

**RSPO PRINCIPLE AND CRITERIA –
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. Eastern Sumatra Indonesia – Bukit Maradja Palm Oil Mill Location of Certification Unit: Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, Sumatera Utara Province, Indonesia

TABLE of CONTENTS	Page No
Section 1: Scope of the Certification Assessment.....	4
1. Company Details	4
2. Certification Information.....	4
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases	5
5. Description of Supply Base	5
6. Plantings & Cycle.....	5
7. Certified Tonnage of FFB (Own Certified Scope).....	6
8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *	6
9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable.....	6
10. Certified Tonnage.....	6
11. Actual Sold Volume (CPO)	7
12. Actual Sold Volume (PK).....	7
13. Actual Group certification Claims	7
Section 2: Assessment Process	8
2.1 Assessment Methodology, Programme, Site Visits	8
2.2 BSI Assessment Team:	10
2.3 Assessment Plan.....	11
Section 3: Assessment Findings	14
3.1 Normative requirement applied for this assessment:	14
3.2 Time Bound Plan progress for multiple management units.....	14
3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)	17
3.4 Details of findings.....	17
3.4.1 Status of Nonconformities Previously Identified and Observations.....	19
3.4.2 Summary of the Nonconformities and Status.....	21
Formal Signing-off of Assessment Conclusion and Recommendation	29
Appendix A: Summary of Findings.....	30
Appendix B: Approved Time Bound Plan.....	120
Appendix C: GHG Reporting Executive Summary	121
Appendix D: General Chain of Custody Requirements for the Supply Chain.....	123
Appendix E : CPO Mill Supply Chain Assessment Report (Module D - CPO Mills: Identity Preserved)	148
Supply Chain Declaration (<i>Applicable For Appendix E</i>)	152

RSPO Public Summary Report
Revision 8 (Mar /2019)

Appendix F: Location Map of Certification Unit and Supply bases155
Appendix G: Estate Field Map157
Appendix H: List of Smallholder Sampled.....159
Appendix I: List of Abbreviations160

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, 10th Floor, Suite 1-11 Jl.Imam Bonjol No.9 Medan – 20112 Sumatera Utara Province Indonesia		
Subsidiary (Certification Unit Name)	PT. Eastern Sumatra Indonesia – Bukit Maradja Palm Oil Mill		
Address	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, Sumatera Utara Province, 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 632266	Date of First Certification	17 May 2010
		Certificate Start Date	17 May 2015
		Certificate Expiry Date	16 May 2020
Scope of Certification	Production of CPO and PK at Bukit Maradja POM with 3 estates as supply base, namely Bukit Maradja Estate (PT. Eastern Sumatera Indonesia), Kerasaan Estate (PT. Kerasaan Indonesia) and Timbang Deli Estate (PT. Timbang Deli Indonesia); with Marketing Activities through SIPEF N.V. Mill capacity of Bukit Maradja POM is 30 MT FFB/hour.		
Applicable Standards	RSPO P&C 2013 - Indonesia National Interpretation, September 2016; RSPO Certification System 2017; RSPO Supply Chain Certification System 2014; RSPO Supply Chain Certification Standard, 2017 (CPO Mill – Module D)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
10105654	ISO 9001:2015	Lloyd's Register Indonesia	3 July 2018 – 2 July 2021

RSPO Public Summary Report
Revision 8 (Mar /2019)

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Bukit Maradja POM	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, Sumatera Utara Province – Indonesia	3° 0' 44.26" N	99° 14' 8.06" E
Bukit Maradja Estate	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, Sumatera Utara Province – Indonesia	3° 0' 5.27" N	99° 13' 25.09" E
Kerasaan Estate	Nagori Kerasaan II Village, Pematang Bandar District, Simalungun Regency, Sumatera Utara Province – Indonesia	3° 3' 51.00" N	99° 15' 53.53" E
Timbang Deli Estate	Timbang Deli Village, Galang District, Deli Serdang Regency, Sumatera Utara Province – Indonesia	3° 27' 20.91" N	98° 53' 58.37" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Maradja Estate	3,001.26	97.71	78.97	3,177.94	94.44
Kerasaan Estate	2,316.65	26.42	18.96	2,362.03	98.08
Timbang Deli Estate	236.02	13.53	722.64	972.19	24.28
Total	5,553.93	137.66	820.57	6,512.16	85.29

6. Plantings & Cycle							
Estate	Age (Years)					Mature*	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Maradja Estate	346.25	902.29	1,106.79	617.77	28.16	2,655.01	346.25
Kerasaan Estate	20.56	1,133.18	526.05	636.86	0	2,296.09	20.56
Timbang Deli Estate	194.22	41.80	0	0	0	41.80	194.22
Total (ha)	561.03	2,077.27	1,632.84	1,254.63	28.16	4,992.90	561.03

Note: *Mature at 25-26 months after planting

RSPO Public Summary Report
Revision 8 (Mar /2019)

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (May 2018 – April 2019)	Actual (March 2018 – Feb 2019)	Forecast (May 2019 – April 2020)
Bukit Maradja Estate	62,470	58,459.40	68,100
Kerasaan Estate	53,384	53,553.79	59,944
Timbang Deli Estate	67.90	0	858
Total	115,922	112,013.19	128,902

Note: *Last audit March 2019*

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 2019 – April 2020)
Nil	N/A		N/A

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 2019 – April 2020)
Nil			

10. Certified Tonnage			
	Estimated (May 2018 – April 2019)	Actual (March 2018 – Feb 2019)	Forecast (May 2019 – April 2020)
	Mill Capacity: 30 MT/hr	FFB	FFB
115,922		112,013.19	128,902
SCC Model: IP	CPO (OER: 23.5%)	CPO (OER: 23.69%)	CPO (OER: 24.00%)
	27,242	26,536.58	30,907
	PK (KER: 5.5%)	PK (KER: 5.50%)	PK (KER: 5.50%)
	6,375	6,168.90	7,090

Note: *Last audit March 2019*

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	10,999.73	9,696.97	0	1,002.60	21,699.30

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	1,700.00	0	0	3,888.71	5,588.71

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
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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 18-23 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 Principles & Criteria 2013 – 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.

RSPO Public Summary Report
Revision 8 (Mar /2019)

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 initial assessment/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 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Bukit Maradja POM	X	X	X	X	X
Bukit Maradja Estate	X	X	X	X	X
Kerasaan Estate	X	X	X	X	X
Timbang Deli Estate	-	-	-	X	X

Tentative Date of Next Visit: March 16, 2020 - March 21, 2020

Total No. of Mandays: 20

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	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 best practices, environment, OHS, and Smallholder audits. He is fluently speaking in English and Bahasa Indonesia.
Eko Purwanto	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, OHS, and Smallholder audits.
Imam Fakhrurozi	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 and OHS.

Accompanying Persons:

No.	Name	Role
	Nil	

RSPO Public Summary Report
Revision 8 (Mar /2019)

2.3 Assessment Plan

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

Date	Time	Subjects	PS	EP	IF
			PRSPOLA/ PRSPO- SC	PRSPO- EMS/SA	PRSPO- OHS/E MS
Monday, 18/03/2019	06.00 – 08.00	Flight Jakarta – Medan	√	√	√
	08.00 – 09.00	Travelling Kualanamu Airport – Timbang Deli Estate	√	√	√
	09.00 – 09.30	Opening Meeting - Presentation by client (Overview of PT. Eastern Sumatra Indonesia – Bukit Maradja POM and its supply base); - Presentation by BSI team (Objective, scope, audit plan, etc.)	√	√	√
	09.30 – 12.00	Field Visit (Timbang Deli Estate): Field observation and Worker interview - boundaries inspection, FFB harvesting, FFB loading, road maintenance, landfill (waste management), workshop, water management, etc.	√	-	-
		Field Visit (Timbang Deli Estate): Field observation and Worker interview - HCV's, riparian zones, housing, social amenities, clinic, etc.	-	√	-
		Field Visit (Timbang Deli Estate): Field observation and worker interview - Herbicide application programmes, fertilizer application, IPM, chemical and fertilizer warehouse, hazardous waste storage, etc.	-	-	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	(Timbang Deli Estate): General information, Time bound plan, partial certification verification, RSPO P&C (for Principle 1, Principle 2, Principle 3, Principle 4 and Principle 7)	√	-	-
		(Timbang Deli Estate): RSPO P&C (for Principle 2, Principle 5.2, Principle 6, Principle 7)	-	√	-
		(Timbang Deli Estate): RSPO P&C (for Principle 4, and Principle 5.3, Principle 7, Principle 8)	-	-	√
Tuesday, 19/03/2019	08.00 – 12.00	(Timbang Deli Estate): General information, Time bound plan, partial certification verification, RSPO P&C (for Principle 1, Principle 2, Principle 3, Principle 4 and Principle 7)	√	-	-
		Stakeholder consultation With government offices in Deli Serdang Regency, local communities, contractors, worker union, etc.	-	√	-
		(Timbang Deli Estate): RSPO P&C (for Principle 4, and Principle 5.3, Principle 7, Principle 8)	-	-	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 15.00	Wash up meeting	√	√	√
	15.00 – 18.00	Travelling to Bukit Maradja POM	√	√	√

Date	Time	Subjects	PS	EP	IF
			PRSPOLA/ PRSPOSC	PRSPO- EMS/SA	PRSPO- OHS/ EMS
Wednesday, 20/03/2019	08.00 – 12.00	(Bukit Maradja POM): General information, Time bound plan, partial certification verification, RSPO P&C (for Principle 1, Principle 2, Principle 3, Principle 4.1), RSPO SCCS implementation	√	-	-
		(Bukit Maradja POM): Visit and interview with government offices in Simalungun Regency	-	√	-
		(Bukit Maradja POM): RSPO P&C (for Principle 4, and Principle 5)	-	-	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	Field Visit (Bukit Maradja POM): RSPO SCCS implementation	√	-	-
		Stakeholder Consultation: Visit to local communities (head of village, cooperatives, community leader, contractors)	-	√	-
Field Visit (Bukit Maradja 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),		-	-	√	
Thursday, 21/03/2019	08.00 – 12.00	Field Visit (Bukit Maradja Estate): Field observation and Worker interview - FFB harvesting, FFB loading, road maintenance, landfill (waste management), workshop, water management, etc.	√	-	-
		Field Visit (Bukit Maradja Estate): Field observation and Worker interview - HCV's, riparian zones, boundaries inspection, housing, social amenities, school, clinic, etc	-	√	-
		Field Visit (Bukit Maradja 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 – 16.00	(Bukit Maradja Estate): General information, Time bound plan, partial certification verification, RSPO P&C (for Principle 1, Principle 2, Principle 3, Principle 4)	√	-	-
		(Bukit Maradja Estate): RSPO P&C (for Principle 2, Principle 5.2, Principle 6)	-	√	-
(Bukit Maradja Estate): RSPO P&C (for Principle 4, Principle 5, Principle 8)		-	-	√	
Friday, 22/03/2019	08.00 – 12.00	Field Visit (Kerasaan Estate): Field observation and Worker interview - FFB harvesting, FFB loading, road maintenance, landfill (waste management), workshop, water management, etc.	√	-	-

Date	Time	Subjects	PS	EP	IF
			PRSPOLA/ PRSPO- SC	PRSPO- EMS/SA	PRSPO- OHS/E MS
		Field Visit (Kerasaan Estate): Field observation and Worker interview - HCV's, riparian zones, boundaries inspection, housing, social amenities, school, clinic, etc	-	√	-
		Field Visit (Kerasaan 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	(Bukit Maradja Estate): General information, Time bound plan, partial certification verification, RSPO P&C (for Principle 1, Principle 2, Principle 3, Principle 4)	√	-	-
		(Bukit Maradja Estate): RSPO P&C (for Principle 2, Principle 5.2, Principle 6)	-	√	-
		(Bukit Maradja Estate): RSPO P&C (for Principle 4, Principle 5, Principle 8)	-	-	√
Saturday, 23/03/2019	08.00 – 12.00	(Bukit Maradja POM and Kerasaan Estate/Bukit Maradja Estate): Verification of outstanding information	√	√	√
	12.00 – 13.00	Report Preparation	√	√	√
	13.00 – 14.00	Closing Meeting	√	√	√

Date	Time	Subjects RSPO NCR Close Out	PS
			PRSPOLA/ PRSPO- SC
Friday, 03/05/2019	08.00 – 08.15	Opening Meeting	√
	08.15 – 11.45	NCR Close Out (Medan Head Office): RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement-Clause 5.7.2 for Bukit Maradja POM.	√
	11.45 – 12.00	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. Eastern Sumatra Indonesia is a subsidiary 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.	SIPEF Group's time bound plan is timely challenging. SIPEF Group has putting consideration on age of plantation, size of plantation as supply base with regards to location of palm oil mill in preparing the time bound plan.	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?	No, there is no changes from the last audit.	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	Comply

RSPO Public Summary Report
Revision 8 (Mar /2019)

	<p>Tracker; raised by the 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 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>	
Un-Certified Units or Holdings		
<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>All new planting after January 1st, 2010 have undergone and complies with RSPO New Planting Procedure/RSPO NPP. RSPO NPP for PT. Agro Muara Rupit, PT. Agro Kati Lama, PT. Agro Rawas Ulu have been published in RSPO website.</p>	Comply
<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>	Comply
<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 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</p>	Comply

<p>The RSPO RaCP tracker shall be 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>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: 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 </p>	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

	<p>2018; Each company provide correction and corrective action on the base to ensure all RSPO P&C requirements are implemented.</p>	
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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>No. There is no smallholder supplying FFB to PT. Eastern Sumatra Indonesia. PT. Eastern Sumatra 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>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. Eastern Sumatra Indonesia – Bukit Maradja 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 it effectiveness and closed accordingly.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1754045-201903-M1	Clause & Category (Major / Minor)	RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement-Clause 5.7.2 - Major
Date Issued	23 March 2019	Due Date	22 June 2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	3 May 2019
Statement of	PT. Eastern Sumatra Indonesia - Bukit Maradja POM have not consistently		

Nonconformity:	demonstrated removal of RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage.
Requirement Reference:	<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.
Objective Evidence:	<p>PT. Eastern Sumatra Indonesia – Bukit Maradja POM demonstrated some of the CSPO and CSPK transaction for other scheme and/or conventional sales have been removed from PalmTrace. However, the other transaction have not been removed:</p> <ul style="list-style-type: none"> - PT. Eastern Sumatra Indonesia – Bukit Maradja POM removed 1999.99 MT CSPO from PalmTrace through transaction ST-TR-78010e8c-e269 dated 11 June 2018 (ISCC). - PT. Eastern Sumatra Indonesia – Bukit Maradja POM removed 1499.94 MT CSPO from PalmTrace through transaction ST-TR-ee8d9c8d-9ff8 dated 11 June 2018 (ISCC). - PT. Eastern Sumatra Indonesia – Bukit Maradja POM removed 4199.86 MT CSPO from PalmTrace through transaction ST-TR-cdc1cda9-99ed dated 21 March 2019 (ISCC). - Another 1,999.18 MT CPO from confirmed ISCC sales have not been removed from PalmTrace. - Another 1,005.77 MT CSPO from confirmed local/conventional sales have not been removed from PalmTrace. - PT. Eastern Sumatra Indonesia – Bukit Maradja POM removed 2,300 MT CSPK from PalmTrace through transaction ST-TR-e0f70cf6-6783 dated 28 March 2018. - Another 1,583.71 MT CSPK from local/conventional sales have not been removed from PalmTrace.
Corrections:	<p>The ENC manager coordinated with Marketing and asked Antwerp to remove the quota CPO and PK on PT. Eastern Sumatra Indonesia's PalmTrace. Antwerp has removed the quota CPO of 2,999.78 MT from PT. Eastern Sumatra Indonesia's PalmTrace account: PalmTrace transaction No.ST-TR-ed14fa5a-a81e dated 1 April 2019 for 1,002.6 MT CSPO removed; PalmTrace transaction No.ST-TR-0d5d115e-8bdd dated 1 April 2019 for 1,997.18 MT CSPO removed; PalmTrace transaction No.ST-TR-09d0c2e7-81d8 dated 4 April 2019 for 3.17 MT CSPO removed;</p> <p>Antwerp has removed the quota PK of 1,583.71 MT from PT. Eastern Sumatra</p>

	Indonesia's PalmTrace account: PalmTrace transaction No.ST-TR-2f26a069-989f dated 3 April 2019 for 859.49 MT CSPK removed; PalmTrace transaction No.ST-TR-59c57fd0-e162 dated 3 April 2019 for 724.22 MT CSPK removed;
Root Cause Analysis:	The lack of communication between the marketing and antwerp, has caused no quota deduction on account PalmTrace of PT. Eastern Sumatra 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. Training dated 16 April 2019; - 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. Eastern Sumatra 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	Consistent implementation of RSPO P&C 2013
PF 2	Preparation to comply with RSPO P&C 2018

3.4.1 Status of Nonconformities Previously Identified and Observations

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

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>RSPO P&C INA NI 2016 - Indicator 4.7.2</p> <p>All activity within PT. Eastern Sumatra Indonesia have been assessed with Hazard Identification Risk Assessment, with latest review 12 March 2018. The assessment have incorporated activity at fertilizer warehouse, such as fertilizer stacking. In addition, company have established a procedure on work permit and access titled "Prosedur Izin Kerja, Lock-Out dan Tag-Out (LOTO) No.TTI/PROS/IMP/20" whereby explaining the work at height starts at 2.5 meters. The control and monitoring record shows no work-related accident from fertilizer stacking activity. Consistent use of work-at-height permit is expected.</p> <p>Action taken: The HIRADC for PT. Eastern Sumatra Indonesia have been reviewed and updated as in "Daftar Penilaian dan Pengendalian Risiko K3". The last review on March 2019. Visit to fertilizer warehouse in Bukit Maradja POM, management have sets the maximum height at 2.5 meters for fertilizer bag stacking.</p>
OFI 2	<p>RSPO INA NI 2016 - Indicator 5.1.3</p> <p>PT. Timbang Deli Indonesia have implemented the environmental management and monitoring as in "Laporan Pelaksanaan Rencana pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL)", such as:</p> <ul style="list-style-type: none"> - Water test analysis "Pengujian Air Bawah Tanah": Analysis Report No.10470/SL/XII/17 (two times per year), last testing on 27 September 2017 conducted by Testing Laboratory PT. Mutu Agung Lestari. The testing result is complying with Peraturan Menteri Kesehatan No.416/MENKES/PER/IX/1990, appendix II; - Ambient air analysis "Uji Udara Ambient": Report of Testing No.0388/SL/I/18, dated 5 January 2018; - Noise analysis "Uji Kebisingan": Report No.0388/SL/I/18, dated 5 January 2018, the result 46.3 dB (parameter 70dB – Uji 3171 sound level meter); - Soil analysis carried out by JH Agriculture; and aerial photograph in February 2017 resulted in soil profile 1:28,000. <p>Environmental parameter have been incorporated and reported into "Laporan RKL-RPL semester I 2017" for period January-June 2017, reported to "Kementerian Lingkungan Hidup dan Kehutanan, Jakarta" on 6 October 2017; reported to "Dinas Lingkungan Hidup Kabupaten Deli Serdang" on 6 October 2017.</p> <p>The same parameter have been incorporated and reported into "Laporan RKL-RPL semester II 2017" for period July – December 2017, reported to "Dinas Lingkungan Hidup Kabupaten Deli Serdang" on 29 January 2018.</p> <p>Consistent inclusion information on soil fertility and erosion risk into "Laporan RKL-RPL" is expected.</p> <p>Action taken: PT. Timbang Deli Indonesia have incorporated information related to soil fertility and erosion risk into RKL-RPL report. Soil map for Timbang Deli Estate is available under "Soil Profile", scale 1:28,000 indicating soil type: <i>Typic Endoaquepts</i>, <i>Typic Kandiualfs</i> and <i>Typic Kandiuults</i>; soil series: Keladang Series (KLD) and Sorek Series (SRK). Data Sources: Field Survey of PT. Timbang Deli, Aerial Photograph (February 2017), soil report by JH Agriculture (2014). Coordinate system: North UTM 47, datum: WGS 1984, grid system: Geographic Lat/Long, map date: 27 July 2017.</p> <p>Based on soil map under "Soil Profile", scale 1:28,000 most area of Timbang Deli Estate is sandy clay. Recommendation from the soil survey is planting <i>Mucuna bracteata</i> leguminous cover to conserve soil moisture. Management strategy performed by planting <i>Mucuna bracteata</i> at replanting area. It was reported all replanting area and planting year 2015 and 2016 ground cover planted with <i>Mucuna bracteata</i>.</p>
OFI 3	<p>RSPO INA NI 2016 - Indicator 5.3.1</p>

	<p>Kerasaan Estate have prepared the waste management plan "Rencana Pengelolaan Limbah", whereby fertilizer bag utilized/re-use as waste bag in worker housing, loose fruit collection container or sand bag (bund for erosion). Continuous identification and waste management plan regarding fertilizer inner bag is expected.</p> <p>Action taken: The estates have prepared the program of waste management, updated on 2 January 2018 consist of:</p> <ul style="list-style-type: none"> - Packaging of small chemical materials and packaging of used chemical jerry cans; - Sacks of fertilizer; <p>Based on field visit in Kerasaan Estate, Landfill area in oil palm block – all domestic waste have been segregated (organic and non-organic).</p>
<p>OFI 4</p>	<p>RSPO P&C INA NI 2016 - Indicator 7.1.1</p> <p>PT. Timbang Deli Indonesia have a documented Social and Environmental Impact Assessment report, carried out by Koompasia datum 2017. The document prepared with consultation with affected stakeholders. The document have assessed the environmental and social aspects. Area of concern relates to reviewing livelihood and job opportunity affected from conversion of rubber to oil palm in the area.</p> <p>Action taken: PT. Timbang Deli Indonesia have implementing alternative approach in order to mitigate social impact from conversion of rubber to oil palm – onto workforce from the surrounding village. The rubber tapper are being transferred into oil palm worker, with adjusted increment in their benefit. PT. Timbang Deli Indonesia issued "Memorandum PT. Timbang Deli Indonesia No.62/TDE/X/2018" dated 31 October 2018 for mutation of 9 rubber tapper into oil palm upkeep worker. "Memorandum PT. Timbang Deli Indonesia No.65/TDE-VBS/VII/2018" dated 24 July 2018 related to "Premi Pemanen Sawit" – benefit for oil palm harvester, with additional IDR. 25,000 per mandays. Oil palm mandores trained the newly transferred rubber tapper for oil palm upkeep, and continues to become oil palm harvester. The current activities covers pruning, sanitation and harvesting.</p>

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1033270M1	Major	RSPO P&C 2.1.1	03/03/2014	Closed on 13/05/2014
1033270M2	Major	RSPO P&C 5.3.2	03/03/2014	Closed on 13/05/2014
1033270M3	Major	RSPO P&C 5.6.2	03/03/2014	Closed on 13/05/2014
1033270N1	Minor	RSPO P&C 2.1.4	03/03/2014	Closed on 28/03/2015
1033270N2	Minor	RSPO P&C 4.7.4	03/03/2014	Closed on 28/03/2015
1033270N3	Minor	RSPO P&C 4.7.5	03/03/2014	Closed on 28/03/2015
1033270N4	Minor	RSPO P&C 4.7.5	03/03/2014	Closed on 28/03/2015
1170504M1	Major	RSPO P&C 6.3.1	28/03/2015	Closed on 22/04/2015
1170504M2	Major	RSPO Supply Chain Certification Standard (November 2014) – clause D.3.1	28/03/2015	Closed on 22/04/2015
1170504N1	Minor	RSPO P&C 2.2.5	28/03/2015	Closed on 18/03/2016
1170504N2	Minor	RSPO P&C 5.3.3	28/03/2015	Closed on 18/03/2016
1170504N3	Minor	RSPO P&C 6.1.4	28/03/2015	Closed on 18/03/2016
1170504N4	Minor	RSPO P&C 6.9.3	28/03/2015	Closed on 18/03/2016
1607838-	Major	RSPO Supply Chain Certification	24/03/2018	Closed on 16/04/2018

201803-M1		Standard (June 2017) – clause D.4.2		
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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. Eastern Sumatra Indonesia – Bukit Maradja 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	
<p>Internal Stakeholders</p> <ul style="list-style-type: none"> - Pengurus Serikat Pekerja SP-BUMM, SP-MUMM Induk – Worker Union - Komite Gender Bukit Maradja – Gender Committee 	<p>Union/Contractors/Local Communities</p> <ul style="list-style-type: none"> - Timbang Deli Village Communities - Wonorejo Village, Bukit Maradja Village Communities
<p>Government Departments</p> <ul style="list-style-type: none"> - Dinas Tenaga Kerja Kabupaten Deli Serdang – Manpower Office - Dinas Lingkungan Hidup Kabupaten Deli Serdang – Environment Office - Kantor Pertanahan Kabupaten Deli Serdang – Lands Office - Dinas Koperasi, UKM dan Tenaga Kerja Kabupaten Simalungun – Cooperative, Small Business and Manpower Office - Dinas Lingkungan Hidup Kabupaten Simalungun – Environment Office - Dinas Pertanian dan Perkebunan Kabupaten Simalungun – Agriculture and Plantation Office - Kantor Pertanahan Kabupaten Simalungun – Lands Office 	<p>NGO</p> <ul style="list-style-type: none"> - Lembaga Swadaya Masyarakat Lumbung Informasi Rakyat (LIRA) – Deli Serdang - Koordinator Daerah Pers Kabupaten Simalungun

IS #	Description
1	<p>Feedbacks: National Land Agency of Deli Serdang Regency</p> <ul style="list-style-type: none"> - HGU is still valid until 2023. - In the last one year there have been no complaints regarding land-related claims. - BPN conducts land control activities, which is to monitor the rights that have been granted to legal entities or individuals, evaluating their utilization; if there is land that is not utilized as much as it should, it can be categorized as abandoned land. - In PT. Timbang Deli Indonesia there is no land categorized as abandoned land. <p>Management Responses: The company acknowledge the positive comment from National Land Agency of Deli Serdang Regency.</p> <p>Audit Team Findings: Auditor accepted the comment and company response, no further action required.</p>
2	<p>Feedbacks: Environmental Agency of Deli Serdang Regency</p> <ul style="list-style-type: none"> - Environmental regulations has been fulfilled by PT. Timbang Deli Indonesia. - Permits related to the environment have been completed by PT. Timbang Deli Indonesia. - Reports related to the environment (hazardous waste and UKL-UPL) are regularly reported by PT. Timbang Deli Indonesia every 3 months. - In the past one year there were no reports from the public regarding environmental pollution. - PT. Timbang Deli Indonesia is currently in the process of renewal the Temporary Hazardous Waste Storage Permit regarding the location of the temporary hazardous waste storage. - The expectation from DLH is for each report to be delivered on time; and increase the CSR program given to the Regency Government in the form of houses renovation of the community around the company. <p>Management Responses: The company acknowledge the positive comment from Environmental Agency of Deli Serdang Regency; related to the submission of reports and CSR programs, the company immediately carried out and coordinated with Timbang Deli Village Head for house renovation.</p> <p>Audit Team Findings: - Auditor accepted the comment and company response, no further action required.</p>
3	<p>Feedbacks: Manpower Agency of Deli Serdang Regency</p> <ul style="list-style-type: none"> - PT. Timbang Deli Indonesia has implemented that if there are industrial relations disputes, then it settled by bipartite. - There were no cases of industrial relations disputes that were reported to the Manpower Office over the past year, the last case of which occurred in 2017. - The company has implemented the latest Collective Labor Agreement (PKB), with a period valid until 2020. - The company has applied minimum wages in accordance with applicable regulations. - Communication between the company and the Manpower Office has been running well. - The company has implemented the mandatory report through an online system for the number of employees, Occupational Safety and Health and P2K3. - Bipartite meetings are held every 3 months and the results are reported to the Manpower Office, however the results of the last bipartite meeting have not been submitted to the Manpower Office. - Job contracting by the Koperasi Jasa Karyawan shall be reported as well as to the Manpower Office. - Companies must employ disability workers as much as 10% of the total workers. <p>Management Responses:</p> <ul style="list-style-type: none"> - Job contracting by the Koperasi Jasa Karyawan has been reported to Manpower Agency of Deli Serdang Regency based on letter No. 39/TDE/III/2019 dated 20 March 2019. - Bipartite report has been submitted to Manpower Agency of Deli Serdang Regency based on letter No. 36/TDE/III/2019 dated 20 March 2019.



	<ul style="list-style-type: none"> - At present the company has employed 2 persons with disabilities - The following company anniversary activities will be reported in the bipartite activity report. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team confirmed the submission of job contract and bipartite report by company to manpower office. - Audit team confirmed disability worker employed by company. - Auditor accepted the comment and company response, no further action required.
<p>4</p>	<p>Feedbacks: Lembaga Swadaya Masyarakat Lumbang Informasi Rakyat (LIRA) - NGO</p> <ul style="list-style-type: none"> - PT. Timbang Deli Indonesia have carried out social activity for construction of religion house, village office of Kramat Gajah and Timbang Deli village. - No complaint from surrounding community related to operation of PT. Timbang Deli Indonesia. - No report related to case of land dispute with other party, including with surrounding community. - Communication and coordination between community and company is good. - Company have implemented the aid to community in form of heavy machinery help for road maintenance, drainage maintenance and UKP3 activities. <p>Management Responses: PT. Timbang Deli Indonesia acknowledge the input and will continue to maintain a good communication with the NGO.</p> <p>Audit Team Findings: Positive comments noted.</p>
<p>5</p>	<p>Feedbacks: Timbang Deli Village Head</p> <ul style="list-style-type: none"> - The company has improved the economy level of the surrounding community through recruitment of workers. - The company has implemented CSR programs including through aid for mosques in the month of Ramadan; company bus loan assistance for village events; construction of water gates in natural trenches to maintain water flow. - The relationship between the company and the community and the village government has been going well. - The process of compensation for growing crops occurred in 2005-2006, after which there were no cases of land disputes between the community and the company. - The community requested that not all Timbang Deli Estate rubber plants be converted into oil palm. - Dissemination of the impact of conversion from rubber commodities into oil palm is still considered lacking. - The community hopes that the company will hold a scholarship program for high achieving children. <p>Management Responses:</p> <ul style="list-style-type: none"> - Dissemination of the impact of conversion from rubber commodities into oil palm has been done according to the TDI Letter No. 37/TDE/III/2019 dated 20 March 2019. - Regarding scholarship program, the company considered to be approved, for 6th grade elementary school student as many as 3 student per 1 (one) elementary school, given once a year for 1st rank Rp.1,000,000 (one million rupiah), 2nd rank Rp. 750,000 (seven hundred fifty thousand rupiahs), 3rd rank Rp. 500,000 (five hundred thousand rupiahs). <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Auditor accepted the comment and company response, no further action required.
<p>6</p>	<p>Feedbacks: Pengurus Serikat Pekerja SP-TDM Induk PT. Timbang Deli Indonesia – Worker Union</p> <ul style="list-style-type: none"> - All workers is SKU-H and SKU-B (permanent worker); - There is a "Lembaga Kerjasama (LKS) Bipartit, functioning as mediation between company and worker; - PT. Timbang Deli Indonesia and the worker union have collective work agreement, regulating the normative such as working hour, overtime, salary, leave – approved by manpower authority;

	<ul style="list-style-type: none"> - Meeting between worker union and company carried out every month during LKS Bipartit meeting; - Company has implemented minimum wage in 2017, as in "Upah Minimum Sektoral Kabupaten" for salary payment standard. Company has asked worker union for meeting on minimum wage 2018; - 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 has communicated the complaint and grievance settlement mechanism; <ul style="list-style-type: none"> - Company have conduct annual appraisal as consideration for salary increment/promotion, outside of normative salary increment, under UMR; - There have been no complaint related to industrial relation. Some comment/request noted, related to house renovation request; - There has been no case of industrial relation dispute between employees and company; <p>Management Responses: PT. Timbang Deli Indonesia acknowledge the positive comment and will continue to improve.</p> <p>Audit Team Findings: Positive comments noted. No further action.</p>
<p>7</p>	<p>Feedbacks: Dinas Koperasi, UKM dan Tenaga Kerja Kabupaten Simalungun – Cooperative, Small Business and Manpower Office</p> <ul style="list-style-type: none"> - The office has not received any negative issue on industrial relationship in PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia. In addition, the past 2 years, there have been no industrial relation dispute in PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia; - PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia have collective work agreement approved by Dinas Tenaga Kerja Provinsi Sumatera Utara; and paid the minimum wage as per regulation; - PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia have registered all workers into BPJS Ketenagakerjaan and BPJS Kesehatan. All workers have been provided with medical check up; - PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia have reported the manpower to manpower office; - Manpower office requested PT. Kerasaan Indonesia to submit report related to temporary workers, as what performed by PT. Eastern Sumatra Indonesia. <p>Management Responses: PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia acknowledged the positive inputs and will continue to implement the obligation according with applicable regulations. PT. Kerasaan Indonesia have submitted the monthly report pertaining status of permanent and temporary workers to Manpower office of Simalungun Regency, period January and February 2019.</p> <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team verified: "Surat Pengantar Laporan ke Dinas Tenaga Kerja dan Transmigrasi Kabupaten Simalungun No.02/KRE-EXT/II/2019 periode laporan bulan Januari 2019", dated 07 February 2019 - Available "Surat Pengantar Laporan ke ke Dinas Tenaga Kerja dan Transmigrasi Kabupaten Simalungun No.05/KRE-EXT/III/2019 periode laporan bulan Februari 2019", dated 11 Maret 2019; - Positive comments noted. No further action.
<p>8</p>	<p>Feedbacks: Dinas Lingkungan Hidup Kabupaten Simalungun – Environment Office</p> <ul style="list-style-type: none"> - PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia have consistently conduct monitoring and management plan, and report to environment office every 6 months; - PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia have consistently report the management of mill effluent and hazardous waste; - No report from community and/or NGO related to environmental pollution from PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia; - PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia have conduct monitoring of surface water quality; and office requested the result reported to environment office;

	<ul style="list-style-type: none"> - Environment office requires companies to conduct monitoring and reporting the progress of domestic waste management - Environment office requires company to share information/progress on administrative sanction from "Kementerian Kehutanan dan Lingkungan Hidup RI". <p>Management Responses:</p> <ul style="list-style-type: none"> - Company have carried out activities as required by regulation and the suggestion made by "Dinas Lingkungan Hidup Kabupaten Simalungun". - Company have reported the result from surface water analysis every 6 months in RKL/RPL report. The report submitted to "Dinas Lingkungan Hidup Kabupaten Simalungun", "Dinas Lingkungan Hidup Provinsi Sumatera Utara" and "Kementerian Lingkungan Hidup dan Kehutanan RI". - PT. Eastern Sumatra Indonesia have fulfilled all requirement as written on "Sanksi Administrasi oleh Kementerian Lingkungan Hidup dan Kehutanan Republik Indonesia". The fulfilled requirement have been reported to "Direktorat Penegakan Hukum Kementerian Lingkungan Hidup dan Kehutanan RI" during meeting with ministry to discuss administrative sanction dated 11 December 2018, in Bogor. Currently, company awaits for response from "Kementerian Kehutanan dan Lingkungan Hidup". - Company is preparing and determining the layout for domestic effluent treatment installation for PT. Eastern Sumatra Indonesia, located in worker housing Division I, Bukit Maradja Estate. The installation work using consultant/contractor by UD. Sumber Teknik with contract No.01/BMS-HO/EDM/2019. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team have verified all evidence related to the concerns raised by environment office. PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia have fulfilled the requirements. - Audit team have sighted and verified the progress for domestic effluent treatment installation.
<p>9</p>	<p>Feedbacks: Dinas Pertanian dan Perkebunan Kabupaten Simalungun – Agriculture and Plantation Office</p> <ul style="list-style-type: none"> - PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia have reported the "Laporan Perkembangan Usaha Perkebunan (LPUP)" each semester. - No land dispute case noted for PT. Kerasaan Indonesia and PT. Eastern Sumatra Indonesia. - No report on pest and disease attack for oil palm commodity and reported the land and forest fire report on monthly basis. - The HGU area of PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia was not located under forest area and/or "Peta Indikatif Penundaan Izin Baru". Based on spatial planning map, company's concession was located under "Kawasan Budidaya Tanaman Perkebunan". <p>Management Responses: PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia acknowledged the inputs and will maintain the good relationship.</p> <p>Audit Team Findings: Positive comments noted.</p>
<p>10</p>	<p>Feedbacks: Kantor Pertanahan Kabupaten Simalungun – Lands Office</p> <ul style="list-style-type: none"> - PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia's plantation was old plantation and have long obtained legal ownership of the land (HGU). - The HGU area of PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia was not located under forest area and/or "Peta Indikatif Penundaan Izin Baru". - The awarding of HGU to The HGU area of PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia have taken into consideration the spatial planning. - There is no abandoned land in PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia. <p>Management Responses: PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia conduct all operational activity as per requirement under applicable laws and regulations.</p> <p>Audit Team Findings: Audit team have verified the legal ownership of the land, the HGU has long obtained. Audit team have verified record for information request, communication and consultation and found no</p>

	inquiry related to land complaint.
11	<p>Feedbacks: Pengurus Serikat Pekerja SP-BUMM, SP-MUMM Induk – Worker Union</p> <ul style="list-style-type: none"> - All workers is SKU-H and SKU-B (permanent worker); - There is a "Lembaga Kerjasama (LKS) Bipartit, functioning as mediation between company and worker; - Company and the worker union have collective work agreement, regulating the normative such as working hour, overtime, salary, leave – approved by manpower authority; - Meeting between worker union and company carried out every month during LKS Bipartit meeting; - Company has implemented minimum wage in 2017, as in "Upah Minimum Sektoral Kabupaten" for salary payment standard. Company has asked worker union for meeting on minimum wage 2018; - 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 has communicated the complaint and grievance settlement mechanism; - Company have conduct annual appraisal as consideration for salary increment/promotion, outside of normative salary increment, as per annual minimum year increment; - There have been no complaint related to industrial relation. Some comment/request noted, related to house renovation request; - There has been no case of industrial relation dispute between employees and company; <p>Management Responses: PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia acknowledge the positive comment and will continue to improve.</p> <p>Audit Team Findings: Positive comments noted. No further action.</p>
12	<p>Feedbacks: Komite Gender Bukit Maradja – Gender Committee</p> <ul style="list-style-type: none"> - Gender committee has been established. The regular program is monthly meeting. - Company have communicated sexual harrasment policy, protection of reproductive rights, anti-discrimination policy during meetings, morning musters, and announcement boards. - No sexual harassment case and/or violence case noted and/or recorded up to date. - Company has implementing and giving 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 have provided medical check up for female worker in high risk area every 6 months and for pregnancy check every month. - Company has communicated the mechanism for complaint and grievance settlement for any sexual harrasment case, including protection of whistleblower. - Company have provided facility such as housing, clean water, electricity, religious house, sport facility. <p>Management Responses: PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia will continue the good practice with regards to gender equality treatment.</p> <p>Audit Team Findings: Audit team noted the gender committee's knowledge on sexual harrasment policy, protection of reproductive rights, anti-discrimination policy – are good.</p>
13	<p>Feedbacks: Wonorejo Village and Bukit Maradja Village Communities</p> <ul style="list-style-type: none"> - No land dispute between companies and the surrounding community. - Company helped communities in providing grass and solid for cattle feed; but if possible, for blocks with older palms – company do not perform chemical upkeep in the harvesting path in order to villagers getting more grass for cattle feeds;

	<p>- In general the communication between company and surrounding communities are good.</p>
	<p>Management Responses: PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia responded that harvest path need to maintain for operational reason such as harvesting, fertilizer application and other upkeep program.</p>
	<p>Audit Team Findings: Positive comments noted. No further action.</p>
<p>14</p>	<p>Feedbacks: Koordinator Daerah Pers Kabupaten Simalungan – Local NGO</p> <ul style="list-style-type: none"> - Organization focused on empowerment activities by companies in Simalungun regency to surrounding communities. - Surrounding community given access to get grass for cattle feeding. - Throughout 2018, no negative response related CSR, environment performance and/or industrial relation. - Company made good and transparent effort to communicates with stakeholders. <p>Management Responses: PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia acknowledge the positive inputs from the NGO and will continue to improve.</p> <p>Audit Team Findings: Positive comments noted. No further action.</p>

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. Eastern Sumatra Indonesia – Bukit Maradja 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. Eastern Sumatra Indonesia – Bukit Maradja POM is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Pratama Agung Sedayu	Name: Mr. Hamdani
Company Name: On behalf BSI Services Malaysia Sdn Bhd	Company Name: PT. Eastern Sumatra Indonesia
Title: Lead Auditor	Title: Senior Manager ENC
Signature: 	Signature: <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> 
Date: 17 May 2019	Date: 10/6/2019.

Appendix A: Summary of Findings

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 indicator 1.2.1	Comply
1.1.2 Records of requests for information and responses to the information requested shall be available. - Major compliance -	<p>PT. Timbang Deli Indonesia recorded the information request and response under “Logbook Permintaan Informasi dan Jawaban”. In year 2018, company received 33 information requests; in year 2019, company received 9 information requests (up to March 2019).</p> <p>Sampled: Letter from “Institut Kesehatan Medistra Lubuk Pakam Fakultas Kesehatan Masyarakat No.013.B/02.1/INKES-MLP/II/2019 tentang Permohonan untuk Melaksanakan Magang” dated 18 February 2019. Received by company on 28 February 2019. Company response through Estate manager disposition to Director on the same date, “Surat Memorandum Timbang Deli Estate No.15/TDE-VBS/II/2019 kepada Direktur PT. Timbang Deli Indonesia”, dated 28 February 2019. Letter Director PT. Timbang Deli Indonesia, “Surat No.28/TDE/III/2019 kepada Dekan Institut Kesehatan Medistra Lubuk Pakam”, dated 4 March 2019. The letter approves 8 student to have on-the-job training for 40 days in estate. Timbang Deli Estate have reported the management of HCV area period 2018 to “Balai Besar Konservasi Sumber Daya Alam Sumatera Utara”, through correspondence PT. Timbang Deli Indonesia No.26/TDE/II/2019 dated 28 February 2019. Timbang Deli Estate have reported the monitoring of land and forest fire fighting performance period 2nd semester 2018 to “Dinas Perkebunan Kabupaten Deli Serdang” through letter No.31/TDE/III/2019 dated 13 March 2019. There is no fire incident period July- December 2018.</p> <p>Bukit Maradja POM recorded all information request and response under “Rekaman Permintaan Informasi dan Tanggapan Bukit Maradja Palm Oil Mill”. In 2018 recorded 9 information request – all have been responded. Sample: Meeting invitation from “Surat Undangan Kemeterian Lingkungan Hidup dan Kehutanan Direktorat Pengaduan, Pengawasan dan Sanksi Administrasi No.UN.374/PPSA/PSA/SCRA.0/12/2018” dated 3 December 2018. The invitation for meeting discussing progress upon administrative sanction dated 11 December 2018, Harris Hotel, Sentul City, Bogor. Management responded on same date and appointed mill</p>	Comply

Criterion / Indicator	Assessment Findings	Compliance
	manager to attend the meeting. Assignment letter "Surat Jalan Tugas No.052/BM/POM/2018 untuk menghadiri rapat pembahasan sanksi administratif dengan Kementerian Lingkungan Hidup dan Kehutanan, Jakarta", dated 10 December 2018.	
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.		
1.2.1 Publicly available documents shall include, but are not necessarily limited to: 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). - Major Compliance -	Bukit Maradja POM has identified and determined document that available for public, as in "Dokumen-Dokumen yang Tersedia untuk Umum" dated 7 January 2019, consist of: - "Akta Perubahan Perusahaan PT. Eastern Sumatra Indonesia No.14 Th. 2013" – change in deed of establishment; - "Pemberian Hak Guna Usaha PT. Eastern Sumatra Indonesia No.108/HGU/BPN/97" – decree for land certificate; - "Surat Pendaftaran Usaha Perkebunan atas nama PT. Eastern Sumatra Indonesia No.208/Menhubun-VII/2000" – Plantation Business Registration; - "Izin Usaha Tetap atas nama PT. Eastern Sumatra Indonesia No.392/T/Kehutanan Perkebunan/1998" – Plantation Business Permit; - "Sertifikat Tanda Bukti Hak No.2 Desa Pematang Syahkuda" – Land title; - "Perpanjangan Izin Pengkajian Pemanfaatan Air Limbah Industri Minyak Sawit pada Tanah Perkebunan Kelapa Sawit No.188.45/440/Linghup-2015" – Permit for land application; - "Izin Pemanfaatan Janjang Kosong dan Limbah Cair untuk Composting No188.45/869/Sekrt-2015" – Permit for using FFB and POME for composting - "Izin TPS Limbah B3 No.188.45/893/Sekrt-2015" – permit for hazardous waste storage; - Laporan-laporan Pelaksanaan RKL/RPL setiap semester – Report of Environmental management and monitoring; - 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 reduction and prevention plan; - Rencana Perbaikan Berkelanjutan – continuous improvement plan; - "Dokumen Revisi Upaya Pengelolaan Lingkungan (RKL) PT. Eastern Sumatra Indonesia No.271/Bpdl/2008" – Environmental document; - "Dokumen Revisi Upaya Pemantauan Lingkungan (RPL) PT. Eastern Sumatra Indonesia No.271/Bpdl/2008" – Environmental document; The document can be accessed through Senior Manager	Comply

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Operation or Office Assisstant.</p> <p>PT. Timbang Deli Indonesia have established the document available for public, as in "Prosedur Pemberian Tanggapan Terhadap Permintaan Informasi" No.SOP/TDI/09 dated 1 July 2017. The list dated 1 January 2019 consist of:</p> <ul style="list-style-type: none"> - "Akta Pendirian Perusahaan PT. Timbang Deli Indonesia No.AHU-98039.AH.01.02" - Deed of Establishment, year 2008; - "Pemberian Hak Guna Usaha PT. Timbang Deli Indonesia No.69/HGU/BPN/97" year 1997 – decree for legal ownership of the land; - "Surat Pendaftaran Usaha Perkebunan sebagai Izin Usaha Perkebunan (IUP) No.209/Menhutbun.VII/2000" year 2000 – plantation business permit; - "Izin Usaha Tetap (IUP) No.386/I/Kehutanan/1998" – Plantation Business Permit; - "Sertifikat Tanda Bukti Hak No.02.04.19.20.00004" year 1997 – Land certificate; - "Penilaian Dampak Sosial dan Lingkungan" (SEIA) by Koompasia Enviro Institute year 2017; - "Dokumen Revisi UKL-UPL PT. Timbang Deli Indonesia" - (SEIA) year 2014; - "Penilaian NKT/HCV PT. Timbang Deli Indonesia oleh Koompasia Enviro Institute" year 2017; - "Izin Tempat Penyimpanan Sementara (TPS) Limbah B3 No.1107 tahun 2015" – hazardous waste storage permit in 2015; - "Izin gangguan/Hinder ordonantie No.503/530.08.570/0330/KP2TPRA-DS/IV/2015" – disturbance permit year 2015 - "Laporan – laporan Pelaksanaan Upaya Pemantauan dan Pengelolaan Setiap Semester" – SEIA management and monitoring report; - Health and safety management program; - Community Development report and Corporate Social Responsibility PT. Timbang Deli Indonesia; - "Kebijakan-kebijakan Perusahaan" – Company Policies; - "Rekaman Keluh Kesah Internal dan Eksternal" – Internal and external grievance resolution record; - "Rekaman Permintaan Informasi & Jawaban" – information request and response; - "Prosedur Ganti Rugi Lahan" – land compensation procedure; - "Rencana Perbaikan Berkelanjutan" – continuous improvement plan; - Code of conduct. 	
<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</p>	<p>Kerajaan Estate, communication of Code of Ethical Conduct Policy to worker dated 20 February 2019 to 2 harvest mandores, 2 clerks, 31 harvesters, 17 fertilizer applicators, 1 manual fertilizer mandor, 1 spreader fertilizer mandor, 3 spreader operators, 2 pest and</p> <p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>with the documentation of socialisation process of the policy to all levels of the workers and operations.</p> <p>- Minor compliance –</p>	<p>disease officer, 5 trunk injection operator, 1 gardener from Division II.</p> <p>In Timbang Deli Estate, communication of Code of Ethical Conduct Policy to worker dated 16 February 2019. Communication to 24 permanent workers and 23 temporary workers.</p> <p>In Bukit Maradja POM, communication of whistle blowing policy, no child worker policy, respecting human rights policy, no-forced labor policy, Code of Ethical Conduct Policy to worker dated 15 January 2019. Communication to 78 workers, comprise of: 17 workshop mechanics and foremans; 6 composting operators; 2 office clerks; 4 security officer; 4 kernel station operators; 8 loading ramp workers; 4 sterilizer operators; 4 fuel bunker operators; 8 screw press operators; 4 clarification operators; 1 engine room operator; 2 crane operators; 2 foremans; 4 boiler operators; 2 water treatment plan operators; 8 chainmans; 2 heavy machinery operators.</p>	
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	<p>Evidence of compliance with relevant legal requirements shall be available.</p> <p>- Major compliance –</p>	Comply
	<p>The Company has prepared the document "Evaluation of Regulatory Compliance Legislation" which every year is always updated. The document explains the details of every inquiry fulfillment of law (inquiry article by article), evidence of compliance and the evaluation of its fulfillment.</p> <p>Based on documents and operational verification showed that the company has fulfilled the regulations, e.g;</p> <p>Legal Permit for Operational:</p> <ul style="list-style-type: none"> - Deed of establishment, "Akte Pendirian Notaris Pembentukan PT. Eastern Sumatra No.225 tahun 1963", dated 23 September 1961. The deed have been approved "Pengesahan Kehakiman berdasarkan Keputusan Menteri Kehakiman RI nomor J.A.5/129/16", dated 26 Nopember 1962. - Latest revision for deed of establishment "Akte Terakhir No.5", dated 31 July 2008. The deed have been approved "Pengesahan Kehakiman No.AHU-93761.AH.01.02, tahun 2008", dated 5 December 2008. - Operational Permit "Izin Usaha Tetap No. 23/II/PMA1979" dated 10 August 1987. Renewal of operational permit "Ijin Usaha Tetap (IUT) PT. Eastern Sumatera Indonesia No.392/T/Kehutanan Perkebunan/1998", dated 21 August 1998. - Operational Plantation Permit "Surat Pendaftaran Usaha Perkebunan (SPUP) PT. Eastern Sumatera Indonesia No.208/Menhutbun-VII/2000", dated 10 March 2000. - Based on Map of "RTRWP" of Simalungun Regency as per "Peraturan Daerah No.10 tahun 2012", area of PT. Eastern Sumatera Indonesia and PT. Kerasaan Indonesia is located at Non Forest Area/Areal 	

Criterion / Indicator	Assessment Findings	Compliance
	<p>Penggunaan Lain (APL).</p> <ul style="list-style-type: none"> - Land titles "HGU No.SK.46/HGU/DA/75", dated on 21 October 1975 and continuing of HGU from "Menteri Negara Agraria/ Kepala BPN nomor 108/HGU/BPN/97", dated on 26 August 1997 with area 3,177.94 Ha. The certificate "HGU No. 2 tahun 1997", with total area 3,177.94 Ha for PT. Eastern Sumatera Indonesia. - Land title "HGU No.SK.45/HGU/DA/75", dated 21 October 1975. The extension of HGU legalized under "Menteri Negara Agraria/ Kepala BPN No.90/HGU/BPN/97", dated on 5 August 1997 with total area 2,362.03 Ha. Issued with certificate "HGU No.1 tahun 1997", with total area 2,362.03 Ha for PT. Kerasaan Indonesia. <p>Environmental Permit</p> <ul style="list-style-type: none"> - Environmental document titled "UKL-UPL" was approved under "Keputusan Kepala Badan Pengendalian Dampak Lingkungan Daerah Kabupaten Simalungun No.188.4/70/BPDL" related to environmental feasibility study at palm oil mill of PT. Eastern Sumatera Indonesia (PT. SIPEF), Bukit Maradja Estate, Simalungun Regency, Sumatera Utara Province dated on 26 February 2004. Latest revision "Rencana Pengelolaan Lingkungan (RKL) dan Revisi Rencana Pemantauan Lingkungan (RPL)" with scope of study palm oil estate area 3,178 Ha and palm oil mill 30 Ton FFB/hour as stated in the "Keputusan Bapedalda Kabupaten Simalungun No.271/Bpdl/2008". - Renewal for land application permit "Izin Pemanfaatan Air Limbah Industri Minyak Sawit pada Tanah di Perkebunan Kelapa Sawit PT. Eastern Sumatra Indonesia" approved through "Surat Keputusan Bupati Simalungun No.188.45/3440/LINGHUP-2015", dated 23 October 2015. - Temporary hazardous waste storage permit "Izin Tempat Penyimpanan Sementara Limbah B3 sesuai Keputusan Dinas Lingkungan Hidup Kabupaten Simalungun No.188.45/893/Sektr-2015", dated 29 June 2015, valid until 29 June 2020 for PT. Eastern Sumatera Indonesia. "Izin Tempat Penyimpanan Sementara Limbah B3 sesuai Keputusan Dinas Lingkungan Hidup Kabupaten Simalungun No.188.45/892/Sektr-2015", dated 29 June 2015 valid until 29 June 2020 for PT. Kerasaan Indonesia. - Water extraction permit "Izin Pengambilan dan Pemanfaatan Air Bawah Tanah No.188.45/503/293/ABT/BPPT-PM/2013", dated 2 May 2013, valid until 2 May 2018; for PT. Eastern Sumatera Indonesia. <p>Collective work agreement as in "Perjanjian Kerja Bersama (PKB) PT. Eastern Sumatra Indonesia dan Serikat Pekerja Bukit Maradja (SP-BUMM) disahkan oleh Kepala Dinas Tenaga Kerja Provinsi Sumatera Utara No.29-6/DTK-TR/2017" dated 25 January 2017 and valid</p>	

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>until 8 January 2019. Other permit for mill machineries have been verified and valid.</p> <p>PT. Kerasaan Indonesia The Company has prepared the document "Evaluation of Regulatory Compliance Legislation" which every year is always updated. The document explains the details of every inquiry fulfillment of law (inquiry article by article), evidence of compliance and the evaluation of its fulfillment. Based on documents and operational verification showed that the company has fulfilled the regulations, e.g; Legal and Operational Permit, e.g:</p> <ul style="list-style-type: none"> - Deed of establishment "Akte Pendirian Notaris pembentukan PT. Kerasaan Indonesia nomor 7 tahun 1963", dated 7 April 1962. The approval from justice ministry "Keputusan Menteri Kehakiman RI No.J.A.5/120/8", dated 20 August 1962. Latest deed of establishment "Akte Notaris No.8", dated 31 July 2008. The approval from justice ministry "No.AHU-85520.AH.01.02, tahun 2008", dated 5 December 2008. - Operational Permit "Izin Usaha Tetap PT. Kerasaan Indonesia No. 400/T/Kehutanan Perkebunan/1998", dated 21 August 1998. - Operational Plantation Permit "Surat Pendaftaran Usaha Perkebunan PT. Kerasaan Indonesia No.180/Menhutbun-VII/2000", dated 3 November 2000. - Plantation Registration "Surat Pendaftaran Usaha Perkebunan (SPUP) sesuai Surat Keputusan Menteri Kehutanan dan Perkebunan No.180/Menhutbun-VII/2000", dated 3 November 2000. <p>Environmental Permit</p> <ul style="list-style-type: none"> - Environmental document titled "Dokumen Upaya Pengelolaan dan Pemantauan Lingkungan (UKL-UPL)" is comply with letter of "Surat Kepala Bapedalda Kabupaten Simalungun No.442/Bpdl- 2005 dated on 23 December 2005 related agreement of "Dokumen UKL/UPL PT. Kerasaan Indonesia" and revision of "Upaya Pengelolaan Lingkungan dan "Upaya Pemantauan Lingkungan (UKL/UPL)" comply with letter "Kepala Badan Lingkungan Hidup Kabupaten Simalungun No.700/109/BLH/2009" dated on 8 April 2009 with scope of study 2,362 Ha oil palm oil estate. - Water extraction permit "Izin Pengambilan dan Pemanfaatan Air Bawah Tanah PT. Kerasaan Indonesia No.188.45/503/740/ABT/BPPT-PM/2013, No.188.45/503/741/ABT/BPPT-PM/2013, and No.188.45/503/742/ABT/BPPT-PM/2013", dated 12 November 2013 (valid until 12 November 2018). <p>PT. Timbang Deli Indonesia</p> <ul style="list-style-type: none"> - Deed of establishment "Akta Perubahan No.5 tentang Pernyataan Keputusan Rapat Umum Pemegang 	

Criterion / Indicator	Assessment Findings	Compliance
	<p>Saham Tahunan Perseroan Terbatas PT. Timbang Deli Indonesia berkedudukan di Medan” dated 14 July 2017. Detailing the revision in deed of establishment, whereby the shareholders are Verdant Bioscience Pte. Ltd., and other parties, including Mr. Ahmad Subagio, and other officials from SIPEF NV.</p> <ul style="list-style-type: none"> - Circular Resolutions in Lieu of The Extraordinary General Meeting of Shareholders of PT. Timbang Deli Indonesia No.03/SH-TD/14, dated 24 March 2014. It is also stating the share swap agreement related to acquisition of PT. Timbang Deli Indonesia by SIPEF NV and Verdant Bioscience Pte. Ltd. dated 21 January 2014; - Tax Registration Number (NPWP) No.01.001.800.0-058.000, Stamp and initials by tax office of foreign investment, dated 14 November 1982. - “Surat Keputusan Hak Guna Usaha No.69/HGU/BPN/97” dated 10 July 1997. Permanent Land Use Title “Hak Guna Usaha No.4” dated 10 July 1997. - Permanent Business Permit “Izin Usaha Tetap No.386/T/Kehutanan/Perkebunan/1998”, dated 21 August 1998. - Plantation Business Permit “Izin Usaha Perkebunan No.209/Menhutbun-VII/2000” dated 10 March 2000. - Principle Permit “Izin Prinsip No. 602/1/IP-PB/PMA/2014” dated 12 March 2014. - Surat Izin Kepala Dinas Kesehatan Kabupaten Deli Serdang tentang Penyelenggaraan Klinik Pratama No.5540/440/KP/XI/DS/2014, for Klinik Pratama Timbang Deli Estate, dated 27 November 2014. Permit valid until October 2019. - Surat Tanda Registrasi Bidan No.0202521161134236, under name Mrs. Suciani, dated 28 March 2016 – valid until 25 September 2021. - Surat Izin Kerja Bidan No.7511/440/SIKB/DS/XII/2016 under name Mrs. Suciani, dated 25 December 2016, until 25 September 2021. 	
<p>2.1.2</p> <p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <p>- Minor compliance –</p>	<p>There is an established procedure related effort to comply with changes in the regulation as regulated in SOP No. CA/SOP/01, dated 1 November 2011. In 2018, PT. Eastern Sumatra Indonesia, PT. Kerasaan Indonesia and PT. Timbang Deli Indonesia have evaluated 236 applicable laws and regulations, (referring to NI appendix) comprise of:</p> <ol style="list-style-type: none"> a. 47 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. 56 types of government regulation “Peraturan 	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>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 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. 17 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. 7 President Regulation such as “Peraturan Presiden No.12 tahun 2013 tentang Jaminan Kesehatan” – health insurance.</p> <p>f. 116 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>PT. Timbang Deli Indonesia have evaluated 236 applicable laws and regulations, comprise of:</p> <p>g. 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 Stockholm” – 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)”.</p> <p>h. 53 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 2014 tentang Perlindungan dan Pengelolaan Ekosistem Gambut” –</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>protection of peat ecosystem.</p> <ul style="list-style-type: none"> i. 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. j. 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". k. 8 President Regulation such as "Peraturan Presiden No.12 tahun 2013 tentang Jaminan Kesehatan" – health insurance. l. 116 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>Companies also evaluating the lecal regulation issued by Sumatera Utara Province; for example decree on minimum wage for Simalungun Regency and Deli Serdang Regency.</p>	
<p>2.1.3</p> <p>A mechanism for ensuring compliance shall be implemented. - Minor compliance –</p>	<p>In accordance with SOP No.CA/SOP/01, dated 1 November 2011, the company has evaluated regulatory compliance is always updated every year and the results are written in the document "Evaluation of Regulatory Compliance Legislation". 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, The compnay has evaluated in detail for each clause dan the evidence for compliance is available.</p> <p>The evaluation document describes in detail the evaluation of the fulfillment of article - per chapter and completed with the fulfillment.</p>	<p>Comply</p>
<p>2.1.4</p> <p>A system for tracking any changes in the law shall be available and implemented. - 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 on 17 December 2018 for new regulation: - "Peraturan Presidaen no.82 tahun 2018 tentang</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>Jaminan Kesehatan" updated on 10 December 2018 – this is applicable for company;</p> <ul style="list-style-type: none"> - "Keputusan Gubernur Sumatera Utara No.188.44/1441/Kpts/2018 tentang Upah Minimum Kabupaten Deli Serdang tahun 2019". This is applicable for PT. Timbang Deli Indonesia. 	
<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 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -</p>	<p>PT. Eastern Sumatra Indonesia have legal ownership of the land – "Hak Guna Usaha/HGU":</p> <ol style="list-style-type: none"> The legal ownership of the land "Surat Keputusan Menteri Agraria/Kepala BPN No.SK.46/HGU/DA/75, untuk PT. Eastern Sumatra Rubber Estate (Indonesia)" dated 21 October 1975 until 31 December 1998. The HGU extension as per "melalui Surat Keputusan Menteri Negara Agraria/Kepala BPN No.108/HGU/BPN/97, tentang Pemberian Perpanjangan Hak Guna Usaha atas Tanah terletak di Kabupaten Simalungun, Provinsi Sumatera Utara atas nama PT. Eastern Sumatra Indonesia", dated 26 August 1997. The name have been changed into PT. Eastern Sumatra Indonesia from previously PT. Eastern Sumatra Rubber Estate (Indonesia) as legalized by "Menteri Kehakiman No.C2-2217-HT.01.04.TH 97" dated 17 March 1997, as per "Akte Notaris Kartini Muljadi, SH No.58 tahun 1986". The land title/HGU covers 3,177.94 Ha, located in "Kecamatan Siantar, Kabupaten Simalungun, Provinsi Sumatera Utara". As mandated, "Kantor Pertanahan Kabupaten Simalungun issued "Pergantian Sertifikat HGU No.2 Tahun 1997" for piece of land located in "Desa Pematang Sakhuda" dated 16 October 1997. This is accurate as per "Surat Ukur No.02.09.03.34.2.00348/1997" dated 16 October 1997. The certificate valid until 31 December 2023. <p>PT. Kerasakan Indonesia have legal ownership of the land – "Hak Guna Usaha/HGU":</p> <ul style="list-style-type: none"> - As per "Surat Keputusan Menteri Dalam Negeri No.SK.45/HGU/DA/75 atas nama PT. Perusahaan Perkebunan Laras Indonesia dengan luas 2,468 Ha" dated 21 October 1975. Subsequently issued with "Sertifikat HGU No.1" dated 16 January 1978 valid until 31 December 1998. - Note: In 1988 the company identity was changed from PT. Perusahaan Perkebunan Laras Indonesia into PT. Kerasakan Indonesia, based on "Akta Berita Acara Rapat Umum Luar Biasa Para Pemegang Saham Perseroan Terbatas yang dibuat dihadapan Notaris Kartini Muljadi, SH; No. 102" dated 27 July 1988. The change approved by ministry of justice "No.C2-10477-HT.01.04-TH88" dated 16 November 1988. - In 1997, company apply for HGU extension as in "Surat Keputusan Menteri Agraria/Kepala BPN 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>No.90/HGU/BPN/97 tentang Pemberian Perpanjangan HGU atas Tanah Terletak di Kabupaten Simalungun, Provinsi Sumatera Utara dengan Luas Izin Sebesar 2,362.03 Ha terletak di Kecamatan Bandar, Kabupaten Simalungun, Provinsi Sumatera Utara yang Semula Atas Nama PT. Perusahaan Perkebunan Laras Indonesia menjadi PT. Kerasakan Indonesia” dated 5 August 1997. The HGU extension valid for 25 years, until 31 December 2023. The HGU extension registered in Lands Office “Kantor Pertanahan Kabupaten Simalungun No.3951/1997 and No.7782/1997” dated 1 October 1997. The registration was for a piece of land 2,362.03 Ha as verified through “Peta Gambar Situasi Khusus No.131/09/IV/1997” dated 14 March 1997.</p> <p>Based on document verification upon “Dokumen Berita Acara Pemeriksaan/Penelitian Lapangan atas Permohonan Perpanjangan Hak Guna Usaha yang dilakukan oleh Petugas Kantor Wilayah Badan Pertanahan Nasional Sumatera Utara” dated 12 March 1997; there was a reduction of 105.97 Ha (between HGU in 1975 and 1997) due to:</p> <ul style="list-style-type: none"> - Public facility inside HGU in form of elementary school, police office, medical clinic and middle school. - There is reposition of HGU pole No.31 and No.32, which previously located in “Jalan Raya Kerasakan – Pematang Bandar”, at the time of HGU extension, located in irrigation – as per current condition. <p>PT. Timbang Deli Indonesia have legal land tittle – “Hak Guna Usaha/HGU”:</p> <ul style="list-style-type: none"> - As per “Surat Keputusan Menteri Dalam Negeri No.53/HGU/DA/1978” with “Sertifikat HGU No.2/Timbang Deli” which expires in 31 December 1998. - Extension as per “Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan Nasional No.69/HGU/BPN/97 tentang Pemberian Perpanjangan Hak Guna Usaha atas Tanah Terletak di Kabupaten Deli Serdang, Provinsi Sumatera Utara dengan luas 972.19 Ha”, dated 10 July 1997. Subsequently issued with “Sertifikat HGU No.4 tahun 1997” dated 10 September 1997; valid until 31 December 2023. The certificate as verified under “Gambar Situasi No.8860/1997” dated 9 July 1997. <p>Audit team made document review, and it was known that PT. Timbang Deli Indonesia have been managed as rubber plantation since Dutch colonial era, 1911. In 1929, the area of PT. Timbang Deli (at the time area 1,104 Ha) was managed by “Perkebunan Bandar Pinang Group” and changed into PT. Timbang Deli in 1968 with commodity rubber and cocoa.</p>	
<p>2.2.2</p>	<p>Legal boundaries are demonstrated clearly and maintained.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>28 September 2018 for "Patok HGU No.22, 23, 24, 25, 26, 27, 28, 29"; in Division IV, checking on 27 September 2018 for "Patok HGU No.2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15";</p> <p>Based on record verification September 2018, pole No.11 and 13 are broken. Management prepared action plan to repair the boundary pole condition in 2019. Division IV planned to have 7 HGU poles repair in August 2019; another 9 boundary poles to be repair in September 2019; another 9 boundary poles to be repair in October 2019 and 3 boundary poles to be repair in November 2018.</p> <p>In Timbang Deli Indonesia, based on verification upon HGU map and pole maintenance "Peta Pemeliharaan Patok HGU" shows 13 HGU poles under PT. Timbang Deli Indonesia. The monitoring carried out and recorded under "Buku Laporan Kondisi Patok HGU/Boundary":</p> <ul style="list-style-type: none"> a. HGU pole monitoring on 17 June 2018 result: all HGU boundary poles in good condition. b. HGU pole monitoring on 15 September 2018 result: all HGU boundary poles in good condition. c. HGU pole monitoring on 18 February 2019 result: all 13 HGU boundary poles in good condition. <p>Based on field visit to HGU boundary "TD/8", located neighboring with PT. Perkebunan Nusantara III Sei Putih. GPS: 3°24'58.84"N and 98°55'02.51"E - condition good.</p> <p>HGU boundary "TD/9", located neighboring with PT. Perkebunan Nusantara III Sei Putih and local community. GPS: 3°24'58.76"N and 98°54'28.53"E - condition good.</p> <p>HGU boundary "TD/10", located neighboring with local community housing. GPS: 3°25'29.46"N and 98°54'15.59"E - condition good.</p> <p>HGU boundary "TD/11", located neighboring with local community housing. GPS: 3°25'29.59"N and 98°54'19.71"E - condition good.</p> <p>There are area enclaved - located inside concession, but not part of the land title/HGU, clearly delineated with the boundary of block 00A04 (rubber plantation) and block 17A04 (oil palm plantation). It can be referenced to the HGU map, that the area was clearly outside of company's concession.</p> <p>The other enclaved – located inside the concession, but not part of the land title/HGU (excised). It was located in block 05D05 (rubber plantation).</p> <p>Management implement additional boundary poles – as aide tools to define the enclaved area with company's plantation.</p>	
<p>2.2.3</p>	<p>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,</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>Supreme Court Letter No.413/H/2000/830.K/PDT/1998 dated 31 July 2000. A copy of the Decision of the Supreme Court on the extent of Cassation on 24 Februari 2000 Reg. No. 830.K/PDT1998 in the case of H***** S*****, cs. with PT. SIPEF Indonesia.</p> <p>In 2009, there were a lawsuit by the community to PT. Tolan Tiga Indonesia (the first defendant), the Government of Simalungun (Defendant II) and the National Land Agency (Defendant III) and there has been a Simalungun District Court decision No.33Pdt.G2009/PN.Sim dated 18 August 2010 which ruled that the lawsuit can not be accepted.</p> <p>Based on the results of public consultation with the surrounding villages (Desa Wonorejo and Desa Bukit Maradja) stated that during the few last years have been no reports from the public related to land disputes between the community and the company.</p> <p>Based on stakeholder consultation to Lands Office in Simalungan Regency, in period of 2017 up to March 2018 there was a report related to land claim for HGU PT. Eastern Sumatra Indonesia – addressed to Simalungun Regent, with Lands Office in the loop. The case was under review by Lands Office.</p> <p>Based on the documents verification upon Statement Area of PT. Kerasaan Indonesia showed that there is no land conflict with other parties. Based on the results of public consultation with the surrounding village (Desa Wonorejo and Desa Bukit Maradja) during the few last years have been no reports from the public related to land disputes between the community and the company.</p> <p>Based on the documents verification upon Area Statement of PT. Timbang Deli Indonesia showed that there is no land conflict with other parties. Based on the results of public consultation with the surrounding village (Desa Timbang Deli) and Kantor Pertanahan Kabupaten Deli Serdang, there are no reports from public related to land disputes between the community and the company.</p>	
<p>2.2.4</p>	<p>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.</p> <p>- Major compliance –</p>	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>No.33Pdt.G2009/PN.Sim dated 18 August 2010 which ruled that the lawsuit can not be accepted.</p> <p>Based on the results of public consultation with the surrounding villages (Desa Wonorejo and Desa Bukit Maradja) stated that during the few last years have been no reports from the public related to land disputes between the community and the company.</p> <p>Based on stakeholder consultation to Lands Office in Simalungan Regency, in period of 2017 up to March 2018 there was a report related to land claim for HGU PT. Eastern Sumatra Indonesia – addressed to Simalungun Regent, with Lands Office in the loop. The case was under review by Lands Office.</p> <p>Based on the documents verification upon Statement Area of PT. Kerasaan Indonesia showed that there is no land conflict with other parties. Based on the results of public consultation with the surrounding village (Desa Wonorejo and Desa Bukit Maradja) during the few last years have been no reports from the public related to land disputes between the community and the company.</p> <p>Based on the documents verification upon Area Statement of PT. Timbang Deli Indonesia showed that there is no land conflict with other parties. Based on the results of public consultation with the surrounding village (Desa Timbang Deli) and Kantor Pertanahan Kabupaten Deli Serdang, there are no reports from public related to land disputes between the community and the company.</p>	
<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> <p>- Minor compliance –</p>	<p>Based on the documents verification of statement area PT. Eastern Sumatra Indonesia, there is no land conflict with other parties. In 1995 a land dispute between the company and community was reported, the case have been resolved through Simalungun District Court, as a last resort.</p> <p>In 1996 the complainant appealed and in 1998, company was re-appealed and it was decided in 2000 by the Supreme Court Letter No.413/H/2000/830.K/PDT/1998 dated 31 July 2000. A copy of the Decision of the Supreme Court on the extent of Cassation on 24 Februari 2000 Reg. No. 830.K/PDT1998 in the case of H***** S*****, cs. with PT. SIPEF Indonesia.</p> <p>In 2009, there were a lawsuit by the community to PT. Tolan Tiga Indonesia (the first defendant), the Government of Simalungun (Defendant II) and the National Land Agency (Defendant III) and there has been a Simalungun District Court decision No.33Pdt.G2009/PN.Sim dated 18 August 2010 which ruled that the lawsuit can not be accepted.</p> <p>Based on the results of public consultation with the surrounding villages (Desa Wonorejo and Desa Bukit Maradja) stated that during the few last years have been no reports from the public related to land disputes between the community and the company.</p> <p>Based on stakeholder consultation to Lands Office in Simalungan Regency, in period of 2017 up to March 2018 there was a report related to land claim for HGU PT.</p>	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Eastern Sumatra Indonesia – addressed to Simalungun Regent, with Lands Office in the loop. The case was under review by Lands Office.</p> <p>Based on the documents verification upon Statement Area of PT. Kerasaan Indonesia showed that there is no land conflict with other parties. Based on the results of public consultation with the surrounding villages (Desa Wonorejo and Desa Bukit Maradja) during the few last years have been no reports from the public related to land disputes between the community and the company.</p> <p>Based on the documents verification upon Area Statement of PT. Timbang Deli Indonesia showed that there is no land conflict with other parties. Based on the results of public consultation with the surrounding village (Desa Timbang Deli) and Kantor Pertanahan Kabupaten Deli Serdang, there are no reports from public related to land disputes between the community and the company.</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. - Major compliance –</p>	<p>Based on document review upon area statement Bukit Maradja Estate, Kerasaan Estate and Timbang Deli 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 villages, NGO and Lands Office, statement gathered that company never instigate violence in resolving issues such as land conflict.</p> <p>Based on the documents verification upon Area Statement of PT. Timbang Deli Indonesia showed that there is no land conflict with other parties.</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. Based on the results of public consultation with the surrounding village (Desa Timbang</p>	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance	
	Deli) and Kantor Pertanahan Kabupaten Deli Serdang, the company never instigate violence in resolving issues such as land conflict.		
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.			
2.3.1 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). - Major compliance -	<p>Based on the documents verification of statement area PT. Eastern Sumatra Indonesia, there is no land conflict with other parties. In 1995 a land dispute between the company and community was reported, the case have been resolved through Simalungun District Court, as a last resort.</p> <p>In 1996 the complainant appealed and in 1998, company was re-appealed and it was decided in 2000 by the Supreme Court Letter No.413/H/2000/830.K/PDT/1998 dated 31 July 2000. A copy of the Decision of the Supreme Court on the extent of Cassation on 24 Februari 2000 Reg. No. 830.K/PDT1998 in the case of H***** S***** , cs. with PT. SIPEF Indonesia.</p> <p>In 2009, there were a lawsuit by the community to PT. Tolan Tiga Indonesia (the first defendant), the Government of Simalungun (Defendant II) and the National Land Agency (Defendant III) and there has been a Simalungun District Court decision No.33Pdt.G2009/PN.Sim dated 18 August 2010 which ruled that the lawsuit can not be accepted.</p> <p>All records and court decision for the complained area are maintained by company.</p> <p>Based on the results of public consultation with the surrounding villages (Desa Wonorejo and Desa Bukit Maradja) stated that during the few last years have been no reports from the public related to land disputes between the community and the company. Based on stakeholder consultation to Lands Office in Simalungan Regency, in period of 2017 up to March 2018 there was a report related to land claim for HGU PT. Eastern Sumatra Indonesia – addressed to Simalungun Regent, with Lands Office in the loop. The case was under review by Lands Office.</p> <p>Based on the documents verification upon Statement Area of PT. Kerasaan Indonesia showed that there is no land conflict with other parties. Based on the results of public consultation with the surrounding villages (Desa Wonorejo and Desa Bukit Maradja) during the few last years have been no reports from the public related to land disputes between the community and the company.</p> <p>Based on the documents verification upon Area Statement of PT. Timbang Deli Indonesia showed that there is no land conflict with other parties. Based on the results of public consultation with the surrounding village (Desa Timbang Deli) and Kantor Pertanahan Kabupaten Deli Serdang, there are no reports from public related to land disputes between the community and the company.</p>	Comply	
2.3.2	Copies of negotiated agreements	Based on the documents verification of statement area	Comply

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
<p>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 - Minor compliance -</p>	<p>PT. Eastern Sumatra Indonesia, there is no land conflict with other parties. Based on the results of public consultation with the surrounding villages (Desa Wonorejo and Desa Bukit Maradja) stated that during the few last years have been no reports from the public related to land disputes between the community and the company. Based on stakeholder consultation to Lands Office in Simalungan Regency, in period of 2017 up to March 2018 there was a report related to land claim for HGU PT. Eastern Sumatra Indonesia – addressed to Simalungun Regent, with Lands Office in the loop. The case was under review by Lands Office.</p> <p>Based on the documents verification upon Statement Area of PT. Kerasaan Indonesia showed that there is no land conflict with other parties. Based on the results of public consultation with the surrounding village (Desa Wonorejo and Desa Bukit Maradja) during the few last years have been no reports from the public related to land disputes between the community and the company.</p> <p>Based on the documents verification upon Area Statement of PT. Timbang Deli Indonesia showed that there is no land conflict with other parties. Based on the results of public consultation with the surrounding village (Desa Timbang Deli) and Kantor Pertanahan Kabupaten Deli Serdang, there are no reports from public related to land disputes between the community and the company.</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>2.3.3 Relevant information shall be available in appropriate forms and languages, including analysis of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -</p>	<p>Based on the documents verification of statement area PT. Eastern Sumatra Indonesia, there is no land conflict with other parties.</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,</p>	Comply

RSPO Public Summary Report
Revision 8 (Mar /2019)

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	compensation letter. All procedures/information available in Bahasa Indonesia.																																																					
2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. - Major compliance -	<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>Based on the documents verification upon Statement Area of PT. Kerasaan Indonesia showed that there is no land conflict with other parties. Based on the results of public consultation with the surrounding village (Desa Wonorejo and Desa Bukit Maradja) during the few last years have been no reports from the public related to land disputes between the community and the company.</p> <p>Based on the documents verification upon Area Statement of PT. Timbang Deli Indonesia showed that there is no land conflict with other parties. Based on the results of public consultation with the surrounding village (Desa Timbang Deli) and Kantor Pertanahan Kabupaten Deli Serdang, there are no reports from public related to land disputes between the community and the company.</p>	Comply																																																				
Principle 3: Commitment to long-term economic and financial viability																																																						
Criterion 3.1:																																																						
There is an implemented management plan that aims to achieve long-term economic and financial viability.																																																						
3.1.1 A documented management plan, a minimum of three years shall be available, including, where appropriate, plan for scheme smallholders. - Major compliance-	<p>The company has prepared budget plan for 10 years (2018 – 2028) and reviewed annually. Budget plan is consist of FFB Production OER, KER, cost, expenditure.</p> <table border="1" data-bbox="699 1473 1066 1641"> <thead> <tr> <th>Description</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>110,741</td> <td>112,213</td> </tr> <tr> <td>CPO</td> <td>25,803</td> <td>26,146</td> </tr> <tr> <td>PK</td> <td>6,091</td> <td>6,172</td> </tr> <tr> <td>OER</td> <td>23.30</td> <td>23.30</td> </tr> <tr> <td>KER</td> <td>5.50</td> <td>5.50</td> </tr> </tbody> </table> <table border="1" data-bbox="699 1671 1082 1832"> <thead> <tr> <th>Description</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>115,851</td> <td>122,654</td> </tr> <tr> <td>CPO</td> <td>26,993</td> <td>28,578</td> </tr> <tr> <td>PK</td> <td>6,372</td> <td>6,746</td> </tr> <tr> <td>OER</td> <td>23.30</td> <td>23.30</td> </tr> <tr> <td>KER</td> <td>5.50</td> <td>5.50</td> </tr> </tbody> </table> <p>The company also has detail budget for Bukit Maradja Estate:</p> <table border="1" data-bbox="699 1917 1209 2020"> <thead> <tr> <th>Year</th> <th>FFB</th> <th>Hectarage</th> <th>Yield (Ton/Ha)</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>60,609</td> <td>2,653.98</td> <td>22.83</td> </tr> <tr> <td>2020</td> <td>62,005</td> <td>2,715.12</td> <td>22.83</td> </tr> <tr> <td>2021</td> <td>59,617</td> <td>2,610.55</td> <td>22.84</td> </tr> </tbody> </table>	Description	2019	2020	FFB	110,741	112,213	CPO	25,803	26,146	PK	6,091	6,172	OER	23.30	23.30	KER	5.50	5.50	Description	2021	2022	FFB	115,851	122,654	CPO	26,993	28,578	PK	6,372	6,746	OER	23.30	23.30	KER	5.50	5.50	Year	FFB	Hectarage	Yield (Ton/Ha)	2019	60,609	2,653.98	22.83	2020	62,005	2,715.12	22.83	2021	59,617	2,610.55	22.84	Comply
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RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator		Assessment Findings				Compliance																																												
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		<p>Cost and expenditure for each financial year have been cascaded, specifying general field works, harvesting cost and general charges. With estimated OER 23.5% and KER 5.5%.</p> <p>Kerasaan Estate:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB</th> <th>Hectarage</th> <th>Yield (Ton/Ha)</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>52,519</td> <td>2,269.09</td> <td>22.87</td> </tr> <tr> <td>2020</td> <td>50,127</td> <td>2,269.09</td> <td>22.09</td> </tr> <tr> <td>2021</td> <td>46.840</td> <td>2,269.09</td> <td>20.64</td> </tr> <tr> <td>2022</td> <td>43,764</td> <td>2,269.09</td> <td>19.28</td> </tr> </tbody> </table> <p>Cost and expenditure for each financial year have been cascaded, specifying general field works, harvesting cost and general charges.</p> <p>Company demonstrates Financial Statements PT. Eastern Sumatra Indonesia for the year ended 31 December 2017 by Satrio Bing Eny & Rekan – Registered Public Accountants (Deloitte). The Independent Auditor’s Report No.GA1180645 ESI PDS dated 22 May 2018. The financial report indicating company financial performance was good.</p> <p>Timbang Deli Estate (dated 2 January 2019):</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB</th> <th>Hectarage</th> <th>Yield (Ton/Ha)</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>338.05</td> <td>53.27</td> <td>6.35</td> </tr> <tr> <td>2020</td> <td>1,477.72</td> <td>210.11</td> <td>7.03</td> </tr> <tr> <td>2021</td> <td>3,362.74</td> <td>312.58</td> <td>10.76</td> </tr> <tr> <td>2022</td> <td>5,741.72</td> <td>337.00</td> <td>17.04</td> </tr> <tr> <td>2023</td> <td>8,134.11</td> <td>428.36</td> <td>18.99</td> </tr> </tbody> </table> <p>There is changes in FFB production plan, adjusting to the NPP progress. Cost and expenditure for each financial year have been cascaded, specifying general field works, harvesting cost and general charges.</p> <p>Financial Statements PT. Timbang Deli Indonesia for the year ended 31 December 2017 by Satrio Bing Eny & Rekan – Registered Public Accountants (Deloitte). The Independent Auditor’s Report No.GA1180684 TDI PDS dated 28 May 2018.</p>				Year	FFB	Hectarage	Yield (Ton/Ha)	2019	52,519	2,269.09	22.87	2020	50,127	2,269.09	22.09	2021	46.840	2,269.09	20.64	2022	43,764	2,269.09	19.28	Year	FFB	Hectarage	Yield (Ton/Ha)	2019	338.05	53.27	6.35	2020	1,477.72	210.11	7.03	2021	3,362.74	312.58	10.76	2022	5,741.72	337.00	17.04	2023	8,134.11	428.36	18.99	
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3.1.2	<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>Bukit Maradja Estate:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Hectare</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>96.78 Ha</td> <td>OP 2000</td> </tr> <tr> <td>2020</td> <td>184.41 Ha</td> <td>OP 1999</td> </tr> <tr> <td>2021</td> <td>185.09 Ha</td> <td>OP 2001</td> </tr> <tr> <td>2022</td> <td>143.06 Ha</td> <td>OP 1993, 1994, 1996</td> </tr> <tr> <td>2023</td> <td>192.33 Ha</td> <td>OP 1996, 1997</td> </tr> <tr> <td>2024</td> <td>203.59 Ha</td> <td>OP 1996, 1997</td> </tr> <tr> <td>2025</td> <td>148.95 Ha</td> <td>OP 1996, 2002</td> </tr> <tr> <td>2026</td> <td>173.68 Ha</td> <td>OP 2002</td> </tr> <tr> <td>2028</td> <td>158.40 Ha</td> <td>OP 2003</td> </tr> <tr> <td>2029</td> <td>105.34 Ha</td> <td>OP 2003</td> </tr> </tbody> </table> <p>Kerasaan Estate</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Hectare</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>101.68 Ha</td> <td>OP 2003</td> </tr> </tbody> </table>				Year	Hectare	Remarks	2019	96.78 Ha	OP 2000	2020	184.41 Ha	OP 1999	2021	185.09 Ha	OP 2001	2022	143.06 Ha	OP 1993, 1994, 1996	2023	192.33 Ha	OP 1996, 1997	2024	203.59 Ha	OP 1996, 1997	2025	148.95 Ha	OP 1996, 2002	2026	173.68 Ha	OP 2002	2028	158.40 Ha	OP 2003	2029	105.34 Ha	OP 2003	Year	Hectare	Remarks	2020	101.68 Ha	OP 2003	Comply					
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RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator		Assessment Findings			Compliance																											
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Principle 4: Use of appropriate best practices by growers and millers																																
Criterion 4.1:																																
Operating procedures are appropriately documented, consistently implemented and monitored.																																
4.1.1	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. - Major compliance -	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: <ol style="list-style-type: none"> "Biology of Oil Palm No.OPM-01-00/02-10-2017/Rev.2 dated 20 November 2017"; "Oil Palm Nursery No.OPM-02-00/02-10-2017/rev.2 dated 20 November 2017"; "Land Preparation of Oil Palm Nursery No.OPM-02-01/02-10-2017/Rev.2"; "Oil Palm Pre-Nursery No.OPM-02-02/02-10-2017/Rev.2"; "Oil Palm Main Nursery No.OPM-02-03/02-10-2017/Rev.2"; "New Development Area and Replanting No.OPM-03-00/02-10-2017/Rev.2"; "Surveys and Mapping No.OPM-03-01/02-10-2017/Rev.2"; "Land Clearing No.OPM-03-02/02-10-2017/Rev.2"; "Land Preparation No.OPM-03-03/02-10-2017/Rev.2"; "Legume Cover Crop No.OPM-03-04/02-10-2017/Rev.2"; 			Comply																											

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<ol style="list-style-type: none"> 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-05-00/02-10-2017/Rev.2"; 16. "Ablation, Castration and Sanitation No.OPM-05-01/02-10-2018/Rev.3"; 17. "Harvesting No.OPM-05-02/02-10-2018/Rev.3"; 18. "FFB and Loose Fruit Delivery No.OPM-05-03/02-10-2018/Rev.3"; 19. "Frond Pruning No.OPM-05-04/02-10-2017/Rev.2"; 20. "Black Bunch Count No.OPM-05-02/02-10-2017/Rev.2"; 21. "<i>Elaeodobius kamerunicus</i> Management No.OPM-05-06/02-10-2017/Rev.2"; 22. "Fertilizer No.OPM-06-00/02-10-2017/Rev.2"; 23. "Inorganic Fertilisers No.OPM-06-01/02-10-2017/Rev.2"; 24. "Organic Fertilisers No.OPM-06-02/02-10-2017/Rev.2"; 25. "Leaf Sampling Unit and Rachis Sample Unit No.OPM-06-03/02-10-2017/Rev.2"; 26. "Pest and Disease No.OPM-07-00/02-10-2017/Rev.2"; 27. "Detection and Census No.OPM-07-01/02-10-2018/Rev.3"; 28. "Pest Control No.OPM-07-02/02-10-2017/Rev.2"; 29. "Disease Control No.OPM-07-03/02-10-2017/Rev.2"; 30. "Integrated Pest Management No.OPM-07-04/02-10-2017/Rev.2"; 31. "Weeds in Oil Palm Plantation No.OPM-08-00/02-10-2017/Rev.2"; 32. "Weeds Control No.OPM-08-01/02-10-2018/Rev.3"; 33. "Environmental Management No.OPM-09-00/02-10-2017/Rev.2"; 34. "Water Management in Coastal Soil No.OPM-09-01/02-10-2017/Rev.2"; 35. "Management of Riparian Area No.OPM-09-02/02-10-2017/Rev.2"; 36. "The Use, Store and Discard Pesticide No.OPM-09-03/02-10-2017/Rev.2"; <p>For Bukit Maradja Mill: Palm Oil Palm Manual Part 1-3</p> <ol style="list-style-type: none"> 1. Introduction to Palm Oil Mill SOP No.POM-00-00 2. General Information of Reception No.POM-01-00 3. Reception in Bukit Maradja POM No.POM-01-01 4. Work Instruction Penimbangan Truk FFB dan Berondolan No.POM-01-01-W01 5. WI Penimbangan Truk Tangki CPO No.POM-01-01-W02; 6. WI Penimbangan Truk Kernel No.POM-01-01-W03; 7. WI Pengisian FFB ke dalam Lori No.POM-01-01-W04; 8. WI Pengoperasian Capstand dan Chain Man No.POM-01-01-W05; 9. WI Pemindahan FFB ke Railtrack Belakang Sterilizer 	

Criterion / Indicator	Assessment Findings	Compliance	
	No.POM-01-01-W06; 10. General Information of Sterilizer No.POM-02-00 11. WI Sterilizer in Bukit Maradja POM No.POM-02-01 rev.01 12. WI Cara Mengeluarkan dan Memasukkan Lori ke Dalam Sterilizer No.POM-02-01-W01 13. WI Pengoperasian Sterilizer No.POM-02-01-W02 14. General Information on Pressing No.POM-03-00 15. Pressing in Bukit Maradja POM No.POM-03-01 16. WI Pengoperasian Hoisting Crane No.POM-03-01-W01; 17. General Information of Pressing No.POM-04-00 18. Pressing in Bukit Maradja POM No.POM-04-01 19. WI Pengoperasian Threshing Machine No.POM-04-01-W01 20. WI Pengoperasian Digester No.POM-04-01-W01; 21. WI Pengoperasian Screw Press No.POM-04-01-W02; 22. WI Pengoperasian Sandtrap Tank dan Vibrating Screen No.POM-04-01-W03 23. WI Pengoperasian Crude Oil Tank No.POM-04-01-W04; 24. General Information on Clarification No.POM-05-00 25. Clarification on Bukit Maradja POM No.POM-05-01 26. WI Pengoperasian Continuous Settling Tank No.POM-05-01-W01; 27. WI Pengoperasian Clean Oil Tank No.POM-05-01-W02; 28. WI Pengoperasian Sludge Tank No.POM-05-01-W03; 29. WI Pengoperasian Oil Purifier No.POM-05-01-W04; 30. WI Pengoperasian Vacuum Drier No.POM-05-01-W05 31. WI Pengoperasian Sludge Centrifuge No.POM-05-01-W06; 32. WI Pengoperasian Sludge Decanter No.POM-05-01-W06; 33. General Information Kernel Plant No.POM-06-00 34. Kernel Plant in Bukit Maradja POM No.POM-06-01; 35. WI Pengoperasian Depericarper No.POM-06-01-W01; 36. WI Pengoperasian Rippler Mill No.POM-06-01-W02; 37. WI Pengoperasian Winnowing No.POM-06-01-W03; 38. WI Pengoperasian Claybath Separator No.POM-06-01-W04; 39. WI Pengoperasian Kernel Silo Drier No.POM-06-01-W05; 40. Steam Plant in Bukit Maradja POM No.POM-07-01; 41. WI Pengoperasian Steam Boiler No.POM-07-01-W03		
4.1.2	Checking or monitoring of operations procedures is conducted at least once a year. - Minor compliance -	Bukit Maradja POM visited by Vice President Director Engineering on 13 July 2018, report shows 15 comments related to housekeeping. Bukit Maradja POM made correction related to dead stock and large pile of scrap metal. Action taken: Mill Manager request approval up to President Director for "Statement of Asset Write Off Approval" dated 7 August 2018 (transport kernel beam, kernel elevator, cracker mixture conveyor, primary air fan, fiber cyclone and air lock); dated 3 September 2018 (integrated fruit bucket, impeller fan boiler, primary and secondary drainage land application);dated 9 September 2018 (rubbish conveyor under loading ramp) – all sold as	Comply

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>scrap iron.</p> <p>Bukit Maradja Estate visited by Vice President Director Estate Department on 1 February 2019, report shows comment related to have manuring OP 1997 (compost application), action plan: check on recommendation and have been applied with Urea 1kg/palm and Rock Phospate 1kg/palm; ordered to update compost application map 2018, action plan: already prepared and updated compost application map 2018.</p> <p>Internal audit to Timbang Deli Estate, carried out on 7-10 January 2019. 30 issues identified. All of issues have been followed up as of verification visit, dated 13 March 2019. Example: social impact assessment through questionnaire have not been analyzed in January 2019. In March 2019, SIA have been analyzed and reported into UKL/UPL report.</p> <p>Agronomist conducted review upon Pest and Disease Census result for Timbang Deli Estate period March 2019. Based on census of bagworm dated 9 March 2019, agronomist ordered hand-picking on 9-15 March 2019 for block B04 and B03. Implemented by assisstant by ordering hand-picking for 11 workers dated 9-15 March 2019.</p>	
<p>4.1.3 Records of monitoring and any follow-up actions shall be available. - Minor compliance -</p>	<p>Bukit Maradja POM demonstrated daily processing logbook. Sampled for Sterilizer: "Laporan Harian Sterilizer", dated 12 March 2019 – indicating process for sterilizer team on second shift started at 14.00PM and completed process 24.00AM; total processing 22 sterilizing cycles, comprise of 198 lorries.</p> <p>Sampled for clarification station: "Laporan Harian Klarifikasi" dated 12 March 2019 – indicating process for shift 2A started in 14.00PM and completed in 24.00AM; Decanter No.1 running hour 10.3 hours; Decanter No.2 running hour 1.3 hours; Sludge centrifuge No.2 running hour 11.3 hours; temperature stabile at Continuous Settling Tank No.1 at 98°C; temperature stabile at Clean Oil Tank No.1 at 80°C; temperature stabile at Clean Oil Tank No.2 at 80°C; remarks: decanter No.3 broken.</p> <p>Harvesting commencement in Timbang Deli Estate:</p> <ul style="list-style-type: none"> - Daliy Production Report (period January 2019), dated 22 January 2019: 963 kg FFB, 76 kg loose fruit; total 1,039 kg FFB and loose fruit. - "Crop Harian" records 5 harvesters collecting 206 bunches - "Laporan Produksi Oil Palm Divisi VII Timbang Deli Estate" dated 22 January 2019, recorded harvest in 2 blocks 206 bunches, totalling 1,039 kg FFB. - "Surat Pengantar TBS" with vehicle No.BK8539XM, dated 22 January 2019: 1,039 kg FFB and loose fruit; - "Buku Pengangkutan TBS" with vehicle No.BK8539XM, dated 22 January 2019: 1,039 kg FFB and loose fruit; 	<p>Comply</p>
<p>4.1.4 Records of the origins of all third-party FFB sourced (collector,</p>	<p>Bukit Maradja POM only received FFB form its supply base (Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate). Note that Bukit Maradja POM have</p>	<p>Not Applicable</p>

Criterion / Indicator	Assessment Findings	Compliance	
deliver, Cooperative, Farmers Association and outgrower) shall be available. - Major compliance -	not received FFB from Timbang Deli Estate. Not applicable.	N/A	
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	A record of SOP implementation to maintain soil fertility that ensures optimal and sustained yield, shall be available. - Major compliance -	All estate (Timbang Deli, Bukit Maradja and Kerasaan Estate) have established procedure to manage soil fertility, as following: <ol style="list-style-type: none"> 1. General Information: Fertiliser (OPM-06-00/02-10-2017/Rev.2) dated 20 November 2017. 2. Inorganic Fertiliser (OPM-06-01/02-10-2017/Rev.2) dated 20 November 2017. 3. Organic Fertilisers (OPM-06-02/02-10-2017/Rev.2) dated 20 November 2017. 4. Copy of "SOP Pemupukan" No.11/SOP/Oil Palm/ESD rev.1 dated 1 October 2009 is kept in Timbang Deli Estate Office 	Comply
4.2.2	Records of fertilizer inputs shall be available. - Minor compliance -	Timbang Deli Estate implement Fertilizer recommendation is based on Oil Palm Fertilizer Recommendation for PT. Timbang Deli Indonesia (1 st Semester 2019, 1 st and 2 nd Semester 2018) by Verdant Bioscience. Application record available under "Rekapitulasi Manuring", such as: in Block 17D01 (2,313 palm), planting 2017, application of Urea date 3 January 2019 dosage 1.5 Kg/Palm, total 3,470 Kg; MOP date 4 January 2019 dosage 1.5 Kg/Palm, total 3.470 Kg; Borate dated 5 January 2019 dosage 0.01 Kg/Palm total 231 Kg. In Kerasaan Estate, the use of fertilizer period February 2018 – January 2019: Urea (N 46%) was 761.66 MT; MOP (K ₂ O 60%) was 542.55 MT; Dolomite (CaO 28% and MgO 18%) was 211.05 MT; Borate (B ₂ O ₃ 47%) was 18.87 MT; Rock Phosphate (P ₂ O ₅ 28%) was 576.98 MT; Kieserite (P ₂ O ₅ 28%) was 121.81 MT; Triple Super Phosphate (P ₂ O ₅ 44%) was 7.20 MT.	Comply
4.2.3	Records of periodical leaf, soil and visual analysis shall be available. - Minor compliance -	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/19/093 dated 18 February 2019. Sample seen: Block OP.15B04 result: pH (H ₂ O) is 5.3, pH (KCl) is 4.07, OM is 6.8 %, N-total is 0.114%.	Comply
4.2.4	A nutrient recycling strategy is recorded, including use of Empty Fruit Bunches (EFB), land application, and palm residues after replanting. - Minor compliance -	POME for land application as per "Keputusan Bupati Simalungun No.188.45/3440/LingHup-2015 tentang Perpanjangan Izin Pemanfaatan Air Limbah Industri Minyak Kelapa Sawit pada Tanah di Perkebunan Kelapa Sawit PT Eastern Sumatera Indonesia" dated 23 October 2015 valid for 5 years. Application in 2018 is 7.90 Ha using 4,873 m ³ of POME. Blocks applied is 96E12A. Total application in 2017 is 90.70 ha using 61,386.50 m ³ of POME. Nutrient recycling strategy is available and recorded. Bukit Maradja Estate:	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>Compost application in Bukit Maradja Estate is recorded in "Aplikasi Compost ke Lapangan". Total application in January – March 2019 is 179.4 Ha, tonnage 2,256.1 ton or average 12.60 ton/Ha.</p> <p>There is no application of EFB and POME in Timbang Deli Estate and POME in Kerasaan Estate due to long distance from Bukit Maradja POM.</p>	
<p>Criterion 4.3: Practices minimise and control erosion and degradation of soils.</p>		
<p>4.3.1</p> <p>Maps of any fragile soils shall be available. - Major compliance -</p>	<p>In Bukit Maradja Estate and Kerasaan Estate; JH Agriculture Service conducted the Semi-Detailed Soil Survey in October 2009 for PT. Eastern Sumatera Indonesia, within the semi-detailed soil survey report, topographic condition, soil fertility status and other information has been accounted into.</p> <p>Soil map for Bukit Maradja Estate is available, indicating that there are 2 major soil series identified and demarcated, which is Bukit Maradja series (2,437 Ha or 78%) sandy loam and Kerasaan series (687 Ha or 22%) sandy clay texture. Topography map for Bukit Maradja Estate is available, the area is flat (0 – 2°).</p> <p>Soil map for Kerasaan Estate is available based on Semi Detail Soil Survey of PT. Kerasaan Indonesia – Kerasaan Estate, October 2009, indicating topography of the estate is raised flat, with slope not exceeding 2°, there are 2 major soil series identified and demarcated, consist Kerasaan series (1,343 ha or 58%) with coarse sandy clay sub-soil texture and Bukit Maradja series (972 Ha or 42%) with coarse sandy loam texture.</p> <p>Soil map for Timbang Deli Estate is available under "Soil Profile", scale 1:28,000 indicating soil type: <i>Typic Endoaquepts</i>, <i>Typic Kandiualfs</i> and <i>Typic Kandiuults</i>; soil series: Keladang Series (KLD) and Sorek Series (SRK). Data Sources: Field Survey of PT. Timbang Deli, Aerial Photograph (February 2017), soil report by JH Agriculture (2014). Coordinate system: North UTM 47, datum: WGS 1984, grid system: Geographic Lat/Long, map date: 27 July 2017.</p>	<p>Comply</p>
<p>4.3.2</p> <p>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 -</p>	<p>PT. Eastern Sumatera Indonesia have prepared management strategy to manage and/or minimize soil erosion. Despite, based on soil survey, the plantation was located on relatively flat area.</p> <p>Based on Semi-Detailed Soil Survey in October 2009 for PT. Eastern Sumatera Indonesia by JH Agriculture Service, topographic condition in Bukit Maradja Estate is flat (0 – 2°). Management strategy for planting was to maintain ground cover.</p> <p>Based on Semi Detail Soil Survey of PT. Kerasaan Indonesia – Kerasaan Estate, October 2009, topography of Kerasaan Estate is raised flat, with slope not exceeding 2°. Management strategy for planting was to maintain ground cover.</p> <p>Map of Slope Class is available in scale 1:28,000,</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>indicating the slope class in Timbang Deli Estate is 0-2° (low laying and raised flat) and 2-6 (raised flat to undulating). There is no area with slope above certain limit.</p>	
<p>4.3.3 A road maintenance program shall be in place. - Minor compliance –</p>	<p>In Timbang Deli Estate, record of road maintenance has demonstrated as in "Program/Realisasi Upkeep Road" year 2019, such as:</p> <ul style="list-style-type: none"> – Month January 2019 planned 7,050 meters and realization 1,461 meters – Month February 2019 planned 3,150 meters and realization 1,128 meters <p>In year 2018, the planned of road maintenance is 57,700 meters and realization is 13,650 meters.</p> <p>Bukit Maradja Estate have record of road maintenance as in "Program/Realisasi Upkeep Road" year 2018 total planned 150,129 meter and actual realization is 422,200 meters. In until March 2019 the planned 13,008 meters and actual implementation is 75,839 meters.</p> <p>Kerasaan Estate:</p> <ul style="list-style-type: none"> – Road Maintenance Program year 2019 location in division I for collection road planned 650 meters, realization in February 450 meters. – Road Maintenance Program year 2019 location in division II for main road planned 350 meters and realization in February 700 meters; for collection road planned 950 meters and realization 1500 meters. 	<p>Comply</p>
<p>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 –</p>	<p>Based on Semi Detailed Soil Survey Report, October 2009 by JH Agriculture there is no indication of area with peat soil in Bukit Maradja and Kerasaan Estate. The soil limitation to oil palm growth is sandy soil with low soil moisture holding capacity and high leaching loss of applied fertilizer.</p> <p>Ground cover management planned along with the replanting program, such as planting <i>Mucuna bracteata</i> as legume cover crop and planting <i>Vertiver</i> grass. Based on "Oil Palm, <i>Mucuna bracteata</i> and Beneficial Nursery Report" period December 2017, it was verified that <i>mucuna</i> has been planted in Division III Block 18D07A (20,500 plant), 18D08A (6,000 plants) and Division II Block 18D32A (300 plants).</p> <p>Based on soil map under "Soil Profile", scale 1:28,000 all area of Timbang Deli Estate is mineral soil, there is no peat soil in Timbang Deli Estate.</p>	<p>Not Applicable N/A</p>
<p>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 –</p>	<p>Based on Semi Detailed Soil Survey Report, October 2009 by JH Agriculture there is no indication of area with peat soil in the Bukit Maradja and Kerasaan Estate. The soil limitation to oil palm growth is sandy soil with low soil moisture holding capacity and high leaching loss of applied fertilizer. Drainability assessment is not applicable.</p> <p>Based on soil map under "Soil Profile", scale 1:28,000 all area of Timbang Deli Estate is mineral soil, there is no</p>	<p>Not Applicable N/A</p>

Criterion / Indicator	Assessment Findings	Compliance
	peat soil in Timbang Deli Estate. Drainability assessment is not applicable.	
<p>4.3.6</p> <p>A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils).</p> <p>- Minor compliance –</p>	<p>Management strategy for problem soil Bukit Maradja Estate implemented by cover crop management for sandy area. Planting <i>Mucuna bracteata</i> in area prepared for replanting 2018; Based on "Oil Palm, <i>Mucuna bracteata</i> and Beneficial Nursery Report" period December 2017, it was verified that mucuna has been planted in Division III Block 18D07A (20,500 plant), 18D08A (6,000 plants) and Division II Block 18D32A (300 plants).</p> <p>Based on Semi Detail Soil Survey of PT. Kerasaan Indonesia – Kerasaan Estate, October 2009, indicating there are 2 major soil series identified and demarcated, consist Kerasaan series (1,343 ha or 58%) with coarse sandy clay sub-soil texture and Bukit Maradja series (972 Ha or 42%) with coarse sandy loam texture. Management strategy by planting <i>Mucuna bracteata</i> in replanting area. Based on field observation in Division II and III Kerasaan Estate, it was sight that <i>Mucuna bracteata</i> planted in all immature area.</p> <p>Based on soil map under "Soil Profile", scale 1:28,000 most area of Timbang Deli Estate is sandy clay. Recommendation from the soil survey is planting <i>Mucuna bracteata</i> leguminous cover to conserve soil moisture. Management strategy performed by planting <i>Mucuna bracteata</i> at replanting area. During field observation it was sight that all replanting area and planting year 2015 and 2016 ground cover planted with <i>Mucuna bracteata</i>. Record seen: "Oil Palm, <i>Mucuna bracteata</i> and Beneficial Nursery Report" period December 2017, it was verified that <i>Mucuna bracteata</i> has been planted in replanting preparation Block 17C03 as mucas 18,500 seed.</p>	<p>Comply</p>
<p>Criterion 4.4: Practices maintain the quality and availability of surface and ground water.</p>		
<p>4.4.1</p> <p>An implemented water management plan shall be in place.</p> <p>- Minor compliance -</p>	<p>The water management plan explains on the water intake/consumption, permit, water need for Bukit Maradja Palm Oil Mill – based on water consumption/ton FFB processed, water need for domestic use, plan to record the water consumption – on monthly basis.</p> <p>The water management plan explains the effort for water saving: promoting water saving to all staffs and employees, installation of signboard related water saving, conducted routine monitoring and maintenance to avoid leaked, fix or change broken valve, installed all bathroom with valve.</p> <p>It was demonstrated that the water management plan has been implemented.</p> <p>In Timbang Deli Estate:</p> <ul style="list-style-type: none"> - "Keputusan Bupati Deli Serdang No.1327 Tahun 2015 tentang Pemberian Perpanjangan Surat Izin Pemakaian Air Bawah Tanah Bupati Deli Serdang, lokasi Sumur Bor Titik I dan II di Desa Timbang Deli Kecamatan Galang", valid until 3 year. - "Keputusan Gubernur Sumatera Utara No. 616/211/BPPTSU/2/XII.2/V/2016 tentang Ijin 	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance																																																																																																			
	<p>Pemakaian Air Bawah Tanah dan Pengusahaan Air Tanah kepada PT Timbang Deli Indonesia”, dated 27 May 2016.</p> <p>In Kerasaan Estate, the permit for water based on: – “Keputusan Gubernur Sumatera Utara No. 546.2/41/DIS PM PPTSP/5/X.3f/I/2019 tentang Izin Pengusahaan Air Tanah Perpanjangan Gubernur Sumatera Utara”, dated 14 January 2019, valid until 3 years. Location sumur Bor 1. – Bank Payment No BV V19020036, dated 21 February 2019 for month January 2019 based on SKPD (Surat Ketetapan Pajak Daerah) amount Rp X,025,722. Status Paid.</p> <p>The analysis report No.PA.0172 by Laboratory “Laboratorium Penguji Balai Riset dan Standardisasi Industri Medan” against “Peraturan Menteri Kesehatan No.416/MenKes/Per/IX/1990” year 1990 at nursery PT. Timbang Deli Indonesia. Sampled and analysis from Office tap water on 22-29 January 2019.</p> <table border="1" data-bbox="699 994 1286 1599"> <thead> <tr> <th>Parameter</th> <th>Max. limit</th> <th>Analysis result</th> </tr> </thead> <tbody> <tr><td>Temperature</td><td>± 3</td><td>25.0° C</td></tr> <tr><td>pH</td><td>6.5 – 9.0</td><td>8.25</td></tr> <tr><td>Total dissolved solid (TDS)</td><td>1,500 mg/L</td><td>75.1 mg/L</td></tr> <tr><td>Color (PtCo)</td><td>15</td><td>63</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><0.0008 mg/L</td></tr> <tr><td>Arsen</td><td>0.05 mg/L</td><td>0.0008 mg/L</td></tr> <tr><td>Fe</td><td>0.3 mg/L</td><td>0.516 mg/L</td></tr> <tr><td>Fluoride (F)</td><td>1.5 mg/L</td><td>0.256 mg/L</td></tr> <tr><td>Cadmium (Cd)</td><td>0.005 mg/L</td><td><0.002 mg/L</td></tr> <tr><td>CaCO₃</td><td>500 mg/L</td><td>26.7 mg/L</td></tr> <tr><td>Chloride (Cl₂)</td><td>250 mg/L</td><td>2.38 mg/L</td></tr> <tr><td>Chromium (Cr⁶)</td><td>- mg/L</td><td>1.43 mg/L</td></tr> <tr><td>Mangan (Mn)</td><td>0.1 mg/L</td><td><0.0001 mg/L</td></tr> <tr><td>Nitrate (NO₃)</td><td>10 mg/L</td><td><0.001 mg/L</td></tr> <tr><td>Selenium (Se)</td><td>0.01 mg/L</td><td><0.01 mg/L</td></tr> <tr><td>Zinc (Zn)</td><td>5.0 mg/L</td><td>0.224 mg/L</td></tr> <tr><td>Cyanide (Cn)</td><td>0.1 mg/L</td><td>0.077 mg/L</td></tr> <tr><td>Sulphate (SO₄)</td><td>400 mg/L</td><td>3.247 mg/L</td></tr> <tr><td>(Pb)</td><td>0.05 mg/L</td><td><0.003 mg/L</td></tr> </tbody> </table> <p>Sampled and analysis from worker housing tap water on 22-29 January 2019.</p> <table border="1" data-bbox="699 1682 1286 2033"> <thead> <tr> <th>Parameter</th> <th>Max. limit</th> <th>Analysis result</th> </tr> </thead> <tbody> <tr><td>Temperature</td><td>± 3</td><td>25.0° C</td></tr> <tr><td>pH</td><td>6.5 – 9.0</td><td>8.16</td></tr> <tr><td>Total dissolved solid (TDS)</td><td>1,000 mg/L</td><td>370 mg/L</td></tr> <tr><td>Color (PtCo)</td><td>15</td><td>11</td></tr> <tr><td>Total Colliform</td><td>0 apm/100ml</td><td>4</td></tr> <tr><td>Hg</td><td>0.001 mg/L</td><td><0.0008 mg/L</td></tr> <tr><td>Arsen</td><td>0.05 mg/L</td><td>0.0009 mg/L</td></tr> <tr><td>Fe</td><td>0.3 mg/L</td><td>0.164 mg/L</td></tr> <tr><td>Fluoride (F)</td><td>1.5 mg/L</td><td>0.215 mg/L</td></tr> <tr><td>Cadmium (Cd)</td><td>0.005 mg/L</td><td><0.002 mg/L</td></tr> <tr><td>CaCO₃</td><td>500 mg/L</td><td>135 mg/L</td></tr> </tbody> </table>	Parameter	Max. limit	Analysis result	Temperature	± 3	25.0° C	pH	6.5 – 9.0	8.25	Total dissolved solid (TDS)	1,500 mg/L	75.1 mg/L	Color (PtCo)	15	63	Total Colliform	0 apm/100ml	<2	Hg	0.001 mg/L	<0.0008 mg/L	Arsen	0.05 mg/L	0.0008 mg/L	Fe	0.3 mg/L	0.516 mg/L	Fluoride (F)	1.5 mg/L	0.256 mg/L	Cadmium (Cd)	0.005 mg/L	<0.002 mg/L	CaCO ₃	500 mg/L	26.7 mg/L	Chloride (Cl ₂)	250 mg/L	2.38 mg/L	Chromium (Cr ⁶)	- mg/L	1.43 mg/L	Mangan (Mn)	0.1 mg/L	<0.0001 mg/L	Nitrate (NO ₃)	10 mg/L	<0.001 mg/L	Selenium (Se)	0.01 mg/L	<0.01 mg/L	Zinc (Zn)	5.0 mg/L	0.224 mg/L	Cyanide (Cn)	0.1 mg/L	0.077 mg/L	Sulphate (SO ₄)	400 mg/L	3.247 mg/L	(Pb)	0.05 mg/L	<0.003 mg/L	Parameter	Max. limit	Analysis result	Temperature	± 3	25.0° C	pH	6.5 – 9.0	8.16	Total dissolved solid (TDS)	1,000 mg/L	370 mg/L	Color (PtCo)	15	11	Total Colliform	0 apm/100ml	4	Hg	0.001 mg/L	<0.0008 mg/L	Arsen	0.05 mg/L	0.0009 mg/L	Fe	0.3 mg/L	0.164 mg/L	Fluoride (F)	1.5 mg/L	0.215 mg/L	Cadmium (Cd)	0.005 mg/L	<0.002 mg/L	CaCO ₃	500 mg/L	135 mg/L	
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		Chloride (Cl ₂)	250 mg/L	61.35 mg/L																																																																																																																											
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4.4.2	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. - Major compliance -	<p>PT. Eastern Sumatera Indonesia and PT. Kerasaan Indonesia have identified the river flow during HCV Identification exercise and explained under HCV Identification report. For example: Bahbolon river, Seragu river. Company has demonstrate effort to minimize erosion, trough planting trees in river buffer zone and not applying agrochemical in designated river buffer zone.</p> <p>Water source of Timbang Deli Estate is 3 deep water well. Quality of water are analysed twice a year by independent laboratory based on UKL-UPL matrix PT. Timbang Deli Indonesia.</p>			Comply																																																																																																																										
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>The company (Bukit Maradja POM) has CDM Project and discharge effluent to block land applications, effluent sampling is taken regularly every month by independent third party (Binalab), e.g. water sample in "Effluent Final Discharge Pond" by BINALAB.</p> <p>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"> <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>83</td><td>230</td><td>0.10</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Feb 2018</td><td>227</td><td>462</td><td>1.30</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Mar 2018</td><td>280</td><td>558</td><td>1.20</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Apr 2018</td><td>302</td><td>592</td><td>1.30</td><td><0.0017</td><td><0.015</td></tr> <tr><td>May 2018</td><td>18.4</td><td>56.4</td><td>4.30</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Jun 2018</td><td>2469</td><td>4362</td><td>6.30</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Jul 2018</td><td>1332</td><td>3924</td><td>7.40</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Aug 2018</td><td>821</td><td>1598</td><td><5.0</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Sep 2018</td><td>2201</td><td>4235</td><td><5.0</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Oct 2018</td><td>1251</td><td>2402</td><td><5.0</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Nov 2018</td><td>2188</td><td>4210</td><td><5.0</td><td><0.0017</td><td><0.015</td></tr> <tr><td>Dec 2018</td><td>2213</td><td>4278</td><td><5.0</td><td><0.0017</td><td><0.015</td></tr> </tbody> </table> <table border="1"> <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>0.042</td><td>7.26</td></tr> <tr><td>Feb 2018</td><td><0.0022</td><td>0.12</td><td>7.76</td></tr> <tr><td>Mar 2018</td><td><0.0022</td><td>0.0092</td><td>8.18</td></tr> <tr><td>Apr 2018</td><td><0.0022</td><td>0.0088</td><td>8.25</td></tr> <tr><td>May 2018</td><td><0.0022</td><td>0.38</td><td>7.86</td></tr> <tr><td>Jun 2018</td><td><0.0022</td><td>0.32</td><td>8.38</td></tr> <tr><td>Jul 2018</td><td><0.0022</td><td>0.74</td><td>8.27</td></tr> <tr><td>Aug 2018</td><td><0.0022</td><td>0.058</td><td>7.63</td></tr> <tr><td>Sep 2018</td><td><0.0022</td><td>0.087</td><td>7.56</td></tr> <tr><td>Oct 2018</td><td><0.0022</td><td>0.57</td><td>7.8</td></tr> </tbody> </table>			Month /Year	BOD (mg/L)	COD (mg/L)	Oil& Grease (mg/L)	Pb (mg/L)	Cu (mg/L)	Jan 2018	83	230	0.10	<0.0017	<0.015	Feb 2018	227	462	1.30	<0.0017	<0.015	Mar 2018	280	558	1.20	<0.0017	<0.015	Apr 2018	302	592	1.30	<0.0017	<0.015	May 2018	18.4	56.4	4.30	<0.0017	<0.015	Jun 2018	2469	4362	6.30	<0.0017	<0.015	Jul 2018	1332	3924	7.40	<0.0017	<0.015	Aug 2018	821	1598	<5.0	<0.0017	<0.015	Sep 2018	2201	4235	<5.0	<0.0017	<0.015	Oct 2018	1251	2402	<5.0	<0.0017	<0.015	Nov 2018	2188	4210	<5.0	<0.0017	<0.015	Dec 2018	2213	4278	<5.0	<0.0017	<0.015	Month /Year	Cd (mg/L)	Zn (mg/L)	pH	Jan 2018	<0.0022	0.042	7.26	Feb 2018	<0.0022	0.12	7.76	Mar 2018	<0.0022	0.0092	8.18	Apr 2018	<0.0022	0.0088	8.25	May 2018	<0.0022	0.38	7.86	Jun 2018	<0.0022	0.32	8.38	Jul 2018	<0.0022	0.74	8.27	Aug 2018	<0.0022	0.058	7.63	Sep 2018	<0.0022	0.087	7.56	Oct 2018	<0.0022	0.57	7.8	Comply
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4.4.4	Monitoring of mill water use per ton of FFB shall be recorded. - Minor compliance –	<p>Bukit Maradja 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: Record for year 2018 seen:</p> <table border="1"> <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>8615.44</td><td>6412</td><td>0.74</td></tr> <tr><td>Feb</td><td>6767.54</td><td>3906</td><td>0.58</td></tr> <tr><td>Mar</td><td>6759.74</td><td>6578</td><td>0.97</td></tr> <tr><td>Apr</td><td>7789.51</td><td>7702</td><td>0.99</td></tr> <tr><td>May</td><td>9055.68</td><td>5024</td><td>0.55</td></tr> <tr><td>Jun</td><td>7331.30</td><td>6663</td><td>0.91</td></tr> <tr><td>Jul</td><td>10959.15</td><td>9890</td><td>0.90</td></tr> <tr><td>Aug</td><td>10238.93</td><td>8556</td><td>0.84</td></tr> <tr><td>Sep</td><td>10663.90</td><td>7635</td><td>0.72</td></tr> <tr><td>Oct</td><td>11238.58</td><td>7705</td><td>0.69</td></tr> <tr><td>Nov</td><td>10020.91</td><td>9467</td><td>0.94</td></tr> <tr><td>Dec</td><td>9795.85</td><td>13789</td><td>1.41</td></tr> <tr><td>Total</td><td>109,236.59</td><td>93,327</td><td>0.85</td></tr> </tbody> </table> <p>Audit team made verification to the water plant logbook. For instance the water for process on 21 January 2019 was 669 m³, on 22 January 2019 was 557 m³, on 23 January 2019 was 455 m³, on 24 January 2019 was 477 m³.</p>	Month	FFB Processed (tons)	Water usage (m ³)	Water usage (m ³ /ton FFB)	Jan	8615.44	6412	0.74	Feb	6767.54	3906	0.58	Mar	6759.74	6578	0.97	Apr	7789.51	7702	0.99	May	9055.68	5024	0.55	Jun	7331.30	6663	0.91	Jul	10959.15	9890	0.90	Aug	10238.93	8556	0.84	Sep	10663.90	7635	0.72	Oct	11238.58	7705	0.69	Nov	10020.91	9467	0.94	Dec	9795.85	13789	1.41	Total	109,236.59	93,327	0.85	Comply
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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>Data seen: Program Pengendalian Hama Terpadu (PHT) 2019, consist of:</p> <ul style="list-style-type: none"> – Planting turnera, realization: January 3,546 trees, February 1,110 trees – Upkeep turnera, realization: January 79.60 Ham February 76.8 Ha – Planting Casiatora, realization: January 1,921 trees 	Comply																																																								
4.5.2	Training records of Integrated Pest Management (IPM) shall be available. - Minor compliance –	<p>In Bukit Maradja Estate, Record of training of IPM conducted on 4 March 2018, was attended by 26 workers. Record seen: photograph, training material, attendance list.</p> <p>In Kerasaan Estate, the training record of IPM – Pelatihan Pengendalian Hama Terpadu, dated 16 March 2019 was attended by 34 workers. Evidences seen: training material, photograph and attendance list.</p>	Comply																																																								
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Pesticides are used in ways that do not endanger health or the environment																																																											
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<p>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>by Agriculture Ministry – 2018.</p> <p>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>All 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="699 884 1289 1671"> <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>Indaziflam 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	Indaziflam 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	
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<p>4.6.3</p> <p>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.</p> <p>- 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 threshold.</p>	<p>Comply</p>																															
<p>4.6.4</p> <p>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.</p> <p>- 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 Timbang Deli Estate, Bukit Maradja Estate and Kerasaan Estate, there were no paraquat stocked in chemicals storage.</p>	<p>Comply</p>																															
<p>4.6.5</p> <p>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</p>	<p>All Estate (Timbang Deli, Bukit Maradja and Kerasaan 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>observed, applied, and understood 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>In Timbang Deli Estate, based on visit in storage of pesticides has been according to recognized best practices. All of pesticides container has disposed of to harzardouse waste storage (TPS limbah B3 berijin).</p> <p>Bukit Maradja Estate – Kerasaan Estate Based on visit to 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. 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. Empty pesticide container was triple rinsed before sent for temporary hazardous waste storage. The company supplies two sets of overalls to all pesticide operators so that one can always be considered clean. 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 rev.01 dated on 1 December 2013 was established and approved related pesticides usage, storage, mixing and handling of container properly to minimise risk and impact. Aplication 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 survey.</p> <p>The organization has carried out the calibration of spraying equipment (weekly – every saturday) to inimize risk and negative impatcs of pesticides, the last calibration on 16 and 23 February 2019 in Bukit Maradja Estate.</p> <p>The method to minimize risk and cimpact of pesticides application has implemented.</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</p> <p>There was no aerial application of pesticide in the operation area of Timbang Deli Estate, Bukit Maradja Estate and Kerasaan Estate. Not applicable.</p>	<p>Not Applicable N/A</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.</p> <p>- Major compliance -</p>	
<p>4.6.9</p>	<p>Evidence of training on handling pesticide for workers and scheme smallholder (if any) shall be available.</p> <p>- Minor compliance -</p> <p>Records of training are kept in each estate for all workers who come into contact with pesticides this include Pesticide Mixers, pesticide Sprayers and any chemical handlers in the stores.</p> <p>The training data is available and centrally in all estates for whoever handles pesticides. There is a minimum requirement of PPE that must be used in the handling and application of pesticides. PPE specifications are stated in the MG and further demonstrated in training manuals.</p> <p>Bukit Maradja Estate:</p> <ul style="list-style-type: none"> - Record of training on handling pesticides was conducted on 27 February 2018, location in Gudang BME attended by 19 workers of sprayers, chemical storage keepers and foreman. - Socialization of the result of calibration knapsack SA 15 dated 23 January 2019. Data seen: training material, photograph and attended list. 	<p>Comply</p>
<p>4.6.10</p>	<p>Proof that pesticide waste has been handled as per legal regulations and understood by worker and manager, shall be demonstrated.</p> <p>- Minor compliance -</p> <p>Bukit Maradja Estate:</p> <ul style="list-style-type: none"> - Record of transporting pesticides waste form pesticides storage to temporary hazardous waste dated 11 March 2019, consisted of empty chemical container (38.1 Kg) and medical waste (2 Kg) - Record of transporting pesticides waste form pesticides storage to temporary hazardous waste dated 26 February 2019, consisted of empty chemical container (10.30 Kg) 	<p>Comply</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. Timbang Deli Estate, PT. Kerasaan Indonesia and PT. Eastern Sumater Indonesia have 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"> - Timbang Deli Estate - Record on special medical check up for pesticides operator (annually) under "Berita Acara Pemeriksaan Kesehatan Periode 2018" dated 22th June 2018 conducted by Klinik Spesialis Anugerah 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>Ibu – Medan, was attended by 20 workers.</p> <ul style="list-style-type: none"> - Record of communication and followed up of the MCU result dated 3-4 August 2018. - Bukit Maradja Estae: Record of special MCU for pesticides applicator dated 23th June 2018, conducted by Klinik Anugerah Ibu in Medan. The MCU was attended by 70 workers. - The result of MCU was communicated to all related employee on 12-15 September 2018. 	
<p>4.6.12 Records shall be available to show that spraying is not conducted by pregnant or breast-feeding women.</p> <p>- Major compliance -</p>	<p>PT. Eastern Sumatera Indonesia dan PT. Kerasaan Indonesia have established the policy related to pesticides application be undertaken by no pregnant or no breast-feeding women (the mechanisme explained in SOP No.TTI/PROS/IMP/14, revision 01, dated 1 December 2013).</p> <p>PT. Timbang Deli Indonesia has established the policy on protection of reproductive rights policy that signed by President Director, dated 1 September 2017. In line 1 mentioned "PT. Timbang Deli Indonesia committed to protecting the right of employees and to provide medical services associated with reproductive health"</p> <p>Data seen:</p> <ul style="list-style-type: none"> - Records that spraying is not conducted by pregnant or breast-feeding women under "Monitoring Pekerja Wanita Hamil dan Menyusui", e.g. moth January 2019 there were no pregnant, no breastfeeding for spraying team , e.g under nama Mrs Suyanti, Mrs Leginem, Mrs Rosmaini. - Bukit Maradja Estate: Surat Keratangan Hamil namely Mrs Sri Mujiati, no register 3144 (spayer), dated 8th September 2018. Record of work attendance dated date 10 September 2018, Mrs Sri Mujiati (selective weeding). 	<p>Comply</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.</p> <p>- Major compliance -</p>	<p>PT. Timbang Deli Indonesia have established an Occupational Health and Safety Policy, issued and signed by the President Director dated 1 September 2017, in point 2 mentioned the company believe in continually improving health and safety record and this will be achieved through:</p> <ol style="list-style-type: none"> a. Hazard and risk identification and reduction b. Provision of adequate resources of OHS programmes and procedure, including strict compliance reviews. c. Ensuring that the policy and procedure integrate with all other company policies.... Etc. <p>OHS Procedure under document "Prosedur Keselamatan dan Kesehatan Kerja (K3)" No. SOP/TDI/06, rev.01 dated 1 February 2019.</p> <p>OHS Program was demonstrated under "Program P2K3 year 2019", such as:</p> <ul style="list-style-type: none"> - Meeting of OHS committee (monthly) 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Report of OHS performance (3 months base) - Fire Drill (Bakartiba) - Fire extinguisher inspection (monthly) - Training for first aider - Training on handling pesticides - Socialization of company policies - Training of PPE for all workers - Medical Check-up test - Monitoring of environmental requirement (water quality, air emission) <p>Record of implementation the OHS program was provided at 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> <p>- Major compliance -</p>	<p>PT. Timbang Deli Indonesia has shown the procedure of hazards identification and risk assessment, no document SOP/TDI/03, issued dated 1 February 2019. The document of risk assessment under "Penilaian Resiko", last review on 1 March 2019.</p> <p>PT. Eastern Sumatera Indonesia - Bukit Maradja Estate: has prepared the procedure of risk assessment as per Procedure of Hazard Identification Risk Analysis and Determining Control of OHS, No.OHS-01-01/04-02-2019/Rev.0, dated 12 March 2019.</p> <p>Document of risk assessment has demonstrated under "Daftar Penilaian dan Pengendalian Risiko K3" last review on March 2019.</p> <p>Visit to fertilizer warehouse in Bukit Maradja POM, management have sets the maximum height at 2.5 meters for fertilizer bag stacking.</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> <p>- Major compliance -</p>	<p>Record of implementation the OHS program, such as:</p> <ul style="list-style-type: none"> - Training on handling of first aid, dated 4 February 2018 was attended by 22 workers. Location in Poliklinik Bukit Maradja Estate. Data seen: training material, attendance list and photograph - Training on using of trunk injection equipment (Mesin Bor Sthill), dated 13 February 2018 was attended by 42 workers. - Record of Muster Chit (daily), e.g: on 16 March 2019 location in division I and on 4 March 2019 location in division II. - Monitoring on handover of PPE for harvester under "Monitoring pemberian APD harvester", dated 1 March 2019 for 8 workers. - Monitoring on using of PPE for contractor under "Pemeriksaan APD kepada Pekerja Kontraktor" month March 2019, location in Division II - Monitoring on using of PPE for harvester month March 2019 for 12 workers, location in division II - Record of monitoring the readiness of fire extinguisher (monthly), data seen: APAR in Bukit Maradja Estate dated 11 March 2019 and 14 February 2019. - Report of General Medical Check-Up (annually) for all worker as per "Formulir Pemeriksaan Medis" the last of MCU was conducted in March 2019. <p>Record of OHS Program in Bukit Maradja POM</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Socialization of HIRAC, dated 14 March 2019 was attended by 18 workers in Mill - Training on using of PPE for 12 workers in POM, conducted on 15 February 2019 - OHS training was conducted on 15 January 2019 was attended by 15 workers. - Safety Inspection Checklist in Bukit Maradja POM (monthly base), e.g: on 18 January 2019 the result shown OK. - Inspection on PPE usage in POM dated 28 January 2019. - Certificate of OHS inspection for hoisting crane, operational permit: 01/PAA/II/HIP/2005. Last inspection was carried out at 28 September 2018 by Manpower Agency Officer in Simalungun Regency. - Certificate of OHS inspection for Turbin-Upap, operational permit: 02/PTP/DTK-TR/III/2010. Last inspection was carried out at 15 February 2019 by Manpower Agency Officer in Simalungun Regency. - Certificate of OHS inspection for Instalasi Penyalur Petir (IPP), operational permit: 03/PTP/DTK-TR/II/2002. Last inspection was carried out at 28 September 2017 by Manpower Agency Officer in Simalungun Regency. Valid until 2 years. - Certificate of OHS inspection for Ketel Upa, operational permit: 12/F.0154 Last inspection was carried out at 10 December 2018 by Manpower Agency Officer in Simalungun Regency. - Special Medical Check-up for worker who have been working in high risk area in Mill, e.g: "Laporan Pemeriksaan Kesehatan" namely Mr Fxxxxxxx (Medical record: xxxx/18/VI/EBMM/18) covering for rontgen, audiometri test, uniren test and spirometry test, conducted on 23 June 2018. 	
<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>- Major compliance -</p>	<p>PT. Timbang Deli Indonesia has appointment a person who has responsible in identified and to ensuring the implementation of OHS program (see indicator 4.7.1).</p> <p>Data verifications:</p> <ul style="list-style-type: none"> - Safety committee; base on "Surat Keputusan Kepala UPT Wilayah II Pengawasan Ketenagakerjaan Dinas Tenaga Kerja Provinsi Sumatera Utara No.06-7/DTK/WILII/SU/2017, tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja di PT. Timbang Deli Indonesia", dated 20 December 2017. - Safety Officer; namely Mr Abdi Purnawan, certificated as "Ahli Keselamatan dan Kesehatan Kerja No. KEP.3787/NAKER-BINWASK3/V/2017", dated 31 May 2017, valid until 3 years. - Report of OHS performance (three months bases) for period October-December 2018 was sent to UPT Pengawasan Ketenagakerjaan Wilayah II (Kabupaten Deli Serdang). <p>Implementation in Bukit Maradja Estate:</p> <ul style="list-style-type: none"> - Safety Committee has registered in Manpower Agency Simalungun Regency as per "Surat Keputusan Kepala Dinas Tenaga Kerja Kabupaten Simalungun Nomor: 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>188.45/129/23.4/2019 tentang Penetapan Susunan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) LHS PT Eastern Sumatra Indonesia – Bukit Maradja Estate, dated 28 February 2019.</p> <ul style="list-style-type: none"> - Safety Officer; namely Mr Nomen Ginting has registered at Manpower of Republic of Indonesia as per “Keputusan Menteri Tenaga Kerja RI nomor: KEP. 17549/NAKER-BINWASK3/V/2018 tentang Penunjukan Ahli Kesehatan dan Keselamatan Kerja Umum (AK3-Umum), dated 2018. - Report of periodical meeting related the OHS issues (monthly), last meeting was carried out at 11 March 2019, location in STC – Bukit Maradja Estate. Data verified: minute of meeting, attendance list and photograph. - Report of OHS performance to Manpower Agency in Simalungun Regency for period October-December 2018 as document No.04/BME-Disnaker/III/2019, dated 9 March 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>The Company has established the procedure of accident response under “Prosedur Keselamatan dan Kesehatan Kerja (K3), No.SOP/TDI/05” dated 1 July 2017.</p> <p>The procedure of Emergency situation, e.g:</p> <ul style="list-style-type: none"> - Emergency procedure for hazardous waste, “SOP Tanggap Darurat Limbah B3 No.SOP/TDI/01”, dated 1 July 2017. - Emergency procedure for pesticide spillage “WI Penganganan Tumpahan Pestisida dan Herbisida No.GMO-NS/ENC/WI/K3/04”, dated 1 April 2014 - Emergency procedure for fertilizer spillage “WI Penanganan Tumpukan Pupuk No.GMO-NS/ENC/K3/03”, dated 1 April 2014 - Emergency procedure for fuel, oil and lubricant spillage “WI Penanganan Tumpahan Bahan Bakar Minyak, Oil dan Pelumas No.GMO-NS/ENC/WI/K3/05”, dated 1 April 2014. <p>In Timbang Deli Estate; Certificate of First Aid at Workplace Office No Ser.2425/PK3-P3K/VII/2014 namely Mr Nasmin dated 23 July 2014.</p> <p>In Bukit Maradja Estate; License of first aid at workplace officer No.645/DTK/P3K/2014 namely Mr Marsudi dated 23th July 2014</p> <p>Kerajaan Indonesia, license of first aid at workplace officer No.643/DTK/P3K/2014 namely Mr Amin Saputra dated 23 July 2014 – valid 5 years.</p> <p>Application for extension sighted: “Permohonan Perpanjangan Sertifikat Petugas P3K, No.23/KRE-External/X/2018”, dated 31 October 2018.</p> <p>Refresh of internal training of first aid has conducted on 20 February 2018 was attended by 13 wokers who are in-charge as first aider.</p>	<p>Comply</p>
<p>4.7.6</p> <p>All workers shall be provided with medical care, and covered by</p>	<p>In Timbang Deli Estate, all workers have been registered with insurance and medical care. Evidence: Bill payment of BPJS Ketenagakerjaan month January</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>accident insurance (see criterion 6.5.3). - Minor compliance –</p> <p>2019 reference: 201902271500042162, total payment IDR X8,427,157 dated 28 February 2019, covering for 224 workers.</p> <p>In Bukit Maradja Estate, all worker have been registered with insurance and medical care. Evidence: Payment record of BPJS Ketenagakerjaan month February 2019, reference number: 190204537876, amount Rp *4,275,595. Status: Paid on 13 March 2019 covering for 280 workers.</p>	
<p>4.7.7</p> <p>Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. - Minor compliance</p>	<p>Record of injuries was shown under “Daftar Kecelakaan Kerja BME year 2018”, there was reported 22 cases of injuries with total 96 lost time day work. Record of each accidents has been kept by the estate, e.g:</p> <ul style="list-style-type: none"> – Accident report “Laporan Kecelakaan Kerja for Mr Amza”, dated 6 October 2018 – Supervisor Investigation Accident Report for mr Amza, dated 6 October 2018 – Laporan Kecelakaan Kerja Tahap I (formulir: 3KK1 – BPJS Ketenagakerjaan) for Mr Amza, dated 6 October 2018 <p>In Bukit Maradja POM:</p> <ul style="list-style-type: none"> – “Rekapitulasi Kehilangan Hari Kerja” period January-December 2018 there were reported 3 cases of accident with 31 lost time day accidents. – Record seen: <ul style="list-style-type: none"> • Laporan Kecelakaan Kerja (1x24 jam), under name Mr Sutar dated 5 December 2018 • Record of accident investigation namely Mr Sutar dated 5 December 2018. The investigation was conducted by OHS expert. The recommendation has been followed up. • “Laporan Kasus Kecelakaan Tahap II (BPJS Ketenagakerjaan formulir 3aKK2)”, namely Mr Sutar (reference number: 90810034808), dated 10 January 2019. All of the cost to treat has been covered by BPJS Ketenagakerjaan. 	<p>Comply</p>
<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>		
<p>4.8.1</p> <p>Records of training program related to the aspects of RSPO Principles and Criteria shall be available. - Major compliance -</p>	<p>Record of training program was shown at the document “Program Pelatihan Tahun 2019”, prepared on 15 January 2019, consist of:</p> <ul style="list-style-type: none"> – Training on harvesting and FFB quality; planned on February and August 2019; – Training of interegrated pest management and handling of drill machine and power spraying; planned on February 2019; – Refresh training of census of ganoderma; planned on May and November 2019; – Training of leaf sampling unit; planned on August 2019; – Training on handling of hazardous waste; planned on October 2019; – Training of calibration of spraying equipment 	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator		Assessment Findings	Compliance
		<p>(knapsack SA 15), planned on January and August 2019;</p> <ul style="list-style-type: none"> – Training of operational procedure and MSDS; planned on February 2019; – Refresh training on implementation the requirement of RSPO P&C, planned on November 2018; <p>Record of implementation the training program was shown, e.g:</p> <ul style="list-style-type: none"> – Record of training on harvesting was conducted on 20 February 2019, location in Division I, was attended by 32 harvester. Data seen: Photograph, training material and attendance list. – Training on handling of hazardous waste was carried out 11 March 2019, location CWS – Bukit Maradja Estate, attended by 25 workers. – Refresh of internal training of first aid has conducted on 20 February 2018 was attended by 13 wokers who are in-charge as first aider. – Training on handling of pestocides and MSDS conducted on 27 February 2019, location in chemical storage, attended by 19 workers. – Record of training of IPM conducted on 4 March 2018, was attended by 26 workers. Record seen: photograph, training material, attendance list. 	
4.8.2	<p>Records of training for each employee shall be maintained.</p> <p>- Minor compliance –</p>	<p>Record of training for each employee has shown as per Employee Training and Education Record.</p> <p>Data seen:</p> <p>Namely Mr. Sumiati (3143), division 1, sprayer. Detail of training record, e.g:</p> <ul style="list-style-type: none"> – Date 16 March 2018 on training of mixing the pesticides; – Date 7 September 2018 on training of calibration of spraying equipment (knapsack SA 15); – Date 27 February 2019 on traiing of handling of pesticedes and MSDS; – Dated 20 February 2019 on training of first aider; <p>Namely Mr. Budi Ariawan, division II, Pest and Disease.</p> <ul style="list-style-type: none"> – Date 14 March 2018 on training of environmental aspect and impact; – Date 15 March 2018 on awareness training of ISO 9001:2015; – Date 4 February 2019 on socialization of code of conduct policy; – Date 17 January 2019 on training of OHS ; 	Comply
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	<p>Environmental impact assessment document(s) shall be available.</p> <p>- Major compliance -</p>	<p>In PT. Eastern Sumatra Indonesia, environmental document titled "UKL – UPL" was approved "Keputusan Kepala Badan Pengendalian Dampak Lingkungan Daerah Kabupaten Simalungun No.188.4/70/Bpdl" related to finalized environmental feasibility at Palm oil mill of PT.</p>	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>Eastern Sumatera Indonesia (PT SIPEF), Bukit Maradja Estate, Simalungun District, North Sumatra Province dated on 26 February 2004 and last revision as in "Rencana Pengelolaan Lingkungan (RKL) dan Revisi Rencana Pemantauan Lingkungan (RPL)" with scope of study palm oil estate area 3,178 Ha and palm oil mill 30 Ton FFB/hour as stated in the "Keputusan Bapedalda Kabupaten Simalungun No.271/Bpdl/2008".</p> <p>The Organization also has prepared the environmental document as in "Dokumen Evaluasi Lingkungan Hidup (DELH) Kebun Kelapa Sawit PKS dan Pemanfaatan Janjang Kosong Kelapa Sawit dengan Limbah Cair untuk di Proses menjadi kompos di Kebun Bukit Maradja PT. Eastern Sumatra Indonesia". The document has approved per "Keputusan Kepala Badan Lingkungan Hidup Kabupaten Simalungun No.188.45/833/Sekrt-2015", dated 8 June 2015, with scope of study palm oil estate area 3,178 Ha location in N 03⁰ 00' 45.0', E 099⁰14'08.0'.</p> <p>PT. Kerasaan Estate have the environmental document under "Dokumen Upaya Pengelolaan dan Pemantauan Lingkungan (UKL- UPL)" is comply with letter of "Kepala Bapedalda Kabupaten Simalungun No.442/Bpdl-2005 dated on 23 Desember 2005 related agreement of "Dokumen UKL/UPL PT. Kerasaan Indonesia" and revision of "Upaya Pengelolaan Lingkungan dan Upaya Pemantauan Lingkungan (UKL/UPL)" comply with letter agreement "Kepala Badan Lingkungan Hidup Kabupaten Simalungun No.700/109/BLH/2009" dated 8 April 2009 with scope of study 2,362 Ha oil palm estates.</p>	
<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>The company has prepared report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester).</p> <p>The Management Plan incorporated in the "Rencana Pengelolaan Lingkungan", consist of:</p> <ul style="list-style-type: none"> - Physical-chemical compenent/aspect: soil fertility (monitoring once per annum); water quality (monitoring twice per annum); air quality (monitoring twice per annum); aesthetic (cleanliness). - Social-economy-cultural component/aspects: community welfare; community perception. - Health component: community health, hazardous waste management; <p>Laporan RKL-RPL semester II tahun 2018</p> <ul style="list-style-type: none"> - Received by Dinas Lingkungan Hidup Kabupaten Deli Serdang No 0086, dated 15 January 2019. - Sent to DLH Sumatera Utara by Kantor Pos No Barcode 16555003385, dated 19 January 2019. <p>Evidence of laporan RKL-RPL Semester II tahun 2018</p> <ul style="list-style-type: none"> - Received by DLH Kabupaten Simalungun dated 23th February 2019, was received by Nurmala T - Received by DLH Provinsi Sumatera Utara dated 23th 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>February 2019 via BahJambi Registered 25021918, dated 23th February 2019.</p> <ul style="list-style-type: none"> - Tanda Terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL), ID TTE: 1552406396-3493, dated 12 March 2019. 	
<p>5.1.3 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. - Minor compliance –</p>	<p>In Timbang Deli Estate:</p> <ul style="list-style-type: none"> - Report of Testing No.0456/SL/III/18, sample type ground water dated 6 March 2018, conducted by PT. Mutu Agung Lestari – Testing and Laboratory. The result shown comply with Regulation of Ministry of Health No.416/MENKES/PER/IX/1990 Lampiran II. - Report of Testing No. 0531/SL/IV/18, sample type domestic waste water dated 6 April 2018, conducted by PT. Mutu Agung Lestari – Testing and Laboratory. The result shown comply with "Regulation of Ministry of Environment No.68 Tahun 2016 tentang Baku Mutu Air Limbah untuk Kegiatan Domestik." <p>PT. Timbang Deli Indonesia have incorporated information related to soil fertility and erosion risk into RKL-RPL report. Soil map for Timbang Deli Estate is available under "Soil Profile", scale 1:28,000 indicating soil type: <i>Typic Endoaquepts</i>, <i>Typic Kandiodalfs</i> and <i>Typic Kandiodults</i>; soil series: Keladang Series (KLD) and Sorek Series (SRK). Data Sources: Field Survey of PT. Timbang Deli, Aerial Photograph (February 2017), soil report by JH Agriculture (2014). Coordinate system: North UTM 47, datum: WGS 1984, grid system: Geographic Lat/Long, map date: 27 July 2017. Based on soil map under "Soil Profile", scale 1:28,000 most area of Timbang Deli Estate is sandy clay. Recommendation from the soil survey is planting <i>Mucuna bracteata</i> leguminous cover to conserve soil moisture. Management strategy performed by planting <i>Mucuna bracteata</i> at replanting area. It was reported all replanting area and planting year 2015 and 2016 ground cover planted with <i>Mucuna bracteata</i>.</p> <p>In Kerasaan Estate:</p> <ul style="list-style-type: none"> - Report of Testing, No.5804/SL/VIII/18 (R), sample type: ground water, location in RW 1, dated 15 August 2019. The result shown comply with Permenkes-RINo.416/MENKES/PER/IX/1990, lampiran II. - Formulir Interview dengan masyarakat untuk aspek social, dated 12 June 2018, namely Mr Supardi (Kerasaan I village), Mr Nurminan Tarigan (Kerasaan I village), Mr Suwidi (Negeri Kerasaan II village), Mr Surya Indra Ariawan (Nagori Wonorejo village) <p>Bukit Maradja Estate and POM:</p> <ul style="list-style-type: none"> - "Laporan Analisis Laboratorium No.3181.13A.SIU-LK/BK3-MDN/XII/2018, tentang Emisi Cerobong Boiler No.1", location in Bukit Maradja POM. The result show comply with "PermenLH No.7 Tahun 2007 lampiran I", conducted by Balai Keselamatan dan Kesehatan Kerja Medan. - "Laporan Analisis Laboratorium No. 318.13A. SIU- 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance	
	<p>LK/BK3-MDN/XII/2018, tentang Emisi Genset No.2”, location in Bukit Maradja POM. The result show comply with “PermenLH No.13 Tahun 2009”, conducted by Balai Keselamatan dan Kesehatan Kerja Medan.</p> <ul style="list-style-type: none"> - “Laporan Analisis Laboratorium No. 318.13A.SIU-LK/BK3-MDN/XII/2018, tentang Kualitas Udara Ambient, location in Bukit Maradja POM. The result show comply with “PP No 41 tahun 1999” dan “KepMenLH No.50 tahun 1996”, conducted by Balai Keselamatan dan Kesehatan Kerja Medan. - Report of Testing No.3123/SL/VIII/18, sample type: water waste, location in Outlet IPAL- D, in Bukit Maradja POM dated 15 August 2018. The result has comply with “KepMenLH No.28 Tahun 2003 tentang Pedoman Teknis Pengkajian Pemanfaatan Air Limbah Industri Minyak Sawit Pada Tanah Di Perkebunan Kelapa Sawit (Pasal 3)”. - Report of Testing nomor 3341/SL/VII/18, sample type: Air Limbah Domestik, location in Perumahan Karyawan PT. ESI, dated 30 July 2018. The result has shown comply with “PerMenLHK RI nomor 68 Tahun 2016 tentang Baku Mutu Air Limbah Domestik”. 		
<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 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 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>PT. Eastern Sumatra Indonesia have prepared a Document Identification of High Conservation Value (HCV) in September 2009 and cooperation with Yayasan Sawit Berkelanjutan Indonesia (YASBI) with the following results: Identified three types of HCV (HCV 1, HCV 4 and HCV 6) with a total area of 97.71 ha, consist of buffer to spring water, riparian area to Bah Bolon River, riparian area to Seragu River, riparian area to Sukarakyat Village’s River and public cemeteries. Company has prepared a HCV Management and Monitoring Plan for HCV PT. Eastern Sumatra Indonesia; which outlines the activities of management and monitoring areas HCV afterwards detailed in the Program and Actual Area Management HCV. Example: Monitoring of HCV including species presence; Conservation cadet Training; Upkeep HCV signboards; planting in HCV Area and upkeep.</p> <p>PT. Kerasaan Indonesia have compiled a Document Identification of High Conservation Value (HCV) in September 2009 and cooperate with the Yayasan Sawit Berkelanjutan Indonesia (YASBI) with the following results: Identified three types of HCV (HCV 1, HCV 4 and HCV 6) with a total area of 26.42 Ha, consist of: Riparian area for Simpang Kiri River, riparian area for water spring and public cemeteries. Company has compiled a HCV Management and</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>Monitoring Plan which outlines the activities of management and monitoring HCV areas. The program: plant and wildlife monitoring; Control <i>Mucuna bracteata</i> plants in the corridor; planting native species in the forest area and training the HCV area management for cadet. At the time of preparation of the two HCV documents above, no ALS scheme, nevertheless the Team Leader was compiled a document is an "assessor of RSPO HCV Approved".</p> <p>PT Timbang Deli Indonesia have completed High Conservation Value Assessment, as reported under "Laporan Identifikasi Nilai Konservasi Tinggi PT Timbang Deli Indonesia, Kabupaten Deli Serdang, Provinsi Sumatera Utara". HCV Assessment conducted by Koompasia Enviro Institute in 2017. Period of assessment are 31 August 2017 to 8 September 2017. Team of assessor led by Henry Marpaung as Team Leader (Provisional ALS160007HM).</p> <p>Based on the report, assessment results are:</p> <ol style="list-style-type: none"> 1. Division I: <ol style="list-style-type: none"> a. HCV 4: <ul style="list-style-type: none"> • Sempadan Alur Buangan Air Galang Kota (0.332 Ha); • Sempadan Alur Jembatan KA (0.517 Ha); • Sempadan Alur Jembatan Sei Galang 2 (1.230 Ha); • Sempadan Alur Kantor Penelitian (0.272 Ha); • Sempadan Alur Pembibitan (1.357 Ha). b. HCV 6: <ul style="list-style-type: none"> • Kuburan Belanda (0.002 Ha); • Kuburan Sampun (0.002 Ha). 2. Division II: <ol style="list-style-type: none"> a. HCV 1 & 4: <ul style="list-style-type: none"> • Resapan Air (1.972 Ha); b. HCV 4: <ul style="list-style-type: none"> • Sempadan Alur Buangan Air Galang Kota (0.577 Ha); • Sempadan Alur Jembatan Sei Galang 2 (2.590 Ha); • Sempadan Alur Kantor Penelitian (1.263 Ha); • Sempadan Alur Rendahan (0.123 Ha); • Sempadan Sei Ular (0.850 Ha). c. HCV 6: <ul style="list-style-type: none"> • Kuburan Cina (0.003 Ha); • TPU Muslim (0.865 Ha). <p>Total HCV area is 11.955 Ha.</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 expected to maintain or enhance them shall be implemented through a</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
management plan. - Major compliance -	<p>results of monitoring in 2018 was found 12 species of birds, one species of which are protected species according to PP 7 of 1999, namely the Eagle (Haliastur sp) and based on the IUCN Redlist included in the Least Concern (LC). Identified one species of reptiles are Monitor lizard (Varanus salvator) and included in the IUCN Redlist status Least Concern (LC) while the second type of mammal, found no protected species according to "Peraturan Pemerintah No.7 tahun 1999".</p> <p>b. Plants control of <i>Mucuna brateata</i> in HCV Area. Based on the results of the field verification, in riparian area to Bah Bolon river company have put HCV enhance ment plan under document "Rencana Penambahan Nilai Guna dan Estetika Area NKT-Sempadan Sungai di STC, Bukit Maradja Estate tahun 2018". The plan incorporated plan for planting forest/native plant species for aesthetic such as "Glodokan tiang" (<i>Polyanthes longifolia</i>), "Ketapang Kencana" (<i>Terminalia mantaly</i>), "Pucuk Merah" (<i>Oleina syzygium</i>) and source of feed for wildlive "Salam" (<i>Syzygium polyanthum</i>).</p> <p>c. Preservation of forest plant species in the HCV area. Based on the results of field visit in riparian area of Bah Bolon River, the side of drainage, showed that the company done enrichment plant species of forest in the area of HCV with the type of "Mahoni" (<i>Swietenia macrophylla</i>), "Manii" (<i>Maesosis eminii</i>), "Waru" (<i>Hisbiscus tiliaceus</i>), "Jati" (<i>Tectona grandis</i>), "Sungkai" (<i>Pheronema canescens</i>).</p> <p>d. HCV Area Management training conducted on 10 October 2017.</p> <p>Kerasaan Estate has developed an annual HCV Management Area program:</p> <ul style="list-style-type: none"> - HCV Monitoring include the protected wildlife and flora which is based on the results of monitoring in 2018 that found three species of birds, one species of which are protected species according to "Peraturan Pemerintah No.7 tahun 1999", namely Eagle (Haliastur sp.) and based on the IUCN Redlist included in the Least Concern (LC). Identified one species of reptile was Cobra snake (<i>Naja sumatrana</i>). Identified one species of mammals was Plantain squirrel (<i>Callosciurus notalus</i>). And two types of aquatic biota are Ray-finned fish (<i>Mystacoleucus marginatus</i>) and freshwater crayfish. - Plants control of <i>Mucuna brateata</i> in HCV area. - Preservation of forest plant species in HCV area. Based on the results of field visited in riparian to water spring, Division III, block K12 showed that company has done the enrichment withtimber species in HCV area. The planted species Mahogany (<i>Swietenia macrophylla</i>), Saga (<i>Adenantha pavonina</i>), sugar palm (<i>Arenga pinnata</i>), White leadtree (<i>Leucaena glauca</i>), Tamarind (<i>Samanea saman</i>), Krey umbrella (<i>Filicium desipiens</i>), Matoa 	

Criterion / Indicator	Assessment Findings	Compliance
	<p>(Pometia pinnata).</p> <ul style="list-style-type: none"> - "Pelatihan Pengelolaan NKT Bukit Maradja Estate" dated 16 October 2018 whereby Mr.Armanto (mandor), Mr. Musliadi (mandor), Mr. Nuriswan (mandor) and Mr. Sarno (security) participated in HCV management training. Specific concern related to management of HCV 4 and 6 inside the plantation. From the plan above, Kerasaan Estate has implemented all the activities, such as monitoring of flora and fauna carried out every month and the results are written in "HCV Area Monitoring Checklist Doc.No.ENS/DOC.08 rev.3". Upkeep and monitoring of plants in HCV area carried out every month. Monitoring warning signs also performed consistently every month. For example, the repair for HCV area signboard in Block K12, Division III. Field conditions of HCV area in Kerasaan Estate i.e. riparian area of water spring, riparian to irrigation (small river) and public cemetery. Based on the results of monitoring in 2018 described species of flora and fauna are protected and protection status by IUCN Redlist. 	
<p>5.2.3 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. - Minor compliance –</p>	<p>Based on the results of documents verification and field visits showed that the types of protected animals had socialized through the installation of leaflets at the estate office, installation of warning at the site of HCV and dissemination directly to the employee during the morning assembly.</p> <p>Based on interviewed with workers and surrounding villages, the company had communicating the HCV management plan, including: protection of wildlife species, a prohibition of hunting, fishing using poison, and cut trees in the area of PT. Eastern Sumatra Indonesia, PT. Kerasaan Indonesia and PT. Timbang Deli Indonesia.</p> <p>Kerasaan Estate Division III communicates the presence of HCV to their worker on 11 March 2019, attended by 2 harvest mandor, 2 clerks, 25 harvesters, 1 upkeep supervisor, 2 spraying supervisors, 13 sprayers, 5 trunk injection, 4 carpenters, 2 grassmowers, 1 division clerk, 1 security, 2 kindergarten teachers, 2 TPI teachers.</p> <p>Socialization to local community of Purbaganda, Wonorejo, Sukarakyat I, Kerasaan I, and Pardomuan Nauli village, 8 November 2018.</p> <p>Bukit Maradja Estate communicates the presence of HCV to their worker on 29 November 2018, attended by 17 workers including creeper weeding worker, pest and disease worker, harvesters, mandors, kindergarten teacher, supervisor, fertilizer applicator, gardener.</p> <p>Bukit Maradja Estate communicates the presence of HCV to their worker on 15 January 2019, attended by 14 workers including harvesters, mandors, kindergarten teacher, supervisor, fertilizer applicator, gardener.</p>	<p>Comply</p>
<p>5.2.4 Once the management plan is prepared, continuous monitoring documentation and report</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 written in the "Report on the Implementation and Monitoring HCV" and evaluated</p>	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
<p>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 monitoring are to be used to follow-up on the improvement of the management plan.</p> <p>- Minor compliance –</p>	<p>the RKL-RPL implementation report annually.</p> <p>Management of HCV have been included in the plan and the operational implementation of replanting in PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia.</p> <p>Based on field verification to Division III, Block 05M07, and the HCV area; riparian to Bah Bolon River, shows that company have delineate the HCV area – in form of painting the oil palm, painting the tree to indicates “No spraying” regime. For HCV 4, in riparian area to Bah Bolon River (next to guest house Bukit Maradja Estate), enrichment in form of planting timber species “Jati” (<i>Tectona grandis</i>), “Mahoni” (<i>Swietenia macrophylla</i>), “Sungkai” (<i>Pheronema canescens</i>).</p> <p>“Checklist Pemantauan Area NKT periode December 2018” indicated on 29 December 2018 - Mr. Bayu, HCV cadet monitor the condition of HCV 4.1 river buffer zone to water source, near division III, block 08K09A. The condition HCV status signboard 1 - OK; buffer boundary (red paint on palm) – OK; no sign of encroachment, no burning, no <i>Mucuna</i> creeper, no hunting.</p> <p>Flora sighted: pohon Aren/Sugar palm (<i>Arenga pinnata</i>), pohon Jati/teak (<i>Tectona grandis</i>), pohon trembesi/Rain tree (<i>Albizia saman</i>), pohon Saga/red lucky seed (<i>Adenanthera pavonina</i>).</p> <p>Fauna sighted: burung perkutut/Zebra dove (<i>Geopelia striata</i>), burung Jalak/Pied myna (<i>Sturnus contra</i>), Tupai/Pygmy treeshrew (<i>Tupaia minor</i>). The cadet, Bayu participated in training dated 25 September 2018 “Pelatihan dan Checklist NKT”, along with 8 other cadet.</p> <p>Implementation in year 2018:</p> <p>Bukit Maradja Estate have monitored the status and condition of HCV area in the plantation every month. “Checklist Pemantauan Area NKT periode October 2018” indicated on 30 October 2018 - Mr. Nuriswan, HCV cadet monitor the condition of HCV 4.1 river buffer zone to Bah Bolon river, near division I, block 05E30A. The condition HCV status signboard 1 - OK; buffer boundary pole 4 – OK; no sign of encroachment, no burning, no <i>Mucuna</i> creeper, no hunting.</p> <p>Bukit Maradja Estate performs monitoring of wildlife, focusing in birds and reptile: “Pemantauan Keberadaan Satwa Liar period Desember 2018”, 1 December 2018 - Mrs. Cecilia Depari direct sighting Cucuk Udang/White-throated Kingfisher (<i>Halcyon smyrnensis</i>), in Division I, block replanting 2018, direct sighting at 10.03 AM; 18 December 2018 direct sighting of Terocok/Yellow-vented bulbul (<i>Pycnonotus goiavier</i>), in Division I, block 05E31A, at 08.26 AM;</p> <p>Training:</p> <p>“Pelatihan Pengelolaan NKT Bukit Maradja Estate” dated 16 October 2018 whereby Mr.Armanto (mandor), Mr. Musliadi (mandor), Mr. Nuriswan (mandor) and Mr. Sarno (security) participated in HCV management training. Specific concern related to management of HCV 4 and 6 inside the plantation.</p>	

Criterion / Indicator	Assessment Findings	Compliance
<p>5.2.5 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 community's rights.</p> <p>- Minor compliance –</p>	<p>Based on the verification of legal documents, identification of HCV and statement area showed that the entire HCV area are fully controlled by companies.</p> <p>Based on the results of public consultation with relevant agencies and surrounding villages claimed that the entire HCV area of PT. Eastern Sumatra Indonesia, PT. Kerasaan Indonesia and PT Timbang Deli Indonesia are controlled by companies.</p>	<p>Comply</p>
<p>Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>		
<p>5.3.1 A documented identified source of all waste and pollution, shall be available.</p> <p>- Major compliance -</p>	<p>All sources of pollution and waste have been identified and documented. The mill has identified and documented all of waste products and sources of pollution as in document "Identifikasi Sumber Sumber Limbah Bahan Berbahaya dan Beracun", updated in 3 January 2018, such as:</p> <ul style="list-style-type: none"> - Weigh bridge station: printer cartridge, used tape printer; - Processing: used glove, used container, expired caustic soda; - Enginee room: used filter, used oil, used battery; - Office: Toner container photocopy, printer cartridge; - Workshop: used battery, used filter, used chemical container, laboratorium waste; - Composting: used Oil, used filters; <p>The estates have prepared the program of waste management, updated on 2 January 2018 consist of:</p> <ul style="list-style-type: none"> - Solid wastes and sharps Polyclinic; - Household liquid waste (black water and gray water); - Household solid waste (organic and anorganic); - Hazardous waste materials from genset and vehicle engines (used oil, usedy former, used oil and fuel filters); - Packaging of small chemical materials and packaging of used chemical jelly; - Sacks of fertilizer; - Toner container photocopy, printer cartridge; - Identification of harzardous waste sources from Mill - Identification of sources of emissions <p>Based on field visit in Kerasaan Estate, Landfill area in oil palm block – all domestic waste have been segregated (organic and non-organic).</p> <p>Based on field visit in Bukit Maradja Estate, Landfill area in oil palm block – all domestic waste have been segregated (organic and non-organic).</p> <p>Rencana Pengelolaan Limbah PT. Timbang Deli Indonesia, dated 20 January 2019.</p>	<p>Comply</p>
<p>5.3.2 There shall be evidence that all chemicals and their empty containers are disposed of responsibly.</p> <p>- Major compliance -</p>	<p>All chemical and hazardous waste from Bukit Maradja POM and Bukit Maradja Estate are stored in temporary hazardous waste storage.</p> <ul style="list-style-type: none"> - The storage permit as "Keputusan Kepala Badan Lingkungan Hidup Kabupaten Simalungun No.188.45/893/Sekrt-2015 tentang Izin Pengelolaan 	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Limbah B3 untuk Kegiatan Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT. Eastern Sumatera Indonesia" dated 29 June 2015 and valid for 5 years. The storage permitted empty pesticide container, fertilizer sheet, used battery, used oil, used lamp bulb, used oil filter, printer cartridge, contaminated material, used paint can. All chemical and their containers from Mill and Estates were collected and kept in temporary waste storage for 180 days prior disposal.</p> <p>Auditor visited the storage (TPS Limbah B3) in Bukit Maradja POM (date 21 March 2019) confirmed appropriate storage has been provided with consideration of safety and environmental aspects such as second containment, spill-kit, warning signs, PPE, fire extinguisher, alarm and first-aid kit.</p> <p>Kerasaan Estate has demonstrated the permit of limited hazardous waste storage under document "Keputusan Kepala Badan Lingkungan Hidup Kabupaten Simalungun No.188.45/892/Sekrt-2015 tentang Izin Pengelolaan Limbah B3 untuk Kegiatan Penyimpanan Sementara PT. Kerasaan Indonesia" dated 29 June 2015, valid until 5 years.</p> <p>In Timbang Deli Estate, temporary hazardous waste storage have license "Surat Keputusan Bupati Deli Serdang No.1107 tahun 2015 tentang Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahay dan Beracun (LB3) PT. Timbang Deli Indonesia.</p> <p>Monitoring as in "Monitoring Stock Wadah Bekas Racun di Gudang B3", total stock until 13 March 2019 is 36 pieces.</p>	
<p>5.3.3 A documented waste management plan to avoid or reduce pollution and its implementation shall be available. - Minor compliance –</p>	<p>In Kerasaan Estate, the management of waste and monitoring through several records:</p> <ul style="list-style-type: none"> - "Lembar Neraca Limbah B3 PT. Kerasaan Indonesia" dated 7 December 2018 for oil used (16 liters). - "Berita Acara Sserah Terima Limbah Bahan Berbahaya dan Beracun (LB3) No.01/KRE-ENC/I/2019, dated 8 January 2019 was sent to PT. Amindy Barokah Sumut, consist of: Filter used (9.5 Kg), empty container pesticides (191.5 Kg), oil used (72 Kg) and medical waste (8.5 liters) - Hazardous Waste Manifest nomor AVT 0008280 for oil used (72 liters), dated 8 January 2019 to PT. Amindy Barokah, vehicle BK 8331 MO; - Hazardous Waste Manifest nomor 0008281 for filter used (9.5 Kg), dated 8 January 2019 to PT. Amindy Barakah, vehicle BK 8331 MO; - Hazardous Waste Manifest No.0008282 for empty container pesticides (191.5 Kg), dated 8 January 2019 to PT. Amindy Barokah, vehicle BK 8331 MO. <p>Bukit Maradja POM:</p> <ul style="list-style-type: none"> - Berita Acara Serah Terima Limbah Bahan Berbahaya dan Beracun (LB3) nomor document: 30/BMPOM-External/I/2019 dated 8 January 2019 from 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance																																																																																												
	<p>Temporarty Hazardous Waste in Bukit Maradja POM to PT. Amindy Barokah in Medan, consist of: oil used (600 liters), filter used (60 kg), electronic waste (14 kg), empty chemical container (505 kg), accu used (13 kg);</p> <ul style="list-style-type: none"> - Hazardous Waste Manifest nomor 0008274 for electronic waste (14 kg), dated 8 January 2019 to PT. Amindy Barokah, vehicle BK 8331 MO; - Hazardous Waste Manifest nomor 0008277 for empty container pesticides (505 Kg), dated 8 January 2019 to PT. Amindy Barokah, vehicle BK 8331 MO. 																																																																																													
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>																																																																																														
<p>5.4.1 A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy shall be in place and monitored. - Minor compliance –</p>	<p>The company has demonstrated the record on improving efficiency of the use of fossil fuels and to optimize renewable energy, e.g:</p> <table border="1" data-bbox="699 864 1257 1296"> <thead> <tr> <th>Month (2018)</th> <th>HSD fuel use (liter)</th> <th>FFB production (ton)</th> <th>HSD oil (liter) / FFB (ton)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>4800</td><td>8615.44</td><td>0.56</td></tr> <tr><td>Feb</td><td>1950</td><td>6767.54</td><td>0.29</td></tr> <tr><td>Mar</td><td>1910</td><td>6759.74</td><td>0.28</td></tr> <tr><td>Apr</td><td>2250</td><td>7789.51</td><td>0.29</td></tr> <tr><td>May</td><td>3140</td><td>9055.68</td><td>0.35</td></tr> <tr><td>Jun</td><td>2680</td><td>7331.30</td><td>0.37</td></tr> <tr><td>Jul</td><td>3410</td><td>10959.15</td><td>0.31</td></tr> <tr><td>Aug</td><td>3320</td><td>10238.93</td><td>0.32</td></tr> <tr><td>Sep</td><td>2730</td><td>10663.90</td><td>0.26</td></tr> <tr><td>Oct</td><td>3820</td><td>11238.58</td><td>0.34</td></tr> <tr><td>Nov</td><td>5840</td><td>10020.91</td><td>0.58</td></tr> <tr><td>Dec</td><td>1780</td><td>9795.85</td><td>0.18</td></tr> <tr><td>Total</td><td>37630</td><td>109,236.59</td><td>0.34</td></tr> </tbody> </table> <p>In Timbang Deli Estate, the records of use of fossil fuel are maintained by estate management. The HSD fuel used mainly for dump trucks, tractors, road grader, JCB. HSD fuel 2018:</p> <table border="1" data-bbox="699 1442 1171 1711"> <thead> <tr> <th>Month (2018)</th> <th>HSD fuel use (liter)</th> <th>Month (2018)</th> <th>HSD fuel use (liter)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>2,274</td><td>Jul</td><td>2,068</td></tr> <tr><td>Feb</td><td>2,304</td><td>Aug</td><td>2,475</td></tr> <tr><td>Mar</td><td>1,938</td><td>Sep</td><td>1,874</td></tr> <tr><td>Apr</td><td>1,720</td><td>Oct</td><td>1,905</td></tr> <tr><td>May</td><td>1,731</td><td>Nov</td><td>2,039</td></tr> <tr><td>Jun</td><td>1,220</td><td>Dec</td><td>2,084</td></tr> <tr><td></td><td></td><td>Total</td><td>23,632</td></tr> </tbody> </table> <p>Optimizing renewable energy in Bukit Maradja POM from fibre and shell for fuel, recorded in "Rekaman Monitoring Penggunaan Energi Terbarukan". The use of fiber and shell from FFB in boiler generates heat; which drives electricity-generating turbines. The use of renewable energy is consistent in the percentage against non – renewable energy. Records of both monitoring of kilowatt hours per tonne of palm product (FFB and CPO) maintained. Calculation for Fiber:</p> <table border="1" data-bbox="699 2002 1289 2024"> <tr> <td>Year</td> <td>FFB Process</td> <td>Fruit Fibers @13%</td> <td>Net Calorific Value of</td> </tr> </table>	Month (2018)	HSD fuel use (liter)	FFB production (ton)	HSD oil (liter) / FFB (ton)	Jan	4800	8615.44	0.56	Feb	1950	6767.54	0.29	Mar	1910	6759.74	0.28	Apr	2250	7789.51	0.29	May	3140	9055.68	0.35	Jun	2680	7331.30	0.37	Jul	3410	10959.15	0.31	Aug	3320	10238.93	0.32	Sep	2730	10663.90	0.26	Oct	3820	11238.58	0.34	Nov	5840	10020.91	0.58	Dec	1780	9795.85	0.18	Total	37630	109,236.59	0.34	Month (2018)	HSD fuel use (liter)	Month (2018)	HSD fuel use (liter)	Jan	2,274	Jul	2,068	Feb	2,304	Aug	2,475	Mar	1,938	Sep	1,874	Apr	1,720	Oct	1,905	May	1,731	Nov	2,039	Jun	1,220	Dec	2,084			Total	23,632	Year	FFB Process	Fruit Fibers @13%	Net Calorific Value of	<p>Comply</p>
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RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator		Assessment Findings			Compliance																																																																																																										
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		Dec	9,795.85	1,861	3,154,263,700																																																																																																										
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		<p>Calculation for Shell:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB Processed (tons)</th> <th>Shell @6% of FFB process (MT)</th> <th>Net Calorific Value of shell (3400 Kcal/kg)</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Jan</td> <td>8,615.44</td> <td>430,772</td> <td>1,464,625,480</td> </tr> <tr> <td>Feb</td> <td>6,767.54</td> <td>338,377</td> <td>1,150,482,990</td> </tr> <tr> <td>Mar</td> <td>6,759.74</td> <td>179,809</td> <td>611,351,247</td> </tr> <tr> <td>Apr</td> <td>7,789.51</td> <td>207,201</td> <td>704,483,827</td> </tr> <tr> <td>May</td> <td>9,055.68</td> <td>240,881</td> <td>818,996,061</td> </tr> <tr> <td>Jun</td> <td>7,331.30</td> <td>195,013</td> <td>663,042,953</td> </tr> <tr> <td>Jul</td> <td>10,959.15</td> <td>291,513</td> <td>991,145,888</td> </tr> <tr> <td>Aug</td> <td>10,238.93</td> <td>272,356</td> <td>926,009,281</td> </tr> <tr> <td>Sep</td> <td>10,663.90</td> <td>283,660</td> <td>964,443,749</td> </tr> <tr> <td>Oct</td> <td>11,238.58</td> <td>298,946</td> <td>1,016,417,899</td> </tr> <tr> <td>Nov</td> <td>10,020.91</td> <td>266,556</td> <td>906,291,914</td> </tr> <tr> <td>Dec</td> <td>9,795.85</td> <td>260,570</td> <td>885,936,674</td> </tr> <tr> <td></td> <td>109,236.59</td> <td>5,461,830</td> <td>18,570,220,300</td> </tr> </tbody> </table> <p>Record of efficiency</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Grand Total NCV</th> <th>Equal to HSD Fuel NCV 10500 Kcal/kg</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td></td> <td></td> </tr> <tr> <td>Jan</td> <td>4,238,798,448</td> <td>403,695</td> </tr> <tr> <td>Feb</td> <td>3,329,633,124</td> <td>317,108</td> </tr> <tr> <td>Mar</td> <td>2,787,988,815</td> <td>265,523</td> </tr> <tr> <td>Apr</td> <td>3,212,707,979</td> <td>305,972</td> </tr> <tr> <td>May</td> <td>3,734,926,309</td> <td>355,707</td> </tr> <tr> <td>Jun</td> <td>3,023,722,197</td> <td>287,974</td> </tr> <tr> <td>Jul</td> <td>4,519,993,476</td> <td>430,476</td> </tr> <tr> <td>Aug</td> <td>4,222,946,351</td> <td>402,185</td> </tr> <tr> <td>Sep</td> <td>4,398,221,803</td> <td>418,878</td> </tr> <tr> <td>Oct</td> <td>4,635,243,235</td> <td>441,452</td> </tr> <tr> <td>Nov</td> <td>4,133,027,832</td> <td>393,622</td> </tr> <tr> <td>Dec</td> <td>4,040,200,374</td> <td>384,781</td> </tr> <tr> <td></td> <td>46,277,409,944</td> <td>4,407,372</td> </tr> </tbody> </table> <p>The use of renewable energy (from fiber and shell) for power generation was equal to saving 4,407 tons of HSD fuel.</p>				Year	FFB Processed (tons)	Shell @6% of FFB process (MT)	Net Calorific Value of shell (3400 Kcal/kg)	2018				Jan	8,615.44	430,772	1,464,625,480	Feb	6,767.54	338,377	1,150,482,990	Mar	6,759.74	179,809	611,351,247	Apr	7,789.51	207,201	704,483,827	May	9,055.68	240,881	818,996,061	Jun	7,331.30	195,013	663,042,953	Jul	10,959.15	291,513	991,145,888	Aug	10,238.93	272,356	926,009,281	Sep	10,663.90	283,660	964,443,749	Oct	11,238.58	298,946	1,016,417,899	Nov	10,020.91	266,556	906,291,914	Dec	9,795.85	260,570	885,936,674		109,236.59	5,461,830	18,570,220,300	Year	Grand Total NCV	Equal to HSD Fuel NCV 10500 Kcal/kg	2018			Jan	4,238,798,448	403,695	Feb	3,329,633,124	317,108	Mar	2,787,988,815	265,523	Apr	3,212,707,979	305,972	May	3,734,926,309	355,707	Jun	3,023,722,197	287,974	Jul	4,519,993,476	430,476	Aug	4,222,946,351	402,185	Sep	4,398,221,803	418,878	Oct	4,635,243,235	441,452	Nov	4,133,027,832	393,622	Dec	4,040,200,374	384,781		46,277,409,944	4,407,372	
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<p>Criterion 5.5: 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.</p>																																																																																																															
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	PT. Eastern Sumatra Indonesia has prepared the procedure No.SOP/OilPalm/ESD, year 2009; tentang Penanaman Kelapa Sawit poin 3.1.3 mentioned "Dalam pembukaan lahan, perusahaan mempunyai kebijakan			Comply																																																																																																										

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<p>techniques based on the existing regulations. - Major compliance -</p>	<p>yang ramah lingkungan sesuai dengan prinsip-prinsip dalam RSPO. Sejalan dengan hal tersebut perusahaan menetapkan metode Zero Burning” – no burning allowed, through zero-burning (mechanical) method. In accordance with regulation on firefighting unit on work place, “Keputusan Menteri Tenaga Kerja dan Transmigrasi No.186 Tahun 1999 tentang Unit Penanggulangan Kebakaran di Tempat Kerja” – fire fighting team at Bukit Maradja POM available: “Surat Keputusan Kepala Dinas Sosial Tenaga Kerja dan Transmigrasi Kabupaten Labuhan Batu Selatan No.KEP.07/Bakortiba/TK/2015 tentang Pengesahan Tim Tanggap Darurat dan Badan Koordinator Anti Kebakaran di PT. Eastern Sumatra Indonesia”, dated 18 May 2015. Team has been appointed, trained and ready; Fire fighting equipments (fire extinguisher, hydrant, hose, water pump, nozzle, etc.) inspected on monthly basis, last dated 3-4 March 2018. Timbang Deli Estate have zero burning policy “Kebijakan Zero Burning No.SOP/TDI/18, revision 01 dated 1 February 2019.</p>					
<p>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 -</p>	<p>Bukit Maradja Estate made replanting through mechanical: “Realisasi Pekerjaan Replanting OP 2019 oleh PT. Aneka Sumatrindo”, dated 26 December 2018: Block 99D12A (20.80 Ha) ripper 2 round 20.63 Ha; felling + holling + closing hole + shreading + spreading 1,363 palms; holling planting point hole 30 holes; closing planting point hole 30 holes; sanitation planting point hole 1,454 holes; Block 00D10A (20.18 Ha) ripper 2 round 20.15 Ha; felling + holling + closing hole + shreading + spreading 1,432 palms; holling planting point hole 6 holes; closing planting point hole 6 holes; sanitation planting point hole 1,279 holes;</p>	<p>Comply</p>				
<p>Criterion 5.6:</p>						
<p>Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>						
<p>5.6.1 Document(s) assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent, shall be available. (see Criterion 4.4) - Major compliance -</p>	<p>In the palm oil mill and estates, the identification of pollution source has been documented under “Environmental Aspect & Impact List”. Assessments have been carried out on all recognized polluting activities and include gas and smoke emissions, particulate and soot emissions, effluent control, treatment and discharge. Any significant pollutants and emissions have been identified. There is a plan in place to reduce pollution – this is included in the aspects/impacts register. Assessment of polluting activities including gaseous emission, particulate emission and effluent has also been done identified in the document “Pengelolaan lingkungan hidup (RKL) dan Pemantauan lingkungan hidup (RPL)”. Emission test second semester period in Bukit Maradja POM, the emission test for Genset No.1 and No.3, date 19 December 2018:</p> <table border="1" data-bbox="699 1989 1283 2016"> <tr> <td>Parameter</td> <td>Limit</td> <td>Result Genset #2</td> <td>Result Genset #3</td> </tr> </table>	Parameter	Limit	Result Genset #2	Result Genset #3	<p>Comply</p>
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RSPO Public Summary Report
Revision 8 (Mar /2019)

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5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plan to reduce or minimize them	Based on Significant pollution and GHG emission was identified, for Mill comes from waste pond, reducing program has been implemented by using methane trap and for estates comes from using of pesticides, action plan to reducing pesticide was made such as program of	Comply																																																																																																							

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Revision 8 (Mar /2019)

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<p>implemented. - Major compliance -</p>	<p>integrated pest control where minimize to use chemical/pesticides. Graph of emission and pollutant were provided to monitor trend of them in monthly basis.</p> <ul style="list-style-type: none"> - Using EFB as organic fertilizer. - Planting beneficial plant - Efficiency of fossil fuel. - Increasing renewable energy usage. <p>Identification of significant pollution and GHG emission in each unit/station as documented in "Environmental Aspect & Impact List", consist of: input, environmental aspect, caused, environmental impact potential, and control.</p> <p>Kerasaan Estate's Reduction of herbicide and pesticide:</p> <table border="1" data-bbox="699 824 1139 987"> <thead> <tr> <th colspan="3">Chemical: SMART (a.i. Glyphosate)</th> </tr> <tr> <th>Year</th> <th>Volume</th> <th>Ha application</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>3569.48 liters</td> <td>10,127.71</td> </tr> <tr> <td>2017</td> <td>4125.01 liters</td> <td>5434.46</td> </tr> <tr> <td>2018</td> <td>2665.96 liters</td> <td>5,071.09</td> </tr> <tr> <td>2019</td> <td>385.00 liters</td> <td>608.74</td> </tr> </tbody> </table> <table border="1" data-bbox="699 1016 1139 1234"> <thead> <tr> <th colspan="3">Chemical: (a.i. Acephate)</th> </tr> <tr> <th>Year</th> <th>Volume</th> <th>Ha application</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>8123.75 liters</td> <td>6150.63</td> </tr> <tr> <td>2017</td> <td>12,923.33 liters</td> <td>4050.54</td> </tr> <tr> <td>2018</td> <td>11,753.47 liters</td> <td>5953.62</td> </tr> <tr> <td>2019</td> <td>1,846.98 liters</td> <td>1396.90</td> </tr> </tbody> </table> <p>In Timbang Deli Estate, management have prepared identification and management plan for estate/plantation:</p> <table border="1" data-bbox="699 1317 1276 2020"> <thead> <tr> <th>Activity</th> <th>Program</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td colspan="3">Reduce use of herbicide and pesticide</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 LCC such as <i>Mucuna bracteata</i> and 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>Planting <i>Mucuna</i> in block 18A03 of 17,710 trees (period 1 September – 21 December 2018); Planting <i>Mucuna</i> in block 18H02 of 5,720 trees (period 8-28 November 2018);</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">Reduce fossil fuel use</td> </tr> <tr> <td>Conduct vehicle</td> <td>To reduce excessive emission</td> <td></td> </tr> </tbody> </table>	Chemical: SMART (a.i. Glyphosate)			Year	Volume	Ha application	2016	3569.48 liters	10,127.71	2017	4125.01 liters	5434.46	2018	2665.96 liters	5,071.09	2019	385.00 liters	608.74	Chemical: (a.i. Acephate)			Year	Volume	Ha application	2016	8123.75 liters	6150.63	2017	12,923.33 liters	4050.54	2018	11,753.47 liters	5953.62	2019	1,846.98 liters	1396.90	Activity	Program	Remarks	Reduce use of herbicide and pesticide			No application of herbicide in riparian area	To implement in all block	Implemented. No herbicide spraying on riparian.	Planting LCC such as <i>Mucuna bracteata</i> and 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.	Planting <i>Mucuna</i> in block 18A03 of 17,710 trees (period 1 September – 21 December 2018); Planting <i>Mucuna</i> in block 18H02 of 5,720 trees (period 8-28 November 2018);	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>		Reduce fossil fuel use			Conduct vehicle	To reduce excessive emission		
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RSPO Public Summary Report
Revision 8 (Mar /2019)

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<p>5.6.3</p>	<p>A monitoring plan and results of regular reporting on emission and pollutants from estate and mill operations using appropriate methods, shall be available.</p> <p>- Minor compliance –</p> <p>Emission monitoring system by using “RSPO PalmGHG” system calculation. Emission from estate and mill operation was calculated and monitored, emission reduction achieved.</p> <p>The result of GHG calculation available in appendix C.</p> <p>Monitoring of any pollutant has been done in daily, weekly and monthly basis, report of monitoring was recorded in the “RKL/RPL” report, and this report submitted to the related institution every 6 month.</p> <p>Monitoring and measurement has been done as follow:</p> <ul style="list-style-type: none"> - Hazardous waste: oil waste, wet battery, lightbulb, filter waste, contaminated packaging, cartridge, fertilizer sack and other contaminated waste. All hazardous waste disposal recorded in monthly basis in the waste balance report as stated in the report of ‘RKL/RPL’ - Replanting process monitoring for zero burning activity. - Boiler emission with parameters: SO₂, NO₂, HCL, Cl₂, NH₃, HF, particle, and opacity. None of above parameters out of threshold limits value. <p>Generator set emission for generator for SO₂, NO₂, CO,</p>	<p>Comply</p>																										

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	<p>Particle and opacity, All parameters measured in the threshold limit value as seen in the "Laporan Hasil Pengujian Udara Emisi" by "Balai Laboratorium Kesehatan".</p> <p>Repair and maintenance of boiler and genset in Bukit Maradja POM: Field operator report PT. Trakindo Utama No.012046 dated 22-24 December 2018, mechanic Wahyu for regular maintenance: test engine and monitoring power generator CAT C75, engine requires oil cooler. "Berita Acara Serah Terima Pekerjaan Trakindo/Caterpillar" dated 24 December 2018 for install oil cooler and water radiator, for power generator Caterpillar C75 S/No.C4400518. After service, engine condition normal. Repair on the boiler: Work Order No.8100 from CV. Boiler care dated 14 December 2018. "Berita Acara Serah Terima Pekerjaan Bongkar Pasang Batu pada Boiler Babcock Atmindo di Bukit Maradja POM" dated 27 February 2019 by CV. Boiler Care. CV. Boiler Care made some service: disassembly the boiler wall, disassembly casing, disassembly duting chut, disassembly the lids, disassembly fire door frame, disassembly rosters, replace leaking valve. The work completed on 27 December 2019.</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</p>	<p>A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -</p>	<p>In PT. Eastern Sumatra Indonesia, social aspects have been identified and documented under document "UKL – UPL" and was approved "Keputusan Kepala Badan Pengendalian Dampak Lingkungan Daerah Kabupaten Simalungun No.188.4/70/Bpdl" related to finalized environmental and social feasibility at palm oil mill of PT. Eastern Sumatera Indonesia (PT SIPEF), Bukit Maradja Estate, Simalungun District, North Sumatra Province dated on 26 February 2004 and last revision as in "Rencana Pengelolaan Lingkungan (RKL) dan Revisi Rencana Pemantauan Lingkungan (RPL)" with scope of study palm oil estate area 3,178 Ha and palm oil mill 30 Ton FFB/hour as stated in the "Keputusan Bapedalda Kabupaten Simalungun No.271/Bpdl/2008".</p> <p>In 2010, company has prepared a social impact assessment, as reported under "Dokumen Sosial Impact Assessment – March 2010", in cooperation with Yayasan Sawit Berkelanjutan Indonesia (YASBI). In the preparation process, the social impact study involving multi stakeholder through guided interview, questionnaire, focus group discussion (FGD).</p> <p>PT. Kerasaan Estate social aspects have been identified and documented under "Dokumen Upaya Pengelolaan dan Pemantauan Lingkungan (UKL- UPL)" is comply with</p>	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>letter of “Kepala Bapedalda Kabupaten Simalungun No.442/Bpdl-2005” dated on 23 Desember 2005 related approval of “Dokumen UKL/UPL PT. Kerasaan Indonesia” and revision of “Upaya Pengelolaan Lingkungan dan Upaya Pemantauan Lingkungan (UKL/UPL)” comply with letter agreement “Kepala Badan Lingkungan Hidup Kabupaten Simalungun No.700/109/BLH/2009” dated 8 April 2009 with scope of study 2,362 Ha oil palm estates. In 2010, company has prepared a social impact assessment, as reported under “Dokumen Sosial Impact Assessment – March 2010”, in cooperation with Yayasan Sawit Berkelanjutan Indonesia (YASBI). In the preparation process, the social impact study involving multi stakeholder through guided interview, questionnaire, focus group discussion (FGD).</p> <p>In 2014, PT. Timbang Deli Indonesia in cooperation with “Fakultas Kehutanan Institut Pertanian Bogor” have prepared “Dokumen Laporan Social Impact Assessment (SIA)”. The assessment team comprise of: Handian Purwawangsa, S.Hut, M.Si (Team Leader; Social and cultural expert); Udi Kusnidar, S.Hut (Social-economic-cultural expert); Ir. Heri Wiyono (Social and cultural expert).</p> <p>The result: PT. Timbang Deli Indonesia is administratively located in the District of Deli Serdang, Sub-District of Galang. The villages located around the licenced area are Timbang Deli, Keramat Gajah dan Jaharun A. All villages are reasonably distant from the district capital which was 4 km from Timbang Deli village, 7 km for Kramat Gajah village and only 1 km for Jaharun A village.</p> <p>From in-depth interviews and discussions, generally response from community for PT. Timbang Deli Indonesia is good, especially PT. Timbang Deli Indonesia already been there for quite a long time and most of villagers is employee or ever been employed or has relatives working at PT. Timbang Deli Indonesia or used to work at PT. Timbang Deli Indonesia. Community do not reject the existence of company in the area.</p> <p>Some social issues related with management PT. Timbang Deli Indonesia are latex and enplumps theft, fires in the dry season, cattle grazing, limited land use for villagers, potential flooding from government’s land that beside (outside) PT. Timbang Deli Indonesia which planted/used by villagers.</p> <p>The local communities expect some positive outcomes from the development of oil palm in PT. Timbang Deli Indonesia. Increase of employment opportunities, grazing for their cattles, participation in social villages activities, and fire woods. Besides that, with the development of PT. Timbang Deli Indonesia, villagers could have new opportunities to make their own business as employees of PT. Timbang Deli Indonesia need goods and services that the villagers can supply. PT. Timbang Deli Indonesia also allocated some of its land for the building of Kantor Desa Timbang Deli (office for the village’s administration purpose where the head of village and his/her staff</p>	

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>work), and schools (SDN Timbang Deli and SMKN Galang). From the interviews with community, it is gathered that PT. Timbang Deli Indonesia give almost no negative impact.</p> <p>In 2017, PT. Timbang Deli Indonesia in cooperation with "Koompasia Enviro Institut" carried out social impact assessment as reported in "Laporan Analisa Dampak Sosial PT. Timbang Deli Indonesia tahun 2017". The assessment team comprise of: Henry Marpaung (Team Leader; Social-cultural expert; ALS licensed assessor Provisional ALS160007HM); Harry Kurniawan, (Team member; GIS and landscape); Ridho Anggara (Team member, GIS assistant).</p>	
<p>6.1.2</p> <p>There shall be evidence that the assessment has been conducted with the participation of affected parties.</p> <p>- Major compliance -</p>	<p>Based on the verification of documents Social impact assessment in 2010, which was conducted in collaboration with "Yayasan Sawit Berkelanjutan Indonesia (YASBI) showed that in the process of drafting the document has involved the participation of the local community through interview, focus group discussions and questionnaire. it was also confirmed from the results of interview with agency village which states that the village government involved in data collection for social studies in 2010. Likewise, every year the Company also conducts social data collection as part of the monitoring of social impacts.</p> <p>In PT. Timbang Deli Indonesia, questionnaire result prove that the assessment has been conducted with participant of affected parties. Questionnaire results from various backgrounds of the villagers are available.</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.</p> <p>- Major compliance -</p>	<p>PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia has prepared an Impact Management and Monitoring Plan as outlined in the Environmental Management and Monitoring Matrix. Management and monitoring of the implementation period, include the social impact regulated in detail in the matrix. The reporting period was carried out every six months while the special social impacts, monitoring and evaluation carried out annually.</p> <p>As part of the Social Impact Assessment document 2010 has been prepared Matrix Management Plan and Social Monitoring results of Social impact assessment in 2010.</p> <p>The company has integrated the impact management and monitoring of the results of the AMDAL study and the results of the SIA in 2010 and the results are written in Report of the RKL-RPL each semester and reported to the relevant agencies.</p> <p>Based on SIA in PT. Timbang Deli Indonesia, the negative impact that arise are:</p> <ol style="list-style-type: none"> 1. The emerge of tension between companies and some cattle and goats owners due to the prohibition of freely grazing livestock in plantation area. 2. Fertilizing activities which are considered to pollute water. 	<p>Comply</p>

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	<p>3. Lack of absorption of labor from villagers. The existence of PT. tImbang Deli Indonesia has give positive impact in form of:</p> <ol style="list-style-type: none"> 1. Encourage the development of socio-economic life of the Deli Serdang Regency of Galang District in general and the villages surrounding Timbang Deli Estate in particular. 2. Ther is an opportunity to work on local entrepreneurs with the opportunity of partner for the company. 3. Plantation routinely carry out social responsibility program with the CSR programs. Ralisation is in the form of scholarship, repair of house of worship, repair of village roads, bridges and others. <p>The social management plan consist of:</p> <ul style="list-style-type: none"> - Regular monitoring and evaluating the company boundaries. - Nurture communication and network with stakeholders through regular meeting with "perangkat desa", "tokoh Masyarakat Desa", "Tokoh Adat". - Empowerment of community's economy inline with potency and cooperation with competent parties. - Empowerment of local husbandry through development of farmer surrounding company. - Prevent land and forest fire through participative engagement. - Planned drainage monitoring and maintenance. 	
<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.</p> <p>- Minor compliance –</p> <p>PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia has prepared a social impact assessment consistently monitor the social impact of either annually from the aspect of social impact assessment results from the AMDAL and Social Studies in 2010. Data from the monitoring activity is used as an evaluation of social management implementation every year and written in the Report of the RKL-RPL. The social impact of replanting and boundary trenches maintenance has also been included in the monitoring of impact.</p> <p>At present PT. Timbang Deli Indonesia has been quite good at minimizing the social impact caused by the operational activities. However, to show the company's commitment in continuous improvement, a work plan is implemented as follows:</p> <ol style="list-style-type: none"> 1. The company's CSR program that has been established is good enough, but it is necessary to study and consider the wishes and expectations of the community while still need to consider company's financial capabilities. 2. Periodic information, counseling and communication must be conducted to minimize negative perceptions of the company. 	<p>Comply</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).</p> <p>PT. Eastern Sumatra Indonesia, PT. Kerasaan Indonesia and PT. Timbang Deli Indonesia were not obliged to develop smallholder scheme – as per regulation. The development of PT. Eastern Sumatra Indonesia, PT. Kerasaan Indonesia and PT. Timbang Deli Indonesia does</p>	<p>Not applicable N/A</p>

Criterion / Indicator	Assessment Findings	Compliance
- Minor compliance –	not involved smallholder development. Not applicable.	
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.		
6.2.1 Communication and consultation procedures shall be documented. - Major compliance -	Timbang Deli Estate the communication and consultation with stakeholder is regulated under: <ul style="list-style-type: none"> - Procedure for receiving and providing response upon information request "Prosedur Pemberian Tanggapan terhadap Permintaan Informasi" Dok.No.SOP/TDI/09 dated 1 February 2019. In the procedure regulates mechanism for providing and responding to information request, from stakeholder. Timeline: response to information request provided by unit manager, immediately or maximum 7 working days; response to information request requiring director approval shall be communicated from unit, maximum 3 working days; response to information request requiring president director approval shall be communicated from director, maximum 7 working days; - Procedure for internal complaint and grievance "Prosedur Keluh Kesah dengan Pihak Internal" Dok.No.SOP/TDI/07 dated 1 July 2017. The procedure explains steps to convey complaint and receive complaint from internal party, as well providing appropriate response. The document complemented with flow chart. - Procedure for external complaint and grievance "Prosedur Keluh Kesah dengan Pihak Eksternal" Dok.No.SOP/TDI/06, dated 1 July 2017. The procedure explains steps to convey complaint and receive complaint from internal party, as well providing appropriate response. The document complemented with flow chart. 	Comply
6.2.2 The company shall have official(s) who is responsible for consultation and communications with parties. - Minor compliance -	Timbang Deli Estate appoints Estate Manager for consultation and communicates with stakeholders. This is available under "Estate Job Description" for Estate Manager, section Tugas Pokok "12. Melaksanakan program-program untuk menjalin hubungan yang harmonis dengan masyarakat sekitar dan instansi terkait" – to carried out programs in order to have harmonious relation with local communities and government agencies.	Comply
6.2.3 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. - Minor compliance -	Bukit Maradja Estate have prepared and updated (1 February 2019) list of stakeholder: 6 government offices in Simalungun Regency; 3 government office in district level; 8 village government (sampled: Nagori Bukit Maradja, Mr. S*****n); 3 worker unions; 3 contractors; Timbang Deli Estate have prepared a list of stakeholder, dated update 26 February 2019. The list of stakeholder comprise of "Kantor Pemerintahan Daerah Kabupaten" – regency government consist 10 offices; "Musyawarah Pimpinan Kecamatan" – district government consist 3 offices; "Kepala Desa" – consist of Timbang Deli and	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>Keramat Gajah village; "Serikat Pekerja Timbang Deli Mandiri" – worker union' "Kontrator" and "supplier". The stakeholder updated with name, address and contact number.</p> <p>Company participated in Focus Group Discussion with "Pusat Kajian dan Perlindungan Anak, Deli Serdang". Company received invitation letter "Surat Undangan Focus Group Discussion Pengembangan Forum Children's Right and Business Principle (CRBP) Sektor Perkebunan Sawit di Deli Serdang No.234/B/PKPA/VIII/2018" dated 10 August 2018. Letter received by Timbang Deli Estate on 14 August 2018. On the same date, Estate Manager ordered assisstants (Mr. Syahrul Akmal and Mr. Panduman Simanjuntak) to attend the focus group discussion dated 16 August 2018 in Aula Kantor Dinas PPKB-PPPA Deli Serdang. The focus group discussion related to introduction of CRBP toolkits to stakeholder in Deli Serdang Regency; mapping the potency for synergy of CRBP implementation in order to achieve "Indonesia Bebas Pekerja Anak tahun 2022". The discussion attended by stakeholders from "Bappeda Kabupaten Deli Serdang", "Dinas Tenaga Kerja Kabupaten Deli Serdang", "Dinas Pertanian Tanaman Pangan dan Hortikultura Kabupaten Deli Serdang", "PT. PP London Sumatra", "PT. Perkebunan Negara 2", "PT. Serdang Jaya", "PT. Perkebunan Sei Karang", "PT. Timbang Deli Indonesia", "Perkumpulan HAPSARI", "Ibu Kepala Desa Damak Maliho", "Ketua Tim Penggerak PKK Deli Serdang".</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>Companies have established "Prosedur Ganti Rugi Lahan" No.SOP/CA/02 dated 1 July 2012 demonstrating company has provide mechanism to resolve land dispute:</p> <ul style="list-style-type: none"> - Company disseminating the permit/land title to local communities; - In the case where claim over land occurs, company will receive the claim if claim is complemented with land ownership; - Land status verification, in case land ownership accepted, continued with field survey and land measurement; - Field survey and land measurement involving company representative, claimant, and government representatives; - Based on survey and land measurement, a minutes of land measurement is being produced. The minute will inform the hectare and boundary coordinates of claimed land parcel – signed by all parties involved; - Final verification based on measurement and map to ensure the claimed land is not overlapping with other ownership/right/claim; - Should final verification demonstrates the claimed land not overlap with other party; company will negotiate the compensation; 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>- If negotiation comes into agreement, company will pay the compensation to land owner.</p> <p>Internal grievance regulated under "Mekanisme Keluh Kesah dengan Pihak Internal" Doc.No.SOP/TDI/08 dated 1 February 2019. Procedure for external complaint and grievance "Prosedur Keluh Kesah dengan Pihak Eksternal" Dok.No.SOP/TDI/07, dated 1 February 2019. The procedure explains steps to convey complaint and receive complaint from internal and external party, as well providing appropriate response. The document complemented with flow chart. Within both procedures, company policy is to ensure anonymity of complainants and whistleblowers, where requested. It was stated in section 6.2 in Internal grievance procedure and in section 7.2 in External grievance procedure.</p> <p>The mechanism to open to all affected parties and ensuring anonymity of complainants and whistleblowers where requested has been disseminated to employees and surrounding communities on 31 January 2019, attended by 50 participants.</p>	
<p>6.3.2 There shall be records of process and outcome of dispute resolution. - Major compliance -</p>	<p>Based on document verification in PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia and public consultation with relevant authorities (Dinas Tenaga Kerja Kabupaten Simalungun, Kantor Pertanahan Kabupaten Simalungun dan Dinas Lingkungan Hidup Kabupaten Simalungun) and surrounding village's authorities, the land dispute between community and company have been settled.</p> <p>In Timbang Deli Estate, based on document verification and public consultation with relevant authorities (Dinas Tenaga Kerja Kabupaten Deli Serdang, Kantor Pertanahan Kabupaten Deli Serdang dan Dinas Lingkungan Hidup Kabupaten Deli Serdang) and Timbang Deli Village Head, there has been no land dispute between community and company.</p> <p>While the internal and external complaints documented by the company as described in the indicator 6.2.3.</p>	<p>Comply</p>
<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 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. - Major compliance -</p>	<p>PT. Eastern Sumatra Indonesia, PT. Kerasaan Indonesia and PT. Timbang Deli Indonesia are a plantation company operating since Dutch colonial era. PT. Kerasaan Indonesia, PT. Eastern Sumatera Indonesia and PT. Timbang Deli Indonesia has not expanding the plantation. However, as anticipation, company has a mechanism to resolve land dispute as per "Prosedur Ganti Rugi Lahan" No.SOP/CA/02 dated 1 July 2012. Based on stakeholder consultation with communities and village heads there has been no report on land dispute between community and company.</p> <p>PT. Timbang Deli Indonesia only conversion of</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	commodity from rubber plantation to oil palm plantation in the same concession area.	
<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>Companies are not planned to expanding the plantation, therefore no compensation process occurred. Based on document verification and consultation with village heads, environmental monitoring body and land office of Kabupaten Simalungun, there is no land dispute between company and other parties. However, as anticipation, company has a mechanism to resolve land dispute as per "Prosedur Ganti Rugi Lahan" No.SOP/CA/02 dated 1 July 2012. Based on stakeholder consultation with communities and village heads there has been no report on land dispute between community and company.</p> <p>The procedure explains the mechanism for land compensation started with project communication (dissemination and FPIC), document verification and demonstration of land ownership, field survey and land measurement with government authorities, participatory mapping, and negotiation of land compensation. The land compensation documentation comprise: 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. Timbang Deli Indonesia only conversion of commodity from rubber plantation to oil palm plantation in the same concession area.</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>PT. Eastern Sumatra Indonesia, PT. Kerasaan Indonesia and PT. Timbang Deli Indonesia are a plantation company operating since Dutch colonial era. PT. Kerasaan Indonesia, PT. Eastern Sumatera Indonesia and PT. Timbang Deli Indonesia has not expanding the plantation. However, as anticipation, company has a mechanism to resolve land dispute as per "Prosedur Ganti Rugi Lahan" No.SOP/CA/02 dated 1 July 2012.</p> <p>The procedure explains the mechanism for land compensation started with project communication (dissemination and FPIC), document verification and demonstration of land ownership, field survey and land measurement with government authorities, participatory mapping, and negotiation of land compensation. The land compensation documentation comprise: 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>Comply</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</p> <p>Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.</p> <p>- 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 SPBUM sesuai</p>	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>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 payment year 2018 has been issued through UMP 2019 based on Keputusan Gubernur Sumatera Utara nomor 188.44/1495/KPTS/2018 tentang Penetapan Upah Minimum Kabupaten Simalungun Tahun 2019 tertanggal 14 Desember 2019. Upah minimum sejumlah Rp 2,402,626 per bulan.</p> <p>Based on document verification, interview with worker union committee stated that at the time of audit using standard for salary 2018. During the interview, worker union committee stated the salary for year 2019 have been discussed between worker union and company on February 2019 in Medan. There was a commitment that the salary for year 2018 would applies retrospective since January 2019. This means the difference of payment between salary 2019 and salary 2018, will be topped up once the salary increment agreed by both parties. The same regime verified to be applied consistently during pay rate transition in 2017 to 2018.</p> <p>Based on document verification, salary payment for month Data verified: Payslip recrd month February 2019 e.g:</p> <ul style="list-style-type: none"> - Namely Mr Sxxxxxxx (register number: 04991), in detail: Basic salary: Rp 2,710,000 Overtime: Rp 1,483,200 Rice: Rp 151,320 Total salary: Rp 4,705,057 - Namely Mr Rxxxxx Sxxxxxxxxx (register number: 03129), in detail: Basic salary: Rp 2,710,000 Overtime: Rp 197,760 Rice: Rp 151,320 Total salary: Rp 3,373,935 <p>In Timbang Deli Estate the applicable regulation for minimum payment in 2019 is “Keputusan Gubernur Sumatera Utara No.188.44/1365/KPTS/2018 tentang Penetapan Upah provinsi Sumatera Utara Tahun 2019” dated 1 November 2018, whereby the minimum wage sets for North Sumatera Province for 2018 at IDR. 2,303,403.43 per month. Based on Collective aIDRgreement between management of PT Timbang Deli Indonesia and Worker Union named Timbaang Deli Mandiri dated 1 March 2019 as result of bipartite meeting, agreed payment for 2019 are as follows:</p> <ol style="list-style-type: none"> 1. Daily permanent worker: <ul style="list-style-type: none"> - IDR. 2,798,000,- for 0-3 years of services; 	

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - IDR. 2,800,000,- for >3-6 years of services; - IDR. 2,802,000,- for >6 years of services. <p>2. Monthly permanent worker: IDR 2,943,000,- Salary increment start at 1 January 2019.</p> <p>Based on document verification, salary payment for March 2019 has been comply with the 2019 regulation and commitment. A number of worker salary payment sampled:</p> <ol style="list-style-type: none"> 1. Mr. H*****, SKU-H of Timbang Deli Estate for March 2019 receives IDR 3,733,250.00; consist of: <ul style="list-style-type: none"> o Basic salary: IDR 2,572,000.00; o Rice benefit: IDR 388,440.00; o BPJS Ketenagakerjaan benefit: IDR 123,170.00; o BPJS Kesehatan benefit: IDR 102,880.00; o BPJS Pensiun benefit: IDR 54,260; o Others: IDR 475,000.00; o Allowance: IDR 17,500.00. 2. Mr. M.S****, SKU-H of Timbang Deli Estate for March 2019 receives IDR 3,139,832.00; consist of: <ul style="list-style-type: none"> o Basic salary: IDR 2,572,000.00; o Rice benefit: IDR 388,440.00; o BPJS Ketenagakerjaan benefit: IDR 123,170.00; o BPJS Kesehatan benefit: IDR 102,880.00; o BPJS Pensiun benefit: IDR 54,260; o Allowance: IDR 17,500.00; o Deduction of absence: IDR 118,418.00. 	
<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>Working conditions are documented in the “Perjanjian Kerja Bersama” (PKB) is registered by Collective Labor Agreement (PKB) between PT Eastern Sumatera Utara and Labour Union (Pengurus Serikat Pekerja Bukit Maradja Mandiri – SP BUMM) for period 2018 – 2020 and that was registered to Manpower Agency in Simalungun Regency on 2 November 2018. Work agreement is the document of agreement between workers represented by labour union (Pengurus Serikat Pekerja Bukit Maradja Mandiri/SP-BUMN) and the company.</p> <p>The work agreement is produced is a form of booklet. The PKB is in line with regulatory requirements approved by the Manpower District Agency. Health and safety is also documented. Payment and conditions include - working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, dismissal reasons, and other normative.</p> <p>Working conditions are documented in the collective working agreement called “Perjanjian Kerja Bersama” (PKB) which is registered by Manpower Agency based on Surat Keputusan Kepala Dinas Ketenagakerjaan Kabupaten Deli Serdang No.560/12/DK-2/DS/2018 dated 5 December 2018. The collective working agreement registered in Deli Serdang Manpower agency under registration number 11/PKB/DK-2/DS/XII/2018 dated 5 December 2019. The working agreement valid for two years from 5 December 2018 to 5 December 2020.</p> <p>Collective working agreement (PKB) is the document of</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>agreement between workers represented by labour union (Pengurus Serikat Pekerja Timbang Deli Mandiri) and the company. The work agreement is produced is a form of booklet. The PKB is in line with regulatory requirements approved by the Manpower District Agency. Health and safety is also documented. Payment and conditions include - working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, dismissal reasons, and other normative.</p> <p>Te collective work agreement has regulated working time, salary, piece rate work, sick days aid, absence, meal allowance, overtime, premium rate, social and health insurance, religious day allowance and bonus, working tolls and PPE. Based on document verification upon sampled work agreement shows the right and obligation including salary and benefit refers to relevant laws and regulations.</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>Inspection confirmed PT. Eastern Sumatra Indonesia and PT. Kerasaan indonesia provide adequate housing for staff and workers, free water supplies are adequate and clean, electricity is at subsidized rate, kindergarden, elementary schools, crèche, place of worship, medical facilities are provided and additional benefit if treatment is needed at hospital. Water quality tests confirmed the treated water supplied to housing is suitable for domestic use. Recreation facilities at each estate include sports field.</p> <p>In Bukit Maradja Estate:</p> <ul style="list-style-type: none"> - Housing (340 unit for employees), staff (8 units), Manager (unit) - Guest house (1 unit) - Mosque (4 units) - Church (1 unit) - Community hall (3 units) - Kindergarden (6 units) - School bus (1 unit) - Sport facilities - Water pump (4 units) - Genset (1 unit), - Electricity for employees housing using National State Electricity Company (PLN) <p>Inspection confirmed that PT. Timbang Deli Indonesia provide adequate housing for staff and workers, free water supplies are adequate and clean, electricity is at subsidized rate, kindergarden, crèche, place of worship, medical facilities are provided and additional benefit if treatment is needed at hospital. Water quality tests confirmed the treated water supplied to housing is suitable for domestic use. Recreation facilities at each estate include sports field. Detail of infrastructure in Timbang Deli Estate are as follows:</p> <ul style="list-style-type: none"> - Staff House (4 units) - EM House (1 unit) - Worker housing – Permanent (15 units) - Worker housing – Semi Permanent (63 units) 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Worker housing – Cibuni style (15 units) - Mosque (1 unit) - Islamic school (1 unit) - Kindergarten (1 unit) - Polyclinic (1 unit) - Employee center (1 unit). <p>The worker housing condition was in good shape. No water puddle and no tall grass.</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>The company has effort to provide minimarket “KSU Bukit Maradja – OMI” and traditional market in Kerasaan villages and Pematang Syahkuda which nearby the company areas.</p> <p>Worker in Timbang Deli Estate have access to grocery shops located in surrounding villages. The nearest village was Timbang Deli village, 4 km from worker housing.</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 understandable language recognising freedom of association, shall be available.</p> <p>- Major compliance –</p>	<p>Company has established freedom of association policy, “Kebijakan Kebebasan Berserikat” approved by President Director on 1 March 2014, states company supports the freedom of association among the workers. This policy is written in Bahasa Indonesia.</p> <p>Based on interview with workers in Bukit Maradja Estate, Kerasaan Estate and Bukit Maradja POM, the basic of policy has been understood.</p> <p>The Company has to disseminate the policy with immediate socialization of employees.</p> <p>In Bukit Maradja POM, communication of policy in recognising freedom of association to worker dated 23 January 2019. Communication to 24 workers comprise of operators from sterilizer station, kernel plant, pressing station, heavy machinery operators, engine room, etc.</p> <p>In Kerasaan Estate, communication of freedom of of association policy in dated 19 February 2019. Communication to Division I worker, 29 harvesters, 2 harvest mandores, 2 harvest clerks, 1 upkeep mandor, 20 upkeep officers.</p>	<p>Comply</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 management PT. Eastern Sumatra Indonesia and the worker union, dated 8 August 2018. The meeting attended by 5 management and 19 worker union representative. The meeting discussed the preparation for independence day, worker union member’s activity.</p> <p>Meeting Bipartit between PT. Kerasaan Indonesia and its worker dated 11 March 2019, location in Estate Manager room</p> <p>In PT. Timbang Deli Indonesia, the discussion between company and their worker through bipartite meeting. Bipartite report has been submitted to Manpower Agency of Deli Serdang Regency based on letter No. 36/TDE/III/2019 dated 20 March 2019. Minutes of</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>meeting: "Notulen Rapat Bipartit antara PT Timbang Deli Indonesia dengan SPTDM, tentang Final Bonus 2018 dan pinjaman dan THR tahun 2019 serta pemakaian APD untuk buruh harian lepas", dated 13 February 2019. Record verified: Minute of Meeting, attendance list and photograph.</p>	
<p>Criterion 6.7: Children are not employed or exploited.</p>		
<p>6.7.1 There shall be documented evidence that minimum age requirements are met. - Major compliance –</p>	<p>PT. Eastern Sumatera Indonesia has policy regarding minimum age requirements, that is Child Labour Policy signed by President Director on 1 March 2014. The policy stated that children should have the right to education and a healthy life, and is committed to ensuring that children, under the age of 18 years, are not employed by the company for any work related purpose". The policy is written in English and Bahasa Indonesia. The policy disseminated to all worker regularly. In Kerasaan Estate, communication of no-child worker policy in dated 16 February 2019. Communication to Division II worker, 24 harvesters, 2 harvest mandores, 1 upkpeep mandor, 2 spray mandores, 13 sprayers, 10 pest and disease officers, 4 carpenters, 2 grassmowers, 4 teachers. Based on verification against 52 workers in Division I; 68 workers in Division II; 65 workers in Division III; 25 workers in Division IV. Sampled: Agung Kurniawan, born April 1996, first work December 2016 (20 years).</p> <p>PT. Timbang Deli Estate has established Child Labour Policy (TDI-QM/07) dated 1 September 2017, mention that children should have the right to education and a healthy life, and is committed to ensuring the children, under the age of 18 years are not employed by the company for any work related activities. The policy has been disseminated to all oil palm employees recently on 18 February 2019, attended by 49 employees, consist of Field Assisstant, Supervisors, upkeep workers and harvesters. Attendance list was evident. Based on interview with worker on 19 March 2019, it was noted that all workers understood the minimum age Policy. Based on document review of list of worker as per 1 March 2018, it was noted there is no worker hired by Timbang Deli Estate less than 18 years old.</p> <p>Based on field visit and interview with worker, there was no worker's family in estate activity.</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 A company's policy on equal opportunity and treatment for work shall be available and documented. - Major compliance –</p>	<p>Company has an equal opportunities policy, approved and signed by President Director, 1 March 2014. The policy is available in Bahasa Indonesia. The policy has been disseminated to employee through notice board on estate office.</p>	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>The policy has been disseminated to employee through notice board on estate office. Sample taken on socialization of the policy, e.g:</p> <ul style="list-style-type: none"> a. In Bukit Maradja POM, communication of policy on equal opportunity and treatment for work to worker dated 23 January 2019. Communication to 24 workers comprise of operators from sterilizer station, kernel plant, pressing station, heavy machinery operators, engine room, etc. b. Bukit Maradja Estate have communicated the policy on equal opportunity and treatment for work to its workers: Dated 16 March 2019 for 45 workers in Division I, comprise of harvester, supervisors, gardener, kindergarten teacher, pest and disease census. c. Dissemination in Timbang Deli Estate on 18 February 2019, attended by 49 employees, consist of Field Assisstant, Supervisors, upkeep workers and harvesters. 	
<p>6.8.2 Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated. - Major compliance –</p>	<p>No discrimination was noted during audit, the company has implemented equal opportunity policy.</p> <p>PT. Eastern Sumatra Indonesia made job vacancy for kindergarten teacher and office clerk for training center on 19 February 2019. The job vacancy leaflet made available to surrounding villages. After interview, one female teacher from Sakhuda Bayu village, accepted.</p> <p>Bukit Maradja POM made equal treatment in terms of promotion from temporary worker into permanent worker. Decree sighted: "Memorandum HRAD No.125/JWB-BMOM/VII/2018 tentang Pengangkatan Karyawan" dated 27 July 2018. The letter appointed 1 temporary worker into permanent worker and promoting permanent worker for higher grade, effective 1 August 2018. 8 out of 13 workers appointed are coming from local villages (Bukit Maradja, Bangun, Maredan Bukit, Sakhuda Bayu, Penyabungan) and 2 of them are female worker.</p> <p>Bukit Maradja Estate made equal treatment in terms of promotion from temporary worker into permanent worker. Decree sighted: "Memorandum HRAD No.152/JWB-NS/VIII/2018 tentang Pengangkatan PKWT menjadi SKU-H & Kenaikan Grade Bukit Maradja Estate" dated 6 September 2018. The letter appointed 13 fertilizer applicator and pest and disease worker into permanent worker, effective 1 September 2018. 8 out of 13 workers appointed are coming from local villages (Bukit Maradja, Bangun, Maredan Bukit, Sakhuda Bayu, Penyabungan) and 2 of them are female worker.</p> <p>Based on document review to "Daftar Pekerja Timbang Deli Estate" period March 2019 shows no indication of discrimination in form of gender, race, religion, or tribe. Based on interview with worker (harvester, fertilizer applicator) and worker union, no discrimination practiced in company. Company employed worker with disability.</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>6.8.3 Records of evidence that equal opportunity and treatment for work shall be available. - Minor compliance -</p>	<p>Bukit Maradja Estate demonstrates equal treatment in term of PPE provision (rubber boot) and working tool (sickle knife) for 12 temporary worker (under Koperasi Jasa), latest handover dated 19 March 2019 – sampled worker: Mr.Ngatemin, Mrs. Rosdiana, Mr. Irwan. The temporary worker observed performed creeper weeding manual (21 March 2019).</p> <p>PT. Eastern Sumatra Indonesia made job vacancy for kindergarten teacher and office clerk for training center on 19 February 2019. The job vacancy leaflet made available to surrounding villages. After interview, one female teacher from Sakhuda Bayu village, accepted.</p> <p>Kerasaan Estate demonstrates equal treatment in term of PPE provision (rubber boot, hand glove) and working tool (hoe, sickle knife) for 128 temporary worker (under Koperasi Jasa), latest handover dated 19-24 September 2018 – sampled worker: Mr. Jodi Kiswanto, Mrs.Nuriati, Mr. Sutrisnik. The temporary worker observed performed manual circle weeding (22 March 2019). Confirmed with warehouse record: "Serahterima APD dan Alat Kerja" and Stock Issue Detail Kerasaan Estate No.1121600535 for issuance of 128 pairs of rubber boots.</p> <p>The company has procedure hiring workers, dated 25 April 2007, regulated that hiring and promotion of workers based on skill, work experiences, interview/evaluation, and medical check up. It is also stipulated in the PKB 2017 article III (Acceptance and Mutation Workers). The company is conducting evaluation of workers on annual basis. Based on document review upon worker appointment from PKWT to SKU (temporary into permanent worker), each appointment completed with "Labour Appraisal Form".</p>	<p>Comply</p>
<p>Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.</p>		
<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>PT. Eastern Sumatera 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. The policy stated company commitment to ensures a harmonious and productive work environment for its employees. This commitment recognized that the work place should be free of sexual harassment. Sexual harassment is an unwanted, unwelcome and offensive behavior and will not be tolerated under any circumstances.</p> <p>The policy is available in English and Bahasa Indonesia and has been communicated to all workers during morning musters and through notice boards. Sample taken on dissemination of the policy, e.g: In Bukit Maradja POM, communication of anti-sexual harassment and protection of reproductive right policy to its workers dated 23 January 2019. Communication to 24 workers comprise of operators from sterilizer station, kernel plant, pressing station, heavy machinery operators, engine room, etc.</p>	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Bukit Maradja Estate have communicated the anti-sexual harassment and protection of reproductive right policy to its workers: Dated 6 August 2018 for 42 workers comprise of Quran teacher, manuring manual, supervisor, harvester, pest and disease census. Dated 11 August 2018 for 30 temporary workers (Koperasi Jasa) in Division I, comprise of upkeep godown, gardener, loose fruit collector, creeper weeding.</p> <p>PT. Timbang Deli Indonesia has established Sexual Harassment Policy (TDI-QM/08) dated 1 September 2017 mentioned that PT Timbang Deli Indonesia is committed to ensuring a harmonious and productive work environment for its employees. This commitment recognized that the work place should be free of sexual harassment. Sexual harassment is an unwanted, unwelcome and offensive behavior and will not be tolerated under any circumstances. The policy written in English and Bahasa Indonesia therefore easy to understood by all employees.</p> <p>The policy has been disseminated to all oil pal plantation employees recently on 18 February 2019, attended by 49 employees, consist of Field Assistant, Supervisors, upkeep workers and harvesters. Attendance list was evident.</p> <p>PT. Timbang Deli Indonesia has formed Gender Committee Contact Group as institution to handle report regarding sexual harassment. Organization Structure of Gender Committee issued on 21 Janaury 2019. Gender Committee conducted regular meeting in monthly basis. Minutes of meeting are available. The last meeting conducted in 21 February 2019, summarized that there is no gender issue during January 2019 in all working unit.</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>PT. Eastern Sumatera Indonesia has a policy to protect reproductive rights, approved and signed by President Director on 1 March 2014. The policy stated commitment of protecting the reproductive rights of its employees, and to provide medical services associated with reproductive rights. The policy is available in English and Bahasa Indonesia and being communicated during morning musters and through notice boards.</p> <p>Sample taken on dissemination of the policy, e.g:</p> <p>a. Bukit Maradja Estate have communicated the anti-sexual harassment and protection of reproductive right policy to its workers: Dated 6 August 2018 for 42 workers comprise of Quran teacher, manuring manual, supervisor, harvester, pest and disease census. Dated 11 August 2018 for 30 temporary workers (Koperasi Jasa) in Division I, comprise of upkeep godown, gardener, loose fruit collector, creeper weeding.</p> <p>Based on interview with female worker and committee gender representative of Bukit Maradja POM, Bukit Maradja Estate and Kerasaan Estate, company has implemented the protection on reproductive right, for example: period leave, birth leave, medical check up for</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>female sprayer/manuring workers and strict policy against sexual harassment and violence to women.</p> <p>PT. Timbang Deli Indonesia has established Protection of Reproductive Right Policy (TDI-QM/09) dated 1 September 2017, mentioned that PT. Timbang Deli Indonesia is committed to protecting the reproductive rights of its employees, and to provide medical services associated with reproductive rights. The policy written in English and Bahasa Indonesia therefore easy to understood by all employees.</p> <p>The policy has been disseminated to all oil pal plantation employees recently on 18 February 2019, attended by 49 employees, consist of Field Assistant, Supervisors, upkeep workers and harvesters. Attendance list was evident.</p>	
<p>6.9.3</p> <p>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>PT. Eastern Sumatera 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>Kerajaan Estate, communication of Whistle Blowing Policy to worker dated 20 February 2019 to 2 harvest mandores, 2 clerks, 31 harvesters, 17 fertilizer applicators, 1 manual fertilizer mandor, 1 spreader fertilizer mandor, 3 spreader operators, 2 pest and disease officer, 5 trunk injection operator, 1 gardener from Division II.</p> <p>Based on interview with female workers in Bukit Maradja POM, Bukit Maradja and Kerajaan 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 Bukit Maradja POM, Bukit Maradja and Kerajaan Estate.</p> <p>In Timbang Deli Estate, the Sexual Harassment Policy (TDI-QM/08) dated 1 September 2017 point 3 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. Based on minutes of meeting from Gender Committee meeting: there is no form of sexual harassment occurred in Timbang Deli Estate.</p>	<p>Comply</p>
<p>Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>		
<p>6.10.1</p>	<p>Current and past prices paid for</p>	<p>Bukit Maradja POM did not received FFB from smallholder</p>
		<p>Not applicable</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	and/or third party outgrowers. 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 -	Not applicable N/A
6.10.3	<p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -</p> <p>There is no contract related in supply FFB and FFB transport. Other type of contract seen:</p> <ul style="list-style-type: none"> - Surat Perjanjian Kerja (contract agreement) no.03/TDE/KM/V/2018 related Land Clearing for Replanting dated 7 May 2018; detail of work contains: Uproating, dispose roat, stacking, ripper 4rd, plough 2rd, harrowing 3rd, making main drain 2 m X 1 m X 1 m, making collection drain 1 m X 1 m X 0.75 m, upkeep main drain, upkeep main road, upkeep collection road, making collection road; location in Block P18A03, P18B03, P18H01, P18H02, P18G01 and P18 H04. - Surat Perjanjian Kerja No.04/III/TDE/DIV OP/2019 between Robinson Sitepu, Field Assisstant Oil Palm Division as first party and Koperasi Jasa Timbang Deli second party, regarding agreement of field work at Division I for March 2019, such as: circle spraying, pest and disease census, black bunch count. <p>Others contract between company and third parties is available and signed by both parties, based on document review and interview with contractors confirmed that they understand term and condition of contracts.</p> <p>Based on interviews with PHL labor and Cooperative Management Services stated that they understood the content of the letter of agreement has been signed Working as a reference work as outlined in the "Perjanjian Kerja No.01/KI/KJI/ I/2018" dated 4 January 2018 between PT. Kerasaan Indonesia and Koperasi Jasa Karyawan Kerasaan, for work of upkeep. The agreement is valid for one year since it was signed, has been set BPJS employment and Health (Kopkar), minimum wage, the use of PPE and the prohibition of workers under the age of 18 years.</p> <p>Based on interviews with temporary worker and Cooperative Management Services stated that they understood the content of the letter of agreement has been signed Working as a reference work as outlined in the Employment Agreement between PT. Timbang Deli Indonesia and Koperasi Jasa Karyawan Timbang Deli, for work of upkeep. The agreement is valid for one year since it was signed, has been set BPJS employment and Health (Kopkar), minimum wage, the use of PPE and the prohibition of workers under the age of 18 years.</p> <p>PT. Eastern Sumatra Indonesia made work agreement</p>	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>with contractor for replanting: "Surat Perjanjian Kerja No.03/GMO-BME/AS/X/2018 antara PT. Eastern Sumatra Indonesia dengan PT. Aneka Sumatrindo tentang Replanting", dated 15 October 2018. Work agreement covers obligation of both parties, governing policies in PT. Eastern (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.</p> <p>Purchase to local contractor in Pematang Asilom village, dated 19 November 2018 for purchase of brick stone and cement; and shower head.</p> <p>Purchase to local contractor, UD Sumber Teknik based on contract "Surat Perintah Kerja No.01/Add/GMO-BME/ST/III/2018 dated 27 March 2018 worth IDR526million – related to company's providing assistance for construction of "bronjong" in Nagori Pematang Asilom village.</p>	
<p>6.10.4 Agreed payments shall be made in a timely manner. - Minor compliance -</p>	<p>Evidence of payment is reviewed and it was seen paid timely mannere, e.g.:</p> <ul style="list-style-type: none"> - Transfer information from PT Timbang Deli Indonesia, account no. 1050092005804 to CV Karya Mandiri, account no. 0420474733, dated 15 February 2019 for Land Clearing work; remark: 02KMTDEI2019; amount IDR 915,964,524.00. - Summary of Cash Requisition for the month of March 2019 for payment to UD Andini as rice supplier; amount IDR 78,036,600.00. - Summary of Cash Requisition for the month of March 2019 for payment to CV Sekawan Sukses as contractor of security wall infrastructure; amount IDR 26,250,000.00. <p>PT. Eastern Sumatra Indonesia made scheduled payment for replanting contractor based on work progress. Record sighted: Invoice PT. Aneka Sumatrindo No.2018-BME-2612 dated 26 December 2018 based on SPK No.03/GMO-BME/AS/X/2018.</p> <p>"Kwitansi PT. Aneka Sumatrindo atas selesai 100% pekerjaan replanting 2019 sesuai SPK No.03/GMO-BME/AS/X/2018" – payment made 13 February 2019.</p> <p>Based on interviews with cooperative management and non-permanent employees stated that PT. Timbang Deli Indonesia, PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia has made payments according to the agreements work in the Letter of Employment Agreement.</p>	<p>Comply</p>
<p>Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.</p>		
<p>6.11.1 Records of contributions to local development based on the results</p>	<p>Bukit Maradja Estate dan Kerasaan Estate, in year 2018 and 2019 have prepared 9 program of Community</p>	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
<p>of consultation with local communities shall be available. - Minor compliance -</p>	<p>Development, e.g: education, infrastructure, agriculture, entrepreneurship, sports, arts, religious and social economics program. Record of realization the program of CSR documented, e.g.:</p> <ul style="list-style-type: none"> a. Assisstance in helping Nagori Marihat Bukit for ID card database collection in February 2018. b. Provision of heavy machinery for road maintenance in Nagori Sakhuda Bayu village February 2018. c. Construction of "bronjong" in Nagori Pematang Asilom, dated April 2018, the construction valued IDR 526million. d. Donation of carpet for "Masjid Annur" May 2018. e. Provision of cement and sand for repair and maintenance of church "Gereja Katolik Parsoksi St. Petrus & Paulus Batu 5" on June 2018. f. Provision of heavy machinery for road maintenance in Nagori Marihat Bukit village, September 2018; g. Provision of cement and brick stone to help local community whose house broken in Nagori Pematang Asilom, December 2018. h. Provision of construction material for repair of village's office in Nagori Pematang Sakhuda. The report available under "Laporan Community Development Program dated 6 December 2018, indicating cement, timber, brick stone, timber, nails. <p>The company have implemented IDR.556million from budget CSR 2018 of IDR.54million. Company budgeted IDR.61 million for 2019.</p> <p>Based on result of public consultation with local community stated that PT. Kerasaan Indonesia and PT. Eastern Sumatra Indonesia have been developing the economy of local community especially the local population's manpower absorption.</p> <p>Based on result of public consultation with local community stated that PT. Kerasaan Indonesia and PT. Eastern Sumatra Indonesia have been developing the economy of local community especially the local population's manpower absorption.</p> <p>Timbang Deli Estate, in 2018 has prepared 8 program of Communy Development, e.g: education, health, infrastructure, agriculture, micro entrepreneurship, sports, regilious and social economics. Record of realization the program of CSR documented either by the Company, e.g:</p> <ul style="list-style-type: none"> a. Provision of 80 pieces of tin roof to District office of Galang on 24 August 2018, based on handover letter no.16/TDE/VIII/2018. b. Provision of 20 sacks of cement to Al Amin Mosque of Dusun IV & V Jaharun A on 18 May 2018, based on circular No.30/CIR-ESD/IV/10. c. Provision of 50 pieces of plastic chairs to Koramil 18 Galang on 29 August 2018. 	
<p>6.11.2 Where there are scheme smallholders, there shall be evidence that efforts and/or</p>	<p>PT. Eastern Sumatra Indonesia, PT. Kerasaan Indonesia and PT. Timbang Deli Indonesia were not obliged to develop smallholder scheme – as per regulation. The development of PT. Eastern Sumatra Indonesia, PT.</p>	<p>Not applicable N/A</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
resources have been allocated to improve scheme smallholder productivity. - Minor compliance -	Kerasaan Indonesia and PT. Timbang Deli Indonesia does not involved smallhodler development. Not applicable.	
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 - PT. Kerasaan Indonesia, PT. Eastern Sumatra Indoneisa and PT. Timbang Deli Indonesia have demonstrated a policy to respect human rights under "Company Policy of Human Right", signed by President Director on 1 March 2014, that stated: a. company recognises that Human Right are universal and apply to all without any form of distinction. b. company supports the implementation of International Bill of Human Right, and of the ILO Declaration on Fundamental Principles and Rights at Work, as they are transcribed into the law and regulation of Republik of Indonesia. c. Charges of violation of Human Rights, where Substantiated, will result in Indiciplinary action up to and including dismissal, and may also lead to legal action. Dissemination in Timbang Deli Estate on 18 February 2019, attended by 49 employees, consist of Field Assisstant, Supervisors, upkeep workers and harvesters.	Comply
6.12.2	It shall be demonstrated that no contract substitution has occurred. - Minor compliance - In Bukit Maradja Estate, company entrust the management of temporary worker through cooperative "Koperasi Jasa PT. Eastern Sumatra Indonesia". Cooperative have working agreement with individual worker. Sample: "Kesepakatan Kerja Ketua Koperasi Jasa PT. Eastern Sumatra Indonesia dengan Pekerja Harian Lepas No.105/KJ/02/2019" signed by cooperative leader and Mr. Saut Pasaribu on 1 February 2019. "Kesepakatan Kerja Ketua Koperasi Jasa PT. Eastern Sumatra Indonesia dengan Pekerja Harian Lepas No.160/KJ/02/2019" signed by cooperative leader and Mrs. Rosdiana on 1 February 2019. "Kesepakatan Kerja Ketua Koperasi Jasa PT. Eastern Sumatra Indonesia dengan Pekerja Harian Lepas No.179/KJ/02/2019" signed by cooperative leader and Mr. Ngatemin on 1 February 2019. "Kesepakatan Kerja Ketua Koperasi Jasa PT. Eastern Sumatra Indonesia dengan Pekerja Harian Lepas No.188/KJ/02/2019" signed by cooperative leader and Mr. Irfan on 1 February 2019. The work agreement stipulated type of industrial relation, type of work, salary, religious benefit, contract timeline, regulation. Management of temporary worker through cooperative "Koperasi Konsumen Kerasaan". Cooperative have working agreement with individual worker. Sample: "Kesepakatan Kerja Ketua Koperasi Konsumen PT. Kerasaan Indonesia dengan Pekerja Harian Lepas No.02/KJ/02/2019" signed by cooperative leader and	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>Mrs. Nurmiati on 1 February – 30 April 2019. “Kesepakatan Kerja Ketua Koperasi Konsumen PT. Kerasaan Indonesia dengan Pekerja Harian Lepas No.02/KJ/02/2019” signed by cooperative leader and Mr. Ramadani on 1 February – 30 April 2019. “Kesepakatan Kerja Ketua Koperasi Konsumen PT. Kerasaan Indonesia dengan Pekerja Harian Lepas No.02/KJ/02/2019” signed by cooperative leader and Mrs. Sutrisnik on 1 February – 30 April 2019. The work agreement stipulated type of industrial relation, type of work, provision of working tools and PPE, salary, religious benefit, contract timeline, regulation.</p> <p>Based on stakeholder consultation with manpower office, in Simalungun Regency and in Deli Serdang Regency, company does not conduct any contract substitution. From worker interview and consultation with worker union, confirmed that no contract substitution was occurred.</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: Sutrisnik; Work: Loose Fruit collector; Rate: IDR.260/kg loose fruit; Absence record: 14 mandays; Total loose fruit collected: 5,615 kg; Total salary IDR.1,459,900; Slip Gaji Mrs.Sutrisnik, IDR.1,459,900 – period October 2018. 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>In PT. Timbang Deli Indonesia, job contracting by the Koperasi Jasa Karyawan has been reported to Manpower Agency of Deli Serdang Regency based on letter No. 39/TDE/III/2019 dated 20 March 2019.</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>PT. Eastern Sumatra Indonesia – Bukit Maradja POM have demonstrated policy to respect human rights under “Company Policy of Human Right”, signed by President Director on 1 March 2014, stated that the company:</p> <ol style="list-style-type: none"> Recognises that Human Right are universal and apply to all without any form of distinction. Supports the implementation of International Bill of Human Right, and of the ILO Declaration on Fundamental Principles and Rights at Work, as they are transcribed into the law and regulation of Republik of Indonesia. Charges of violation of Human Rights, where Substantiated, will result in Indiciplinary action up to 	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>and including dismissal, and may also lead to legal action.</p> <p>Bukit Maradja Estate have communicated the policy on respecting human right to its workers: dated 21 August 2018 for 48 workers in Division I, comprise of harvesters, supervisors, gardener, water supply operator, upkeep worker. Dated 6 August 2018 for 17 workers in Division III, comprise of kindergarten teacher, harvesters, loose fruit collector, supervisors, gardener, sprayers, pest and disease, upkeep worker. Dated 15 August 2018 for 53 contract worker (Koperasi Jasa) comprise of circle weeding Mucuna, compost applicator and FFB helper. In Kerasaan Estate, communication the policy on respecting human right to its workers dated 19 February 2018. Communication to Division II worker, 29 harvesters, 2 harvest mandores, 2 harvest clerks, 2 pest and disease, 2 manuring manual.</p> <p>Based on interview with workers of Bukit Maradja POM, Bukit Maradja Estate and Kerasaan Estate, it was noted that the workers understood the policy to respect human right.</p> <p>PT. Timbang Deli Indonesia has established Company Policy of Human Rights (TDI-QM/11) dated 1 September 2017 mentioned that:</p> <ol style="list-style-type: none"> PT. Timbang Deli Indonesia recognizes that human rights are universal and apply to all, without any form of distinction. PT. Timbang Deli Indonesia supports the implementation of the International Bill of Human Rights, and of the ILO Declaration on Fundamental Principles and Rights at Work, as they are transcribed into the laws and regulation of Republic Indonesia. Charges of violation of Human Rights, where substantiated, will result in disciplinary action up to and including dismissal, and may also lead to legal action. <p>The policy has been disseminated to all oil pal plantation employees recently on 18 February 2019, attended by 49 employees, consist of Field Assisitant, Supervisors, upkeep workers and harvesters. Attendance list was evident.</p>	

Principle 7: Responsible development of new plantings

Background:
 Bukit Maradja POM have Timbang Deli Estate, a seed production facility under PT. Timbang Deli Indonesia, as one of the supply base. PT. Timbang Deli Indonesia is subsidiary of SIPEF Group, planting rubber commodity. Lately, management decided to develop oil palm seed production facility and research center onsite. Therefore, converting the rubber plantation into oil palm plantation.
 Prior to conversion of rubber plantation to oil palm plantation in 2015, PT. Timbang Deli Indonesia have complied to requirements for RSPO New Planting Procedure: Company prepared HCV assessment, SIA assessment, LUC assessment for scope of 206.07 Ha – out of total 972.19 Ha (under HGU); with planting plan between year 2015 – 2020.
 Based on document review, legality review, field visit, and interview with stakeholder, known:
 - The allocated new planting area of PT. Timbang Deli Indonesia have been managed as rubber plantation since Dutch colonial era, 1911. In 1929, the area of PT. Timbang Deli (at the time area 1,104 Ha) was managed by "Perkebunan Bandar

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance	
<p>Pinang Group” and changed into PT. Timbang Deli in 1968 with commodity rubber and cocoa;</p> <ul style="list-style-type: none"> - The allocated new planting area have been owned by PT. Timbang Deli Indonesia, and no expansion; - From HCV Assessment Report, known that no primary forest in area PT. Timbang Deli Indonesia. The HCV in PT. Timbang Deli Indonesia was 6.20 Ha. <p>The environmental and social impact have been identified. Management have prepared management and monitoring plan. NPP PT. Timbang Deli Indonesia have been uploaded into RSPO website for 30-days public notification since 18 December 2014. The NPP public notification have been passed without comment and/or complaints. PT. Timbang Deli Indonesia have obtained confirmation form RSPO secretariat in 25 January 2015.</p> <p>Based on management decision, PT. Timbang Deli Indonesia planned for conversion of the whole concession 972.19 Ha. PT. Timbang Deli Indonesia have reported the RSPO NPP referring to the latest RSPO NPP 2015 standard. Based on RSPO NPP 2015, PT. Timbang Deli Indonesia have converted commodity from rubber to oil palm – therefore shall report the activity to RSPO as new planting.</p> <p>Based on document review, legality review, field visit, and interview with stakeholder, known:</p> <ul style="list-style-type: none"> - The allocated new planting area of PT. Timbang Deli Indonesia have been managed as rubber plantation since Dutch colonial era, 1911. In 1929, the area of PT. Timbang Deli (at the time area 1,104 Ha) was managed by “Perkebunan Bandar Pinang Group” and changed into PT. Timbang Deli in 1968 with commodity rubber and cocoa. As at HCV assessment reporting, the rubber plantation was 588.66 Ha. - The allocated new planting have been owned by PT. Timbang Deli Indonesia, and no new expansion; - From HCV assessment report, known that no known that no primary forest in area PT. Timbang Deli Indonesia. The HCV in PT. Timbang Deli Indonesia was 11.955 Ha. <p>The environmental and social impact have been identified. Management have prepared management and monitoring plan. NPP PT. Timbang Deli Indonesia have been uploaded into RSPO website for 30-days public notification since 12 February 2018. The NPP public notification have been passed without comment and/or complaints. PT. Timbang Deli Indonesia have obtained confirmation form RSPO secretariat in 13 March 2018.</p>	<p>Pinang Group” and changed into PT. Timbang Deli in 1968 with commodity rubber and cocoa;</p> <ul style="list-style-type: none"> - The allocated new planting area have been owned by PT. Timbang Deli Indonesia, and no expansion; - From HCV Assessment Report, known that no primary forest in area PT. Timbang Deli Indonesia. The HCV in PT. Timbang Deli Indonesia was 6.20 Ha. <p>The environmental and social impact have been identified. Management have prepared management and monitoring plan. NPP PT. Timbang Deli Indonesia have been uploaded into RSPO website for 30-days public notification since 18 December 2014. The NPP public notification have been passed without comment and/or complaints. PT. Timbang Deli Indonesia have obtained confirmation form RSPO secretariat in 25 January 2015.</p> <p>Based on management decision, PT. Timbang Deli Indonesia planned for conversion of the whole concession 972.19 Ha. PT. Timbang Deli Indonesia have reported the RSPO NPP referring to the latest RSPO NPP 2015 standard. Based on RSPO NPP 2015, PT. Timbang Deli Indonesia have converted commodity from rubber to oil palm – therefore shall report the activity to RSPO as new planting.</p> <p>Based on document review, legality review, field visit, and interview with stakeholder, known:</p> <ul style="list-style-type: none"> - The allocated new planting area of PT. Timbang Deli Indonesia have been managed as rubber plantation since Dutch colonial era, 1911. In 1929, the area of PT. Timbang Deli (at the time area 1,104 Ha) was managed by “Perkebunan Bandar Pinang Group” and changed into PT. Timbang Deli in 1968 with commodity rubber and cocoa. As at HCV assessment reporting, the rubber plantation was 588.66 Ha. - The allocated new planting have been owned by PT. Timbang Deli Indonesia, and no new expansion; - From HCV assessment report, known that no known that no primary forest in area PT. Timbang Deli Indonesia. The HCV in PT. Timbang Deli Indonesia was 11.955 Ha. <p>The environmental and social impact have been identified. Management have prepared management and monitoring plan. NPP PT. Timbang Deli Indonesia have been uploaded into RSPO website for 30-days public notification since 12 February 2018. The NPP public notification have been passed without comment and/or complaints. PT. Timbang Deli Indonesia have obtained confirmation form RSPO secretariat in 13 March 2018.</p>	<p>Compliance</p>	
<p>Criterion 7.1:</p>			
<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.</p> <ul style="list-style-type: none"> - Major compliance - 	<p>Timbang Deli Estate has shown the document an environmental impact assessment, consist of:</p> <ul style="list-style-type: none"> - “Dokumen Panyajian Evaluasi Lingkungan (PEL) Perkebunan Kelapa Sawit, Karet dan Kakao serta Pabrik Pengolahannya kebun Bandar Pinang Group Kabupaten Deli Serdang – nomor persetujuan RC.220/472/B/III/93”, dated 17 March 1994 - Environment management and monitoring plan “Rencana Kelola Lingkungan (RKL) dan Rencana Pemantauan Lingkungan (RPL) Perkebunan Kelapa Sawit, Karet dan Kakao serta Pabrik Pengolahannya, Kebun Bandar Pinang Group Kabupaten Deli Serdang – nomor persetujuan: RC.220/939/B/V/1994” dated 28 May 1994. - “Surat Keputusan Badan Pengendalian Dampak Lingkungan Daerah Lubuk Pakam nomor 0101/BPDL/DS/2006 tentang Persetujuan Dokumen UKL/UPL”, dated 6 January 2006. - “Surat Keputusan Badan Pengendalian Dampak Lingkungan Daerah Lubuk Pakam nomor 0580/BPDL/DS/2009 tentang Persetujuan REVISI Dokumen UKL/UPL”, dated 18 May 2009. - “Dokumen Upaya Pengelolaan Lingkungan Hidup (UKL) dan Upaya Pemantauan Lingkungan Hidup (UPL) Pusat Penelitian Kelapa Sawit dan Karet di Desa Timbang Deli Kecamatan Galang Kabuaoten Deli Serdang” was approved by “Badan Pengendalian 	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Dampak Lingkungan Daerah Lubuk Pakam” as in “Surat Rekomendasi Atas Perubahan UKL-UPL No.APDL.P/325/VII/2014”, dated 6 August 2014. The scope of 972.19Ha.</p> <p>All environmental impact assessments have been carried when and where appropriate. Records of all impact assessments carried out are readily available.</p> <p>PT. Timbang Deli Indonesia have conducted two series of social impact assessment.</p> <p>In 2014, PT. Timbang Deli Indonesia in cooperation with “Fakultas Kehutanan Institut Pertanian Bogor” have prepared “Dokumen Laporan Social Impact Assessment (SIA)”. The assessment team comprise of: Handian Purwawangsa, S.Hut, M.Si (Team Leader; Social and cultural expert); Udi Kusnidar, S.Hut (Social-economic-cultural expert); Ir. Heri Wiyono (Social and cultural expert).</p> <p>The result: PT. Timbang Deli Indonesia is administratively located in the District of Deli Serdang, Sub-District of Galang. The villages located around the licenced area are Timbang Deli, Keramat Gajah dan Jaharun A. All villages are reasonably distant from the district capital which was 4 km from Timbang Deli village, 7 km for Kramat Gajah village and only 1 km for Jaharun A village.</p> <p>From in-depth interviews and discussions, generally response from community for PT. Timbang Deli Indonesia is good, especially PT. Timbang Deli Indonesia already been there for quite a long time and most of villagers is employee or ever been employed or has relatives working at PT. Timbang Deli Indonesia or used to work at PT. Timbang Deli Indonesia. Community do not reject the existence of company in the area.</p> <p>Some social issues related with management PT. Timbang Deli Indonesia are latex and enplumps theft, fires in the dry season, cattle grazing, limited land use for villagers, potential flooding from government’s land that beside (outside) PT. Timbang Deli Indonesia which planted/used by villagers.</p> <p>The local communities expect some positive outcomes from the development of oil palm in PT. Timbang Deli Indonesia. Increase of employment opportunities, grazing for their cattles, participation in social villages activities, and fire woods. Besides that, with the development of PT. Timbang Deli Indonesia, villagers could have new opportunities to make their own business as employees of PT. Timbang Deli Indonesia need goods and services that the villagers can supply. From the interviews with community, it is gathered that PT. Timbang Deli Indonesia give almost no negative impact. One thing the villagers concern is the lack of land for farming. But there recognise that PT. Timbang Deli Indonesia is legally established and has been there for a long time, even before the establishment of some villages.</p> <p>In 2017, PT. Timbang Deli Indonesia in cooperation with</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>"Koompasia Enviro Institut" carried out social impact assessment as reported in" Laporan Analisa Dampak Sosial PT. Timbang Deli Indonesia tahun 2017". The assessment team comprise of: Henry Marpaung (Team Leader; Social-cultural expert; ALS licensed assessor Provisional ALS160007HM); Harry Kurniawan, (Team member; GIS and landscape); Ridho Anggara (Team member, GIS assisstant).</p> <p>PT. Timbang Deli Indonesia have implementing alternative approach in order to mitigate social impact from conversion of rubber to oil palm – onto workforce from the surrounding village. The rubber tapper are being transferred into oil palm worker, with adjusted increment in their benefit. PT. Timbang Deli Indonesia issued "Memorandum PT. Timbang Deli Indonesia No.62/TDE/X/2018" dated 31 October 2018 for mutation of 9 rubber tapper into oil palm upkeep worker. "Memorandum PT. Timbang Deli Indonesia No.65/TDE-VBS/VII/2018" dated 24 July 2018 related to "Premi Pemanen Sawit" – benefit for oil palm harvester, with additional IDR. 25,000 per mandays. Oil palm mandores trained the newly transferred rubber tapper for oil palm upkeep, and continues to become oil palm harvester. The current activities covers pruning, sanitation and harvesting.</p>	
<p>7.1.2 Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts. - Minor compliance -</p>	<p>The company has prepared report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester). The social management plan consist of:</p> <ul style="list-style-type: none"> - Regular monitoring and evaluating the company boundaries. - Nurture communication and network with stakeholders through regular meeting with "perangkat desa", "tokoh Masyarakat Desa", "Tokoh Adat". - Empowerment of community's economy inline with potency and cooperation with competent parties. - Empowerment of local husbandry through devempoment of farmer surrounding company. - Prevent land and forest fire through participative engagement. - Planned drainage monitoring and maintenance. <p>Report of environmental management and monitoring performance "Laporan RKL-RPL semester II tahun 2018":</p> <ul style="list-style-type: none"> - Received by DLH Kabupaten Deli Serdang No 0086, dated 15 January 2019. - Sent to DLH Sumatera Utara by Kantor Pos No Barcode 16555003385, dated 19 January 2019. <p>Evidence of laporan RKL-RPL Semester II tahun 2018</p> <ul style="list-style-type: none"> - Received by DLH Kabupaten Simalungun dated 23 February 2019, was received by Nurmala T - Received by DLH Provinsi Sumatera Utara dated 23 February 2019 via BahJambi Regustered 25021918, dated 23th February 2019. 	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	– Tanda Terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL), ID TTE: 1552406396-3493, dated 12 March 2019.	
7.1.3 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 -	The company were not obliged to develop smallholder scheme – as per regulation. The development of PT. Timbang Deli Indonesia does not involved smallhodler development. Not applicable.	Not Applicable N/A
Criterion 7.2: 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.		
7.2.1 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 -	Soil map for Timbang Deli Estate is available under “Soil Profile”, scale 1:28,000, indicating soil type: Typic Endoaquepts, Typic KandiudalFs and Typic Kandiudults; soil series: Keladang Series (KLD) and Sorek Series (SRK). Data Sources: Field Survey of PT Timbang Deli, Aerial Photograph (Feb 2017), soil report by JH Agriculture (2014). Coordinate system: North UTM 47, datum: WGS 1984, grid system: Geographic Lat/Long, map date: 27 July 2017. Based on soil map under “Soil Profile”, scale 1:28,000 most area of Timbang Deli Estate is sandy clay. Recommendation from the soil survey is planting <i>Mucuna bracteata</i> leguminous cover to conserve soil moisture.	Comply
7.2.2 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 -	Map of Slope Classe Timbang Deli Estate is available in scale 1:28,000, indicating the topography in Timbang Deli Estate is 0-2° (low laying and raised flat) and 2-6 (raised flat to undulating). There is no area with slope above certain limit.	Comply
Criterion 7.3: New plantings since November 2005 have not replaced primary forest or any area required to maintain or 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 –	PT. Timbang Deli Indonesia have conducted HCV assessment in cooperation with “Fakultas Kehutanan Institut Pertanian Bogor” in 2014. The assessment team comprise of: Dr. Ir Nyoto Santoso, MS (Team Leader, wildlife expert; RSPO approved HCV Assessor), Eko Adhiyanto, S.Hut, (vegetation expert; RSPO approved HCV Assessor), Handian Purwawangsa, S.Hut, M.Si, (social aspect expert; RSPO approved HCV Assessor), Udi Kusnidar, S.Hut, (social expert; RSPO approved HCV Assessor), Ir. Heri Wiyono, (social expert), Irham Fauzi, S.Hut, (GIS expert). The HCV assessment refers to “Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by “Konsorsium Revisi HCV Toolkit Indonesia”, July 2008. The field exercise for primary data collection dated 7 - 11 March 2014. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 11 March	Comply

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>2014 – whereby attended by 19 individuals and representatives of stakeholders such as “Badan Pertanahan Kabupaten Deli Serdang” and “Badan Lingkungan Hidup Kabupaten Deli Serdang”. As part of reporting process, the assessment have been peer-reviewed by Dr. Rahmad Hermawan in May 2014.</p> <p>One of the results of the 2014 HCV assessment is the area is not a primary forest. Most of the area surrounding the license area is covered by rubber and oil palm owned by villagers and others plantation companies. HCV identification showed that HCV 1 is covers 1.52 Ha or 0.16% of the area, and HCV 4 is found on 3.79 Ha or 0.39% of the area, HCV 6 is found 0.89 Ha or 0.09% of the area. Total HCV area indentified in PT. Timbang Deli Indonesia was 6.20 Ha or 0.64% of the total permanent land use title.</p> <p>Related to presence of forest area, based on review upon relevant documents and record, known that:</p> <ul style="list-style-type: none"> - Based on overlay against “Peta Lampiran SK Menteri Kehutanan No.579/Menhut-II/2014” dated 24 June 2014 – all HGU of PT. Timbang Deli Indonesia has function as “Areal Penggunaan Lain/APL” – area for other purpose/non-forest area. - Based on “Keputusan Menteri Kehutanan No.SK. 3706/MenhutVII/IPSDH/2014 tentang Penetapan Peta Indikatif Penundaan Pemberian Izin Baru Pemanfaatan Hutan, Penggunaan Kawasan Hutan dan Perubahan Peruntukan Kawasan Hutan dan Areal Penggunaan Lain (Revisi VI)” dated 13 May 2014 – shows the whole concession falls was not under “Kawasan Penundaan Pemberian Izin Baru” – not forest area/peat area. <p>For the purpose of new planting - a plan to develop oil palm plantation, conversion from rubber plantation; PT. Timbang Deli Indonesia conducted another round of HCV assessment in cooperation with “Koompasia Enviro Institute” in 2017. The assessment team comprise of: Henry Marpaung (Team Leader; Social-cultural expert; ALS licensed assessor Provisional ALS160007HM); Wibowo A. Djatmiko (Team member; Ecology/biodiversity); Riswan, (Team member; Environmental Service expert); Harry Kurniawan, (Team member; GIS and landscape); Ridho Anggara (Team member, GIS assisstant).</p> <p>The HCV assessment refers to “Panduan Identiikasi Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by “Konsorsium Revisi HCV Toolkit Indonesia”, July 2008 – and “Common Guidance for the Identification of HCV”, 2013.</p> <p>The field exercise for primary data collection dated 6-8 September 2017. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 8 September 2017 – whereby attended by 20 individuals and representatives of stakeholders. As part of reporting process, the assessment have been peer-reviewed by Dr.</p>	

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Kunkun J. Gurmaya in 20 October 2017 as reported in "Peer Review Report Penilaian HCV di Kebun PT. Timbang Deli Indonesia, Kabupaten Deli Serdang, Provinsi Sumatera Utara".</p> <p>From the 2017 HCV assessment found the area is not a primary forest. Most of the area surrounding the license area is covered by rubber and oil palm owned by villagers and others plantation companies. HCV identification showed that HCV 1 is covers 1.972 Ha, HCV 4 is found on 11.083 Ha; HCV 6 is found 0.872 Ha. Total HCV area indentified in PT. Timbang Deli Indonesia was 11.955 Ha or 1,23% of the total permanent land use title (972,19 Ha). In addition, as per high carbon stock assessment, there was an additional 2.82 Ha from riparian zone and lowland area to be set aside as HCV (part of it; 1.57 Ha was overlapping with HCV4). The total HCV area was 13.53 Ha.</p>	
<p>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 –</p>	<p>PT. Timbang Deli Indonesia have conducted HCV assessment in cooperation with "Fakultas Kehutanan Institut Pertanian Bogor" in 2014. The assessment team comprise of: Dr. Ir Nyoto Santoso, MS (Team Leader, wildlife expert; RSPO approved HCV Assessor), Eko Adhiyanto, S.Hut, (vegetation expert; RSPO approved HCV Assessor), Handian Purwawangsa, S.Hut, M.Si, (social aspect expert; RSPO approved HCV Assessor), Udi Kusnidar, S.Hut, (social expert; RSPO approved HCV Assessor), Ir. Heri Wiyono, (social expert), Irham Fauzi, S.Hut, (GIS expert).</p> <p>The HCV assessment refers to "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008. The field exercise for primary data collection dated 7 - 11 March 2014. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 11 March 2014 – whereby attended by 19 individuals and representatives of stakeholders such as "Badan Pertanahan Kabupaten Deli Serdang" and "Badan Lingkungan Hidup Kabupaten Deli Serdang". As part of reporting process, the assessment have been peer-reviewed by Dr. Rahmad Hermawan in May 2014.</p> <p>Based on the HCV identification and analysis, no indication/presence of primary forest or peat soil in the scope area. The majority of HGU PT. Timband Deli Indonesia was rubber plantation, while the rest consist of infrastructure such as road, worker housing, offices, laboratory and <i>arboretum</i>.</p> <p>Based on the HCV assessment report, it was known that some flora and fauna identified in the concession area. Flora: found 170 types of flora from 63 families, consist of:</p> <ul style="list-style-type: none"> - <i>Pteridophyta</i>: found 10 families with 12 spesies. No protected species; No species under category of CR, EN, VU based on IUCN Redlist. - <i>Spermatophyta</i>: <ul style="list-style-type: none"> - <i>Gymnospermae</i>: found 2 families with 2 spesies and no protected species as in "Peraturan 	<p>Comply</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Pemerintah No.7 tahun 1999"; and 1 species under category VU under IUCN Redlist which was Pine (<i>Pinus merkusii</i>).</p> <ul style="list-style-type: none"> - <i>Angiospermae</i>: <ul style="list-style-type: none"> - <i>Monocotyledonae</i>: found 17 families with 53 spesies where no protected species noted, as listed under "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist. - <i>Dicotyledonae</i>: found 34 families with 103 spesies where no protected species noted, as listed under "Peraturan Pemerintah No.7 tahun 1999"; found 1 species under VU category which was "Mahoni" (<i>Swietenia macrophylla</i>). <p>Fauna: found 50 species from 34 families, consist of:</p> <ul style="list-style-type: none"> - <i>Mammals</i>: found 2 species under 2 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist. - <i>Aves</i>: found 41 species of birds from 26 families whereby 6 species protected under "Peraturan Pemerintah No.7 tahun 1999" (<i>Elanus caeruleus</i>, <i>Haliastur indus</i>, <i>Halcyon chloris</i>, <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Necatirina malacensis</i>). No species under category of CR, EN, VU based on IUCN Redlist. - <i>Reptilia</i> and <i>Amphibia</i>: found 4 species under 4 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist. <p>For the purpose of new planting - a plan to develop oil palm plantation, conversion from rubber plantation; PT. Timbang Deli Indonesia conducted HCV assessment in cooperation with "Koompasia Enviro Institute" in 2017. The assessment team comprise of: Henry Marpaung (Team Leader; Social-cultural expert; ALS licensed assessor Provisional ALS160007HM); Wibowo A. Djatmiko (Team member; Ecology/biodiversity); Riswan, (Team member; Environmental Service expert); Harry Kurniawan, (Team member; GIS and landscape); Ridho Anggara (Team member, GIS assisstant).</p> <p>The HCV assessment refers to "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008 – and "Common Guidance for the Identification of HCV", 2013.</p> <p>The field exercise for primary data collection dated 6-8 September 2017. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 8 September 2017 – whereby attended by 20 individuals and representatives of stakeholders. As part of reporting process, the assessment have been peer-reviewed by Dr. Kunkun J. Gurmaya in 20 October 2017 as reported in "Peer Review Report Penilaian HCV di Kebun PT. Timbang Deli Indonesia, Kabupaten Deli Serdang,</p>	

Criterion / Indicator	Assessment Findings	Compliance
	Provinsi Sumatera Utara". From the 2017 HCV assessment found the area is not a primary forest. Most of the area surrounding the license area is covered by rubber and oil palm owned by villagers and others plantation companies. HCV identification showed that HCV 1 is covers 1.972 Ha, HCV 4 is found on 11.083 Ha; HCV 6 is found 0.872 Ha. Total HCV area indentified in PT. Timbang Deli Indonesia was 11.955 Ha or 1,23% of the total permanent land use title (972,19 Ha). In addition, as per high carbon stock assessment, there was an additional 2.82 Ha from riparian zone and lowland area to be set aside as HCV (part of it; 1.57 Ha was overlapping with HCV4). The total HCV area was 13.53 Ha.	
7.3.3 Records of land preparation and clearing dates shall be available. - Minor compliance –	The activity falls under criteria for new planting in PT. Timbang Deli Indonesia was the conversion from rubber to oil palm plantation. Record of land preparation for Timbang Deli Estate are available: <ul style="list-style-type: none"> - Work agreement between company and the replanting contractor "Surat Perjanjian Kerja No.03/TDE/KM/V/2018 antara PT. Timbang Deli Indonesia dan CV Karya Mandiri tentang Land Clearing" dated 7 May 2018". The work instruction covers: uprooting; stump eradication out of plantation area; stacking; ripper 4 rounds; plough 2 rounds; harrowing 2 rounds; making main drains; making collection drains; making collection roads; upkeep collection roads. - Summary Report "Data Kemajuan Replanting 2018 di Divisi I Boyan dan II Galang": as of 23 December 2018: Progress felling (52.6 Ha – 100%); uprooting (52.6 Ha – 100%); stump eradication (12.69 Ha – 100%); stacking (39.91 Ha – 100%); ripper I-IV (52.60 Ha – 100%); ploughing I-II (52.6 Ha – 100%); harrowing I-II (52.6 Ha – 100%); making main drain 2x1x1 meter (850 meters); making collection drain size 1x1x0.75 meter (2,800 meters). - The new planting (conversion from rubber into oil palm) in Timbang Deli Estate, year 2018 was 25.91 Ha. 	Comply
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 –	PT. Timbang Deli Indonesia has developed an HCV Management Area program, e.g in 2018 consists of activities: <ol style="list-style-type: none"> a. HCV area monitoring on monthly basis. Report of monitoring sighted. b. Maintenance/upkeep of HCV Signboards & HCV delineation/marketing poles.. c. Prohibit the chemical spraying at 5 meters from small rivers and 30 meters from riparian to Ular River effective March 2018. d. Provision of 1,200 forest species seedling on July 2018. e. Planting/enrichment of forest species in HCV area. f. HCV management and monitoring report on December 2018. 	Comply
7.3.5 Areas required by affected communities to meet their basic	Based on the verification of legal documents, identification of HCV and statement area showed that the entire HCV area fully controlled by companies.	Comply

Criterion / Indicator	Assessment Findings	Compliance
	<p>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).</p> <p>- Minor compliance -</p>	<p>Based on the results of public consultation with relevant agencies and surrounding villages claimed that the entire area of HCV PT. Timbang Deli Indonsia was controlled by companies.</p>
<p>Criterion 7.4: Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.</p>		
<p>7.4.1</p>	<p>Maps identifying marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided.</p> <p>- Minor compliance -</p>	<p>In Timbang Deli Estate, based on soil map under "Soil Profile", scale 1:28,000 most area of Timbang Deli Estate is sandy clay. Recommendation from the soil survey is planting <i>Mucuna bracteata</i> leguminous cover to conserve soil moisture. Management strategy performed by planting <i>Mucuna bracteata</i> at replanting area. During field observation it was sight that all replanting area and planting year 2015 and 2016 ground cover planted with <i>Mucuna bracteata</i>. There is no fragile soil.</p> <p>Comply</p>
<p>7.4.2</p>	<p>Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and implemented to protect them without incurring adverse impacts.</p> <p>- Major compliance -</p>	<p>Based on soil map under "Soil Profile", scale 1:28,000 most area of Timbang Deli Estate is sandy clay. Recommendation from the soil survey is planting <i>Mucuna bracteata</i> leguminous cover to conserve soil moisture. Management strategy performed by planting <i>Mucuna bracteata</i> at replanting area. There is no fragile soil.</p> <p>Comply</p>
<p>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.</p>		
<p>7.5.1</p>	<p>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.</p> <p>- Major compliance -</p>	<p>Based on document review, legality review shows that PT. Timbang Deli Indonesia have been managed as rubber plantation since Dutch colonial era, 1911. In 1929, the area of PT. Timbang Deli (at the time area 1,104 Ha) was managed by "Perkebunan Bandar Pinang Group" and changed into PT. Timbang Deli in 1968 with commodity rubber and cocoa.</p> <p>Company have prepared environmental and social plan. While company received comment/concern from community related to manpower absorption and pension plan. Company have exercise the FPIC, communicating the plan for conversion of rubber plantation to oil palm plantation to community.</p> <p>Comply</p>
<p>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.</p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>7.6.1 Documented identification and assessment of demonstrable legal, customary and user rights shall be available. - Major compliance -</p>	<p>Based on document review, legality review shows that PT. Timbang Deli Indonesia have been managed as rubber plantation since Dutch colonial era, 1911. In 1929, the area of PT. Timbang Deli (at the time area 1,104 Ha) was managed by "Perkebunan Bandar Pinang Group" and changed into PT. Timbang Deli in 1968 with commodity rubber and cocoa. The whole plantation was controlled by company.</p> <p>Company did not carried out landbank expansion/purchase new land; only converting the rubber into oil palm plantation.</p>	<p>Comply</p>
<p>7.6.2 A system for identifying people entitled to compensation shall be in place. - Major compliance -</p>	<p>Based on document review, legality review shows that PT. Timbang Deli Indonesia have been managed as rubber plantation since Dutch colonial era, 1911. In 1929, the area of PT. Timbang Deli (at the time area 1,104 Ha) was managed by "Perkebunan Bandar Pinang Group" and changed into PT. Timbang Deli in 1968 with commodity rubber and cocoa. The whole plantation was controlled by company.</p> <p>Company did not carried out landbank expansion/purchase new land; only converting the rubber into oil palm plantation.</p>	<p>Comply</p>
<p>7.6.3 A system for calculating and distributing fair compensation (monetary or otherwise) shall be in place. - Major compliance -</p>	<p>Based on document review, legality review shows that PT. Timbang Deli Indonesia have been managed as rubber plantation since Dutch colonial era, 1911. In 1929, the area of PT. Timbang Deli (at the time area 1,104 Ha) was managed by "Perkebunan Bandar Pinang Group" and changed into PT. Timbang Deli in 1968 with commodity rubber and cocoa. The whole plantation was controlled by company.</p> <p>Company did not carried out landbank expansion/purchase new land; only converting the rubber into oil palm plantation.</p>	<p>Comply</p>
<p>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 -</p>	<p>Based on document review, legality review shows that PT. Timbang Deli Indonesia have been managed as rubber plantation since Dutch colonial era, 1911. In 1929, the area of PT. Timbang Deli (at the time area 1,104 Ha) was managed by "Perkebunan Bandar Pinang Group" and changed into PT. Timbang Deli in 1968 with commodity rubber and cocoa. The whole plantation was controlled by company.</p> <p>Company did not carried out landbank expansion/purchase new land; only converting the rubber into oil palm plantation.</p>	<p>Comply</p>
<p>7.6.5 The process and outcome of any compensation claims shall be documented and made publicly available. - Minor compliance -</p>	<p>Based on document review, legality review shows that PT. Timbang Deli Indonesia have been managed as rubber plantation since Dutch colonial era, 1911. In 1929, the area of PT. Timbang Deli (at the time area 1,104 Ha) was managed by "Perkebunan Bandar Pinang Group" and changed into PT. Timbang Deli in 1968 with commodity rubber and cocoa. The whole plantation was controlled by company.</p> <p>Company did not carried out landbank</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>expansion/purchase new land; only converting the rubber into oil palm plantation.</p> <p>Company have prepared environmental and social plan. While company received comment/concern from community related to manpower absorption and pension plan. Company have exercise the FPIC, communicating the plan for conversion of rubber plantation to oil palm plantation to community.</p>	
<p>7.6.6</p> <p>Evidence shall be available that the 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>Based on document review, legality review shows that PT. Timbang Deli Indonesia have been managed as rubber plantation since Dutch colonial era, 1911. In 1929, the area of PT. Timbang Deli (at the time area 1,104 Ha) was managed by "Perkebunan Bandar Pinang Group" and changed into PT. Timbang Deli in 1968 with commodity rubber and cocoa. The whole plantation was controlled by company.</p> <p>Company did not carried out landbank expansion/purchase new land; only converting the rubber into oil palm plantation.</p> <p>Company have prepared environmental and social plan. While company received comment/concern from community related to manpower absorption and pension plan. Company have exercise the FPIC, communicating the plan for conversion of rubber plantation to oil palm plantation to community.</p>	<p>Comply</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>Timbang Deli Indonesia have Policy for Zero Burning No Document: SOP/TDI/18, rev.01 dated 1 February 2019.</p>	<p>Comply</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>Based on document review dan result interview with Timbang Deli Estate staff (ENC and staff division) there are no any open burning was noted for land preparation.</p>	<p>Comply</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</p>	<p>From the high carbon stock assessment, as part of HCV assessment; the assessor stated: Rubber crops has larger number of carbon stock actually, and will be cleared gradually to be oil palm. Both rubbers (72.8 ton C/Ha) and oil palm are not categorize as high carbon pool class vegetation in this study according to HCSA guideline</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
estimated. - Major compliance -	issued by RSPO. Meanwhile in the High Carbon pool class there is 624.37 ton C stock saved in Low density forest at Arboretum area and old shrubs in low- lying swampy area, part of riparian zone, and other low dense vegetation land.	
7.8.2 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. - Minor compliance -	The initial plan was to convert all rubber plantation into oil palm plantation. An area of 1.55 Ha (arboretum) will categorized as high carbon stock pool. An area of 2.82 Ha in form of riparian area and lowland area sets aside as HCV – not converted.	Comply
Principle 8: Commitment to continual improvement in key areas of activity		
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.		
8.1.1 The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to: <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. - Major compliance -	Intenal audit: <ul style="list-style-type: none"> - Visit Report (internal audit), dated 18-19 July 2018. Standard RSPO INA-NI PnC 2016, there were 6 nonconformities (NC) related indicator 5.1.3; 6.6.2; 4.7.1; 4.6.11; 3.1.1 and 4.5. All of the NC was followed up and the status was closed at September 2018. - Management Review Report dated 7th September 2018. Agenda: review the result of internal audit. Bukit Maradja POM: <ul style="list-style-type: none"> - Laporan Internal Audit RSPO dated 11-12 February 2019. - Management review untuk implementasi RSPO tanggal 13 Maret 2019, location in Meeting Room. 	Comply

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 Manjuntio estate - Malin Deman estate	2014	Certified
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 2018	Certified May 2010 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	The most recent acquisition 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 Bukit Maradja 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 **Bukit Maradja POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.47
PKO	0.47

Extraction	%
OER	23.69
KER	5.54

Production	t/yr
FFB Process	110272
CPO Produced	26126.62
PKO Produced	6108.59

Land Use	Ha
OP Planted Area	5411.75
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	64.04
Total	5475.79

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	28980.99	0.5	22881.68	0.44	0	0	51862.67	0.94
CO ₂ Emission from fertilizer	2012.18	0.03	2365.04	0.05	0	0	4377.22	0.08
NO ₂ Emmision	4250.74	0.07	2172.21	0.04	0	0	6422,95	0.11
Fuel Consumption	367.01	0.01	278.07	0.01	0	0	645.08	0.02
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-28412.86	-0.49	-21688.8	-0.41	0	0	-50101.66	-0.9
Conservation Sequestration	0	0	0	0	0	0	0	0

RSPO Public Summary Report
Revision 8 (Mar /2019)

Total	7198.06	0.12	6008.2	0.11	0	0	13206.26	0.23
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**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0	0
Fuel Consumption	134.63	0
Grid Electricity Utilisation	1651.33	0.01
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	1785.96	0.02

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	2841.03
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 (%)	100
Divert to anaerobic diversion (%)	0

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. Eastern Sumatra Indonesia – Bukit Maradja 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. Eastern Sumatra Indonesia – Bukit Maradja 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. Eastern Sumatra 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_PO1000000095.	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	PT. Eastern Sumatra Indonesia – Bukit Maradja 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.	PT. Eastern Sumatra Indonesia – Bukit Maradja POM is certified against RSPO P&C Indonesia National Interpretation, September 2016 and RSPO Supply Chain Certification	Yes

RSPO Public Summary Report
Revision 8 (Mar /2019)

	Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	<p>Standard, June 2017 Module D - CPO Mills: Identity Preserved. Bukit Maradja POM received certified raw material (Fresh Fruit Bunch) from its own estate: - Bukit Maradja Estate; - Kerasaan Estate; - Timbang Deli Estate; All of the supply base are RSPO P&C certified.</p> <p>The certification of estates under PT. Eastern Sumatra Indonesia – Bukit Maradja POM with certificate number RSPO 632266, expired on 16 May 2020. Management of PT. Eastern Sumatra 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. Eastern Sumatra Indonesia – Bukit Maradja POM uses Module D of RSPO Supply Chain Certification Standard, June 2017. Therefore, Bukit Maradja 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. Eastern Sumatra Indonesia – Bukit Maradja POM uses Segregation (SG) as the supply chain model. For shipping by trucking, PT. Eastern Sumatra Indonesia – Bukit Maradja 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. Eastern Sumatra 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; 5.2 Production Process in the Mill; 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; 5.4 Evaluation – covers record reconciliation, internal control for estate performance, mill</p>	Yes

		operation and process of transporting;	
	<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 Bukit Maradja POM is the Mill Manager, currently held by Mr. Datar Silaen. 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 11-12 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 Bukit Maradja POM against RSPO General Chain of Custody indicator 5.6.1.	Yes
5.4. Purchasing and goods in			
5.4.1	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	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,	Yes

RSPO Public Summary Report
Revision 8 (Mar /2019)

<p>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; • 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>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.78/F3/BM/2018 dated 25 September 2018; issued by Bukit Maradja Estate, Division F3; Vehicle BK 8742TN; Mandor: Suyamdi; Year of planting 2013, Block: 13C10A (680 bunches); stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266. - FFB Receiving Slip Ticket No.FFB18011152W dated 25 September 2018 issued by Bukit Maradja POM, Estate: from Bukit Maradja Estate; Vehicle BK 8742TN; Transporter: PT. Eastern Sumatra Indonesia; Product: FFB; DO No.78/F3/BM/2018; Nett weight: 5,05 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266. - FFB Delivery Note No.KRE/1314 dated 25 September 2018; issued by Kerasaan Estate, Division F2; Vehicle BK9183TO; Mandor: Sugeng; Year of planting 2011 and 2012, Block: 11I08A (281 bunches) and 12I07 (403 bunches); stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266. - FFB Receiving Slip Ticket No.FFB18011184W dated 25 September 2018 issued by Bukit Maradja POM, Estate: from Kerasaan Estate; Vehicle BK9138TO; Transporter: PT. Kerasaan Indonesia; Product: FFB; DO No.KRE/1314; Nett weight: 10.11 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266. - FFB Delivery Note No.KRE/702 dated 4 February 2019; issued by Kerasaan Estate, Division F3; Vehicle BK9317TP; Mandor: Harsono; Year of planting 2005, Block: 05M07A (187 bunches); stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266. - FFB Receiving Slip Ticket No.FFB19001554W dated 4 February 2019 issued by Bukit Maradja POM, Estate: from Kerasaan Estate; Vehicle BK9317TP; Transporter: PT. Kerasaan Indonesia; Product: FFB; DO No.KRE/702; Nett weight: 4.59 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266. 	
<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.78/F3/BM/2018 dated 25 September 2018; issued by Bukit Maradja Estate, Division F3; Vehicle BK 8742TN; Mandor: Suyamdi; Year of planting 	<p>Yes</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

		<p>2013, Block: 13C10A (680 bunches); stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266.</p> <ul style="list-style-type: none"> - FFB Receiving Slip Ticket No.FFB18011152W dated 25 September 2018 issued by Bukit Maradja POM, Estate: from Bukit Maradja Estate; Vehicle BK 8742TN; Transporter: PT. Eastern Sumatra Indonesia; Product: FFB; DO No.78/F3/BM/2018; Nett weight: 5,05 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266. - FFB Delivery Note No.KRE/1314 dated 25 September 2018; issued by Kerasaan Estate, Division F2; Vehicle BK9183TO; Mandor: Sugeng; Year of planting 2011 and 2012, Block: 11I08A (281 bunches) and 12I07 (403 bunches); stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266. - FFB Receiving Slip Ticket No.FFB18011184W dated 25 September 2018 issued by Bukit Maradja POM, Estate: from Kerasaan Estate; Vehicle BK9138TO; Transporter: PT. Kerasaan Indonesia; Product: FFB; DO No.KRE/1314; Nett weight: 10.11 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266. 	
	<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. 	<p>Bukit Maradja POM received certified FFB from its own plantation: Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.</p>	<p>Yes</p>
	<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. 	<p>PT. Eastern Sumatra Indonesia – Bukit Maradja POM with RSPO P&C Certificate No.RSPO 632266 are certified until 16 May 2020.</p>	<p>Yes</p>
	<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. 	<p>PT. Eastern Sumatra Indonesia – Bukit Maradja POM is not a trader. The marketing was done by the parent company, SIPEF NV. The marketing agreement between PT. Eastern Sumatra Indonesia and SIPEF NV was signed on 24 October 1995. The scope of marketing agreement covers appointment and duration, obligation of SIPEF, remuneration, termination, dispute settlement, etc.</p>	<p>Yes</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	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.	Yes
5.5. Outsourcing activities			
5.5.1	<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. Eastern Sumatra 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. Eastern Sumatra Indonesia; - The control over product movement is within PT. Eastern Sumatra Indonesia; - The independent third party physically handles the RSPO-certified palm products; <p>This clause is applicable to scope of certification.</p>	Yes
5.5.2	<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. Eastern Sumatra 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. Eastern Sumatra Indonesia.</p>	Yes
	<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</p>	<p>PT. Eastern Sumatra 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. Agreement between PT. Eastern Sumatra Indonesia with storage tank facility sighted: "Perjanjian Sewa Menyewa Tangki Timbun PT. Dumai Paricipa Abadi dan PT. Eastern Sumatra Indonesia No.023/DPA/XI/2017", signed 3 December 2018. The contract valid</p>	Yes

	<p>is deemed necessary.</p>	<p>from 1 January – 31 December 2019. Chapter 5. Right and Obligation of the Parties – Section 5 stated whenever necessary, PT. Eastern Sumatra 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. Eastern Sumatra Indonesia will provide training as necessary.</p> <p>Agreement between PT. Eastern Sumatra Indonesia with transporters:</p> <p>a. "Perjanjian Pengangkutan PT. Eastern Sumatra Indonesia dengan Pengangkutan Sahabat No.2015/Angkutan/CPO/BM-Dumai/01" signed on 15 January 2015. 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. Eastern Sumatra Indonesia dengan CV. Jasa Sahabat Abadi No.2015/Angkutan/CPO/BM-Dumai/06" signed on 21 October 2015. 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. Eastern Sumatra Indonesia dengan PO. Sumber Agung No.2015/Angkutan/CPO/BM-Dumai/02" signed on 15 January 2015. "Addendum Perjanjian Pengangkutan No.2015/Angkutan/CPO/BM-Dumai/02 dated 1 November 2015" shifting the transporter from PO Sumber Agung to CV. Sejahtera Abadi. 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>	
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RSPO Public Summary Report
Revision 8 (Mar /2019)

		<p>d. "Perjanjian Pengangkutan PT. Eastern Sumatra Indonesia dengan Pengangkutan Felindo No.2015/Angkutan/CPO/BM-Dumai/04" signed on 15 January 2015. Pengangkutan Felindo issued a statement letter signed by Drs. 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>																	
	<p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	<p>The control through contract between company and the tank storage.</p> <p>PT. Eastern Sumatra Indonesia conducted internal audit to the storage tank facility. Internal audit to PT. Dumai Paricippta Abadi carried out in 11-12 February 2019, ENC team verified the traceability of transaction No.TR-4cb410d7-1651 for sales of 499.873 MT CSPO SG. ENC team made sample of delivery to PT. Dumai Paricippta Abadi:</p> <table border="1" data-bbox="1014 767 1756 879"> <thead> <tr> <th>Date</th> <th>Truck ID</th> <th>Transporter</th> <th>Quantity</th> </tr> </thead> <tbody> <tr> <td>26 February 2018</td> <td>BK9121CT</td> <td>CV. Sejahtera Abadi</td> <td>28.03 MT</td> </tr> <tr> <td>26 February 2018</td> <td>BK9775CP</td> <td>CV. Sejahtera Abadi</td> <td>26.20 MT</td> </tr> <tr> <td>26 February 2018</td> <td>BK8673CO</td> <td>CV. Sejahtera Abadi</td> <td>24.20 MT</td> </tr> </tbody> </table> <p>Records sighted and verified: email correspondence between ENC and Marketing Department; Contract No.PBMO-10065 dated 30 October 2017; Inspection certificates; Bill of Lading No.CPE621845 dated 24 January 2018; Invoice; sampled dispatch slip and incoming slip in PT. Dumai Paricippta Abadi No.DPA.IN.180228059 dated 28 February 2018.</p>	Date	Truck ID	Transporter	Quantity	26 February 2018	BK9121CT	CV. Sejahtera Abadi	28.03 MT	26 February 2018	BK9775CP	CV. Sejahtera Abadi	26.20 MT	26 February 2018	BK8673CO	CV. Sejahtera Abadi	24.20 MT	<p>Yes</p>
Date	Truck ID	Transporter	Quantity																
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26 February 2018	BK9775CP	CV. Sejahtera Abadi	26.20 MT																
26 February 2018	BK8673CO	CV. Sejahtera Abadi	24.20 MT																
	<p>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>	<p>PT. Eastern Sumatra 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. Agreement between PT. Eastern Sumatra Indonesia with storage tank facility sighted: "Perjanjian Sewa Menyewa Tangki Timbun PT. Dumai Paricippta Abadi dan PT. Eastern Sumatra Indonesia No.023/DPA/XI/2017", signed 3 December 2018. The contract valid from 1 January – 31 December 2019. Chapter 5. Right and Obligation of the Parties – Section 5 stated whenever necessary, PT. Eastern Sumatra 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. Eastern Sumatra Indonesia will provide training as necessary.</p>	<p>Yes</p>																

		<p>Agreement between PT. Eastern Sumatra Indonesia with transporters:</p> <p>a. "Perjanjian Pengangkutan PT. Eastern Sumatra Indonesia dengan Pengangkutan Sahabat No.2015/Angkutan/CPO/BM-Dumai/01" signed on 15 January 2015. 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. Eastern Sumatra Indonesia dengan CV. Jasa Sahabat Abadi No.2015/Angkutan/CPO/BM-Dumai/06" signed on 21 October 2015. 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. Eastern Sumatra Indonesia dengan PO. Sumber Agung No.2015/Angkutan/CPO/BM-Dumai/02" signed on 15 January 2015. "Addendum Perjanjian Pengangkutan No.2015/Angkutan/CPO/BM-Dumai/02 dated 1 November 2015" shifting the transporter from PO Sumber Agung to CV. Sejahtera Abadi. 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. Eastern Sumatra Indonesia dengan Pengangkutan Felindo No.2015/Angkutan/CPO/BM-Dumai/04" signed on 15 January 2015. Pengangkutan Felindo issued a statement letter signed by Drs. 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</p>	
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RSPO Public Summary Report
Revision 8 (Mar /2019)

		following requirement from RSPO Supply chain, and Pengangkutan Felindo available for audit if needed by certification body.	
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 Paricippta 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; - 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. Eastern Sumatra Indonesia. The transporter have armada of 120 tanks. CV. Sejahtera Abadi have been trained by PT. Eastern Sumatra 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 Bukit Maradja POM to bulking tank in Dumai.</p>	Yes
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.	Bukit Maradja 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; 	<p>PT. Eastern Sumatra Indonesia – Bukit Maradja POM made shipping annoucement inside PalmTrace transaction:</p> <ul style="list-style-type: none"> - Kontrak Jual Beli No.2018/BM-PK/05 between Seller: PT. Eastern Sumatra Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: PT. Multimas Nabati Asahan, address: Gedung B&G Tower 9th Floor, Jl. Putri Hijau No.10, Kesawan, Medan Barat, 20111. Product: Palm Kernel – IP. Volume 350 MT. Dated 13 March 2018. - Delivery Order PT. Eastern Sumatra Indonesia No.2018/BM-PK/DO/05 dated 19 March 2018. Seller: PT. Eastern Sumatra Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: 	Yes

RSPO Public Summary Report
Revision 8 (Mar /2019)

<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>PT. Multimas Nabati Asahan, address: Gedung B&G Tower 9th Floor, Jl. Putri Hijau No.10, Kesawan, Medan Barat, 20111. Product: Palm Kernel – IP. Volume 350 MT. Product delivery, loko PKS Bukit Maradja.</p> <ul style="list-style-type: none"> - 20 deliveries made to fulfil the Delivery Order No.2018/BM-PK/DO/05 for total PK volume of 350 MT from source: Bukit Maradja POM; destination: PT. Multimas Nabati Asahan, Kuala Tanjung. - Sampled delivery: Weighbridge Despatch Slip No.PK18000070W; DO No.2018/BM-PK/DO/05; contract No.2018/BM-PK/05; Product: Palm Kernel; Module: IP; Volume 13.3 MT; Cert. No.RSPO 632266; Transporter PT. Sumatera Sarana Sekar Sakti, vehicle No.BK8498RO – dated 11 April 2018. - Noted in PalmTrace as TR-16602f8f-5377 dated 25 September 2018; buyer PT. Multimas Nabati Asahan; Product: CSPK-IP; Quantity 350 MT; - TR-2252c9ec-2b5e dated 4 February 2019; buyer PT. Multimas Nabati Asahan; Product: CSPK-IP; Quantity 300 MT; - Kontrak Jual Beli No.2018/BM-PK/17 between Seller: PT. Eastern Sumatra Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: PT. Multimas Nabati Asahan, address: Gedung B&G Tower 9th Floor, Jl. Putri Hijau No.10, Kesawan, Medan Barat, 20111. Product: Palm Kernel – IP. Volume 300 MT. Dated 4 December 2018. - Delivery Order PT. Eastern Sumatra Indonesia No.2018/BM-PK/DO/17 dated 7 December 2018. Seller: PT. Eastern Sumatra Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: PT. Multimas Nabati Asahan, address: Gedung B&G Tower 9th Floor, Jl. Putri Hijau No.10, Kesawan, Medan Barat, 20111. Product: Palm Kernel – IP. Volume 300 MT. Dated 4 December 2018. Product delivery, loko PKS Bukit Maradja. - 12 deliveries made to fulfil the Delivery Order No.2018/BM-PK/DO/17 for total PK volume of 300 MT from source: Bukit Maradja POM; destination: PT. Multimas Nabati Asahan, Kuala Tanjung. - Sampled delivery: Weighbridge Despatch Slip No.PK18000264W; DO No.2018/BM-PK/DO/17; contract No.2018/BM-PK/17; Product: Palm Kernel; Module: IP; Volume 24.12 MT; Cert. No.RSPO 632266; Transporter UD. Serba Guna, vehicle No.BK8358XR – dated 20 December 2018. - Contract No.PBMO-10075 dated 4 January 2018 between Seller: PT. Eastern Sumatra
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**RSPO Public Summary Report
Revision 8 (Mar /2019)**

		<p>Indonesia, address: Gedung Bank Sumut, 7th Floor, Jl. Imam Bonjol No.18, Medan 20152. Buyer: Olenex SARL, CH-1180 Rolle. Product: CSPO ISCC. Volume 1000 MT.</p> <ul style="list-style-type: none"> - Delivery Order. The contract divided into 10 Delivery Orders: Delivery Order No.2018/BM-CPO/DO/Dumai/No.55, 57, 59, 60, 61, 62, 63, 64, 66, 68 - 89 deliveries made to fulfil the contract for total CPO volume of 2500 MT from source: Bukit Maradja POM; delivery period: 18 August – 12 September 2018; destination: PT. Dumai Paricippta Abadi (bulking storage), Dumai. Note: total 2,500 MT party was comprise of 2 RSPO contracts. Sampled delivery: Weighbridge Despatch Slip No.CPO18000604W; DO No.2018/BM-CPO/DO/DUMAI/63; Product: Crude Palm Oil; Module: IP; Volume 27.61 MT; Cert. No.RSPO 632266; Transporter Pengangkutan Felindo, vehicle No.BK8005CO – dated 1 September 2018. - Certificate of Analysis Schutter Group No.0070/SLS/X/18 dated 11 October 2018 for product: CPO; based on Contract No.PBMO-10075; volume 1,000MT; vessel: MT Champion Pula Voy.21; Remarks: RSPO SG, Certificate No.RSPO632266, expiry date 16 May 2020. Note: another 1499 MT was under contract No.PBMO-10084. - Bill of Lading No.CPL211846 dated 7 October 2018. Shipper: PT. Eastern Sumatra Indonesia; Notify Address: Olenex SARL; Port of Loading: Dumai; Port of delivery: Rotterdam, The Netherlands; Tanker: MT Champion Pula Voy.21; Commodity: Indonesian CSPO SG; quantity 2499.985 MT; Remarks: RSPO SG, Certificate No.RSPO632266, expiry date 16 May 2020. - Noted in PalmTrace as TR-e816be16-e153 dated 1 October 2018; buyer Olenex SARL; Product: CSPO-SG; Quantity 1000 MT; <p>Contract No.PBMO-10078 dated 4 January 2018 between Seller: PT. Eastern Sumatra Indonesia, address: Gedung Bank Sumut, 7th Floor, Jl. Imam Bonjol No.18, Medan 20152. Buyer: Olenex SARL, CH-1180 Rolle. Product: CSPO ISCC. Volume 1000 MT.</p> <ul style="list-style-type: none"> - Delivery Order. The contract divided into 7 Delivery Orders: Delivery Order No.2018/BM-CPO/DO/Dumai/No.92, 94, 95, 96, 98, 100, 101 - 38 deliveries made to fulfil the contract for total CPO volume of 2500 MT from source: Bukit Maradja POM; delivery period: 13-23 December 2018; destination: PT. Dumai Paricippta Abadi (bulking storage), Dumai. Note: total 2,500 MT party was comprise of 2 RSPO contracts. Sampled delivery: Weighbridge Despatch Slip No.CPO18000928W; DO No.2018/BM-CPO/DO/DUMAI/94; Product: Crude Palm Oil; Module: IP; Volume 28.18 MT; Cert. 	
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RSPO Public Summary Report
Revision 8 (Mar /2019)

		<p>No.RSPO 632266; Transporter: CV. Sejahtera Abadi, vehicle No.BK9542DA – dated 14 December 2018.</p> <ul style="list-style-type: none"> - Certificate of Analysis Schutter Group No.0165/SLS/XII/18 dated 27 October 2018 for product: CPO; based on Contract No.PBMO-10078; volume 1,000MT; vessel: MT Kastav Voy.28; Remarks: RSPO SG, Certificate No.RSPO632266, expiry date 16 May 2020. Note: another 1499 MT was under contract No.PBMO-10088. - Bill of Lading No.KAS-DUM-RDM/23 dated 24 December 2018. Shipper: PT. Eastern Sumatra Indonesia; Notify Address: Olenex SARL; Port of Loading: Dumai; Port of delivery: Rotterdam, The Netherlands; Tanker: MT Kastav Voy.28; Commodity: Indonesian CSPO SG; quantity 2499.889 MT; Remarks: RSPO SG, Certificate No.RSPO632266, expiry date 16 May 2020. - Noted in PalmTrace as TR-e9855933-5556 dated 27 December 2018; buyer Olenex SARL; Product: CSPO-SG; Quantity 1,000 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. 	<p>Company announce their transaction into PalmTrace.</p>	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 	<p>PT. Eastern Sumatra Indonesia – Bukit Maradja 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_PO100000095.</p>	Yes

RSPO Public Summary Report
Revision 8 (Mar /2019)

	<p>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.</p>		
<p>5.7.2</p>	<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 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>PT. Eastern Sumatra Indonesia – Bukit Maradja POM made shipping announcement inside PalmTrace transaction:</p> <ul style="list-style-type: none"> TR-16602f8f-5377 dated 25 September 2018; buyer PT. Multimas Nabati Asahan; Product: CSPK-IP; Quantity 350 MT; Kontrak Jual Beli No.2018/BM-PK/05 between Seller: PT. Eastern Sumatra Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: PT. Multimas Nabati Asahan, address: Gedung B&G Tower 9th Floor, Jl. Putri Hijau No.10, Kesawan, Medan Barat, 20111. Product: Palm Kernel – IP. Volume 350 MT. Dated 13 March 2018. Delivery Order PT. Eastern Sumatra Indonesia No.2018/BM-PK/DO/05 dated 19 March 2018. Seller: PT. Eastern Sumatra Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: PT. Multimas Nabati Asahan, address: Gedung B&G Tower 9th Floor, Jl. Putri Hijau No.10, Kesawan, Medan Barat, 20111. Product: Palm Kernel – IP. Volume 350 MT. Product delivery, loko PKS Bukit Maradja. 20 deliveries made to fulfil the Delivery Order No.2018/BM-PK/DO/05 for total PK volume of 350 MT from source: Bukit Maradja POM; destination: PT. Multimas Nabati Asahan, Kuala Tanjung. Sampled delivery: Weighbridge Despatch Slip No.PK18000070W; DO No.2018/BM-PK/DO/05; contract No.2018/BM-PK/05; Product: Palm Kernel; Module: IP; Volume 13.3 MT; Cert. No.RSPO 632266; Transporter PT. Sumatera Sarana Sekar Sakti, vehicle No.BK8498RO – dated 11 April 2018. TR-2252c9ec-2b5e dated 4 February 2019; buyer PT. Multimas Nabati Asahan; Product: CSPK-IP; Quantity 300 MT; Kontrak Jual Beli No.2018/BM-PK/17 between Seller: PT. Eastern Sumatra Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: PT. Multimas Nabati Asahan, address: Gedung B&G Tower 9th Floor, Jl. Putri Hijau No.10, Kesawan, Medan Barat, 20111. Product: Palm Kernel – IP. Volume 300 MT. Dated 4 December 2018. Delivery Order PT. Eastern Sumatra Indonesia No.2018/BM-PK/DO/17 dated 7 	<p>Yes</p>

**RSPO Public Summary Report
Revision 8 (Mar /2019)**

		<p>December 2018. Seller: PT. Eastern Sumatra Indonesia, address: Gedung Forum Nine 10th Floor, Suite 1-11, Jl. Imam Bonjol No.9, Petisah Tengah, Medan 20112. Buyer: PT. Multimas Nabati Asahan, address: Gedung B&G Tower 9th Floor, Jl. Putri Hijau No.10, Kesawan, Medan Barat, 20111. Product: Palm Kernel – IP. Volume 300 MT. Dated 4 December 2018. Product delivery, loko PKS Bukit Maradja.</p> <ul style="list-style-type: none"> - 12 deliveries made to fulfil the Delivery Order No.2018/BM-PK/DO/17 for total PK volume of 300 MT from source: Bukit Maradja POM; destination: PT. Multimas Nabati Asahan, Kuala Tanjung. - Sampled delivery: Weighbridge Despatch Slip No.PK18000264W; DO No.2018/BM-PK/DO/17; contract No.2018/BM-PK/17; Product: Palm Kernel; Module: IP; Volume 24.12 MT; Cert. No.RSPO 632266; Transporter UD. Serba Guna, vehicle No.BK8358XR – dated 20 December 2018. - TR-e816be16-e153 dated 1 October 2018; buyer Olenex SARL; Product: CSPO-SG; Quantity 1000 MT; - Contract No.PBMO-10075 dated 4 January 2018 between Seller: PT. Eastern Sumatra Indonesia, address: Gedung Bank Sumut, 7th Floor, Jl. Imam Bonjol No.18, Medan 20152. Buyer: Olenex SARL, CH-1180 Rolle. Product: CSPO ISCC. Volume 1000 MT. - Delivery Order. The contract divided into 10 Delivery Orders: Delivery Order No.2018/BM-CPO/DO/Dumai/No.55, 57, 59, 60, 61, 62, 63, 64, 66, 68 - 89 deliveries made to fulfil the contract for total CPO volume of 2500 MT from source: Bukit Maradja POM; delivery period: 18 August – 12 September 2018; destination: PT. Dumai Paricippta Abadi (bulking storage), Dumai. Note: total 2,500 MT party was comprise of 2 RSPO contracts. <p>Sampled delivery: Weighbridge Despatch Slip No.CPO18000604W; DO No.2018/BM-CPO/DO/DUMAI/63; Product: Crude Palm Oil; Module: IP; Volume 27.61 MT; Cert. No.RSPO 632266; Transporter Pengangkutan Felindo, vehicle No.BK8005CO – dated 1 September 2018.</p> <ul style="list-style-type: none"> - Certificate of Analysis Schutter Group No.0070/SLS/X/18 dated 11 October 2018 for product: CPO; based on Contract No.PBMO-10075; volume 1,000MT; vessel: MT Champion Pula Voy.21; Remarks: RSPO SG, Certificate No.RSPO632266, expiry date 16 May 2020. Note: another 1499 MT was under contract No.PBMO-10084. - Bill of Lading No.CPL211846 dated 7 October 2018. Shipper: PT. Eastern Sumatra Indonesia; Notify Address: Olenex SARL; Port of Loading: Dumai; Port of delivery: Rotterdam, The Netherlands; Tanker: MT Champion Pula Voy.21; Commodity: 	
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RSPO Public Summary Report
Revision 8 (Mar /2019)

		<p>Indonesian CSPO SG; quantity 2499.985 MT; Remarks: RSPO SG, Certificate No.RSPO632266, expiry date 16 May 2020.</p> <ul style="list-style-type: none"> - TR-e9855933-5556 dated 27 December 2018; buyer Olenex SARL; Product: CSPO-SG; Quantity 1,000 MT; - Contract No.PBMO-10078 dated 4 January 2018 between Seller: PT. Eastern Sumatra Indonesia, address: Gedung Bank Sumut, 7th Floor, Jl. Imam Bonjol No.18, Medan 20152. Buyer: Olenex SARL, CH-1180 Rolle. Product: CSPO ISCC. Volume 1000 MT. - Delivery Order. The contract divided into 7 Delivery Orders: Delivery Order No.2018/BM-CPO/DO/Dumai/No.92, 94, 95, 96, 98, 100, 101 - 38 deliveries made to fulfil the contract for total CPO volume of 2500 MT from source: Bukit Maradja POM; delivery period: 13-23 December 2018; destination: PT. Dumai Paricipita Abadi (bulking storage), Dumai. Note: total 2,500 MT party was comprise of 2 RSPO contracts. <p>Sampled delivery: Weighbridge Despatch Slip No.CPO18000928W; DO No.2018/BM-CPO/DO/DUMAI/94; Product: Crude Palm Oil; Module: IP; Volume 28.18 MT; Cert. No.RSPO 632266; Transporter: CV. Sejahtera Abadi, vehicle No.BK9542DA – dated 14 December 2018.</p> <ul style="list-style-type: none"> - Certificate of Analysis Schutter Group No.0165/SLS/XII/18 dated 27 October 2018 for product: CPO; based on Contract No.PBMO-10078; volume 1,000MT; vessel: MT Kastav Voy.28; Remarks: RSPO SG, Certificate No.RSPO632266, expiry date 16 May 2020. Note: another 1499 MT was under contract No.PBMO-10088. <p>Bill of Lading No.KAS-DUM-RDM/23 dated 24 December 2018. Shipper: PT. Eastern Sumatra Indonesia; Notify Address: Olenex SARL; Port of Loading: Dumai; Port of delivery: Rotterdam, The Netherlands; Tanker: MT Kastav Voy.28; Commodity: Indonesian CSPO SG; quantity 2499.889 MT; Remarks: RSPO SG, Certificate No.RSPO632266, expiry date 16 May 2020.</p>	
	<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 generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. 	<p>Not applicable for CPO Mills. Not applicable (N/A)</p>	<p>N/A</p>
	<ul style="list-style-type: none"> • Remove: RSPO certified volumes sold under other scheme or 	<p>PT. Eastern Sumatra Indonesia – Bukit Maradja POM removed 1999.99 MT CSPO from</p>	<p>NC-Major</p>

RSPO Public Summary Report
Revision 8 (Mar /2019)

	<p>as conventional, or in case of underproduction, loss or damage shall be removed.</p>	<p>PalmTrace through transaction ST-TR-78010e8c-e269 dated 11 June 2018 (ISCC). PT. Eastern Sumatra Indonesia – Bukit Maradja POM removed 1499.94 MT CSPO from PalmTrace through transaction ST-TR-ee8d9c8d-9ff8 dated 11 June 2018 (ISCC). PT. Eastern Sumatra Indonesia – Bukit Maradja POM removed 4199.86 MT CSPO from PalmTrace through transaction ST-TR-cdc1cda9-99ed dated 21 March 2019 (ISCC). Another 1,999.18 MT CPO from ISCC sales have not been removed from PalmTrace. Another 1,002.60 + 3.17 MT CSPO from local/conventional sales have not been removed from PalmTrace.</p> <p>PT. Eastern Sumatra Indonesia – Bukit Maradja POM removed 2,300 MT CSPK from PalmTrace through transaction ST-TR-e0f70cf6-6783 dated 28 March 2018. Another 1,583.71 MT CSPK from local/conventional sales have not been removed from PalmTrace.</p> <p>Correction: The ENC manager coordinated with Marketing and asked Antwerp to remove the quota CPO and PK on PT. Eastern Sumatra Indonesia’s PalmTrace. Antwerp has removed the quota CPO of 2,999.78 MT from PT. Eastern Sumatra Indonesia’s PalmTrace account: PalmTrace transaction No.ST-TR-ed14fa5a-a81e dated 1 April 2019 for 1,002.6 MT CSPO removed; PalmTrace transaction No.ST-TR-0d5d115e-8bdd dated 1 April 2019 for 1,997.18 MT CSPO removed; PalmTrace transaction No.ST-TR-09d0c2e7-81d8 dated 4 April 2019 for 3.17 MT CSPO removed;</p> <p>Antwerp has removed the quota PK of 1,583.71 MT from PT. Eastern Sumatra Indonesia’s PalmTrace account: PalmTrace transaction No.ST-TR-2f26a069-989f dated 3 April 2019 for 859.49 MT CSPK removed; PalmTrace transaction No.ST-TR-59c57fd0-e162 dated 3 April 2019 for 724.22 MT CSPK removed;</p>	<p>Yes</p>
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	<p>PT. Eastern Sumatra Indonesia – Bukit Maradja POM did not buy any CSPO and/or CSPK both through physical or credit. Not applicable (N/A)</p>	<p>N/A</p>

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 NoHRA-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 BM POM 2018", Supply Chain Training planned for October 2018- implemented 9 February 2018. Implementation of training "Supply Chain RSPO Certification Standar 2017, dated 18 February 2019. Training attended by weighbridge officer, security, document control, laboratory superintendent, laboratory analyst, and office assistant.</p> <p>Inside "Program Training Karyawan & Staff BM POM 2019", Supply Chain Training planned for October 2019.</p>
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"> - Mesran (head laboratory) have participated in trainings: RSPO Supply Chain Standard 2017 dated 9 February 2018; Training Work Instruction Weighbridge dated 12 February 2018; Introduction to HIRADC/risk assessment dated 25 June 2018; Socialization of Company Policy on Code of Conduct dated 23 January 2019; Training Internal Calibration and Verification dated 14 February 2019; Training Supply Chain Certification dated 18 February 2019; Training on operation of laboratory instrument dated 13 March 2019; - Ramona Siallagan (weighbridge officer) have participated in trainings: RSPO Supply Chain Standard 2017 dated 9 February 2018; Training Work Instruction Weighbridge dated 12 February 2018; Introduction to HIRADC/risk assessment dated 25 June 2018; Socialization of Company Policy on Code of Conduct dated 23 January 2019; Training Supply Chain Certification dated 18 February 2019; <p>Ridzla (document control) have participated in trainings: RSPO Supply Chain Standard 2017 dated 9 February 2018; Training Work Instruction Weighbridge dated 12 February 2018; Introduction to HIRADC/risk assessment dated 25 June 2018; Socialization of Company Policy on Code of Conduct dated 23 January 2019; Socialization of whistle blowing policy dated 7 February 2019; Training Supply Chain Certification dated 18 February 2019;</p>
5.9. Record Keeping		

RSPO Public Summary Report
Revision 8 (Mar /2019)

5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	PT. Eastern Sumatra Indonesia – Bukit Maradja POM maintains accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements.	Yes
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. Eastern Sumatra Indonesia – Bukit Maradja 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 untuk penerimaan FFB 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.	PT. Eastern Sumatra Indonesia – Bukit Maradja 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 Bukit Maradja Estate, Kerasaan Estate, and Timbang Deli Estate. Estimate of FFB volume received and processed in Bukit Maradja POM for period May 2019 to April 2020 is 120,000 MT. Estimated volume for CPO is 28,200 MT and estimated volume for PK is 6,600 MT.	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	<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 23.50%, whilst from FFB to PK is 5.5%.</p> <p>PT. Eastern Sumatra Indonesia – Bukit Maradja POM reported the conversion factors based on averaged actual monthly OER and KER.</p>	Yes

	(www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as 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>Mar 2018</td><td>23.47</td><td>5.48</td></tr> <tr><td>Apr 2018</td><td>24.05</td><td>5.53</td></tr> <tr><td>May 2018</td><td>23.94</td><td>5.15</td></tr> <tr><td>Jun 2018</td><td>24.02</td><td>5.20</td></tr> <tr><td>Jul 2018</td><td>24.21</td><td>5.35</td></tr> <tr><td>Aug 2018</td><td>23.64</td><td>5.91</td></tr> <tr><td>Sep 2018</td><td>23.30</td><td>5.64</td></tr> <tr><td>Oct 2018</td><td>23.35</td><td>5.89</td></tr> <tr><td>Nov 2018</td><td>23.32</td><td>5.60</td></tr> <tr><td>Dec 2018</td><td>23.48</td><td>5.29</td></tr> <tr><td>Jan 2019</td><td>23.73</td><td>5.60</td></tr> <tr><td>Feb 2019</td><td>23.65</td><td>5.21</td></tr> </tbody> </table>	Month	OER (%)	KER (%)	Mar 2018	23.47	5.48	Apr 2018	24.05	5.53	May 2018	23.94	5.15	Jun 2018	24.02	5.20	Jul 2018	24.21	5.35	Aug 2018	23.64	5.91	Sep 2018	23.30	5.64	Oct 2018	23.35	5.89	Nov 2018	23.32	5.60	Dec 2018	23.48	5.29	Jan 2019	23.73	5.60	Feb 2019	23.65	5.21	Yes
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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. Eastern Sumatra Indonesia – Bukit Maradja 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. Eastern Sumatra Indonesia – Bukit Maradja POM is a subsidiary of RSPO registered member, SIPEF Group. SIPEF Group, the parent company of PT. Eastern Sumatra Indonesia – Bukit Maradja 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:	Corporate communication in SIPEF Group website:	Yes																																							

RSPO Public Summary Report
Revision 8 (Mar /2019)

	<p>a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member’s history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. 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>a. Display its RSPO membership status: No, SIPEF did not display its RSPO membership status. b. Display the RSPO web address: Not in direct manner. SIPEF made a link to RSPO website. 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”. d. State the member’s history with regards to the RSPO: No. SIPEF did not state their history with regards to the RSPO. 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	<p>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.</p>	<p>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.</p>	Yes
4.4	<p>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.</p>	<p>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.</p>	Yes
4.5	<p>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.</p>	<p>No, SIPEF Group did not display the RSPO Corporate Logo in the website as well as in the correspondence letter.</p>	Yes
Business to business communications			
5.1	<p>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.</p>	<p>PT. Eastern Sumatra Indonesia – Bukit Maradja 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. Umbul Mas Wisesa – UMW 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. Eastern Sumatra Indonesia – Bukit Maradja POM made clear the product is Segregated. Because at the</p>	Yes

RSPO Public Summary Report
Revision 8 (Mar /2019)

		point of shipping, all identity preserved oil palm product have been mixed between Certificate Holder's palm oil mills.	
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.	PT. Eastern Sumatra Indonesia – Bukit Maradja 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. Eastern Sumatra Indonesia – Bukit Maradja 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. Eastern Sumatra Indonesia – Bukit Maradja 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. Eastern Sumatra Indonesia – Bukit Maradja 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	PT. Eastern Sumatra Indonesia – Bukit Maradja 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

	breakdown of all palm based ingredients within an end product 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. Eastern Sumatra Indonesia – Bukit Maradja POM is an RSPO certificate holder with certificate number RSPO 632266 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. Eastern Sumatra Indonesia – Bukit Maradja POM is an RSPO certificate holder with certificate number RSPO 632266 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. Eastern Sumatra Indonesia – Bukit Maradja 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. Eastern Sumatra Indonesia – Bukit Maradja 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. Eastern Sumatra Indonesia – Bukit Maradja POM is certified RSPO P&C, selling CSPO and CSPK. PT. Eastern Sumatra Indonesia – Bukit Maradja 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. Eastern Sumatra Indonesia – Bukit Maradja POM has not use RSPO trademark.	Yes
6.7	Use of any other trademark or logo to highlight the presence of	Up to this moment, PT. Eastern Sumatra Indonesia – Bukit Maradja POM has not use any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm	Yes

	RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	products.	
6.8	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 .	PT. Eastern Sumatra Indonesia – Bukit Maradja POM is not a retailer or food service company. Not applicable.	N/A
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 compriseof 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. Eastern Sumatra Indonesia – Bukit Maradja 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. • Recommendations for improvement. 	Management review dated 13 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 11-12 February 2019, resulted in 3 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. Eastern Sumatra Indonesia – Bukit Maradja POM; - Status of preventive and corrective actions: All findings from internal audit process have been closed out; - 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; Recommendations for improvement: Suggestion that subsequent management review covers all unit operational for RSPO SCCS implementation (Marketing dept., Bukit Maradja POM and bulking storage tank in Dumai).	Yes
5.13.3	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	Management review dated 13 March 2019: <ul style="list-style-type: none"> - Improvement of the effectiveness of the management system and its processes: training on PalmTrace - Resource needed: training on PalmTrace 	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.	<p>PT. Eastern Sumatra Indonesia – Bukit Maradja POM is certified against RSPO P&C Indonesia National Interpretation, September 2016 and RSPO Supply Chain Certification Standard, June 2017 Module D - CPO Mills: Identity Preserved. Bukit Maradja POM received certified raw material (Fresh Fruit Bunch) from its own estate:</p> <ul style="list-style-type: none"> - Bukit Maradja Estate; - Kerasaan Estate; - Timbang Deli Estate; <p>All of the supply base are RSPO P&C certified.</p> <p>The certification of estates under PT. Eastern Sumatra Indonesia – Bukit Maradja POM with certificate number RSPO 632266, expired on 16 May 2020.</p> <p>Management of PT. Eastern Sumatra 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>	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.	<p>PT. Eastern Sumatra Indonesia – Bukit Maradja POM uses Module D of RSPO Supply Chain Certification Standard, June 2017. Therefore, Bukit Maradja 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. Eastern Sumatra Indonesia – Bukit Maradja POM uses Segregation (SG) as the supply chain model.</p> <p>For shipping by trucking, PT. Eastern Sumatra Indonesia – Bukit Maradja POM uses Identity Preserved (IP) as the supply chain model.</p>	Yes

RSPO Public Summary Report
Revision 8 (Mar /2019)

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. Eastern Sumatra Indonesia – Bukit Maradja 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_PO100000095. PT. Eastern Sumatra Indonesia – Bukit Maradja POM made shipping announcement inside PalmTrace transaction: - TR-16602f8f-5377 dated 25 September 2018; buyer PT. Multimas Nabati Asahan; Product: CSPK-IP; Quantity 350 MT; - TR-e816be16-e153 dated 1 October 2018; buyer Olenex SARL; Product: CSPO-SG; Quantity 1000 MT;	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;	PT. Eastern Sumatra 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. 5.1 Transporting Palm Products from Estate to Mill; 5.2 Production Process in the Mill; 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; 5.4 Evaluation – covers record reconciliation, internal control for estate performance, mill operation and process of transporting;	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 Bukit Maradja POM is the Mill Manager, currently held by Mr. Datar Silaen. 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
D.3.2	The site shall have documented procedures for receiving and processing certified FFBs.	Company has 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,	Yes

RSPO Public Summary Report
Revision 8 (Mar /2019)

		product description and quantity, RSPO certificate number, transporter identity and unique identification number.	
D.4 Purchasing and goods in			
D.4.1	The site shall verify and document the tonnage and sources of certified FFBs received.	<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.78/F3/BM/2018 dated 25 September 2018; issued by Bukit Maradja Estate, Division F3; Vehicle BK 8742TN; Mandor: Suyamdi; Year of planting 2013, Block: 13C10A (680 bunches); stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266. - FFB Receiving Slip Ticket No.FFB18011152W dated 25 September 2018 issued by Bukit Maradja POM, Estate: from Bukit Maradja Estate; Vehicle BK 8742TN; Transporter: PT. Eastern Sumatra Indonesia; Product: FFB; DO No.78/F3/BM/2018; Nett weight: 5,05 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266. - FFB Delivery Note No.KRE/1314 dated 25 September 2018; issued by Kerasaan Estate, Division F2; Vehicle BK9183TO; Mandor: Sugeng; Year of planting 2011 and 2012, Block: 11I08A (281 bunches) and 12I07 (403 bunches); stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266. - FFB Receiving Slip Ticket No.FFB18011184W dated 25 September 2018 issued by Bukit Maradja POM, Estate: from Kerasaan Estate; Vehicle BK9138TO; Transporter: PT. Kerasaan Indonesia; Product: FFB; DO No.KRE/1314; Nett weight: 10.11 MT; stamped as Sustainable Product – IP, RSPO certificate No. RSPO 632266. 	Yes
D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	As per procedure, ENC and Marketing Department will announce to Certification Body in any case of projected overproduction.	Yes
D.5 Record keeping			
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time	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	Yes

RSPO Public Summary Report
Revision 8 (Mar /2019)

	<p>basis.</p> <p><i>IP Mill must report on real time basis.</i></p>	<p>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. Eastern Sumatra Indonesia – Bukit Maradja 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; - Weighbridge ticket untuk penerimaan FFB 10 years; 	
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. Eastern Sumatra Indonesia demonstrates a set of procedure for implementation of RSPO SCCS, June 2017:</p> <p>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

RSPO Public Summary Report

Revision 8 (Mar /2019)

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.	March 2018	6,744.47	0	6,744.47
2.	April 2018	7,790.14	0	7,790.14
3.	May 2018	9,066.65	0	9,066.65
4.	June 2018	7,320.73	0	7,320.73
5.	July 2018	10,965.75	0	10,965.75
6.	August 2018	10,236.94	0	10,236.94
7.	September 2018	10,649.42	0	10,649.42
8.	October 2018	11,262.64	0	11,262.64
9.	November 2018	10,031.14	0	10,031.14
10.	December 2018	9,629.88	0	9,629.88
11.	January 2019	9,809.82	0	9,809.82
12.	February 2019	8,506.61	0	8,506.61
		112,013.19	0	112,013.19

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.	March 2018	1,604.23	370.41
2.	April 2018	1,877.31	430.78
3.	May 2018	2,167.53	465.92
4.	June 2018	1,760.83	380.89
5.	July 2018	2,652.92	586.73
6.	August 2018	2,420.18	605.56
7.	September 2018	2,484.86	601.93
8.	October 2018	2,624.36	661.74
9.	November 2018	2,337.22	561.01
10.	December 2018	2,299.83	518.29
11.	January 2019	2,290.09	540.39
12.	February 2019	2,020.93	445.15
		26,536.58	6,168.90

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 MNA"	TR-16602f8f-5377	0	350

2.	"Buyer MNA"	TR-99b77029-82d3	0	350
3.	"Buyer MNA"	TR-27c6c199-ac7b	0	450
4.	"Buyer O"	TR-e816be16-e153	1,000	0
5.	"Buyer O"	TR-a1905f7c-6672	1,499.99	0
6.	"Buyer O"	TR-1e11de7c-3467	3,999.94	0
7.	"Buyer MNA"	TR-f217ac6f-76d5	0	100
8.	"Buyer O"	TR-419dc6d2-6b50	1,000	0
9.	"Buyer O"	TR-95b799bc-b890	999.91	0
10.	"Buyer O"	TR-e9855933-5556	1,000	0
11.	"Buyer O"	TR-21fedf72-eb99	1,499.89	0
12.	"Buyer MNA"	TR-2252c9ec-2b5e	0	300
13.	"Buyer MNA"	TR-cd818631-d55e	0	150
			10,999.73	1,700.00

Note:

Last audit March 2018

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.	May 2018 - "Buyer O"	ISCC	1,499.94	0
2.	June 2018 - "Buyer O"	ISCC	1,999.99	0
3.	July 2018 - "Buyer O"	ISCC	3,199.93	0
4.	August 2018 - "Buyer O"	ISCC	999.93	0
5.	February 2019 – "Buyer S"	ISCC	1,997.18	0
			9,696.97	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.	June 2018 – "Buyer MNA"	0	153.86
2.	July 2018 – "Buyer MNA"	0	472.47
3.	August 2018 – "Buyer MNA"	0	747.70
4.	September 2018 – "Buyer MM"	0	512.83
5.	October 2018 – "Buyer MNA"	0	462.04
6.	November 2018 – "Buyer MNA"	0	751.09
7.	December 2018 – "Buyer MNA"	0	59.50
8.	January 2019 – "Buyer MNA"	732.45	0
9.	January 2019 – "Buyer MNA"	0	440.51
10.	February 2019 – "Buyer MNA"	270.15	0
11.	February 2019 – "Buyer SM"	0	283.71
		1,002.60	3,888.71

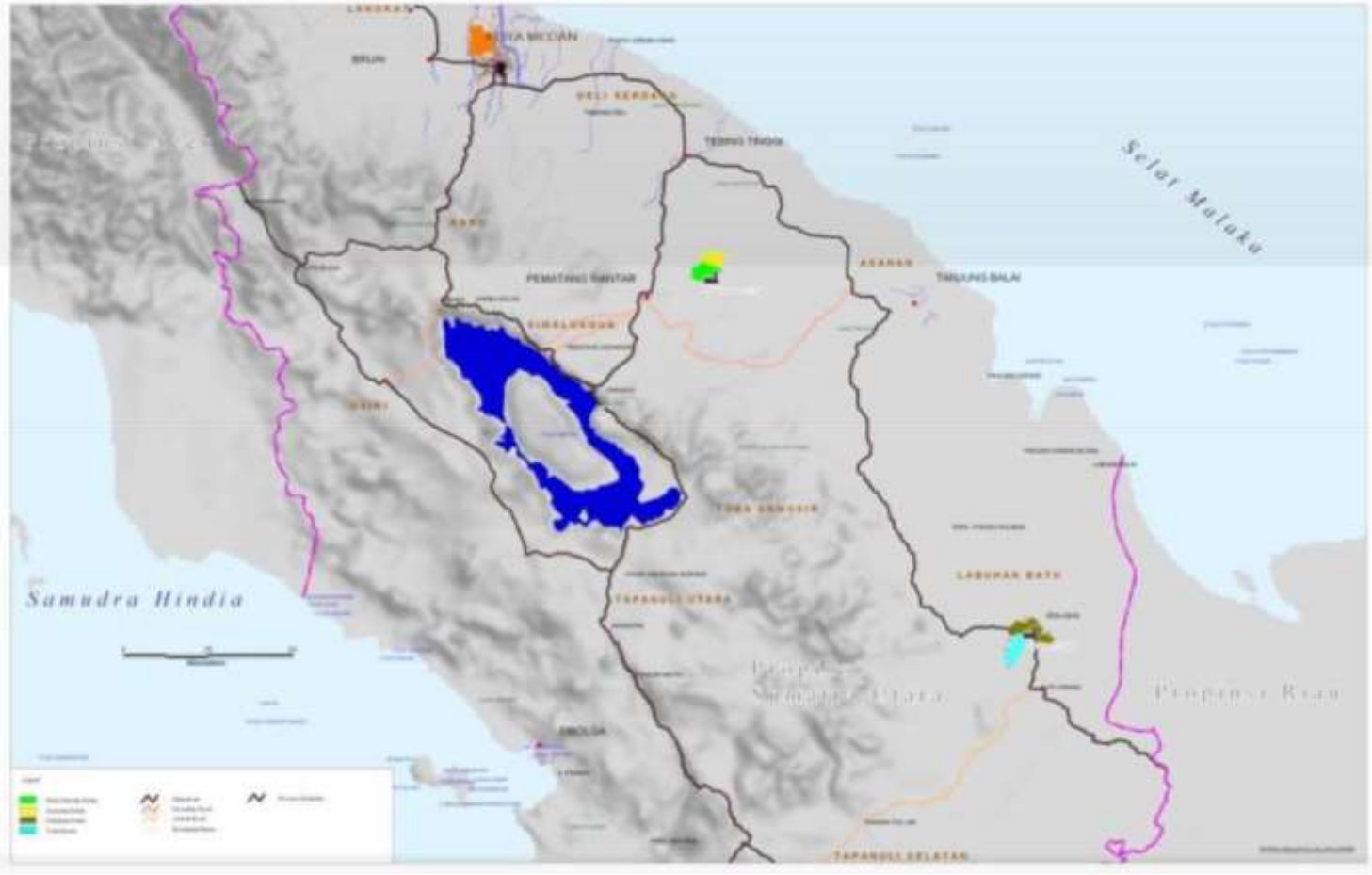
Note:

Last audit March 2018

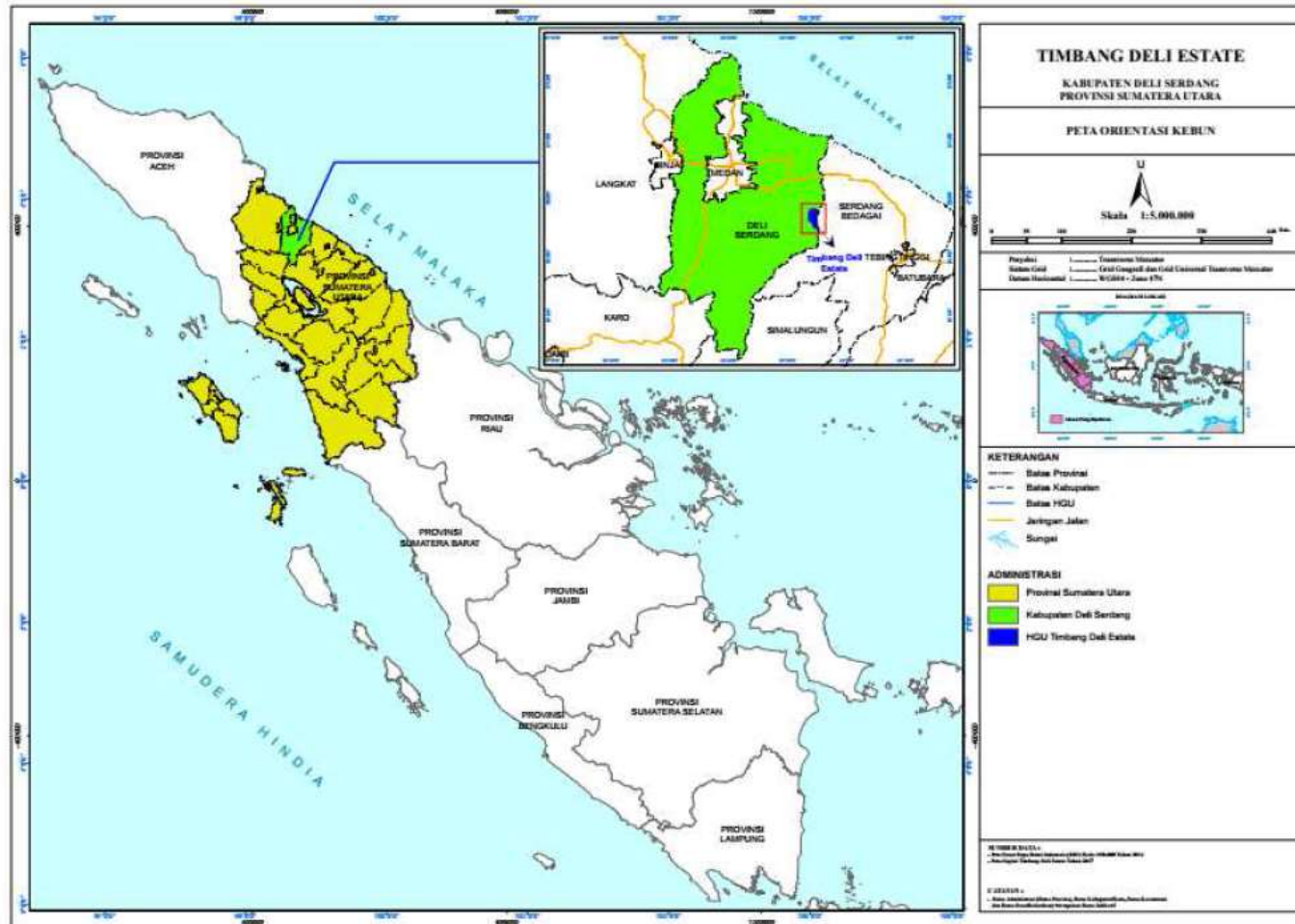
RSP0 Public Summary Report
Revision 8 (Mar /2019)

F. Records of Certified CPO Sold under RSP0 Credits to Buyers since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSP0 Credits of Certified CPO Sold (mt)
	Nil		
Note: Last audit March 2018			

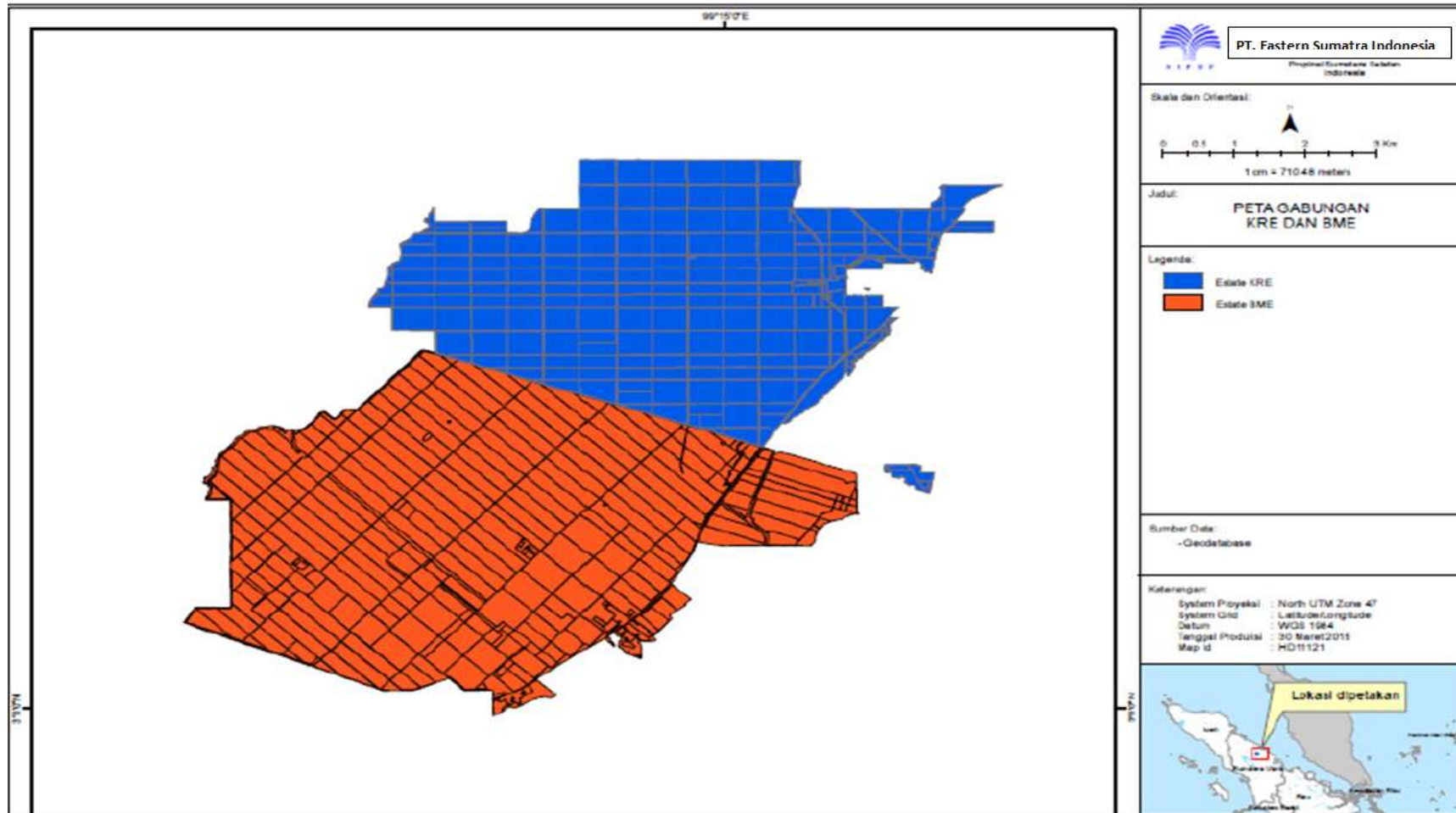
Appendix F: Location Map of Certification Unit and Supply bases



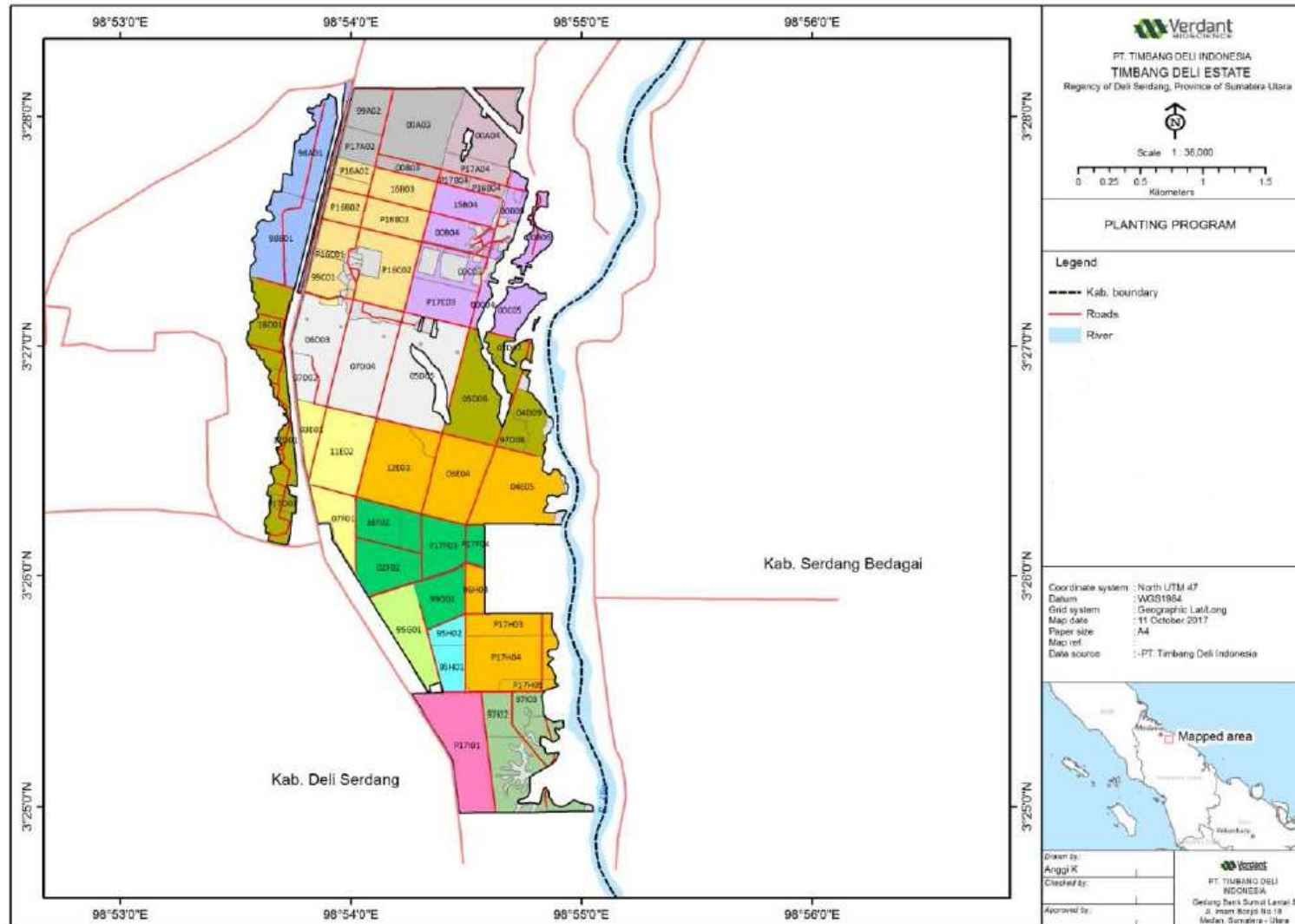
**RSPO Public Summary Report
Revision 8 (Mar /2019)**



Appendix G: Estate Field Map



**RSPO Public Summary Report
Revision 8 (Mar /2019)**



Appendix H: List of Smallholder Sampled

Not Applicable (N/A)

Appendix I: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
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 Sustainable 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