Perlabian POM is a subsidiary of SIPEF Group, which is a member of RSPO with membership number 1-0021-05-000-00, since 7 December 2005. PT. Tolan Tiga Indonesia – Perlabian POM has been registered in RSPO IT Platform account RSPO_PO1000000099.	Yes
D.3 Documented procedures			
D.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a. Complete and up to date procedures covering the implementation of all the elements in these requirements;	Procedure Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019. The scope of procedure applicability covers estate operation, mill operation and marketing activity. Procedure completed with the flow diagram of FFB receiving, processing in POM, CPO shipping to tank terminal; Receiving and shipping of CPO from tank terminal. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager.	Yes
	b. The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site’s procedures for the implementation of this standard.	The organization has stated in the Job Description that responsible person over the implementation of supply chain and traceability in Perlabian POM is the Mill Manager, currently held by Mr. Sarwedi MT Sitorus.	Yes
D.3.2	The site shall have documented procedures for receiving and processing certified FFBs.	PT. Tolan Tiga Indonesia - Perlabian POM has a written procedures and/work instruction for ensuring the implementation of RSPO Supply Chain Standard. The procedure are complete and up to date covering the implementation of all elements in the supply chain requirements, including Process at Palm Oil Mill, covers FFB and Loose fruit receiving, identification, production process, delivery of product and recording.	Yes
D.4 Purchasing and goods in			
D.4.1	The site shall verify and document the tonnage and sources of certified FFBs received.	The FFB tonnage received from all certified supply bases. PT. Tolan Tiga Indonesia – Perlabian POM received certified raw material (Fresh Fruit Bunch) from its own estate: - Perlabian Estate; - Tolan Estate; There is no FFB received from other source.	Yes

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		<p>PT. Tolan Tiga Indonesia – Perlabian POM has demonstrated Procedure Supply Chain and Traceability of Palm Products. Chapter 5.2 of the procedure indicates the Weighbridge Clerk has responsibility to input data and print “Receiving Slip” based on FFB Delivery Note, covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>Document FFB Delivery Note and FFB Receiving Slip described identity and location of FFB source and other item required e.g.:</p> <ul style="list-style-type: none"> - FFB Delivery Note No.PLE/009210 dated 25 September 2018; issued by Perlabian Estate, Division F5; block 95D02A; Vehicle BK9716YE; Mandor: Tumijan; Year of planting 1995; Volume 250 bunches; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 555208. - FFB Receiving Slip Ticket No.FFB18023957W dated 25 September 2018 issued by Perlabian POM, Estate: from Perlabian Estate; Vehicle BK 9716YE; Transporter: Perlabian Estate; Product: FFB; DO No.09210; Nett weight: 5,46 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 555208. - FFB Delivery Note No.TLE/040381 dated 25 September 2018; issued by Tolan Estate, Division F4; Vehicle BK8298YS; Mandor: Nanda; Block: 01E29 (267 bunches); stamped as Sustainable Product – IP, RSPO certificate No. RSPO 55208. - FFB Receiving Slip Ticket No.FFB18023956W dated 25 September 2018 issued by Perlabian POM, Estate: from Tolan Estate; Vehicle BK8298YG; Transporter: Tolan Estate; Product: FFB; DO No.TLE/040381; Nett weight: 6 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 555208. 	
D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	<p>PT. Tolan Tiga Indonesia – Perlabian POM has demonstrated Procedure Supply Chain and Traceability of Palm Products.. The procedure explains OU will report any projected overproduction.</p> <p>During this annual surveillance assessment, PT. Tolan Tiga Indonesia – Perlabian POM was not over sold the CPO and PK production.</p>	Yes
D.5 Record keeping			
D.5.1	The site shall record and balance all receipts of RSPO certified FFB	Perlabian POM Daily Production Figure dated 25 March 2019:	Yes

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	<p>and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p><i>IP Mill must report on real time basis.</i></p>	<p>FFB stock before 175.67 MT; FFB received 517.88 MT; FFB processed 460.83 MT; FFB stock carry forward 232.72 MT; Cages processed 200 cages; Processing hour 8.33 hours; Mill throughput 55.32 ton/hour; CPO OER 21.81%; PK KER 5.67%; CPO production 100.50 MT; PK production 26.11 MT; CPO stock 1121.94 MT; CPO despatched 107.29 MT; CPO produced 100.50 MT; stock CPO carry forward 1115.16 MT; CPO stock at bulking station 3,508.19 MT – total CPO stock 4,623.35 MT PK stock 165.83 MT; PK despatched 0 MT; PK produced 26.11 MT; stock CPO carry forward 191.94 MT; Dispatch per day (to bulking station) and sales does not exceed current stock.</p>	
D.6 Processing			
D.6.1	<p>The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.</p>	<p>PT. Tolan Tiga Indonesia – Perlabian POM did not receive any non-certified FFB. Therefore, no non-certified FFB being entered the process, no non-certified CPO and PK being produced, no non-certified product being dispatched. Storage tank for CPO dedicated only for certified oil. Silo for PK used to store non-certified product.</p>	Yes

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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1.	Mar 2018	16,730.57	0	16,730.57
2.	Apr 2018	16,510.70	0	16,510.70
3.	May 2018	17,739.33	0	17,739.33
4.	Jun 2018	12,873.07	0	12,873.07
5.	Jul 2018	21,953.30	0	21,953.30
6.	Aug 2018	19,428.91	0	19,428.91
7.	Sep 2018	19,374.10	0	19,374.10
8.	Oct 2018	22,359.36	0	22,359.36
9.	Nov 2018	16,008.77	0	16,008.77
10.	Dec 2018	16,074.76	0	16,074.76
11.	Jan 2019	17,557.64	0	17,557.64
12.	Feb 2019	11,649.38	0	11,649.38
		208,259.89		208,259.89

Note:
Last audit March 2018

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1.	Mar 2018	3,746.23	942.96
2.	Apr 2018	3,681.44	936.03
3.	May 2018	3,869.41	1,000.89
4.	Jun 2018	2,697.10	713.09
5.	Jul 2018	4,886.12	1,135.18
6.	Aug 2018	4,093.07	1,080.21
7.	Sep 2018	4,018.20	1,114.24
8.	Oct 2018	4,857.44	1,259.61
9.	Nov 2018	3,473.45	942.97
10.	Dec 2018	3,568.29	912.17
11.	Jan 2019	3,712.28	977.35
12.	Feb 2019	3,203.97	688.28
		45,807.00	11,702.98

Note:
Last audit March 2018

C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1.	Buyer "OS"	TR-c7cf2527-f449	499.91	-
2.	Buyer "MNA"	TR-9c0b6c45-e1d9	-	900.00

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3.	Buyer "MNA"	TR-fbdbf94a-a1ea	-	950.00
4.	Buyer "NKCP"	TR-f568171a-e50a	-	500.00
5.	Buyer "OS"	TR-03d3b89e-3582	500.00	-
6.	Buyer "OS"	TR-66c9f614-2dd9	1,000.00	-
7.	Buyer "OS"	TR-95f877e0-8b10	999.93	-
8.	Buyer "OS"	TR-5e49f3ae-843e	6,199.99	-
9.	Buyer "MNA"	TR-dbc25854-e0aa	-	1,000.00
10.	Buyer "MNA"	TR-e69643c7-70ba	-	600.00
11.	Buyer "NBj"	TR-827f1d39-06cd	-	500.00
12.	Buyer "OS"	TR-0745061d-765e	2,000.00	-
13.	Buyer "OS"	TR-f65dfa40-49f6	999.97	-
14.	Buyer "OS"	TR-27fdc712-1c61	500.00	-
15.	Buyer "OS"	TR-76b20d90-643f	999.98	-
16.	Buyer "MNA"	TR-c7317ad7-f337	-	500.00
17.	Buyer "MNA"	TR-b83a8679-893a	-	400.00
18.	Buyer "MNA"	TR-b5120548-83c0	-	600.00
19.	Buyer "IMT"	TR-95d748d2-e0a5	-	500.00
20.	Buyer "IMT"	TR-b7d3c9ac-aef6	-	200.00
			13,699.78	6,650.00

Note:

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D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)

No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1.	Mar 2018 - nil	-	0	0
2.	Apr 2018 - nil	-	0	0
3.	May 2018 - "Buyer OS"	ISCC	4,999.98	0
4.	Jun 2018 - "Buyer OS"	ISCC	1,999.90	0
5.	Jul 2018 - "Buyer OS"	ISCC	6,299.94	0
6.	Aug 2018 - "Buyer OS"	ISCC	3,499.94	0
7.	Sep 2018 - nil	-	0	0
8.	Oct 2018 - nil	-	0	0
9.	Nov 2018 - nil	-	0	0
10.	Dec 2018 - "Buyer OS"	ISCC	2,999.98	0
11.	Jan 2019 - nil	-	0	0
12.	Feb 2019 - "Buyer IMT"	ISCC	3,425.58	0
			23,225.32	0

Note:

Last audit March 2018

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)

No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1.	Mar 2018 - Transporter	0.08	0
2.	Apr 2018 - nil	0	0
3.	May 2018 - nil	0	0

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4.	Jun 2018 – nil	0	0
5.	Jul 2018 – Transporter/“Buyer MTM”/“Buyer IM”	0.27	1,014.95
6.	Aug 2018 - Transporter/“Buyer MTM”/“Buyer IVM”/“Buyer MM”/“Buyer NBJ”	0.03	934.81
7.	Sep 2018 - Transporter/“Buyer MTM”/“Buyer IVM”/“Buyer MM”/“Buyer NBJ”	0.13	1,102.07
8.	Oct 2018 - Transporter/“Buyer MTM”/“Buyer IVM”/“Buyer MM”/“Buyer NBJ”	0.12	395.32
9.	Nov 2018 - Transporter/“Buyer MTM”/“Buyer IM”/“Buyer MM”/“Buyer NBJ”	0.43	499.11
10.	Dec 2018 – Transporter	0.48	0
11.	Jan 2019 – Transporter/“Buyer MNA”/“Buyer MM”	500.28	663.36
12.	Feb 2019 – Transporter/“Buyer MM”	1,000.42	0
		1,502.24	4,609.62

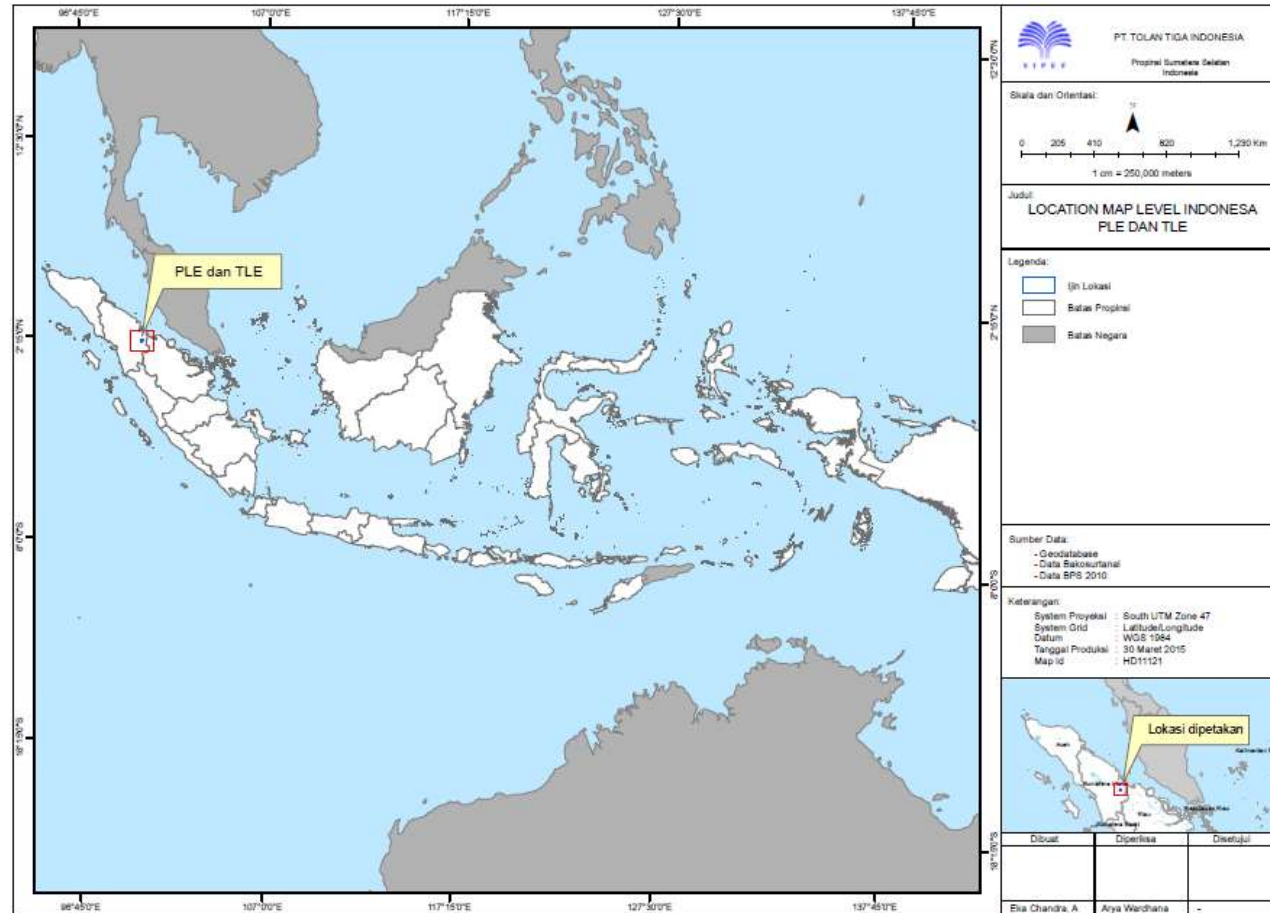
Note:

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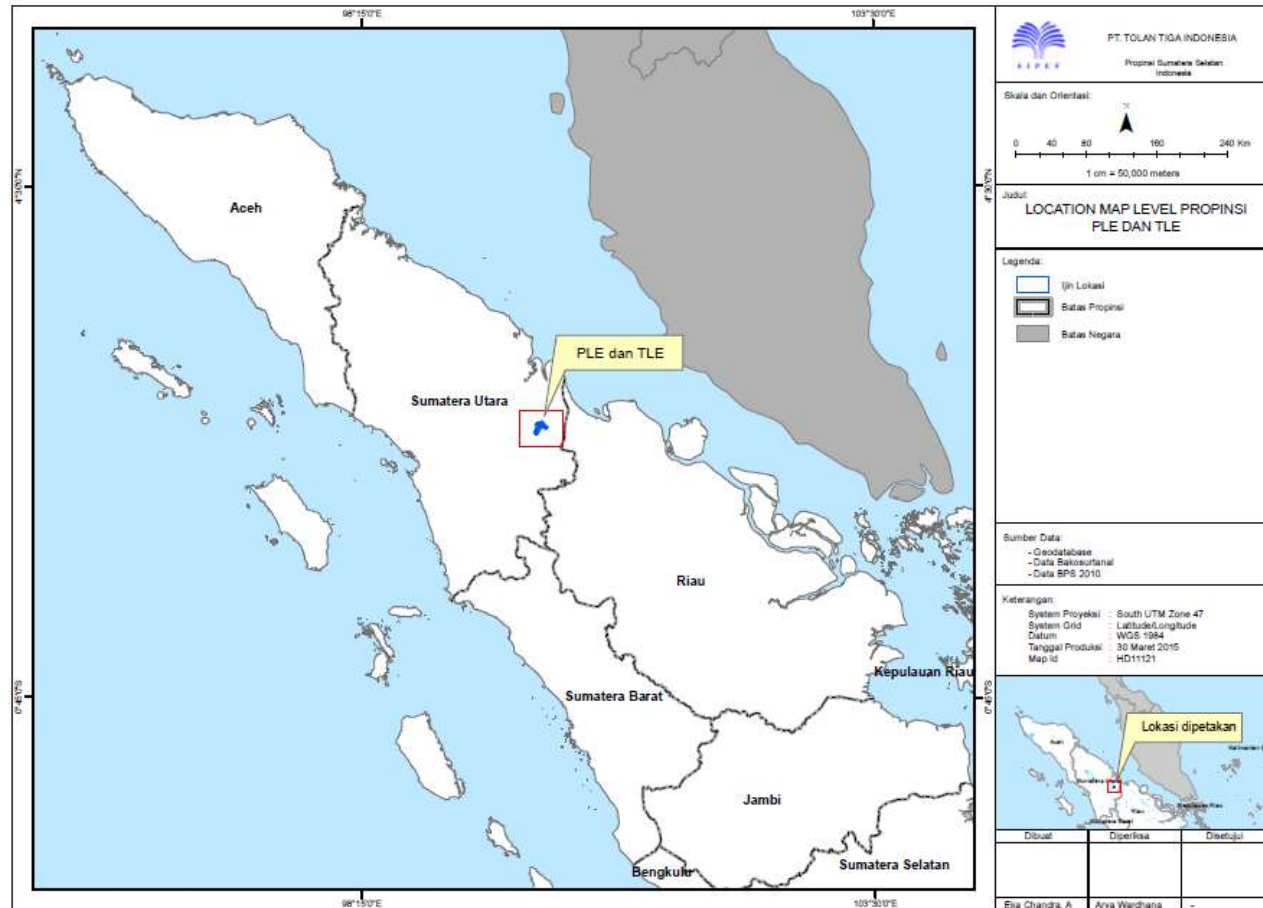
F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)

No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		

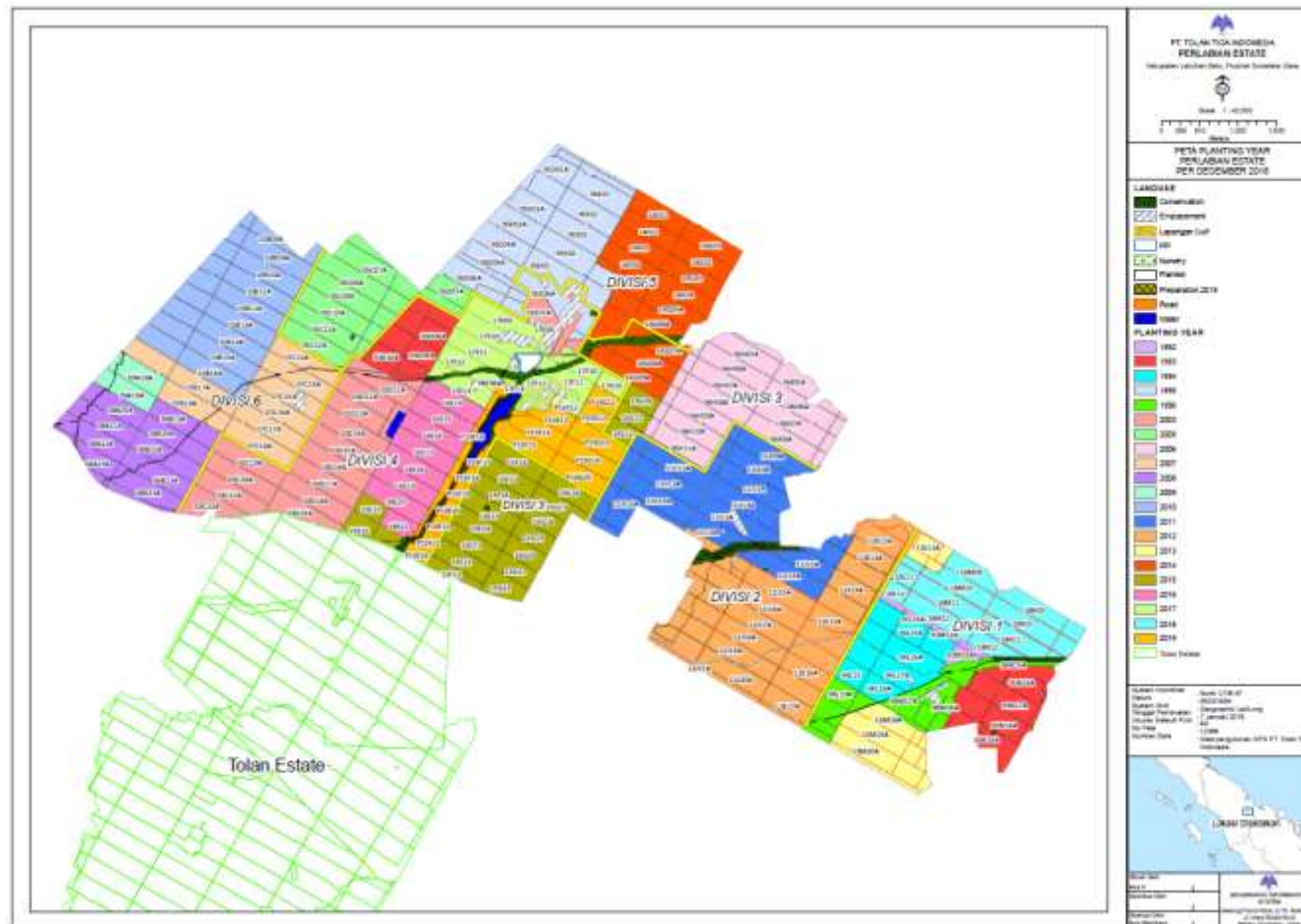
Appendix F: Location Map of Certification Unit and Supply bases



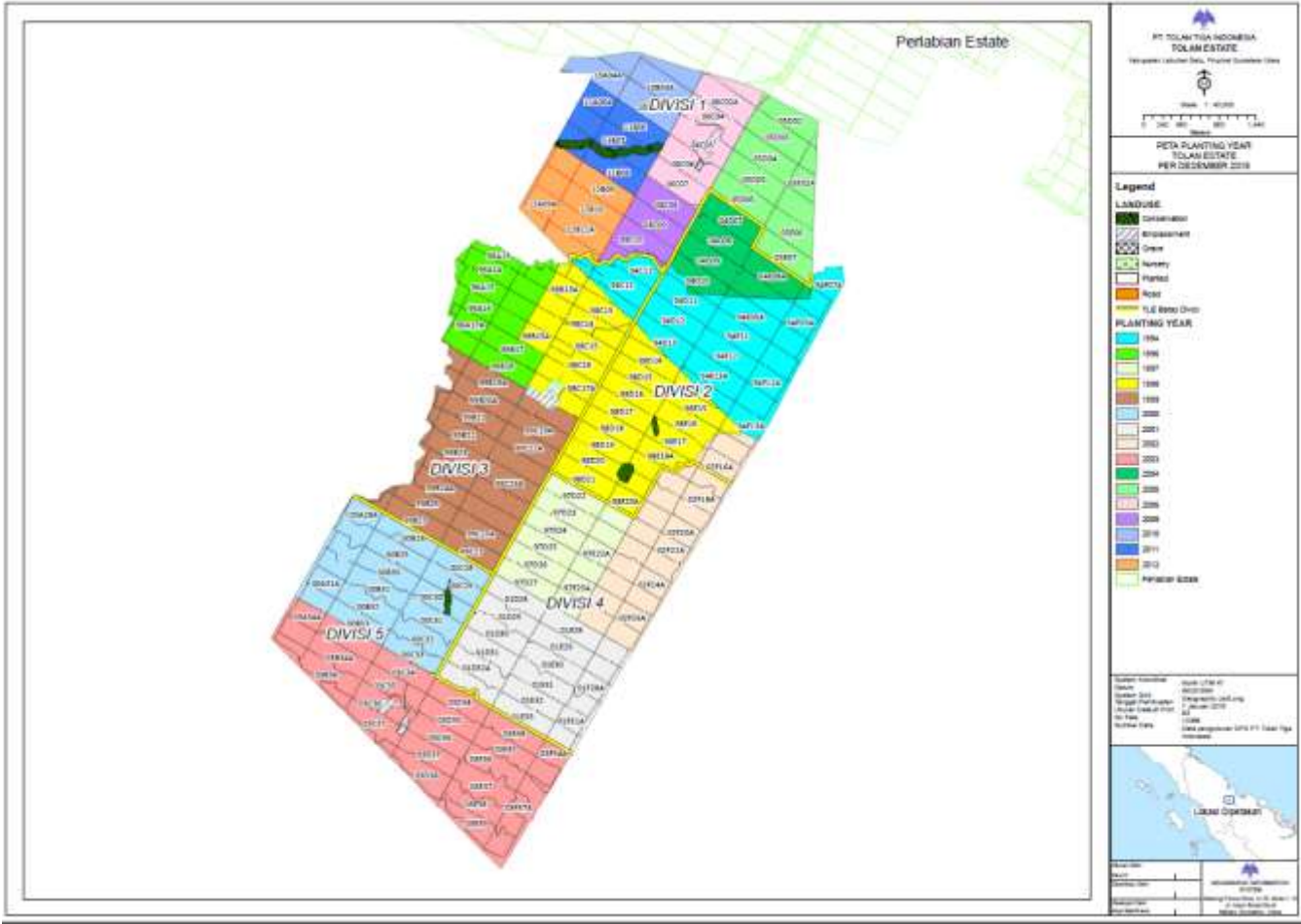
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Appendix G: Estate Field Map



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Appendix H: List of Smallholder Sampled

N/A

Appendix I: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainablebe Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure