

**RSPO PRINCIPLE AND CRITERIA –  
4<sup>th</sup> ANNUAL SURVEILLANCE ASSESSMENT  
Public Summary Report**

<b>PT. Saudara Sejati Luhur (PT. Inti Indosawit Subur): Gunung Melayu I Palm Oil Mill and Its Supply Base</b>
Client company Address: Head Office: JI MH Thamrin No 31 Jakarta 10330
Certification Unit: Gunung Melayu-1 Palm Oil Mill and its supply base (Pulau Maria Estate)  Location of Certification Unit: Village of Batu Anam, Sub-District of Rahuning, Asahan Regency, North Sumatra Province, INDONESIA

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0022-06-000-00	<b>Membership Approval Date</b>	06 <sup>th</sup> February 2006
<b>Parent Company Name</b>	PT. Inti Indosawit Subur		
<b>Address</b>	JI MH Thamrin No 31 Jakarta 10230		
<b>Subsidiary (Certification Unit Name)</b>	PT. Saudara Sejati Luhur		
<b>Address</b>	Head Office: JI MH Thamrin No 31 Jakarta 10330  Site address: Batu Anam Village, Rahuning Sub-District, Asahan Regency, North Sumatra Province - Indonesia		
<b>Contact Name</b>	Mr Ivan Novrizaldie		
<b>Website</b>	<a href="http://www.asianagri.com">www.asianagri.com</a>	<b>E-mail</b>	<a href="mailto:Ivan_novrizaldie@asianagri.com">Ivan_novrizaldie@asianagri.com</a>
<b>Telephone</b>	021 2301119	<b>Facsimile</b>	021 2301120

2. Certification Information			
<b>Certificate Number</b>	<b>RSPO 620755</b>	<b>Date of First Certification</b>	07/09/2015
		<b>Certificate Start Date</b>	07/09/2015
		<b>Certificate Expiry Date</b>	06/09/2020
<b>Scope of Certification</b>	Production of CPO and PK of PT. Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill and 1 (one) estates as supply base, namely Pulau Maria Estate. Mill capacity of Gunung Melayu I POM is 60 tonnes FFB/hour.		
<b>Applicable Standards</b>	RSPO P&C INA-NI September 2016; RSPO Supply Chain Certification Standard, June 2017 (CPO Mill – Module E)		

3. Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
ID05/65250	ISO 14001:2015	SGS Indonesia	10 June 2020
EU-ISCC-Cert- DE100-37262018	ISCC	SGS Indonesia	01 Dec 2019
BSI-ISPO-619194	ISPO	BSI Indonesia	18 July 2021

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4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates (Note for Auditors: Deg °, Minutes ', Seconds "; The format must be two decimal points) (Eg. 3° 51' 14.01" N)	
		Latitude	Longitude
Gunung Melayu I POM	Batu Anam Village, Rahuning Sub-District, Asahan Regency, North Sumatra Province - Indonesia	02° 47' 29.29" N	99° 35' 54.25" E
Pulau Maria Estate	Batu Anam Village, Rahuning Sub-District, Asahan Regency, North Sumatra Province - Indonesia	02° 45' 51.07" N	99° 34' 32.06" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pulau Maria Estate	2,063	17.17	226.83	2,307	89.42
<b>Total</b>	<b>2,063</b>	<b>17.17</b>	<b>226.83</b>	<b>2,307</b>	<b>89.42</b>

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Pulau Maria Estate	-	-	2,063	-	-	2,063	-
<b>Total (ha)</b>			<b>2,063</b>			<b>2,063</b>	

**Note:**

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated ( <i>Sep2018 – Aug2019</i> )	Actual ( <i>Jun2018 – Apr2019</i> )	Forecast ( <i>Sep2019 – Aug2020</i> )
Pulau Maria Estate	52,026	46,060.43	50,699
<b>Total</b>	<b>52,026</b>	<b>46,060.43</b>	<b>50,699</b>

**Note:**

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<b>8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *</b>			
Estate	Tonnage / year		
	Estimated ( <i>Sep2018 – Aug2019</i> )	Actual ( <i>Jun2018 – Apr2019</i> )	Forecast ( <i>Sep2019 – Aug2020</i> )
Nil	N/A	Nil	N/A
<b>Total</b>			

**Note:**

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>			
Independent FFB Supplier	Tonnage / year		
	Estimated ( <i>Sep2018 – Aug2019</i> )	Actual ( <i>Jun2018 – Apr2019</i> )	Forecast ( <i>Sep2019 – Aug2020</i> )
3 <sup>rd</sup> party FFB Supplier (25 suppliers)	270,158	202,431.90	244,502
<b>Total</b>	<b>270,158</b>	<b>202,431.90</b>	<b>244,502</b>

**Note:**

<b>10. Certified Tonnage</b>			
Mill Capacity: 60 MT/hr	Estimated ( <i>Sep2018 – Aug2019</i> )	Actual ( <i>Jun2018 – Apr2019</i> )	Forecast ( <i>Sep2019 – Aug2020</i> )
		FFB	FFB
	52,026	46,060.43	50,699
SCC Model: MB	CPO (OER: 25.20%)	CPO (OER: 25.03%)	CPO (OER: 24.90%)
	13,110.55	11,529.12	12,624
	PK (KER: 5.36%)	PK (KER: 5.24%)	PK (KER: 5.36%)
	2,788.59	2,412.38	2,717

**Note:**

<b>11. Actual Sold Volume (CPO)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	309.22	11,130	-	-	11,439.22

<b>12. Actual Sold Volume (PK)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>PK (MT)</b>	2,266.71	-	-	-	<b>2,266.71</b>

<b>13. Actual Group certification Claims</b>		
	Credit	Physical Volume (MT)
<b>IS-CSP0</b>	-	-
<b>IS-CSPKO</b>	-	-
<b>IS-CSPKE</b>	-	-

## 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 4<sup>th</sup> annual surveillance assessment was conducted from **14-16 May 2019**. The audit programme is included as Appendix D. 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 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 (RSPO P&C INA-NI 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.

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



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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**

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 4)</b>	<b>Year 5 (ASA 4)</b>
Gunung Melayu I POM	X	X	X	X	X
Pulau Maria Estate	X	X	X	X	X

**Tentative Date of Next Visit: June 1, 2020 - June 3, 2020**

**Total No. of Mandays: 8 Mandays (onsite)**

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Yudwi Wisnu Rahmanto (YW)	Lead Auditor	Bachelor of Forestry with majoring on Forest Silviculture. He worked at professional independent Certification Body as an Auditor for last 8 years and has involved in auditing activities with various certification schemes. Selected training which have been followed, such as RSPO Endorsed Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, Quality Management System (QMS) ISO 9001:2008 Auditor/Lead Auditor

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		Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme and others internal training programs. He has involved in auditing activities, such as Sustainable Forest Management by FSC FM/COC Scheme, Sustainable Palm Oil by RSPO and ISPO Scheme, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile. During the assessment he assigned to verify legal, land dispute and social aspect.
Eko Purwanto (EP)	Team Member	He graduated as Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Agricultural University (IPB) in 2001. He owned working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implemented good agricultural practice including integrated pest management and limited pesticides uses. He has experience in auditing ISO 9001, ISPO, RSPO P&C and RSPO SCC with SAI Global since 2012 to 2017 as Lead Auditor and sometimes as Auditor. He joined BSI Group Indonesia in August 2017 as Auditor/Lead Auditor for ISO, ISPO, RSPO P&C and RSPO SCC (Client Manager/Tutor). 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 received refreshment training of RSPO P&C in May 2018 and RSPO SCC in March 2018. 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.
Imam Fakhrurozi (IM)	Team Member	Imam holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta in 2011. He had 2 (two) years working experienced related to oil palm industries i.e. as a sustainability and HSE in oil palm Plantation Company in Indonesia. Several relevant Training he has completed include ISO 9001 and 14001 Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed courses. 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 2016. During this assessment, he assessed on the OHS and Environmental aspect.

**Accompanying Persons: None**

### 2.3 Assessment Plan

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

Date	Time	Subjects	YWR	EP	IF
Monday, 13/05/2019	10.40 – 13.05	Flight Jakarta to Medan (GA 186)	√	√	√
	13.30 – 18.00	Travelling to site	√	√	√
Tuesday, 14/05/2019	08.00 – 09.00	Opening meeting <ul style="list-style-type: none"> <li>• Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>• Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> <li>• Verification of Basic Information (Mill and supply bases)</li> <li>• Review of previous assessment findings.</li> </ul>	√		
	09.00 – 12.00	Field visit to <b>Pulau Maria Estate:</b> <ul style="list-style-type: none"> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Waste Management, HCV Area)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect, include ground check on facilities</li> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries)</li> </ul>	√	√	√  √
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	Continuing field visit (if necessary); completing checklist and document review.	√	√	√

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Date	Time	Subjects	YWR	EP	IF
Wednesday 15/05/2019	08.00 – 12.00	<ul style="list-style-type: none"> <li>- Interview with Stakeholders (statutory bodies of Asahan Regency) <b>by phone</b> and Local Communities representatives (<b>by Focus Group Discussion</b>)</li> </ul> Field visit to <b>Gunung Melayu I POM</b> : <ul style="list-style-type: none"> <li>• BMP for Mill Processing – site visit</li> <li>• Supply Chain for CPO Mill (site visit) - FFB Receiving, Weighbridge, Dispatch CPO.</li> <li>• Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, Processing Activities)</li> <li>• Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, Biogas Plant – if any)</li> </ul>	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	Continuing field visit (if necessary); completing checklist and document review.	√	√	√
	17.00 -	Traveling from site to Kualanamu, stay overnight at the Hotel	√	√	√
Thursday 16/05/2019	08.00 – 12.00	Completing checklist and document review	√		√
	12.00 – 14.00	<b>Break</b>	√		√
	14.00 – 15.00	Preparation for Closing Meeting	√		√
	16.00 – 17.00	Closing Meeting <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)</li> <li>• Comments, Responses and Questions</li> </ul>	√	√	√
	17.00 -	Traveling from site to Kualanamu, stay overnight at the Hotel	√	√	√
Friday 17/05/2019	09.00 – 11.25	Return Flight Medan to Jakarta (GA 183)	√	√	√

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

- PT. Saudara Sejati Luhur – Gunung Melayu I POM Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

#### 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. Inti Indosawit Subur – Asian Agri Group has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Comply
Have all the estates and mills certified within five years after obtaining RSPO membership?	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	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.	No new acquisition.	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?	There is no changes from previous audit	Comply
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No	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 <b>Major</b> non-compliance shall be raised	No	Comply

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Have there been any stakeholder comments?	Yes, stakeholder comment is presented within this report.	Comply
<b>Un-Certified Units or Holdings</b>		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
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.  The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a> . The progress on the Liabilities shall be verified and reported.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply

### 3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?  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.	No Smallholders within scope of Gunung Melayu I POM.	Not Applicable

### 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 4<sup>th</sup> Annual Surveillance Assessment there were One (1) Minor nonconformity raised. The **Gunung Melayu 1 POM - PT. Saudara Sejati Luhur** 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.

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1778313-201905-N1	<b>Clause &amp; Category (Major / Minor)</b>	5.1.2 Minor
<b>Date Issued</b>	16 <sup>th</sup> May 2019	<b>Due Date</b>	Next Assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	-
<b>Statement of Nonconformity:</b>	There was lack of evidence the organization has submitted the report of implementation of RKL-RPL for second semester year 2018 (July-December 2018) as required at the SK Izin Lingkungan Nomor: 660.1/0779/LH/2015 tentang Izin Lingkungan PT Saudara Sejati Luhur.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	PT. Saudara Sejati Luhur has shown the environmental document of "UKL-UPL" that been approved under environmental decree "Keputusan Kepala Kantor Lingkungan Hidup Kabupaten Asahan Provinsi Sumatera Utara Nomor: 660.1/0779/LH/2015, tertanggal 17th June 2015 tentang		

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	<p>Izin Lingkungan PT Saudara Sejati Luhur” pada poin Memutuskan bagian kesembilan “Menyampaikan laporan pelaksanaan implementasi pengelolaan lingkungan hidup dan implementasi pemantauan lingkungan hidup kepada:</p> <ol style="list-style-type: none"> <li>1. Menteri Negara Lingkungan Hidup dan Kehutanan RI di Jakarta,</li> <li>2. Kepala Badan Lingkungan Hidup Provisni Sumatera Utara dan</li> <li>3. Kepala Kantor Lingkungan Hidup Kabupaten Asahan Provinsi Sumatera Utara.</li> </ol> <p>However, there was lack of evidence the organization has submitted the report of implementation of RKL-RPL for second semester year 2018 (July-December 2018) as required at the “SK Izin Lingkungan Nomor: 660.1/0779/LH/2015 tentang Izin Lingkungan PT Saudara Sejati Luhur”.</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>- Daftar Distribusi Eksternal tentang Laporan Pelaksanaan RKL-RPL periode Juli-Desember 2018 kepada Dinas Perkebunan Kabupaten Asahan</li> <li>- Memorandum Nomor: 117/MI-PGS/MEMO/03/2019, Hal Pengiriman Laporan RKL/RPL Juli – Desember 2018, tertanggal 27 Maret 2019 ditujukan kepada RH Plt I Medan; Attn: Ibu Rika Damanik (RO Plt I – Medan)</li> </ul>
<p><b>Corrections:</b></p>	<p>Ask the Medan office to provide of receipt the RKL RPL report and follow up back to the field for receipt of RKL-RPL Semester 2 2018 as soon as possible.</p> <p>Evidence:</p> <ul style="list-style-type: none"> <li>• Receipt of RKL-RPL Semester 2 Year 2018 submission report, dated 26 April 2019.</li> <li>• E-Receipt of “Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL)”, dated 18 June 2019.</li> </ul>
<p><b>Root Cause Analysis:</b></p>	<p>The RKL RPL report has been sent to Medan but no feedback report or receipt has been received by the HO office, so the receipt of the RKL RPL report for semester 2018 cannot be shown.</p>
<p><b>Corrective Actions:</b></p>	<p>Appoint the PIC in charge of all report receipts to follow up with the Medan office. In order to avoid re-misunderstanding to show receipts throughout the report.</p>
<p><b>Assessment Conclusion:</b></p>	<p>Corrective action plan accepted. Effectiveness of corrective action will be verify in the next assessment.</p>

<p style="text-align: center;"><b>Opportunity for Improvements</b></p>	
<p><b>OFI #</b></p>	<p style="text-align: center;"><b>Description</b></p>
<p><b>OFI 1</b></p>	



Positive Findings	
PF #	Description
PF 1	

### 3.4.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity			
<b>NCR Ref #</b>	1643091-201806-N1	<b>Clause &amp; Category (Major / Minor)</b>	2.2.2 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	14 May 2019
<b>Statement of Nonconformity:</b>	Lack of evidence that legal boundaries has clearly maintained by PT Saudara Sejati Luhur.		
<b>Requirement Reference:</b>	Legal boundaries are demonstrated clearly and maintained.		
<b>Objective Evidence:</b>	<p>During field visit, it was found that the numbering of HGU pegs (legal boundaries) was not accordance with the maps on HGU certificate. For example:</p> <p>-Pegs no. 37 / 38, on block I02H, Division I, bordering with Batu Anam Estate, coordinate no; 02°45'51.0" N; 099°35'17.0" E.--&gt; in field written peg no. 37 however in the map written peg no. 38.</p> <p>-Numbering of pegs HGU is not sequence in accordance with the map of the certificate HGU, e.g: di Afdeling II: pegs no. 27, 28, 38, 37, 42..., di Afdeling III pegs no. 48, 49, 61, 50 51, 53, ...</p>		
<b>Corrective Actions:</b>	Conduct regular monitoring and maintenance of HGU pegs in accordance with HGU certificate. Company has conduct regular monitoring each semester. Latest conducted on semester II 2017.		
<b>Assessment Conclusion:</b>	<p>Verification during ASA-4 on14 May 2019:            Certificate Holder showing Map "Peta Patok HGU PT. SSL – Kebun Pulau Maria", scale 1:30,052. Total number of pegs identified are 76 pegs, consist of 19 pegs available, 11 pegs plan to install within 2019, 9 pegs planned in 2020, 9 pegs planned in 2021.</p> <p>Based on field visit:</p> <p>1. Pegs SSL #38. Located in Block J06E, Afd. 1. GPS Coordinates: 2° 45' 51.42" N and 99° 35' 17.51" E. South side borders with community land (planted with oil palm) of Batu Anam villagers. This boundary peg is appropriate numbering with the map.</p> <p>2. Numbering of pegs on map are not sequences. Pegs #14, #15, #17 up to #20, #22 up to #26 are not registered within HGU map "Peta Bidang Tanah" scale 1:10,000.</p> <p>All boundaries map already identified and planned to completing install pegs up to year 2021.</p>		

Opportunity for Improvement	
OFI#	Description
OFI 1	

### 3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1128966M1	Major	3.1	18/12/2014	CLOSED on 20/04/2015
1128966M2	Major	4.1.1	18/12/2014	CLOSED on 17/06/2015
1128966M3	Major	4.6.2	18/12/2014	CLOSED on 20/04/2015
1338574M1	Major	4.7.2	03/06/2016	CLOSED on 17/07/2016
1338574N1	Minor	2.1.3	03/06/2016	CLOSED on 07/06/2017
1338574N4	Minor	4.7.5	03/06/2016	CLOSED on 06/06/2017
1338574N3	Minor	4.7.6	03/06/2016	CLOSED on 06/06/2017
1338574N5	Minor	5.3.3	03/06/2016	Escalated to Major NC CLOSED on 03/08/2017
1338574N6	Minor	6.9.3	03/06/2016	CLOSED on 06/06/2017
1487832-201706-M1	Major	2.1.1	07/06/2017	CLOSED on 03/08/2017
1487832-201706-M2	Major	5.2.2	07/06/2017	CLOSED on 03/08/2017
1487832-201706-M3	Major	5.3.3	07/06/2017	CLOSED on 03/08/2017
1487832-201706-N1	Minor	6.1.4	07/06/2017	CLOSED on 07/06/2018
1643091-201806-N1	Minor	2.2.2	07/06/2018	CLOSED on 14/05/2019
1778313-201905-N1	Minor	5.1.2	16/05/2019	OPEN

### 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 **Gunung Melayu I Palm Oil Mill – PT. Saudara Sejati Luhur** 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


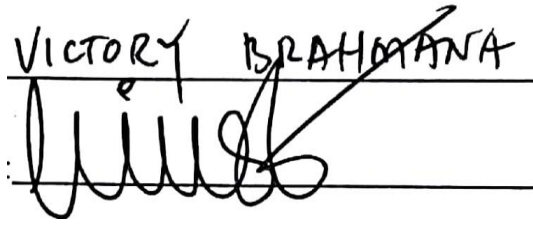
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workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

List of Stakeholders Contacted	
<b>Internal Stakeholders</b> Interviewed workers Gender Committee	<b>Union/Contractors/Local Communities</b> Labor union, Chief of Batu Anam Village.
<b>Government Departments</b> <ul style="list-style-type: none"> <li>- Environmental Agency, Asahan Regency.</li> <li>- Manpower Agency, Asahan Regency.</li> <li>- Land Agency, Asahan Agency.</li> <li>- Agriculture Agency, Asahan Agency</li> </ul>	<b>NGO</b> None

IS #	Description
1	<p><b>Feedbacks:</b></p> <p><b>Village Head Batu Anam Mr. Haryanto</b></p> <ul style="list-style-type: none"> <li>➤ The existence of the company has a positive impact on the surrounding community, especially in the field of local employment of CSR programs and impact on the economic development of the community, especially the benefit of community TBS acceptance by PT GM1. The surrounding community feels that they have received positive benefits from the company's existence, especially the TBS harvest can be accepted by PKS GM 1 (PT SSL).</li> <li>➤ In general communication and coordination between village government and the Company has been running well.</li> <li>➤ The Company always responds to any problems submitted by the village government officials or from the surrounding community.</li> <li>➤ The company has realized the CSR program to the surrounding community and involve it in the process of preparing the plan of each village's CSR program. Particularly, road maintenance.</li> <li>➤ PT SSL implements the FFB Price is based on the provisions of the Dinas Pertanian Asahan District established by the Governor of North Sumatra.</li> <li>➤ There is no land disputes issues for the last 5 years.</li> </ul> <p><b>Management Responses:</b></p> <p>As a company commitment, maintaining relationship for affected stakeholder are very important. If the company continuous to develop communication effectively, then negative impact can be reduce. PT. SSL thanks to surrounding communities upon fair cooperation in all aspect, this aim to build trusted value that existing of the company will impact positively.</p> <p><b>Audit Team Findings:</b></p> <p>Positive finding</p>
2	<p><b>Feedbacks:</b></p> <p><b>Manpower Agency of Asahan Regency</b></p> <ul style="list-style-type: none"> <li>➤ No respond while contacting by phone</li> </ul> <p><b>Management Responses:</b></p> <p>None</p>

	<p><b>Audit Team Findings:</b> None</p>
3	<p><b>Feedbacks:</b>  <b>National Land of Asahan Regency</b></p> <ul style="list-style-type: none"> <li>➤ No respond while contacting by phone</li> </ul>
	<p><b>Management Responses:</b> None</p>
	<p><b>Audit Team Findings:</b> None</p>
4	<p><b>Feedbacks:</b>  <b>Agriculture Agency of Asahan Regency</b></p> <ul style="list-style-type: none"> <li>➤ The Company has performed periodic reporting obligations related to plantation business operations in the form of statistical data of oil palm plantations to the Office of Forestry and Plantation of Asahan Regency.</li> <li>➤ The entire HGU area of the company has been in accordance with its designation with the Asahan District Spatial as a cultivation area of plantation crops.</li> <li>➤ The price of FFB shall be determined based on prevailing market price and the company is not bound to the decision of TBS preparation of North Sumatera province. Based on reports coming in PT. Saudara Sejati Luhur has a good community TBS price structure compared to other companies.</li> </ul>
	<p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>- Company have strong commitment to comply with related regulation, including periodical submission report.</li> <li>- Yes, the company have no story of land disputes, it is because land title or HGU has obtained very long time.</li> <li>- FFB pricing for outsider supplier, the company has own calculation and formula. The FFB prices is bit higher than others Mill, but the company still open and transparent inform to third party suppliers.</li> </ul>
	<p><b>Audit Team Findings:</b> Positive finding, please refer to relevant indicator in the summary findings.</p>

<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that <b>Gunung Melayu I Palm Oil Mill – PT. Saudara Sejati Luhur</b> has complied with the RSPO P&amp;C INA-NI September 2016 and RSPO Supply Chain Certification Standard (June 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 <b>Gunung Melayu I Palm Oil Mill – PT. Saudara Sejati Luhur</b> is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name: Yudwi Wisnu Rahmanto</b>	<b>Name: Victory Brahmna</b>
<b>Company Name: On behalf BSI Services Malaysia Sdn Bhd</b>	<b>Company Name: PT. Saudara Sejati Luhur</b>
<b>Title: Lead Auditor</b>	<b>Title: General Manager</b>
<b>Signature:</b> 	<b>Signature:</b> 
<b>Date: 13 August 2019</b>	<b>Date: 13 August 2019</b>

**Appendix A: Summary of Findings**

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Commitment to Transparency</b>			
<b>Criterion 1.1:</b> 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 -	The Certificate Holder has shown the list of information that can be accessed by relevant stakeholders under document "Daftar Dokumen Yang dapat diakses oleh Stakeholders, Memorandum No 21/GMGME/Int/03/18", updated on 11th February 2018, that covered: <ol style="list-style-type: none"> <li>1. Legal Documents - a copy of SK HGU (Land Title) - a copy of AMDAL (Social and Environmental Impact Assessment) - a copy of Operational Permit (IUP/SPUP)</li> <li>2. Environment Documents - Hazardous waste storage permit - Waste management plans - Report of waste water - Report of water management - Report of river water quality - Report of air quality. - Report of RKL (Environmental Management Plan) – RPL (Environmental Monitoring Plan). - Report of Hazardous Waste - HCV Assessment</li> <li>3. Social Activity Documents (Rencana dan Realisasi Program CSR).</li> <li>4. Employment Documents. - Jamsostek and also BPJS Kesehatan - HSE management programs</li> </ol>	Comply
1.1.2	Records of requests for information and responses to the information requested shall be available.  - Major compliance -	Request Information and response from Stakeholder has been documented into a log book "Surat Masuk" and the response is documented in "Log Book Stakeholders – Out". There were noted 12 information request and others from Stakeholder up to April 2019, sample seen: <ol style="list-style-type: none"> <li>1. Request information on 5 March 2019 No. 501/049/III/2019 from Dinas Lingkungan Hidup.</li> </ol>	Comply

		<p>2. Request information on 27 February 2019 No. 81/ORG/PC FSP.PP-AS/II/2019 from Ketua DPC SPSI Asahan Regency related participants of Conference.</p> <p>All request information and others has been responded timely manner Personel in charge to monitor the records of information request and response is public relation department (Humas) and KTU (head of administration) PT Saudara Sejati Luhur both mill and estate.</p>	
<p><b>Criterion 1.2:</b>  Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>			
<p>1.2.1</p>	<p>Publicly available documents shall include, but are not necessarily limited to:</p> <ul style="list-style-type: none"> <li>a) Land titles/user rights (Criterion 2.2)</li> <li>b) Occupational health and safety plans (Criterion 4.7)</li> <li>c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)</li> <li>d) HCV documentation (Criteria 5.2 and 7.3)</li> <li>e) Pollution prevention and reduction plans (Criterion 5.6)</li> <li>f) Details of complaints and grievances (Criterion 6.3)</li> <li>g) Negotiation procedures (Criterion 6.4)</li> <li>h) Continual improvement plans (Criterion 8.1)</li> <li>i) Public summary of certification assessment report</li> <li>j) Human Rights Policy (Criterion 6.13).</li> </ul>	<p>Based on procedure "Menerima dan Merespon Permintaan Informasi Stakeholder" (SOP. No.: AA-GL5008.1-R1 dated 22nd August 2011) which is manage and monitoring information request from stakeholder.</p> <p>The Company has also established a Matrix of Provision of Information to Stakeholders, describing the types of information that can be provided to stakeholders, including legal basis, type of information and relationships with relevant agencies. All information request from stakeholder will be handled by relevant department. For example: CSR department responsible for inquiry from local community, media, NGO including dispute or complaint; Human Resources Department responsible for worker consultation, worker union or government authorities related to manpower/labor issue; Purchasing Department responsibility to communicate regulation's, environment's, health and safety and social's requirement to all supplier.</p> <p>PT Saudara Sejati Luhur Gunung Melayu I POM and estate has made a list of documents that are publicly accessible recorded in "Formulir Distribusi Informasi" (Open to Public) and is updated annually, such as:</p> <ul style="list-style-type: none"> <li>a) Laws and regulation document: Permit and license (Izin Lokasi, Izin Usaha Perkebunan, Hak Guna Usaha, etc.);</li> <li>b) Environmental document: AMDAL document (SEIA), RKL-RPL document (environmental management and monitoring report), permit for temporary hazardous waste storage, waste management plan, environmental policy, HCV identification document, pollution management plan etc.</li> </ul>	<p>Comply</p>

	<p>- Major compliance –</p>	<p>c) Several procedures that publicly available such as: Measurement and land acquisition procedures, land dispute procedure and mechanism, Procedure No. SOP: XX-HR-308.5-RO; Revision: 0, Desember 11th 2009: Employees complaints etc.</p> <p>d) Social document: Social Impact Assessment (SIA) "Study Evaluasi Lingkungan" which covering social impact assessment. This SEL has been approved by Ministry Agriculture no. 220/687/B/IV/1994, Social program, Community development program, company policies, etc. e. Human rights policy that has been published No.298/ES-KTS/Memo/08/14 dated 26th August 2014 which also covering ethics in business that stated that "ethical behavior, Prohibition of all forms of corruption, bribery in the conduct or transaction business practices and fraudulent use of funds".</p>	
<p><b>Criterion 1.3:</b>          Growers and millers commit to ethical conduct in all business operations and transactions.</p>			
<p>1.3.1</p>	<p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions along with the documentation of socialisation process of the policy to all levels of the workers and operations.</p> <p>- Minor compliance –</p>	<p>The company maintained human rights policy that has been published No.298/ES-KTS/Memo/08/14 dated 26th August 2014 which also covering ethics in business that stated that "ethical behavior, Prohibition of all forms of corruption, bribery in the conduct or transaction of business practices and fraudulent use of funds "(Perusahaan berkomitmen berperilaku etis dalam berbisnis pada seluruh transaksi dan operasi bisnis, pelarangan seluruh bentuk korupsi, penyuapan dan penipuan dalam penggunaan dana dan sumber daya)".</p> <p>That policy has been informed to all employees and it also has been posted in public area as well as been socialized in every morning briefing so that it can be accessed by all employees. The policy has been disseminated to all level on 2018 only.</p>	<p>Comply</p>
<p><b>Principle 2: Compliance with applicable laws and regulations</b></p>			
<p><b>Criterion 2.1</b>          There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available.</p> <p>- Major compliance –</p>	<p>Evidence of compliance with legal requirement of PT. Saudara Sejati Luhur as follow:          Deed of Company Establishment:</p>	<p>Comply</p>



		<p>Deed No. 62 Year 1971, dated 20 March 1971. Approval from Ministry of Law No. J.A.5/28/18, dated 15 February 1972. Latest Deed of Amendment No. 82 dated 29 July 2011.</p> <p>Land Use Title (HGU):</p> <p>Certificate of HGU issued by Kantor Pertanahan Asahan Regency no. 1 of 2004 dated April 29, 2004 in accordance with the Measure Letter no. 01/Rahuning/2004 dated April 27, 2004 with an area of 2,301.883 Ha and valid until December 31, 2030. Equipped with HGU Map Appendix with a scale of 1: 10,000.</p> <p>Plantation Permit (IUP):</p> <p>Surat Pendaftaran Usaha Perkebunan (SPUP) issued from Ministry of Agriculture No.HK.350/539/Dj.Bun.5/VII/2001, dated 12 July 2001. Permitted area is 2,319 Ha.</p> <p>Company Tax ID Number (NPWP): No.011390309-115.001.</p>	
2.1.2	<p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <p>- Minor compliance –</p>	<p>"Evaluasi Kepatuhan Hukum Tahun 2019", issued January 2019. The certificate holder has a mechanism to ensure compliance with all applicable laws and regulations compliance through procedure "SOP Pemenuhan Peraturan Perundang-undangan dan Perubahannya" (No. SOP; AA-GL-5001.1-RO) dated 5<sup>th</sup> December 2009).</p>	Comply
2.1.3	<p>A mechanism for ensuring compliance shall be implemented.</p> <p>- Minor compliance –</p>	<p>There is an internal audit process which includes a review of laws and their compliance. This is the way to ensure that company still compli with relevant regulation. Each department has to demonstrate evidence of compliance and/or effort in complying with these legal/regulatory requirements.</p> <p>This includes manpower regulation fulfilment, environmental reporting, health and safety reporting and other legal/regulatory requirements. Evidence of documented mechanism on the compliance with relevant regulation was sighted in terms of Legal Requirements and Evaluation Compliance.</p> <p>The Company has the mechanism to ensure the contractor/supplier compliance to the relevant regulation before approved the contractor/supplier as a partner of company. Recorded on form "Evaluasi Kepatuhan Hukum PT Saudara Sejati Luhur". Revised on January</p>	Comply

		2019. Evidence of evaluation document has been verified and found completed and sufficient.	
2.1.4	A system for tracking any changes in the law shall be available and implemented. - Minor compliance –	“Evaluasi Kepatuhan Hukum Tahun 2019”, issued January 2019. The certificate holder has a mechanism to ensure compliance with all applicable laws and regulations compliance through procedure “SOP Pemenuhan Peraturan Perundang-undangan dan Perubahannya” (No. SOP; AA-GL-5001.1-RO) dated 5 <sup>th</sup> December 2009).	Comply
<b>Criterion 2.2</b>			
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.			
2.2.1	Documents showing legal ownership or lease, history of land tenure ownership/control, and the actual legal use of the land shall be available. - Major compliance -	Land Use Title (HGU):  Certificate of HGU issued by Kantor Pertanahan Asahan Regency no. 1 of 2004 dated April 29, 2004 in accordance with the Measure Letter no. 01/Rahuning/2004 dated April 27, 2004 with an area of 2,301.883 Ha and valid until December 31, 2030. Equipped with HGU Map Appendix with a scale of 1: 10,000.  Plantation Permit (IUP):  Surat Pendaftaran Usaha Perkebunan (SPUP) issued from Ministry of Agriculture No.HK.350/539/Dj.Bun.5/VII/2001, dated 12 July 2001. Permitted area is 2,319 Ha.	Comply
2.2.2	Legal boundaries are demonstrated clearly and maintained. - Minor compliance -	Certificate Holder has a monitoring map of legal boundaries and its report. Document sighted on “Laporan Pemeriksaan dan Perawatan Patok Batas PT. Saudara Sejati Luhur – Kebun Pulau Maria No: 001/LAP/KTU/05/2019, dated May 2019”. 76 boundary pegs already identified and checked, completed with GPS coordinates (degree, minutes, second).  Sample during field visit at Pulau Maria Estate:  1. Pegs SSL #05. Located in Block I08G, Afd. 3. GPS Coordinates: 2° 47’ 31.78” N and 99° 33’ 47.62” E. North West side borders with PT. PADASA (Oil Palm Plantation Company).	Comply

		<p>2. Pegs SSL #28. Located in Block J06B, Afd. 2. GPS Coordinates: 2° 46' 42.06" N and 99° 36' 10.72" E. East side borders with community land (planted with oil palm).</p> <p>3. Pegs SSL #38. Located in Block J06E, Afd. 1. GPS Coordinates: 2° 45' 51.42" N and 99° 35' 17.51" E. South side borders with community land (planted with oil palm) of Batu Anam villagers.</p> <p>All the sample of pegs are clearly visible and well maintained.</p> <p><u>Corrective Action on Pegs Installation (previous NC's):</u></p> <p>Certificate Holder showing Map "Peta Patok HGU PT. SSL – Kebun Pulau Maria", scale 1:30,052. Total number of pegs identified are 74 pegs.</p> <p>Report of "Laporan Pemeriksaan dan Perawatan Patok Batas PT. Saudara Sejati Luhur – Kebun Pulau Maria No: 001/LAP/KTU/05/2019, dated May 2019". Informed that there is total 76 pegs with current status: 19 pegs available, 11 pegs will installed during 2019, 9 pegs in 2020, 9 pegs in 2021. Conclusion: previous NC minor is Closed.</p>	
2.2.3	<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, Prior and Informed Consent by all related parties shall be provided.</p> <p>- Minor compliance -</p>	<p>According to hectare statement "Laporan Unit Kebun Pulau Maria, April 2019", there is no occupied land or dispute land within the certified area.</p> <p>To ensure whether or not land dispute occurring within certified area, auditor contact to relevant stakeholder/authority (National Land Agency of Asahan Regency) on 15 May 2019, it is clearly informed that no land disputes occurs in PT. Saudara Sejati Luhur.</p>	Comply
2.2.4	<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>According to hectare statement "Laporan Unit Kebun Pulau Maria, April 2019", there is no occupied land or dispute land within the certified area.</p> <p>To ensure whether or not land dispute occurring within certified area, auditor contact to relevant stakeholder/authority (National Land Agency of Asahan Regency) on 15 May 2019, it is clearly informed that no land disputes occurs in PT. Saudara Sejati Luhur.</p>	Comply

2.2.5	<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>According to hectare statement “Laporan Unit Kebun Pulau Maria, April 2019”, there is no occupied land or dispute land within the certified area.</p> <p>To ensure whether or not land dispute occurring within certified area, auditor contact to relevant stakeholder/authority (National Land Agency of Asahan Regency) on 15 May 2019, it is clearly informed that no land disputes occurs in PT. Saudara Sejati Luhur.</p>	Comply
2.2.6	<p>To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and/or planned operations.</p> <p>- Major compliance –</p>	<p>According to hectare statement “Laporan Unit Kebun Pulau Maria, April 2019”, there is no occupied land or dispute land within the certified area.</p> <p>To ensure whether or not land dispute occurring within certified area, auditor contact to relevant stakeholder/authority (National Land Agency of Asahan Regency) on 15 May 2019, it is clearly informed that no land disputes occurs in PT. Saudara Sejati Luhur.</p>	Comply
<p><b>Criterion 2.3</b>          Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
2.3.1	<p>Maps with appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).</p> <p>- Major compliance -</p>	<p>PT. Saudara Sejati Luhur has legal ownership as Land Use Title or Hak Guna Usaha, completed with map “Peta Bidang Tanah” scale 1:10,000. This land title certificate issued based on Minutes of Multi-stakeholder “Risalah Panitia Tanah-B”.</p>	Comply
2.3.2	<p>Copies of negotiated agreements including the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and these include:</p> <ul style="list-style-type: none"> <li>a) Evidence of consultation</li> <li>b) Statement of transfer of rights</li> <li>c) Evidence of compensation</li> </ul>	<p>The issuance of HGU certificate has gone through “Rapat Panitia Tanah B” involving multi-stakeholder as consideration prior to HGU issuance.</p>	Comply

	See specific guidance 2.3.2 - Minor compliance -		
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 -	Based on documents review and interview with local government, Batu Anam and Sidomulyo Village as well as National Land Agency office of Asahan Regency and local communities surrounding the company (at the time of audit on public consulttion), it was noted that there is no any customary land or legal rights within the company areas.	Comply
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 -	Based on stakeholder consultation with communities surrounding the plantation, there has never been social unrest related to presence of occupied land. Good communication between company and community, related to FFB harvesting schedule, as explained in RSPO P&C indicator 2.3.2.	Comply
Principle 3: Commitment to long-term economic and financial viability			
Criterion 3.1			
<b>There is an implemented management plan that aims to achieve long-term economic and financial viability.</b>			
3.1.1	A documented management plan, a minimum of three years shall be available, including, where appropriate, plan for scheme smallholders. - Major compliance-	The company has committed to economic and financial sustainability, as on documented working plan of Financial Budget Plan "Rencana Kerja Tahun 2019 - 2024". The company has set up a business management plan for the next 5 years and the forecast have been well documented in the document "Proyeksi Produk Sustainable & Non Sustainable PT Saudara Sejati Luhur – Gunung Melayu I POM period 2019 - 2024. Management plan was set up including independent FFB suppliers. Its management plan include:  <ol style="list-style-type: none"> <li>1. FFB Production projection 2019 – 2024</li> <li>2. CPO, PK, production projection 2019 – 2024</li> <li>3. OER, KER projection 2019 – 2024</li> <li>4. Estate Cost Estimation: Upkeep cost, manuring cost, pest and disease management cost, pruning cost, census cost, terrace maintenance cost, road and bridge maintenance cost, harvesting cost.</li> </ol>	Comply

5. Mill Cost, KCP Cost, Selling cost, Bulking cost and Tax portion actual 2018 and projection 2019 – 2024							
6. Net Profit/Loss							
Estimated Production 2019 – 2024:							
Description		2019	2020	2021	2022	2023	2024
FFB	Core Estate	50,699	53,233	55,895	57,292	57,292	57,292
	Outside	244,502	245,000	245,000	250,000	260,000	260,000
CPO	Core Estate	12,624	13,308	13,974	14,438	14,438	14,438
	Outside	44,255	44,835	44,835	45,750	47,580	47,580
PK	Core Estate	2,717	2,928	3,074	3,151	3,151	3,151
	Outside	13,105	13,475	13,475	13,750	14,300	14,300
OER	Core Estate	25.50	25.50	25.50	25.50	25.50	25.50
	Outside	18.40	18.40	18.40	18.50	18.50	18.50
KER	Core Estate	5.25	5.25	5.25	5.25	5.25	5.25
	Outside	5.50	5.50	5.50	5.50	5.50	5.50
FFA		3.58	3.58	3.58	3.58	3.58	3.58
DOBI		3.00	3.00	3.00	3.00	3.00	3.00
Oil Losses		0.99	0.98	0.98	0.97	0.97	0.97
PK Losses		0.28	0.27	0.27	0.27	0.26	0.26
<p>The Financial Audit Results of PT Sejati Luhur has been carried out by Registered Public Accountants, Satrio Bing Eny &amp; Partners (License Number 89/KM.1/2017) based on letter No.090/10/18/GA/YT dated 3 October 2018. Audit carried out on the company's financial statements prepared in accordance with the Financial Accounting Standards in Indonesia,</p>							

		which consists of statements of financial position as of 31 December 2018, and statements of comprehensive income, statements of changes in equity, and statements of cash flows for the year ended that date.																					
3.1.2	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.  - Minor compliance-	The company has set a replanting program of Pulau Maria Estate for Year 2027-2033, as documented on "Rencana Replanting PT Saudara Sejati Luhur Pulau Maria Estate". Detail are as follows:  <table border="1"> <thead> <tr> <th rowspan="2">Year of Planting</th> <th colspan="2">Replanting Program</th> </tr> <tr> <th>Planned Year</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr> <td>2002</td> <td>2027</td> <td>372</td> </tr> <tr> <td>2003</td> <td>2028</td> <td>227</td> </tr> <tr> <td>2006</td> <td>2031</td> <td>433</td> </tr> <tr> <td>2007</td> <td>2032</td> <td>446</td> </tr> <tr> <td>2008</td> <td>2033</td> <td>585</td> </tr> </tbody> </table>	Year of Planting	Replanting Program		Planned Year	Area (Ha)	2002	2027	372	2003	2028	227	2006	2031	433	2007	2032	446	2008	2033	585	Comply
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2002	2027	372																					
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Principle 4: Use of appropriate best practices by growers and millers																							
Criterion 4.1																							
<b>Operating procedures are appropriately documented, consistently implemented and monitored.</b>																							
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 -	PT Saudara Sejati Luhur – Pulau Maria Estate has demonstrated procedures for estate operation, starts from land preparation including replanting up to harvesting, such as:  1. SOP AA-APM-OP-1100.01-R4 dated 5/09/2016 Pembibitan; explains Nursery. 2. SOP AA-APM-OP-1100.02-R3 10/06/2015 Penanaman Areal Baru; explains New Area Palnting. 3. SOP AA-APM-OP-1100.03-R2 24/07/2015 Pembuatan dan Perawatan Jalan dan Jembatan; explains road and bridge construction and maintenance. 4. SOP AA-APM-OP-1100.04-R3 07/12/2015 Pembuatan dan Pemeliharaan Parit; explains culvert/drainage construction and maintenance.	Comply																				

		<p>5. SOP AA-APM-OP-1100.05-R3 23/11/2016 Konservasi Tanah dan Air; explains Soil &amp; Water Conservation.</p> <p>6. SOP AA-APM-OP-1100.06-R6 16/02/2017 Menanam Kacangan; related to Planting cover crops.</p> <p>7. SOP AA-APM-OP-1100.07-R6 16/02/2017 Menanam Kelapa Sawit; related to Planting Oil Palm.</p> <p>8. SOP AA-APM-OP-1100.08-R6 11/05/2016 Pengendalian Gulma or Weed control.</p> <p>9. SOP AA-APM-OP-1100.09. R5 5/09/2016 Pemupukan; related to Fertilizer application.</p> <p>10. SOP AA-APM-OP-1100.10. R6 23/11/2016 Pengendalian Hama dan Penyakit; explains Pests &amp; Disease Control.</p> <p>11. SOP AA-APM-OP-1100.11. R1 01/02/2009 Pestisida dan Pengendaliannya; explains for pesticide handling.</p> <p>12. SOP AA-APM-OP-1100.12. R3 23/11/2016 Kastrasi; explains castration (cutting all generative product (male flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested.</p> <p>13. SOP AA-APM-OP-1100.13. R3 04/03/2016 Tunas Pokok for pruning.</p> <p>14. SOP AA-APM-OP-1100.14. R3 16/02/2017 Sensus dan Identifikasi Pokok; explains census and palm identification;</p> <p>15. SOP AA-APM-OP-1100.15. R2 01/10/2010 Sensus Produksi related to production census.</p> <p>16. SOP AA-APM-OP-1100.16. R1 01/02/2009 Konsolidasi Pohon Tumbang; explains provision of support to fallen palm.</p> <p>17. SOP AA-APM-OP-1100.17. R1 23/10/2014 Pengelolaan Air; related to water management.</p> <p>18. SOP AA-APM-OP-1100.18. R3 20/04/2015 Potong Buah related to harvesting.</p> <p>19. SOP AA-APM-OP-1100.19. R1 01/02/2009 Pengelolaan Transport explains FFB Transport.</p> <p>20. SOP AA-APM-OP-1100.20-R6 16/02/2017 Replanting;</p> <p>Gunung Melayu I POM has established a procedure to process the FFB to become CPO and PK starts from reception of FFB to dispatch of CPO and PK:</p> <ol style="list-style-type: none"> <li>1. SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station;</li> <li>2. SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer;</li> <li>3. SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation;</li> <li>4. SOP AA-MPM-OP-1400.05-R1 Stasiun pengadukan dan pengempaan for pressing station;</li> </ol>	
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		<ol style="list-style-type: none"> <li>5. SOP AA-MPM-OP-1400.06-R1 Stasiun pemurnian for clarification;</li> <li>6. SOP AA-MPM-OP-1400.07-R1 Stasiun pemisahan nut dan fiber for nut and fiber separation;</li> <li>7. SOP AA-MPM-OP-1400.08-R1 Stasiun kernel for kernel station;</li> <li>8. SOP AA-MPM-OP-1400.09-R1 Stasiun boiler;</li> <li>9. SOP AA-MPM-OP-1400.10-R1 Stasiun engine room;</li> <li>10. SOP AA-MPM-OP-1400.11-R1 Stasiun water treatment;</li> <li>11. SOP AA-MPM-OP-1400.12-R1 Laboratorium;</li> <li>12. SOP AA-MPM-OP-1400.13-R1 Stasiun pengelolaan limbah for palm oil mill effluent treatment;</li> <li>13. SOP AA-MPM-OP-1400.14-R2 Stasiun penimbunan dan pengiriman CPO dan kernel for CPO and PK bulking and despatch operation;</li> <li>14. SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance;</li> <li>15. SOP AA-MPM-OP-1400.19.R2 Manajemen dan Metode Menghitung Emisi Gas rumah kaca (GHG)</li> <li>16. SOP AA-MPM-OP-1400.18-R4 Book Keeping</li> <li>17. AA-MPM-OP-1400.17-R6 Traceability</li> </ol> <p>The mill operational procedures explains the flow process, specification of material and process, machinery and tools required, step-by-step process, control, monitoring and measurement and health and safety requirements.</p>	
4.1.2	<p>Checking or monitoring of operations procedures is conducted at least once a year.</p> <p>- Minor compliance -</p>	<p>The company follows procedure for internal audit under Standard Operating Procedures AA-SOP-ES-6001-R1 dated 1 March 2013. The procedure stated that internal audit conducted minimum once a year. Upon finding, management unit shall prepare review on audit finding and prepare root cause analysis, prepare corrective action – with person in charge and completion target. The latest Sustainability internal audit has performed on 26 to 27 February 2019.</p> <p>To checking and monitoring of operations procedures, the company has conducted any others internal audit and visit both in estate and mill:</p> <p>- R&amp;D Agronomic Visit, conducted once a year to check and monitor the implementation</p>	Comply

		<p>of Agronomy best management practices particularly for pest and disease control and plant upkeep. Last visit performed in Pulau Maria Estate on 15 to 16 January 2019 by Daniel Erikson H. based on report KPM/R&amp;D-P&amp;D/01-2019. Report summary mentioned that:</p> <ul style="list-style-type: none"> <li>• Leaf eater caterpillar attack is under control, although there was activity of <i>Olonia gateri</i>, <i>Sucica malayana</i> found in spots of 1-2 caterpillar per frond, control should be done by natural predator.</li> <li>• Rat attack on loose fruit is low and in general under control, although activity found in Block I07f and I07e on 1 palm each Block. Control done by <i>Tyto alba</i>. Census result mentioned that there was 83 of barn-owl box with 38.5% of occupation.</li> <li>• Found ganoderma attack in Block J07F which has been controlled. First round of ganoderma census is being done. All palm attacked resulted from 3<sup>rd</sup> round ganoderma census in September 2018 have been controlled.</li> </ul> <p>- Visiting Agent conducted once a year to check and monitor the implementation of general Agronomy best management practices. Last visit performed in Pulau Maria Estate on 28 January to 1 February 2019 by Sinnaiha Ganapathy, based on report KPM/VA/FULL 01-19. Numbers of comments recommendation were made such as:</p> <ul style="list-style-type: none"> <li>✓ Condition of circles was grassy towards open spaces (due to ganoderma) while in some cases it was due to lack of follow up after washout. Recommendation: the assistant must mark out the open spaces (on a map) and monitor the condition of circles; include in the program to carry out additional round of spraying for those areas; all areas affected by washout must be recorded and verified by the assistant by 2 weeks to program a follow up spraying.</li> <li>✓ There was no progress made on control of Typhonium (Keladi Tikus) and some blocks it has encroached into circles. Recommendation: The management must be aggressive in handling this weed, as it is resistant to ally and amine. In this respect, manual uprooting must be done while the condition is still light.</li> <li>✓ Slow progress in removing Giant Yam and Epiphytes mainly due to poor monitoring of follow up. Recommendation: The Assistant must follow up on completion of work and take stern action on indiscipline work; The manager must consistently verify on quality of work.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Visiting Engineering (VE) performed once a year to check and monitoring the implementation of mill operation procedure. Last VE in Gunung melayu I Mill performed on 8 to 12 April 2019 by Sahat Sibuea based on report No. PGS-VE-FULL 01-19. There were several issues found during visit engineering, e.g. Oil power pack in Sterilizer door has been changed color to white because of contamination with water. Recommendation: weekly cleaning shall be done and whole sterilizer maintenance shall be done.</li> <li>- Process and Quality Control visit performed annually to check the quality parameter of mill process and mill production (CPO and PK standard quality), loses, FFB quality, sterilizer pressure, process temperature, unstriped bunches, raw water treatment plant and laboratory. Last visit performed on 27 to 30 April 2019. All issue found during visit has been addressed and solved by Gunung Melayu I POM. For example related to FFB sortation, sterilizer, temperature &amp; pressure gauge, unstripped bunch, process loss of CPO and PK.</li> </ul>	
4.1.3	<p>Records of monitoring and any follow-up actions shall be available.</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>Records of monitoring and any follow up actions can be demonstrated during audit, such as:</p> <ul style="list-style-type: none"> <li>- RSPO internal audit report, which done on 26 to 27 February 2019 in Pulau Maria Estate and Gunung Melayu I POM. Audit conducted by Hendrik K. Simanjuntak, Ridho Illahi and Ian Septian Arifin. Audit result findings can be demonstrated and the corrective action has been implemented to address issue found during audit.</li> <li>- R&amp;D Agronomic Visit Report Pulau Maria Estate no. KPM/R&amp;D-P&amp;D/01-2019 date of visit 15 to 16 January 2019 by Daniel Erikson H. All issues found during visit have been addressed by the company as explained in indicator 4.1.2 above.</li> <li>- Visit Agent Report No. KPM/VA/FULL 01-19 by Sinnaiha Ganapathy, date of visit on 28 January to 1 February 2019, in Pulau Maria Estate. All issues found during visit have been addressed by estates as explained in indicator 4.1.2 above.</li> <li>- Production Performance report, that explained the FFB production performance and evaluation as well as determined production target for next year. Evaluation FFB production each block can be demonstrated.</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>- Mandore logbook, contain information of daily work monitoring covering: harvesting, spraying, fertilizing, pest and disease census, road and infrastructure maintenance, and others.</li> <li>- Visiting Engineering, date of visit 8 to 12 April 2019 by Sahat Sibuea based on report No. PGS-VE-FULL 01-19.. All issue found during visit has been addressed by company as explained in indicator 4.1.2 above.</li> <li>- Process and QC visit report on 27 to 30 April 2019 by Tri Lasmono. All issue found during visit has been addressed by company as explained in indicator 4.1.2 above.</li> <li>- Internal Audit RSPO SSC of Gunung Melayu I POM carried out on 8 April 2019 by Mr. Welly Joel Candra, against RSPO SCCS 2017 – RSPO General Chain of Custody requirements and Module E: Mass Balance. Audit result findings can be demonstrated and the corrective action has been implemented to address issue found during audit.</li> <li>- Mill Daily Report of Gunung Melayu I POM, dated 31 December 2018 and 30 April 2019; contain information covering FFB receiving, FFB process: gross and net FFB processed, FFB stock, shift hour, process hour, press hour, press capacity, sterilizer process, Utility factor commercial and capacity, CPO and PK production, CPO and PK extraction rate, CPO and PK quality. Process performance evaluated each day by mill manager and some corrective action to address some issue has been developed by Gunung Melayu I POM.</li> <li>- It is a routine that the estate and mill management prepare monthly reports and send to the company’s head office for monitoring purpose as well. Monthly Report Document has recorded all field inspection results.</li> </ul>	
4.1.4	<p>Records of the origins of all third-party FFB sourced (collector, deliver, Cooperative, Farmers Association and outgrower) shall be available.</p> <p>- Major compliance -</p>	<p>The Mill has recorded list of third party FFB supplier as recorded in “Laporan Harian Pabrik” (Mill Daily Report) and resume in document Mill Summary Operation. The FFB from third party coming from collectors, cooperative farmers association and outgrower. List of third party supplier that supplied FFB to Gunung Melayu I Mill is available containing 25 outside FFB supplier, e.g.: Abdul Gani, BD Siregar, Gunawan Tanu, Hasan BP, UD Saudara, PT Sawit Trading Sejahtera, LU, and CV Mitra Langgeng Sukses.</p> <p>Based on document “Laporan Harian Pabrik” dated 31 December 2018, FFB received from own and third-party are as follows:</p>	Comply

		<ul style="list-style-type: none"> <li>- Own estate: 139,140 kg; todate 48,009,030 kg</li> <li>- Sister company: 0 kg; todate 1,358,680 kg</li> <li>- Third party: 628,852 kg; todate 201,072,397 kg</li> <li>- Total: 767,992 kg; todate 250,440,107 kg</li> </ul> <p>Based on document "Laporan Harian Pabrik" dated 30 April 2019, FFB received from own and third-party are as follows:</p> <ul style="list-style-type: none"> <li>- Own Estates: 88,270 kg; todate 12,005,410 kg</li> <li>- Sister company: 0 kg; todate 24,130 kg</li> <li>- Third-party: 604,009 kg; todate 70,581,163 kg</li> <li>- Total: 669,279 kg; todate 82,610 kg.</li> </ul> <p>FFB Purchasing from outside supplier are conducted based on Procedure Traceability – FFB Purchase (AA-SOP-MM-506.4-R1 dated 1 September 2017. The procedure stated that all FFB supplier shall make guarantee statement that FFB delivered are legal, not coming from protected forest, conservation forest or production forest; No deforestation; zero burning; and not employed under age worker. The company cooperates with the surrounding community in terms of purchasing FFB and recorded in "Pernyataan dan Jaminan" - Statement and Guarantee as a supplier of FFB. The document stated that:</p> <ol style="list-style-type: none"> <li>1. FFB that supplied to Gunung Melayu I POM came from land that has been owned/controlled/cultivated in accordance with the legislation, especially in the field of land and plantation.</li> <li>2. FFB supplied does not originate from unauthorized areas, such as:             <ol style="list-style-type: none"> <li>a. Protected Forest Area</li> <li>b. Industrial Forest Area</li> <li>c. Production Forest Area</li> <li>d. Conservation area</li> </ol> </li> </ol> <p>Record seen: "Statement and Guarantee" on behalf of Abdul Gani, Kebun Aman and CV Mitra Langgeng Sukses. Documents are completed with GPS coordinates.</p>	
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<b>Criterion 4.2</b>																										
Practices maintain soil fertility at, or where possible improve soil fertility to a level that ensures optimal and sustained yield.																										
4.2.1	<p>A record of SOP implementation to maintain soil fertility that ensures optimal and sustained yield, shall be available.</p> <p>- Major compliance -</p>	<p>The company has established procedure soil fertility in "SOP AA-APM-OP-1100.09. R1" - SOP Pemupukan, consist of type and recommendation of fertilizer for immature and mature areas, cycle, dosage and time of fertilizer applied. During field visit can be demonstrated that company has applied management strategy to maintain soil fertility according to the procedure. Manuring was performed manually with spreading the fertilizer by person uniformly in each palm oil trees in accordance with dosage, which has defined by Research and Development recommendation.</p> <p>Fertilizers were applied to maintain and increase soil fertility, fertilizer applied in accordance to the fertilizer recommendation which established based on soil and leaf analysis results. Records of fertilizer application in Pulau Maria Estate for 2018 and 2019 are available as well as recommendation in "Fertilizer Application and Recommendation".</p>	Comply																							
4.2.2	<p>Records of fertilizer inputs shall be available.</p> <p>- Minor compliance -</p>	<p>Fertilizer recommendation and actual implementation is recorded under "Fertilizer Application and Recommendation" and "Laporan Unit Kebun".</p> <p>Below are fertilizer input of Pulau Maria Estate in 2018:</p> <table border="1" data-bbox="857 962 1585 1374"> <thead> <tr> <th rowspan="2">Type of Fertilizer</th> <th colspan="2">Pulau Maria Estate</th> </tr> <tr> <th>Recommendation (kg)</th> <th>Realization (kg)</th> </tr> </thead> <tbody> <tr> <td>CuSO<sub>4</sub></td> <td>15,232</td> <td>14,780</td> </tr> <tr> <td>Dolomite</td> <td>92,428</td> <td>88,271</td> </tr> <tr> <td>Kieserite</td> <td>361,188</td> <td>354,152</td> </tr> <tr> <td>MOP</td> <td>171,962</td> <td>166,068</td> </tr> <tr> <td>ZA</td> <td>510,321</td> <td>497,781</td> </tr> <tr> <td>HGFB</td> <td>44,961</td> <td>43,858</td> </tr> </tbody> </table>	Type of Fertilizer	Pulau Maria Estate		Recommendation (kg)	Realization (kg)	CuSO <sub>4</sub>	15,232	14,780	Dolomite	92,428	88,271	Kieserite	361,188	354,152	MOP	171,962	166,068	ZA	510,321	497,781	HGFB	44,961	43,858	Comply
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NPK 12:12:17:2+TE	977,586	483,307																		
4.2.3	Records of periodical leaf, soil and visual analysis shall be available. - Minor compliance -	<p>Records of periodical leaf sampling and visual analysis were available. Leaf analysis performed by Research and Development Centre PT Nusa Pusaka Kencana Analytical &amp; QC Laboratory. Foliar Analysis Report document shows that leaf sampling and analysis has been done recently in April 2018. The results were used to develop fertilizer recommendation of 2019. For example it was shown Foliar Analysis Report #038/INT/R&amp;D/MAR/L/18 dated 9 April 2018. Number of samples 16, e.g. Lab Ref 18L044442, Block I02a EFB R, year of planting 2002, Afdeling I Pulau Maria Estate; frond: 17, Ash= 9.94, N= 2.44, P= 0.158, K= 0.91, Mg= 0.21, Ca= 0.57 (all UOM % on DM), and B= 20, Cu= 3 ppm on DM.</p> <p>Evidence of soil analysis was shown as on "Laporan Survey Update Analisa Tanah – KPM" under Memorandum from Head Oil Palm R&amp;D No.03/RD/KPM/JAN/2019 dated 23 January 2019. Based on Soil Analisis Result ref no. 004/RD-INT/S/JAN/19 dated 2 January 2019, number of sample 24. E.g. Lab ref 18S4286, Block Profil P5 KBA; depth 10-36 cm. Particle size: coarse sand 30%; fine sand 22%; silt 24%; clay 24%; N= 0.11%; organic C=0.80%; CEC= 5.21; Ca= 1.68; Mg= 0.38; K=0.18; Na= 0.07; pH H2O= 5.15; KCl= 4.35.</p>	Comply																	
4.2.4	A nutrient recycling strategy is recorded, including use of Empty Fruit Bunches (EFB), land application, and palm residues after replanting.	The company applied EFB to increase the soil fertility with dosage 150 kg/palm tree. Based on Program Aplikasi EFB 2019, the plan form EFB application is EFB 30,655 ton. The	Comply																	

	<p>- Minor compliance -</p>	<p>realization up to April 2019 is 11,147 ton for 414 Ha. Blocks applied among others I02b, I06d, I06f, J06e, J06h, J02a, J02c, J02e, I07a, J08d and J06e.</p> <p>The palm oil mill effluent utilized as soil nutrient through land application. The POME application permit in Pulau Maria Estate based on Keputusan Bupati Asahan No.660.1/0639/LH/2015 regarding "Pemberian Izin Land Aplikasi Limbah Cair (Land Application) PT Saudara Sejati Luhur (PMKS GMI) Desa Batu Anam Kecamatan Rahuning Kabupaten Asahan – Sumatera Utara" dated 20/05/2015 – valid for five (5) years. The land application approved for ±100 Ha, maximum BOD 5,000 mg/liters. The implementation of Palm Oil Mill Effluent (POME) into the plantation and monitoring wells was reported in March 2019, to the "Kepala Kantor Lingkungan Hidup Kabupaten Asahan".</p> <p>Land application program for Pulau Maria Estate was 194.78 Ha spread in 15 blocks, comprise of 787 lines and 15,625 flat beds, capacity LA was 49,651 m<sup>3</sup>. Total plan 2019 is 779 Ha or 191,580 m<sup>3</sup>. Total application in Januari to April 2019 was 184.53 Ha with volume 65,820 m<sup>3</sup>.</p>	
<p><b>Criterion 4.3</b> Practices minimise and control erosion and degradation of soils.</p>			
<p>4.3.1</p>	<p>Maps of any fragile soils shall be available.</p> <p>- Major compliance -</p>	<p>PT Saudara Sejati Luhur shown map of soil under "Peta Sebaran Satuan Peta Tanah" in scale 1:25,000. Map issued by Asian Agri Research and Development Center Tebung Tinggi – North Sumatera. The map showing the predominant soil type are:</p> <ol style="list-style-type: none"> <li>1. Typic Hapludults; topography 0-8%; drainage good; 1,129 Ha (58%).</li> <li>2. Typic Hapludults; topography &gt;30%; drainage quick; 529 Ha (27%).</li> <li>3. Typic Endoaquepts; topography 0-8%; drainage bad; 303 Ha (15%).</li> </ol> <p>Based on map soil there was no fragile soil identified in area of Pulau Maria Estate.</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).</p> <p>- Minor compliance -</p>	<p>The procedure of Soil and Water Conservation - "Konservasi Tanah dan Air" (AA-SOP-OP-1100-05.R1) has determined strategy to control erosion particular in slope area, such as: 0 – 5°, 6 – 12°, 13 – 20°, and above 20°. The company has applied silt pit, L shape stacking frond and terracing in slope area to reduce erosion</p> <p>The realization of management strategy for slope area are as follows:</p>	<p>Comply</p>



		<ol style="list-style-type: none"> <li>Maintenance of contour terraces, realization in January to May 2018 total 11,400 m</li> <li>Maintenance "Tapak Kuda" (individual platform), realization January to May 2018 total 308 units.</li> </ol>	
4.3.3	<p>A road maintenance program shall be in place.</p> <p>- Minor compliance –</p>	<p>Road maintenance program and progress was made and recorded in "Program dan Realisasi Pemeliharaan Jalan Manual, Mekanis dan Pengerasan Jalan 2019". Road maintenance implementation in Pulau Maria Estate:</p> <ul style="list-style-type: none"> <li>Manual Road maintenance and road service by spreading split stone in January – April 2019 total 287,892 m, whilst in 2018 total 630,492 m.</li> <li>Mechanical Road maintenance using Motor Grader in January – April 2019 total 496,137 m, whilst in 2018 total 276,551 m.</li> <li>Road hardening using gravel and split stone in January – April 2019 total 5,471 m (budget 2019: 10,600 m) with volume of gravel 1,658 m<sup>3</sup>, whilst in 2018 total road hardened 8,518 m (budget 8,600 m) with volume of gravel 2,793 m<sup>3</sup>.</li> </ul> <p>During field visit and audit in PT Saudara Sejati Luhur found that road condition was in good condition and well maintained.</p>	Comply
4.3.4	<p>Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.</p> <p>- Major compliance –</p>	<p>Based on soil map and analysis, there is no peat soil in PT Saudara Sejati Luhur – Pulau Maria Estate. The map indicated the predominant soil type consist of Typic Hapludults and Typic Endoaquepts. This indicator is not applicable.</p>	Comply
4.3.5	<p>Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.</p> <p>- Minor compliance –</p>	<p>Based on soil map and analysis, there is no peat soil in PT Saudara Sejati Luhur – Pulau Maria Estate. The map indicated the predominant soil type consist of Typic Hapludults and Typic Endoaquepts. This indicator is not applicable.</p>	Comply

4.3.6	<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>Based on soil map and analysis, there is no other fragile soil in PT Saudara Sejati Luhur – Pulau Maria Estate. The map indicated the predominant soil type consist of Typic Hapludults and Typic Endoaquepts. This indicator is not applicable.</p>	Comply
<p><b>Criterion 4.4</b>  <b>Practices maintain the quality and availability of surface and groundwater</b></p>			
4.4.1	<p>An implemented water management plan shall be in place.</p> <p>- Minor compliance -</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has a water management document, both in the estate and mill. Monitoring the implementation of water management has implemented on a regular basis, such as surface water quality monitoring are available in the report of RKL / RPL.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has analysed water quality each semester to ensure the compliance against PP No. 82 tahun 2001 regarding water quality standard.</p> <ul style="list-style-type: none"> <li>- Procedure SOP AA-APM-OP-1100.05. R1 “Konservasi Tanah dan Air” has been established to maintain the quality and availability of water. Procedures also established for protection and management of riparian buffer zones at or before replanting. Procedure mentioned that in 50 m on the left and right side of riparian buffer zones, Estates prohibited to apply agrochemical, used manual manuring and rivers bank planted by erosion barrier crop (planting of “vetiver” grass).</li> <li>- The organisation also has policy that prohibits Estates for planting in 50 m on the left and right side of riparian buffer zones at or before replanting. Warning board placed regarding prohibition to apply agrochemicals and fertiliser in the buffer zone. Riparian buffers of small natural water courses was 50 metres wide on both sides of the rivers as defined in the procedure AA-KL-12-EFP Restorasi Riparian dan Areal Sekitar Danau/Waduk atau Mata Air lainnya. Several evidence of maintaining quality and availability of water were evident, such as plan and realisation of riparian management, installation of warning boards, planting erosion prevention plan (e.g. Terminalia cattapa, Paraserianthes falcataria, Hibiscus sp. and vetiver grass) and checking of water quality.</li> </ul> <p>Data verified:</p> <ul style="list-style-type: none"> <li>- Pulau Maria Estate has permit to use the ground water for domestic usage according to “Keputusan Gubernur Sumatera Utara Nomor: 544.2/496/DPMPPTSP//6/XI.3b/VII/2017</li> </ul>	Comply

		<p>Tentang Izin Pengambilan Air Tanah” dated 18 July 2017 valid for 3 years. Water usage monitored each month and retributions fee has paid by Pulau Maria Estate each month to “Dinas Pendapatan daerah Provinsi Sumatera Utara”.</p> <ul style="list-style-type: none"> <li>– Gunung Melayu I POM based on “Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat Nomor 1074/KPTS/M/2018 tentang Pemberian Izin Penguasaan Sumber Daya Air Kepada Perseroan Terbatas Saudara Sejati Luhur untuk usaha industry sungai Masehi Kabupaten Asahan Provinsi Sumatera Utara”, dated 21th Dcember 2018 valid until 3 years.</li> <li>– Payment Record on using of ground waster for domestic usage via Bank BRI, e.g: for month January – March 2019 No Vpucher PU/19/05/7001, dated 10<sup>th</sup> May 2019, amount IDR X7,686,079</li> </ul> <p>Monitoring on water usage for domestic need year 2018 and 2019</p> <table border="1" data-bbox="862 783 1509 1254"> <thead> <tr> <th>Month</th> <th>2018 (M<sup>3</sup>)</th> <th>2019 (M<sup>3</sup>)</th> </tr> </thead> <tbody> <tr><td>January</td><td>6,363</td><td>5,953</td></tr> <tr><td>February</td><td>5,688</td><td>5,684</td></tr> <tr><td>March</td><td>6,386</td><td>6,671</td></tr> <tr><td>April</td><td>6,180</td><td>6,180</td></tr> <tr><td>May</td><td>6,386</td><td></td></tr> <tr><td>June</td><td>6,180</td><td></td></tr> <tr><td>July</td><td>6,386</td><td></td></tr> <tr><td>August</td><td>6,180</td><td></td></tr> <tr><td>September</td><td>6,386</td><td></td></tr> <tr><td>October</td><td>6,042</td><td></td></tr> <tr><td>November</td><td>6,266</td><td></td></tr> <tr><td>December</td><td>6.180</td><td></td></tr> <tr><td>Total</td><td>74,854</td><td>24,488</td></tr> </tbody> </table>	Month	2018 (M <sup>3</sup> )	2019 (M <sup>3</sup> )	January	6,363	5,953	February	5,688	5,684	March	6,386	6,671	April	6,180	6,180	May	6,386		June	6,180		July	6,386		August	6,180		September	6,386		October	6,042		November	6,266		December	6.180		Total	74,854	24,488	
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4.4.2	Protection of water courses and wetlands, including securing and maintaining appropriate	PT Saudara Sejati Luhur – Gunung Melayu I POM has water source management: Identification of water source and wetland, as indicated in HCV report. The water source	Comply																																										

	<p>riparian and other buffer zones, at the time of or prior to replanting shall be demonstrated.</p> <p>- Major compliance -</p>	<p>identified mill's water reservoir and river. Policy to prohibit chemical application in riparian zone according to Memorandum Nomor: 10/ES-KPM/MEMO/01/14 dated 20 January 2014. Policy to prohibit fish poisoning and prohibit woods cutting in area of company plantation.</p> <p>Estate had program restoration and conserving the water course a such as planting of Terminalia cattapa, Paraserianthes falcataria, Hibiscus sp and vetiver grass on riparian area of Masehi river, Karmila river, Pamerahan river, Block J06 river. No chemical-related operation on riparian area. Riparian area was marked with radius 50 meters from both side of the river as per Memorandum Nomor: 10/ES-KPM/MEMO/01/14 dated 20 January 2014 and procedure AA-KL-12-EFP Restorasi Riparian dan Areal Sekitar Danau/Waduk atau Mata Air lainnya.</p>	
<p>4.4.3</p>	<p>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).</p> <p>- Minor compliance –</p>	<p>Gunung Melayu I POM has a procedure to manage the palm oil mill effluent, under AA-MPM-OP-1400.13-R1. The mill effluent process from recovery tank into cooling pond, into acidification pond (anaerob bactery activation) into primary anaerob pond (decomposistion), secondary anaerobic pond. The purpose was to reduce BOD &lt;1000 ppm.</p> <p>The fresh palm oil mill effluent processed in order to met regulation "KepMenLH No. 29 Tahun 2003 tentang Pedoman Syarat dan Tatacara Perizinan Pemanfaatan Air Limbah Industri Minyak Sawit Pada Tanah di Perkebunan Kelapa Sawit".</p> <p>Gunung Melayu I POM has a work instruction for management of POME pond, under "Instruksi Kerja Pengoperasian Kolam Limbah".</p> <p>Mill effluent has processed in wastes water processing installation and discharge to the land application.</p> <p>PT Saudara Sejati Luhur has permit to discharge the waste water to plantation (land application) according to "Keputusan Bupati Asahan Nomor 503/LA/DPMPPTSP/0117/I/2018 tentang Izin Pemanfaatan Air Limbah ke Tanah untuk Aplikasi pada Tanah PT Saudara Sejati Luhur" dated 31 January 2018 valid until 3 years.</p> <p>POME quality monitoring, analysis was conducted by Balai Teknik Kesehatan Lingkungan dan Pengendalian Penyakit (BTKLPP) Kelas I Medan, against "PerMenLH No. 05 tahun 2014 Lampiran III tentang Baku Mutu Air Limbah Bagi Usaha dan atau Industri Sawit".</p>	<p>Comply</p>

		<p>The POME quality analysis result in periode second semester 2 year 2018:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>BOD (mg/Liter) – year 2018</th> <th>BOD (mg/Liter) – year 2019</th> </tr> </thead> <tbody> <tr><td>January</td><td>4,828</td><td>4,825</td></tr> <tr><td>February</td><td>4,380</td><td>4,847</td></tr> <tr><td>March</td><td>4,238</td><td>4,329</td></tr> <tr><td>April</td><td>4,131</td><td></td></tr> <tr><td>May</td><td>4,347</td><td></td></tr> <tr><td>June</td><td>4,100</td><td></td></tr> <tr><td>July</td><td>4,728</td><td></td></tr> <tr><td>August</td><td>4,855</td><td></td></tr> <tr><td>September</td><td>3,872</td><td></td></tr> <tr><td>October</td><td>3,982</td><td></td></tr> <tr><td>November</td><td>3,964</td><td></td></tr> <tr><td>December</td><td>4,132</td><td></td></tr> </tbody> </table>	Month	BOD (mg/Liter) – year 2018	BOD (mg/Liter) – year 2019	January	4,828	4,825	February	4,380	4,847	March	4,238	4,329	April	4,131		May	4,347		June	4,100		July	4,728		August	4,855		September	3,872		October	3,982		November	3,964		December	4,132		
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<p>4.4.4</p>	<p>Monitoring of mill water use per ton of FFB shall be recorded. - Minor compliance –</p>	<p>Gunung Melayu I POM has shown the document of monitoring mill water usage each month. Water usage monitored by flow meter which installed under water treatment plant. Below are the data of water usage monitoring in PT Saudara Sejati Luhur – Gunung Melayu I POM periode in 2018 (budget is 1.04 M3/ton FFB) and January – April 2019 (budget is 1.04 M3/ton FFB) ,:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>2018 (mg/liters)</th> <th>2019 (M<sup>3</sup>)</th> </tr> </thead> <tbody> <tr><td>January</td><td>0.75</td><td>0.57</td></tr> <tr><td>February</td><td>0.72</td><td>0.94</td></tr> <tr><td>March</td><td>1.28</td><td>1.47</td></tr> <tr><td>April</td><td>1.20</td><td>1.42</td></tr> <tr><td>May</td><td>1.07</td><td></td></tr> <tr><td>June</td><td>1.00</td><td></td></tr> <tr><td>July</td><td>0.89</td><td></td></tr> <tr><td>August</td><td>0.78</td><td></td></tr> </tbody> </table>	Month	2018 (mg/liters)	2019 (M <sup>3</sup> )	January	0.75	0.57	February	0.72	0.94	March	1.28	1.47	April	1.20	1.42	May	1.07		June	1.00		July	0.89		August	0.78		<p>Comply</p>												
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		Total	0.09	1.11																						
<b>Criterion 4.5</b>																										
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate integrated Pest Management (IPM) techniques.																										
4.5.1	Monitoring of Integrated Pest Management (IPM) plan implementation shall be available.  - Major compliance -	<p>Integrated Pest Management (IPM) was implemented and documented in related records, e.g. "Rekap Serangan Hama dan Penyakit", Pest Census Summary form B2 (Ulat Api &amp; Ulat Kantong), "Data Titik Sensus Ulat Api", "Ringkasan Sensus Hama Tikus", "Sensus Kandang Burung Hantu", "Formulir A4 Sensus Burung Hantu".</p> <p>Detection of leaf-eater caterpillar conducted monthly as early warning system. Leaf eater caterpillar attack is under control, although there was activity of <i>Olonia gateri</i> in Block I06d, 1 palm attacked; Block J07d, 1 palm attacked and I07j, 1 palm attacked. Report presented on "Rekapitulasi Hasil Sensus Hama Pemakan Daun" and "Rekap Sensus Hama Daun" period January - May 2019. Pulau Maria Estate has implemented biological control to minimize or eliminate pest and disease, e.g. by use of barn owl and planting beneficial plants such as <i>Casia sp.</i>, <i>Antigonon leptopus</i> and <i>Turnera subulatta</i>.</p> <p>Based on "Rekapitulasi Hasil Sensus Serangan Tikus dan Tirathaba" Rat attack on loose fruit is low and in general under control. Control done by <i>Tyto alba</i>. Based on "Rekapitulasi Sensus Burung Hantu", documented evidence of barn-owl census as per April 2019, it was found:</p> <table border="1"> <thead> <tr> <th>Afdeling</th> <th>Cage</th> <th>Occupied</th> <th>Barn-owl</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>26</td> <td>11</td> <td>10</td> </tr> <tr> <td>2</td> <td>28</td> <td>17</td> <td>18</td> </tr> <tr> <td>3</td> <td>29</td> <td>15</td> <td>15</td> </tr> <tr> <td>Total</td> <td>83</td> <td>43</td> <td>43</td> </tr> </tbody> </table>				Afdeling	Cage	Occupied	Barn-owl	1	26	11	10	2	28	17	18	3	29	15	15	Total	83	43	43	Comply
Afdeling	Cage	Occupied	Barn-owl																							
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		<p>Census result based on "Rekapitulasi Sensus Burung Hantu" mentioned that there were 83 of barn-owl box with 43 cage occupied. Based on document "Serangan Ganoderma dan Pengendaliannya" found ganoderma attack in Block I06c, which has been controlled. All ganoderma census result in September 2018 have been controlled.</p> <p>Document "Program dan Realisasi Pengendalian Hama Lainnya" monitor planting of beneficial plant, for period January to December 2018 it has been planted in 6,115 spot.</p>	
4.5.2	<p>Training records of Integrated Pest Management (IPM) shall be available.</p> <p>- Minor compliance –</p>	<p>Training related Integrated Pest Management (IPM) has been held recently by Learning &amp; Development Department on 12 April 2019. All supervisors and worker of IPM from Pulau Maria Estate have attended the training. Based on document of training module and attendance list, the training was attended by 11 participants from Afdeling I, 14 participants from Afdeling II and 9 participants from Afdeling III.</p>	Comply
<p><b>Criterion 4.6</b>  Pesticides are used in ways that do not endanger health or the environment.</p>			
4.6.1	<p>Documented evidence shall be available to show that pesticide used based on regulations and the use of pesticide is specific to target species with appropriate dosage which have minimal impact on non-target species.</p> <p>- Major compliance -</p>	<p>Justification of pesticide used is explained under company procedure of weed control - "SOP Pengendalian Gulma No.AA-APM-OP-11100.08-R1" dated 1 November 2008. Chapter IV explains the weed control program for woody, grass, fern, caladium, wild banana (<i>Musa spp</i>), <i>Asystasia</i>, etc. It does explain active ingredients use to control such weed, dosage per application, type of nozzle used and volume of spraying per application. Chapter V explains selection of pesticide and its active ingredients content, nature of the pesticide and target species. Chapter VII describes calculation of actual area implemented per hectare plantation (spray factor), spraying rotation and spraying output. Interview with spraying workers indicated that they understood the target species and active ingredients to control it. Spraying worker shows knowledge on minimizing chemical impact on beneficial weed. Justification for use of pesticide is clear, and understood by workers.</p> <p>Spraying works were conducted by selected spraying on specific target, for example weeds spraying on circle, path and TPH. Other areas beside specific area were not applied. Riparian area along the river are prohibits to be performed spraying to minimize and reduce the negative environmental impact to the river and ecosystem. Pesticide and herbicide used by</p>	Comply

		<p>company was registered in the book of pesticides - "Komisi Pestisida" and has permit from government.</p> <p>Type of pesticide use by Pulau Maria Estate and its weeds target are as follow:</p> <table border="1" data-bbox="857 491 1776 938"> <thead> <tr> <th>Agrochemical</th> <th>Active ingredients</th> <th>Register No.</th> <th>Weeds target</th> </tr> </thead> <tbody> <tr> <td>Gramoxone</td> <td>Paraquat 200 g/l</td> <td>RI.010301197436, valid until 10 Dec 2020</td> <td>Fern, VOP, wood, Kerisan grass</td> </tr> <tr> <td>Elang 480 SL</td> <td>Isopropil Amina Glifosat 480 g/l</td> <td>RI.01030119941170, valid until 21 Dec 2021</td> <td>Narrow leaf weed, <i>Asystasia</i>, <i>Imperata cylindrical</i></td> </tr> <tr> <td>Lindomin 865 SL</td> <td>2,4 Dimetilamina 865 gr/L</td> <td>RI.0103011989867 valid until 31 Dec 2020</td> <td>Musa sp., Caladium</td> </tr> <tr> <td>Meta Prima 20 WG</td> <td>Methyl Metsulfuron 20%</td> <td>RI.01030120031897 valid until 3 Sept 2023</td> <td>Wide leaf weeds, <i>Stenochlaena</i>, <i>Crysan</i></td> </tr> </tbody> </table>	Agrochemical	Active ingredients	Register No.	Weeds target	Gramoxone	Paraquat 200 g/l	RI.010301197436, valid until 10 Dec 2020	Fern, VOP, wood, Kerisan grass	Elang 480 SL	Isopropil Amina Glifosat 480 g/l	RI.01030119941170, valid until 21 Dec 2021	Narrow leaf weed, <i>Asystasia</i> , <i>Imperata cylindrical</i>	Lindomin 865 SL	2,4 Dimetilamina 865 gr/L	RI.0103011989867 valid until 31 Dec 2020	Musa sp., Caladium	Meta Prima 20 WG	Methyl Metsulfuron 20%	RI.01030120031897 valid until 3 Sept 2023	Wide leaf weeds, <i>Stenochlaena</i> , <i>Crysan</i>	
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Gramoxone	Paraquat 200 g/l	RI.010301197436, valid until 10 Dec 2020	Fern, VOP, wood, Kerisan grass																				
Elang 480 SL	Isopropil Amina Glifosat 480 g/l	RI.01030119941170, valid until 21 Dec 2021	Narrow leaf weed, <i>Asystasia</i> , <i>Imperata cylindrical</i>																				
Lindomin 865 SL	2,4 Dimetilamina 865 gr/L	RI.0103011989867 valid until 31 Dec 2020	Musa sp., Caladium																				
Meta Prima 20 WG	Methyl Metsulfuron 20%	RI.01030120031897 valid until 3 Sept 2023	Wide leaf weeds, <i>Stenochlaena</i> , <i>Crysan</i>																				
4.6.2	<p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) shall be available.</p> <p>- Major compliance -</p>	<p>PT Saudara Sejati Luhur – Pulau Maria Estate has a pesticide application program which documented in annual work program. Activities using pesticides among others circle and path spraying and selective spraying.</p> <p>Records of pesticides use have been recorded including active ingredient, area treated, amount applied per ha, use of selective product and rotation number of applications. Several records of pesticide used were sighted, e.g. application schedule, list of pesticide use in oil palm estate, work achievement and pesticide use, stock card of agrochemicals. The records covered date of application, quantity of pesticide use and name of sprayers.</p> <p>Record "Daftar Pemakaian Bahan Pestisida Tahun 2019" described that pesticide used for January to April 2019 are as follows:</p>	Comply																				



		<b>Agrochemical</b>	<b>Active ingredients contains</b>	<b>Volume used</b>	<b>Active ingredient used</b>	<b>Active ingredient ratio Per 2,063 Ha</b>	<b>LD50 (skin) mg/kg</b>	
		Gramoxone	200 gr/L	134	36.98	0.267	735	
		Elang 480 SL	480 gr/L	1,172.80	324	0.267	5000	
		Lindomin 865 SL	865 gr/L	12.20	5.86	0.267	700	
		Meta Prima 20 WG	20 %	57,500	49,738	0.480	2000	
		<p>The company has monitored and recorded pesticides use since 2015. Usage quantity of pesticides was within the recommended levels. Monitoring of pesticides toxicity unit LD50 per Ha was conducted monthly, record sight in December 2018 and May 2019.</p> <p>Agrochemicals have been applied and handled by trained spraying workers who have received usage of limited pesticide training. Training for limited pesticides uses was delivered by Pesticide Commission of Agriculture Department of North Sumatera Province on 22 February 2018 in Pulau Maria Estate. Refreshment training for SOP and WI regarding spraying work was conducted regularly in morning briefing. Training record and certificates were sighted for all sprayers, e.g. No. 521.4/277.07/UPTTPH/II/2018 on behalf SA.</p> <p>Training covered handling of concentrate agrochemical and spraying method including pesticide hazard. Pesticides handled, used and applied only by persons who have completed the necessary training, it was observed during field audit that all sprayers' workers have been trained.</p>						
4.6.3	Any use of pesticides shall be minimized as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific	There were records showing that the use of pesticides have been minimised in accordance with Integrated Pest Management (IPM) plan. Use of pesticides in the field was lower than the planned budget. It also shows the company's commitment to always reduce pesticide						Comply

	<p>situations identified in Indonesia Best Practice guidelines. - Major compliance -</p>	<p>usage and give priority to the prevention of mechanical, biological and integrated pest management.</p> <p>There was no prophylactic use of pesticides, it is evident by site visit and field observation in Pulau Maria Estate. Pesticide only used and apply for weeds and pest.</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.  - Minor compliance -</p>	<p>The Company has a complete listing of WHO class 1A, class 1B, and Stockholm or Rotterdam Conventions pesticide. It was well documented in Estate office. Paraquat is not banned in Indonesia according Act No.12/1992 regarding plant cultivation system, article 60 (g) jo. Article 38, and Ministry of Agriculture regulation No.107/Permentan/ SR.140/9/2014 regarding pesticides supervisor. National regulation mentioned that paraquat dichloride is a restricted active ingredient so that its user must hold a certificate use of limited pesticides and the manufacturer must train first for the user of the pesticide.</p> <p>Paraquat which was the active ingredient of Gramoxone was still used in Pulau Maria Estate, however the organization has set internal target to reduce paraquat use. Record of paraquat use in Pulau Maria Estate was available in "Trend Pemakaian Gramoxone (Paraquat) per Tahun".</p> <p>Below are the paraquat usage by PT Saudara Sejati Luhur:</p> <table border="1" data-bbox="857 1026 1238 1323"> <thead> <tr> <th>Year</th> <th>Paraquat usage</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>683</td> </tr> <tr> <td>2016</td> <td>657</td> </tr> <tr> <td>2017</td> <td>629</td> </tr> <tr> <td>2018</td> <td>558</td> </tr> <tr> <td>2019</td> <td>134</td> </tr> </tbody> </table>	Year	Paraquat usage	2015	683	2016	657	2017	629	2018	558	2019	134	<p>Comply</p>
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		<p>Training for limited pesticides uses was delivered by Pesticide Commission of Agriculture Department of North Sumatera Province on 22 February 2018 in Pulau Maria Estate. Refreshment training for SOP and WI regarding spraying work was conducted regularly in morning briefing. Training record and certificates were sighted for all sprayers, e.g. No. 521.4/277.07/UPTTPH/II/2018 on behalf SA.</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 observed, applied, and understood by workers (see Criterion 4.7).</p> <p>- Major compliance -</p>	<p>Pesticide use and handling have documented in the procedure of Pesticides Management (SOP AA-APM-OP-1100.11-R1, dated 1 February 2009), Pests &amp; Disease Control (SOP AA-APM-OP-1100.10-R5, dated 11 January 2016) and Weeding Control (SOP AA-APM-OP-1100.08-R5, dated 7 December 2015). General instructions of security in working with pesticides described in procedure includes the selection of types of pesticides, pesticide storage, pesticide use, addressing pesticide contamination, first aid instructions, medical assistance.</p> <p>Agrochemicals have applied and handled by trained spraying workers who have received usage of limited pesticide training. Training for limited pesticides uses has delivered by Pesticide Commission of Agriculture Department of North Sumatera Province lately on 22 February 2018 located in Pulau Maria Estate. Refreshment training for SOP and WI regarding spraying work conducted regularly in morning briefing. Training record and certificates have sighted for all sprayers, e.g. No. 521.4/277.07/UPTTPH/II/2018 on behalf SA. Its evidence that training has conducted in an appropriate language (Bahasa Indonesia) and understood by the workers.</p> <p>Training covered handling of agrochemical concentrate and spraying method including pesticide hazard. Pesticides handled, used and applied only by persons who have completed the necessary training, it was observed during field audit and interview that all spraying workers have trained. Personnel interviewed (spraying workers) can clearly explain the type of work including work methods and goals, materials used (pesticides) including the dosage and hazards and risks, personal protective equipment and first aid. Pesticides have applied in accordance with the product label and storage instruction.</p>	<p>Comply</p>

		<p>Based on visit in agrochemicals storage on 14<sup>th</sup> May 2019, there was locked areas with limited access. The storage has ventilated. MSDS and hazard symbol label have provided nearby of agrochemicals. Emergency shower and eyewash have also provided to anticipate in case of an emergency of agrochemical handling. The possible spill has managed. Secondary containment has provided around the chemical storage area. Spill kit has also provided in the area. PPE for handling of chemicals have provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used easily replaced if damaged.</p>	
4.6.6	<p>Storage of pesticides shall be according to recognised best practices. All pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers (see criterion 5.3).          - Major compliance -</p>	<p>Based on visit in agrochemicals storage on 14<sup>th</sup> May 2019, there was locked areas with limited access. The storage has ventilated. MSDS and hazard symbol label have provided nearby of agrochemicals. Emergency shower and eyewash have also provided to anticipate in case of an emergency of agrochemical handling. The possible spill has managed. Secondary containment has provided around the chemical storage area. Spill kit has also provided in the area. PPE for handling of chemicals have provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used easily replaced if damaged.</p> <p>All empty pesticides containers were triple rinsed and collected in the temporary storage of hazardous waste. Pesticides containers were transported by authorized transporter in accordance to procedure of hazardous waste handling – “Penanganan Limbah Bahan Berbahaya dan Beracun” (AA-KL-06-EFP), point 6.2. Records of pesticides containers quantity were evident. Liquid waste from pesticides has reused for the next spraying applications also there are several ex-containers “jerry can” that may re-use for field application.</p>	Comply

4.6.7	<p>Application of pesticides shall be by proven methods that minimize risk and negative impacts.</p> <p>- Minor compliance -</p>	<p>Application of pesticides was following SOP of Pesticides Management – “Pestisida dan Pengelolaannya” (AA-APM-OP-1100.11-R1) chapter III point 3.2 which stated that pesticide operator must be fit, not in pregnancy or breast feeding, must have meal before work, and uses appropriate PPE. Based on interview with spraying workers of Pulau Maria Estate, they know how to handle pesticide during storage, mixing, usage, and how to conduct first aid for poisoning pesticide.</p>	Comply
4.6.8	<p>Pesticides may only be applied aerially where there is a documented justification. Surrounding communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.</p> <p>- Major compliance -</p>	<p>Based on interview with Estate Management, surrounding community and field observation, there was no pesticide applied aerially Pulau Maria Estate.</p>	Comply
4.6.9	<p>Evidence of training on handling pesticide for workers and scheme smallholder (if any) shall be available.</p> <p>- Minor compliance -</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has provided information materials on pesticide handling to all employees. Refreshment training and dissemination on work instruction including risk and impacts of pesticide applications (Material Safety Data Sheet - MSDS) has performed by during morning briefing attended by all pesticides sprayer workers. Training module and attendance list were available.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has conducted periodic training (in Bahasa Indonesia) of employees on pesticide handling.</p> <p>Data seen:</p> <ul style="list-style-type: none"> <li>- Training for limited pesticides uses have delivered by Pesticide Commission of Agriculture Department of North Sumatera Province lately on 22 February 2018 in Pulau Maria Estate. Training record and certificates sighted for all sprayers, e.g. No. 521.4/277.07/UPTPTPH/II/2018 on behalf SA.</li> <li>- Refresh training on handling of pesticides for operator of spraying was conducted on 12<sup>th</sup> April 2019 was attended by 11 workers.</li> </ul>	Comply

<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>All empty pesticides containers were triple rinsed and collected in the temporary storage of hazardous waste. Pesticide containers have transported by authorized transporter. Records of pesticides containers quantity were evident, e.g. Hazardous Waste Disposal Manifest. Liquid waste from pesticides have reused for the next spraying applications also there are several ex-containers "jerry can" that may re-use for field application.</p> <p>Training/briefing regarding disposal of waste material has conducted to all workers and staffs.</p> <p>Based on interview with spraying workers, they all understood the disposal of waste material.</p>	<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 Saudara Sejati Luhur – Gunung Melayu I POM has been performed regular medical check-up for all workers once a year and special medical checkup twice a year for workers which exposed pesticide/fertilizer/agrochemical including warehouse officer of store and supervisor (Mandor).</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>- Last general medical check-up for all employee was conducted on December 2018 in Pulau Maria Estate by Asian Agri Sehat Clinic doctor. Medical test covered blood pressure, nadi and nafas. The MCU result and follow up action were evident.</li> <li>- Special medical checkup for workers which exposed pesticide/fertilizer/agrochemical including warehouse officer of store and supervisor (Mandor) has been performed on 7<sup>th</sup> May 2019 for 21 workers in Gunung Melayu I POM and 32 workers in Pulau Maria Estate.</li> </ul>	<p>Comply</p>
<p>4.6.12</p>	<p>Records shall be available to show that spraying is not conducted by pregnant or breast-feeding women.</p>	<p>Pesticide female worker has prohibited on do their job during pregnancy or breast-feeding as stated in company policy and Memorandum No. 003/ES-KPM/MEMO/01/2018 dated 30 January 2018.</p>	<p>Comply</p>

	<p>- Major compliance -</p>	<p>Incase female sprayer and fertilizer workers pregnant, those workers was relocated another job station with low risk level. No negative report on regard with reproduction rights of female workers during past years as interviewed with female workers and gender committee.</p> <p>Based on interview with female worker on 14<sup>th</sup> May 2019 confirmed no pregnant and/or breast-feeding involved in chemical/pesticides, they were transferred other duties. Data seen: Hasil Pemeriksaan Kehamilam dated 15<sup>th</sup> April 2019 there was negative reported on pregnant and/or breast-feeding, e.g: Mrs Suriyem, Mrs Sri Astuti, Mrs Idar, Mrs Sugiyati,</p>	
<p><b>Criterion 4.7</b>  An occupational health and safety plan is documented, effectively communicated and implemented.</p>			
<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored.  - Major compliance -</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has established the Occupational health and safety policy under “Kebijakan Perusahaan”, signed by Managing Director of Asian Agri Group, on 1st December 2014. Point 3. Committed to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation</p> <p>The policy was communicated all employee and was displayed at strategic locations of Mill and Estates and communicated to employees including contractor workers.</p> <p>The procedure reated OHS management and monitoring has been established:</p> <ul style="list-style-type: none"> <li>- SOP Identifikasi Bahaya Penilaian Resiko dan Penentuan Pengendalian AA-SMK3-1101.02-R0 dated 1 May 2017</li> <li>- SOP Investigasi Kecelakaan Kerja AA-SMK3-1101.01-R0 dated 1 May 2017</li> <li>- SOP Kesiagaan Tanggap Darurat AA-EMS-820-PR dated 5 April 2017</li> <li>- SOP Pengendalian Kebakaran Lahan AA-KL-14-EFP dated 5 May 2013, described the mechanism of handling fire.</li> <li>- SOP Pengendalian Kebakaran di Pabrik, Kantor, dan Perumahan AA-KL-15-EFP dated 1 December 2010</li> <li>- SOP Pengendalian Tumpahan B3 dan Limbah B3 AA-KL-16-EFP dated 1 December 2010</li> <li>- SOP Pengendalian Tanggap Darurat Boiler AA-KL-17-EFP dated 1 December 2010</li> <li>- SOP Pengendalian Gempa Bumi, Banjir, dan Tanah Longor AA-KL-18 - EFP dated 1 December 2010</li> </ul>	<p>Comply</p>

		<ul style="list-style-type: none"> <li>- Accident and emergency procedures no. AA-EMS-446-PR (operation control), AA-EMS-447-PR (Emergency preparedness), AA-EMS-001-FM (Emergency plan), AA-EMS-003-FM (Emergency incident), and AA-EMS-004-FM (Emergency incident Reporting).</li> </ul> <p>OHS Program was prepared for year 2019, such as:</p> <ul style="list-style-type: none"> <li>- PPE provision for all employee according to risk analysis</li> <li>- Safety talk and briefing</li> <li>- Machine inspection</li> <li>- Medical Checkup for employee</li> <li>- Update OHS warning sign</li> <li>- Emergency equipment &amp; First aid kit monitoring</li> <li>- OHS Internal Audit</li> <li>- Management Reveiw</li> </ul>	
4.7.2	<p>A documented risk assessment shall be available and its implementation shall be recorded.</p> <p>- Major compliance -</p>	<p>OHS risk assessment procedure SOP "Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendalian" AA-SMK3-02-R0 dated 3 August 2017 was established and implemented for Mill and Estates activities both routine and non-routine activities. Hierarchy of control has considered on planning of risk control.</p> <p>Data seen:</p> <ul style="list-style-type: none"> <li>- Risk assessment document has shown under "Analisa Resiko year 2019" last review in January 2019, location in Pulau Maria Estate. The document was covered all activities in plantation e.g: harvesting, office and administration, chemical storage, spraying, manuring,</li> <li>- Gunung Melayu I POM – last review on 4<sup>th</sup> January 2019. All of activities were examined in regard to risk assessment including for boiler operation, sterilizer operation, generator set operation, loading ramp activity, cleaning of CPO storage tank, chemical mixing, fertilizer warehouse, herbicide and pesticide sprayer, harvesting, road maintenance, waste water treatment, etc.</li> </ul>	Comply



<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>OHS training has been programmed and provided appear balanced with OHS hazard and risk at Mill and Estates. Basic OHS training performed internally by safety officer in charge at mill and estate, the training record and programme related to OHS were sighted and verified during this audit, e.g. licenses for boiler operator, licence for operator of generator set, licence of heavy equipment operator, pesticide training for sprayers</p> <p>Data seen:</p> <ul style="list-style-type: none"> <li>- Monitoring on using of PPE for operator of spraying (daily inspection), e.g: month April 2019 -&gt; result shown OK.</li> <li>- Summary report of medical check up for all employee month December 2018 – conducted by compay doctor.</li> <li>- Checklist on inpection of OHS facility e.g: first aid kit, hydrant and fire extinguisher (monthly) – last report for April 2019 – result reported OK.</li> <li>- OHS meeting (monthly), e.g: last meeting on 4<sup>th</sup> March 2019. Agende: review of OHS performance and review of accident report</li> <li>- Report on inspection of mill machinery dated 25<sup>th</sup> January 2019 – result shown OK</li> <li>- Report of housekeeping in emplacement (weekly)</li> <li>- Safety talk (weekly), e.g: on 2<sup>nd</sup> May 2019 for mill operator – attended by 13 workers.</li> <li>- Checklist on PPE using for mechanical in workshop – month January 2019 – result shown OK, e.g: namely Mr Untung Widyantara, Mr Katino, Mr Sucipto</li> <li>- Recotrd on handover of first aid kit (kotak P3K) for foreman of harvesting dated 15<sup>th</sup> April 2019</li> <li>- Refersh training on basic fire dated 6<sup>th</sup> December 2018 was attended by 79 workers.</li> <li>- Rencana Tanggap Darurat dated 13<sup>th</sup> April 2019, evidence seen: scenario, attendance list, photograph and record of evaluation</li> <li>- Safety inspection regularly conducted by company to check the OHS implementation and unsafe condiction/action.</li> </ul>	<p>Comply</p>
<p>4.7.4</p>	<p>The responsible person(s) for occupational health and safety shall be identified and there</p>	<p>OHS Organization (P2K3) has established and approved by “Dinas Tenaga Kerja dan Transmigrasi” Asahan Regency, in each operation unit, e.g:</p>	<p>Comply</p>

	<p>shall be records of periodical meetings on health and safety issues.</p> <p>- Major compliance -</p>	<ul style="list-style-type: none"> <li>- OHS expert was assignment decree letter from Manpower and Transmigration Ministry Nomor: KEP.17739/NAKER-BINWASK3/V/2018 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum, namely Mr Boston Gultom, dated 17<sup>th</sup> May 2018.</li> <li>- Registered of P2K3 was shown under "Surat Keputusan Kepala Dinas Tenaga Kerja Provinsi Sumatera Uatra UP Pengawasan Ketenagakerjaan Wilayah IV Nomor KEP.108/P2K3/DTK/V/2019 tentang Pengesahaan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) di Perusahaan dated 13<sup>th</sup> May 2019.</li> </ul> <p>Report on OHS performance under "Laporan P2K3" for period January – March 2019 was sent to Manpower Agency in Asahan Regency</p>	
<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>PT Saudara Sejati Luhur – Gunung Melayu I POM has established several documented procedures related to emergency response in local language Bahasa Indonesia. Company has establish SOP Kesiagaan Tanggap Darurat AA-EMS-820-PR dated 5 April 2017. The emergency conditions have been identified including Fire and explosion at buildings; land fire; earthquake; flooding; chemical spill and poisonings also waste water ponds spillage.</p> <p>Emergency response procedure was defined in:</p> <ul style="list-style-type: none"> <li>- SOP Pengendalian Kebakaran Lahan AA-KL-14-EFP dated 5 May 2013, described the mechanism of handling fire.</li> <li>- SOP Pengendalian Kebakaran di Pabrik, Kantor, dan Perumahan AA-KL-15-EFP dated 1 December 2010</li> <li>- SOP Pengendalian Tumpahan B3 dan Limbah B3 AA-KL-16-EFP dated 1 December 2010</li> <li>- SOP Pengendalian Tanggap Darurat Boiler AA-KL-17-EFP dated 1 December 2010</li> <li>- SOP Pengendalian Gempa Bumi, Banjir, dan Tanah Longor AA-KL-18 - EFP dated 1 December 2010</li> <li>- Rencana Tanggap Darurat "AA-447-001-FM dated 2 January 2018 covered a mechanism to handle the emergency situation such as: fire, spill and leaking.</li> <li>- Accident and emergency procedures no. AA-EMS-446-PR (operation control), AA-EMS-447-PR (Emergency preparedness), AA-EMS-001-FM (Emergency plan), AA-EMS-003-FM (Emergency incident), and AA-EMS-004-FM (Emergency incident Reporting).</li> </ul>	<p>Comply</p>

		Data seen: First aider who have a license from Ministry of Manpower and Transmigration in PT Saudara Sejati Luhur is Retno Satika license No. 17/P3K/2016, valid until 1st July 2019.	
4.7.6	All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).  - Minor compliance –	<p>All workers in mill and estate including daily workers have covered by Medical and Social Insurance (BPJS), as requested by applicable regulation. Records of insurance payment available in:</p> <ul style="list-style-type: none"> <li>– BPJS registration number</li> <li>– Monthly BPJS insurance premium payment.</li> </ul> <p>Based on document review confirmed that the company has registered all their employees in social insurance program, namely BPJS. Payment social insurance (BPJS Ketenagakerjaan &amp; BPJS Kesehatan) has paid to the “BPJS” monthly,</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>– Document of Payment Application for BPJS Ketenagakerjaan in Pulau Maria Estate month January 2019, A/C No. 19040044xxxx, amount IDR X47,468,752 covering for 164 workers was payment dated 12<sup>th</sup> February 2019.</li> <li>– Document of Payment Application for BPJS Ketenagakerjaan in Pulau Maria Estate month February 2019, A/C No. 898869000280xxxx, amount IDR X5,494,553 covering for 204 workers (guarantee: 472 persons) was payment dated 11<sup>th</sup> February 2019.</li> </ul>	Comply
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.  - Minor compliance	<p>PT Saudara Sejati Luhur EHS team prepares safety index. The safety index is monitoring tool, indicating number of worker (at each operating units), number of major and minor accident as well as the lost time injury.</p> <p>The monitoring carried out on monthly basis and results have discussed during safety committee meeting. The incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were reported quarterly by safety officer.</p>	Comply

		<p>Data seen:</p> <ul style="list-style-type: none"> <li>- In Pulau Maria Estate, in year 2018 recorded: first aid (0 case), medical aid &lt;2 man-day (11 cases), medical aid &lt;2 mand-day (5 cases), LTI (5 cases) – total of lost day by accidents are 11 man-days.</li> <li>- In Gunung Melayu I POM, in year 2018 recorded: first aid (0 case), medical aid &lt;2 man-day (0 case), medical aid &lt;2 mand-day (0 case), LTI (1 case) – total of lost day by accidents are 6 man-days.</li> </ul>	
<p><b>Criterion 4.8</b>  All staff,workers, smallholders and contract workers are appropriately trained.</p>			
4.8.1	<p>Records of training program related to the aspects of RSPO Principles and Criteria shall be available.</p> <p>- Major compliance -</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has shown the document of Training Program as in “Program Pelatihan Environment and Sustainability” year 2019, developed by Asian Agri Learning Institute.</p> <p>The training program such as:</p> <ul style="list-style-type: none"> <li>- Sustainability awareness</li> <li>- Traceability and Mass balances training</li> <li>- HCV awareness training</li> <li>- Training on environmental management, monitoring and reporting</li> <li>- Training on basic fire</li> <li>- Training on first aid</li> <li>- Training on handling of hazardous waste</li> </ul>	Comply
4.8.2	<p>Records of training for each employee shall be maintained.</p> <p>- Minor compliance –</p>	<p>Record training for each employee waivalbe under – Personal Data Training, .eg:  Namely Mr Harianto (transportation foreman, TMK 1<sup>st</sup> July 2009), training record:</p> <ul style="list-style-type: none"> <li>- Corporate culture</li> <li>- Refresh teknis pengoperasioan mesin kendaraan</li> <li>- Training on administration of traksi</li> <li>- Basic fire training</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>- Trainig on first aid</li> <li>- Training on HCV</li> <li>- Sustainability awareness</li> </ul> <p>Namely Mr David Mikail Ritonga (chemical storage keeper, TMK 1th July 2016), training record:</p> <ul style="list-style-type: none"> <li>- Corporate culture</li> <li>- Refreshment training on Plantaion Management System</li> <li>- Training on SOP of administration</li> <li>- Basic fire training</li> <li>- Trainig on first aid</li> <li>- Training on handling of hazardous waste</li> <li>- Sustainability awareness</li> </ul>	
<p><b>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</b></p>			
<p><b>Criterion 5.1</b>  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.</p>			
<p>5.1.1</p>	<p>Environmental impact assessment document(s) shall be available.</p> <p>- Major compliance -</p>	<p>PT Saudara Sejati Luhur has shown the document of environment permit under "Dokumen Studi Evaluasi Lingkungan (SEL) Perkebunan dan Pabrik Kelapa Sawit PT Gunung Melayu, PT Saudara Sejati Luhur dan PT Sumber Sawit Makmur di Kabupaten Asahan – Sumatera Utara", prepared by CV Andalen Persada Konsultan.</p> <p>The author team consist of:  Team leader: Dr. Hemat R. Bramana, MSc;  Coordinator: Ir. Juliarto Barus, MS (AMDAL A/B);  Agronomy/Soil science: Ir. Bahtera Purba and Ir. Jansen Sinulingga;  Water and air quality: Drs. Ahmad Darwin, MSc (AMDAL A) dan Drs. Satrianda;  Social, economic and cultural: Abdul Rahman SH, MH and Drs. Johannes Karo-Karo;  Production technology: Dr. R. Kamrol D, MSc and Renalson;</p>	<p>Comply</p>

		<p>Aquatic and Terra biology: Dra. Retno Widhiastuti and Drs. Mimpin Ginting, MS;          Mechanical engineering: Ir. Rejeki Maha and Juna B;          Programmer: Drs. Sehat Sembiring and Roshermida;</p> <p>The environment document have approved by "Komisi Pusat AMDAL, Departement Pertanian" through "Surat No.220/687/B/IV/1994 dated 18/04/1994. The document have explained the positive and negative impact from construction and development of oil palm plantation and palm oil mill Gunung Melayu since pre-operation up to construction of palm oil mill.</p> <p>PT Saudara Sejati Luhur has shown the document of "Upaya Pengelolaan dan Pemantauan Lingkungan (UKL-UPL) Pekebunana Kelapa Sawit, Peningkatan Kapasitas Produksi Pabrik CPO 60 Ton TBS/Jam dan Pembangunan Pabrik KCP 200 Ton/Hari dan Biogas Plant", the environmental permit under "Keputusan Kepala Kantor Lingkungan Hidup Kabupaten Asahan Provinsi Sumatera Utara Nomor: 660.1/0779/LH/2015, tertanggal 17<sup>th</sup> Juni 2015 tetang Izin Lingkungan PT Saudara Sejati Luhur" pada poin Memutuskan bagian kesembilan "Menyampaikan laporan pelaksanaan implementasi pengelolaan lingkungan hidup dan implementasi pemantauan lingkungan hidup kepada (1) Menteri Negara Lingkungan Hidup dan Kehutanan RI di Jakarta, (2) Kepala Badan Lingkungan Hidup Provisni Sumatera Utara dan (3) Kepala Kantor Lingkungan Hidup Kabupaten Asahan Provinsi Sumatera Utara.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM also has identified Environmental impact assessment in whole operation as documented in "Evaluasi Aspek dan Dampak Lingkungan", last review on 8<sup>th</sup> January 2019 in each unit operation, in estate and mill, this document covering all operation in Estates and mill.</p>	
5.1.2	<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</p>	<p>The Management Plan incorporated in the "Rencana Pengelolaan Lingkungan dan Rencana Pemantauan Lingkungan" as mentioned in Bab IV at document of DELH, consist of:</p> <ul style="list-style-type: none"> <li>- Penerimaan Tenaga Kerja (job opportunity)</li> <li>- Peningkatan Pendapatan (increase of income)</li> <li>- Hazardous waste source</li> </ul>	<p><b>Not Comply</b></p>

	<p>shall appoint the responsible person(s) for the implementation of the document.</p> <p>- Minor compliance -</p>	<ul style="list-style-type: none"> <li>- Terganggunya keberadaan satwa liar</li> <li>- Penurunan kualitas udara (air quality)</li> <li>- Peningkatan kebisingan (noise)</li> <li>- Solid waste source</li> <li>- Liquid waste source</li> <li>- Munculnya sikap dan persepsi masyarakat</li> </ul> <p>PT Saudara Sejati Luhur has assigned Estate and Mill Manager who responsible person on implementation the management plan.</p> <p>PT Saudara Sejati Luhur has prepared report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester), e.g RKL-RPL report semeseter I 2018 (period January-June 2018, reported to KLHK Jakarta on; DLH Kabupaten Asahan on 17<sup>th</sup> October 2018) and semester II 2018 (Period July – December 2018, reported to Dinas Perkebunan Kabupaten Asahan on March 2019 received by Mr Jay “Laporan Pelaksanaan Rencana pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL)</p> <p>NC:          There was lack of evidence that the organization has submitted the report of implementation of RKL-RPL for second semester year 2018 (July-December 2018) as required at the SK Izin Lingkungan Nomor: 660.1/0779/LH/2015 tentang Izin Lingkungan PT Saudara Sejati Luhur.</p> <p>Evidence:          PT Saudara Sejati Luhur has shown the document of “Upaya Pengelolaan dan Pemantauan Lingkungan (UKL-UPL) Pekebunana Kelapa Sawit, Peningkatan Kapasitas Produksi Pabrik CPO 60 Ton TBS/Jam dan Pembangunan Pabrik KCP 200 Ton/Hari dan Biogas Plant”, the environmental permit under “Keputusan Kepala Kantor Lingkungan Hidup Kabupaten Asahan Provinsi Sumatera Utara Nomor: 660.1/0779/LH/2015, tertanggal 17<sup>th</sup> Juni 2015 tetang Izin Lingkungan PT Saudara Sejati Luhur” pada poin Memutuskan bagian kesembilan “Menyampaikan laporan pelaksanaan implementasi pengelolaan lingkungan hidup dan implementasi pemantauan lingkungan hidup kepada (1) Menteri Negara Lingkungan Hidup</p>	
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		<p>dan Kehutanan RI di Jakarta, (2) Kepala Badan Lingkungan Hidup Provisni Sumatera Utara dan (3) Kepala Kantor Lingkungan Hidup Kabupaten Asahan Provinsi Sumatera Utara.</p> <p>However, There was lack of evidence that the organization has submitted the report of implementation of RKL-RPL for second semester year 2018 (July-December 2018) as required at the SK Izin Lingkungan Nomor: 660.1/0779/LH/2015 tentang Izin Lingkungan PT Saudara Sejati Luhur.</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>- Daftar Distribusi Ekternal tentang Laporan Pelaksanaan RKL-RPL periode Juli-Desember 2018 kepada Dinas Perkebunan Kabupaten Asahan</li> <li>- Memorandum Nomor: 117/MI-PGS/MEMO/03/2019, Hal Pengiriman Laporan RKL/RPL Juli – Desember 2018, tertanggal 27 Maret 2019 ditujukan kepada RH Plt I Medan; Attn: Ibu Rika Damanik (RO Plt I –Medan)</li> </ul>	
5.1.3	<p>Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly basis.</p> <p>- Minor compliance –</p>	<p>Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) available under Report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester).</p> <p>PT Saudara Sejati Luhur also has conducted monitoring of environmental impact year 2018, such as:</p> <ul style="list-style-type: none"> <li>- Analysis Report of air emission, no certificate 09821/CLACAK, dated 12<sup>th</sup> October 2018, conducted by SUCOFINDO, sample test location: Boiler No 01 and Boiler No 02. The result was complied with KepMenLH No 7 Tahun 2017 Lampiran I.</li> <li>- Analysis Report of noise, temperature, humidity, vibration and ambient air, no certificate 09820/CLACAK, dated 12<sup>th</sup> October 2018 conducted by SUCOFINDO, sample test location: Gunung Melayu I POM. The result was complied with relevant regulation (Nilai Ambang Batas – Permenakertrans NO 13/MEN/X/2011, KEPMENLH No 48/MENLH/11/1996).</li> </ul>	Comply



		<ul style="list-style-type: none"> <li>- Analysis Report of Kebauan, no certificate: 09818/CLACAK, dated 12<sup>th</sup> October 2018 conducted by SUCOFINDO, sample test location: Gunung Melayu POM. The result was complied with KepMenLH No 50/MENLH/II/1996</li> <li>- Report of Testing of water waste, no 6263/K/AL/08/2018 dated 18<sup>th</sup> July 2018, 20<sup>th</sup> September 2018, 24<sup>th</sup> October 2018, 26<sup>th</sup> November 2018, 14<sup>th</sup> December 2018, conducted by BTKLPP (Balai Teknik Kesehatan Lingkungan dan Pengendalian Penyakit Kelas I Medan. Ther results are still below the quality standard in accordance KepMenLH no 28-29 tahun 2003 Tentang Pedoman Syarat dan Tata Cara Perizinan Pemanfaatan Air Limbah Minyak Sawit di Perkebunan Kelapa Sawit. Detail record available at indicator 4.4.3</li> </ul>	
<p><b>Criterion 5.2</b>  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>			
5.2.1	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.  - Major compliance -	PT Saudara Sejati Luhur – Gunung Melayu I POM has conducted the HCV identification in coordination with “Fakultas Kehutanan Institut Pertanian Bogor” back in 2013, under “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Saudara Sejati Luhur – Pulau Maria Estate, Provinsi Sumatera Utara”. The HCV assessment conducted based on “Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.  The HCV identification team consist of: Team leader: Dr. Ir. Nyoto Santoso, MS (RSPO HCV Assessor and HCVRNI member); Environmental service expert: Ir. A. Faizal Siregar, Msi (RSPO HCV Assessor and HCVRNI member); Vegetation expert: Eko Adhiyanto, S.Hut (RSPO HCV Assessor and HCVRNI member); Wildlife expert: Sutopo S.Hut. (RSPO HCV Assessor and HCVRNI member);	Comply

		<p>Social-economic-cultural expert: Rae Birumbo (RSPO HCV Assessor and HCVRNI member); GIS: Arif Prasetyo, S.Hut (RSPO HCV Assessor and HCVRN member).</p> <p>The HCV identification carried out with public stakeholder consultation with surrounding communities on 22-24/04/2013 in Desa Gonting Malaha and Desa Batu Anam. The HCV Identification report has been peer reviewed by Mr.Dr.Jarwadi Budi Hernowo (RSPO HCV Assessor and HCVRNI member) on 01/2014. The total HCV identified in Pulau Maria Estate was 17.77 Ha, consist of HCV 4.1 (16.74 Ha) and HCV 6 (1.03 Ha).</p> <p>The HCV identification document has explained the general condition of landscape surrounding company's plantation: there is no protected forest/ecosystem that feasible for wildlife to maintain its viability. Therefore no recommendation for wildlife corridor.</p>	
5.2.2	<p>Whererare, 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 management plan.</p> <p>- Major compliance -</p>	<p>Based on HCV Identification Report, 2014 shows in area of Pulau Maria Estate, found 2 types of mammal, 23 types of bird, 3 types of reptile. Based on CITES, there are 3 species under Appendix II: 2 types of bird and 1 type of reptile. No wildlife found in the plantation categorized under IUCN.</p> <p>PT Saudara Sejati Luhur has established Conservation Management and Monitoring Plan 2018 to maintain the HCV area and and enhance the biodiversity. Biodiversity monitoring performed each month by HCV foreman, example monitoring in April 2018 identified the presence of wildlife such as: Egretta asp, Macaca fascicularis, Varanus salvator and Macaca nemestrina.</p> <p>PT Saudara Sejati Luhurhas been reporting the management and monitoring of HCV area and biodiversity each semester and reported to BKSDA Sumatera Utara. Based on document verification upon "Laporan Monitoring Tumbuhan dan Satwa Liar PT Saudara Sejati Luhur periode Semester II 2018"- monitoring period June - December 2018", was reported on 29<sup>th</sup> January 2019 sent to Kepada Badan Konservasi Sumber Daya Alam (BKSDA) Provinsi Sumatera Utara, monitoring team identified 3 types of mammal (Callosciurus notatus, macaca nemestrina, macaca fascicularis), 3 types of reptile (Mabouya sp, Varanus salvator,</p>	Comply

		<p>Naja sumatrana) and 11 types of birds such as: Burung balam, perkutut, ruak-ruak, kaccer and perenjak jawa. No threatened species were identified.</p> <p>Based on field verification, PT Saudara Sejati Luhur has demonstrated effort for management and monitoring of HCV area. For example, Monitoring of plant and animal on 6 monthly basis, planting trees and vertifer grass on river buffer zone since 2014 - 2018.</p>	
5.2.3	<p>Program(s) to socialize the status of protected, rare, threatened or endangered (RTE) to all workers shall be available, including records of appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance –</p>	<p>PT Saudara Sejati Luhur has been established management program of HCV to annuallyeducat e about the status and protection of the RTE species to worker and community around estate. Refreshment dissemination and socialization.e.g: attendance list on socialization of HCV dated 18<sup>th</sup> April 2019 was attended 36 employee.</p> <p>All staff and employees were informed about HCV areas and RTE species. Object of educate program regarding the status of the RTE species, list of protection species in area, management of RTE species, protection of RTE species. Educate to worker through socialization conducted continuously through master morning and minimum twice a year. Latest socialization in Pulau Maria Estate and Gunung Melayu I POM conducted on 26 February 2018. Documentation and minutes of socialization can be demonstrated.</p> <p>Based on field visit and interview with workers and local communities it was found no any capture, harm, collect or kill RTEs.</p>	Comply
5.2.4	<p>Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan.</p> <p>- Minor compliance –</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared Conservation Management Plan, detailing location of HCV area, hectare of HCV area, management objective, management program, method, person in charge, target of implementation and monthly status.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has consistently monitors the status of HCV area, as well as protected flora and fauna species. This is recorded in “Laporan Monitoring Tumbuhan dan Satwa Liar PT Saudara Sejati Luhur periode Semester II 2018”– monitoring period June - December 2018”, was reported on 29<sup>th</sup> January 2019 sent to Kepada Badan Konservasi Sumber Daya Alam (BKSDA) Provinsi Sumatera Utara. The report</p>	Comply

		<p>explains the monitoring on status of plant and wildlife, disturbance and damage to the protected area.</p> <p>Wildlife observations are conducted monthly by Mandor HCV in each Afdeling. Last observation in April 2018 documented in the "Daftar Temuan satwa liar di areal kebun" observed several protected species such as: Egretta asp, Macaca fascicularis, Varanus salvator and Macaca nemestrina. Types of animal such as Felis bengalensis, Tragulus javanica, Muntiacus muntjak, Manis javanica is rarely seen at the time of observation</p> <p>Based on field verification, company has demonstrated effort for management and monitoring of HCV area.</p>	
5.2.5	<p>Where HCV areas overlapped with an identified local community's land, there shall be evidence of a negotiated agreement that optimally safeguard their HCVs and the local community's rights.</p> <p>- Minor compliance –</p>	<p>All HCV and conservation areas within the company areas. Based on document verification, field visit and interview with stakeholders, there was no HCV area under existing rights of local community.</p>	Comply
<p><b>Criterion 5.3</b></p> <p>Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>			
5.3.1	<p>A documented identified source of all waste and pollution, shall be available.</p> <p>- Major compliance -</p>	<p>Waste and pollution sources have been identified and documented, including used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse. Record of identification was presented in "Evaluasi Aspek Dampak Lingkungan" EMS-431-003-LT last review on 8<sup>th</sup> January 2019.</p> <p>There is a mechanism "Mekanisme Penanganan Sampah Domestik" to segregate organic and an-organic waste, further to re-use or re-cycle an-organic domestic waste (such as plastic) and composting the organic domestic waste.</p>	Comply

		<p>All polluting activities has been assessed including emission from boiler and generator, effluent from mill waste water, particulate from boiler stack, noise, used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse.</p>	
5.3.2	<p>There shall be evidence that all chemicals and their empty containers are disposed of responsibly.</p> <p>- Major compliance -</p>	<p>PT. Saudara Sejati Luhur – Gunung Melayu I POM and Supply bases collects all hazardous waste from estate and mill into temporary hazardous waste storage. The temporary hazardous waste storage has permit according to “Keputusan Bupati Asahan Nomor 503/LB3/DPMPPTSP/1427/XI/2014 tanggal 22 November 2017 tentang Pemberian Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT Saudara Sejati Luhur”, permit valid for 5 years and PT Saudara Sejati Luhur has permit to store the hazardous waste for 180 days because of producing hazardous waste less than 50 kg/day.</p> <p>The hazardous waste with storage time 180 days: used battery, waste from laboratory containing hazardous waste, uncodified solvent, waste contaminated with hazardous waste, sulfic acid, other acid waste, used refrigerant, clinical waste with infectious characteristic, expired medicine, expired agrochemical, laboratory equipment contaminated with hazardous waste, medical equipement with heavy metal. Hazardous waste type with storage time 365 days: lead scrub, ex-hazardous waste packing, used lubricant, resin waste or ion exchanger, used filter, used rags. Temporary hazardous waste storage has been equipped with fire extinguisher, emergency shower and emergency eyewash, alarm, spill kit. The building also built with floor bund and sufficient ventilation.</p> <p>PT. Saudara Sejati Luhur Gunung Melayu I POM and Supply bases has an agreement in transporting the hazardous waste with licensed contractor: “Perjanjian Kerjasama antara PT. Saudara Sejati Luhur dengan Konsorsium PT. Sumatera Deli Lestari Indah – PT Indostar Cargo dan PT Prasadha Pamunah Limbah Industri No.003/AA-SDLI-ISC-PPLI/III/2018 dated 2<sup>nd</sup> March 2018; valid for one year. The type of hazardous waste to be transported: used oil, old battery, waste oil, old lamp bulb, used chemical container, used filter, used jerry can, contaminated waste and used filter.</p>	Comply

		<p>The contractor, PT Indostar Cargo has also permit for hazardous waste transporting based on "Izin Penyelenggaraan Angkutan Barang Khusus Untuk Mengangkut Barang Berbahaya dari Kementerian Perhubungan Direktorat Jenderal Perhubungan Darat berdasarkan SK Nomor: SK.00018/AJ.309/1/DJPD/2018/100000090-00008 dated 4<sup>th</sup> June 2018, valid until 4<sup>th</sup> June 2019.</p> <p>PT Saudara Sejati Luhur has demonstrate the records of hazardous waste management such as:</p> <ul style="list-style-type: none"> <li>- Report of moitoring on handling the hazardous waste (3 months base) has sent to Environmental Agency in Asahan Regency for period October – December 2018. Document number: 021/MI-PGS/Ext/01/2019.</li> <li>- Catatan Serah Terima Limbah B3 (record on handover of hazardous waste) to third party that have permint (PT Indostar Cargo) dated 23th December 2018, consist of: oil used (1.917 Kg), oil filter used (48 Kg), empty chemical container (95 Kg), lamp used (49 Kg), container cat used (62 Kg), accu used (200 Kg). Vehicle BK 8486 EG.</li> <li>- Hazardous Waste Manifest Nomor 0026341 for item: lamp used (49 Kg), Vehicle BK 8486 EG, dated 23th December 2019.</li> <li>- Hazardous Waste Manifest Nomor 0026341 for item: empty chemical container (95 Kg), Vehicle BK 8486 EG, dated 23th December 2019</li> </ul>	
5.3.3	<p>A documented waste management plan to avoid or reduce pollution and its implementation shall be available.</p> <p>- Minor compliance –</p>	<p>Waste and pollution sources have identified and documented in Buatan Estate. The identification of waste and pollution including used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse. Record of identification was documented in "Evaluasi Aspek Dampak Lingkungan" EMS-431-003-LT issued 8<sup>th</sup> January 2019</p> <p>PT Saudara Sejati Luhur has also prepare waste management plan such as:</p> <ul style="list-style-type: none"> <li>- Domestic waste, managed by segregation of organic and inorganic waste, transport the</li> </ul>	Comply

		<p>waste to sanitary landfill</p> <ul style="list-style-type: none"> <li>- Liquid domestic waste, managed by providing septic tank and trench each house</li> <li>- Solid waste resulted from mill such as: shell and fiber used as boiler fuel, EFB applied to plantation used as mulched and organic fertilizer</li> <li>- Liquid waste from mill managed by application to plantation as fertilizer (Land application)</li> <li>- Hazardous waste resulted from mill and estate managed by store in the temporary storage which has licensed and delivered to licensed transporter and collector.</li> <li>- Waste of used goods/scrap, collect and sell to vendors</li> <li>- Air emission, water and soil pollutant managed by dust collector installation</li> </ul>							
<p><b>Criterion 5.4</b>  Efficiency of fossil fuel use and the use of renewable energy is optimized.</p>									
<p>5.4.1</p>	<p>A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy shall be in place and monitored.</p> <p>- Minor compliance –</p>	<p>Gunung Melayu I POM is using 100% fiber and nut shell for power generation during FFB processing. The fiber and nut shell is by-product from CPO production. Gunung Melayu I POM has calculated the total energy required for process, based on FFB tonnage x steam required to process one ton FFB x energy required to generate one kg steam. Tanjung Selamat POM has also calculated the potential energy generated from using fiber and nut shell. From calculation it was known that there is energy surplus, whereby used as power generation when mill is in operation but not processing FFB (electricity source, cleaning, etc.).</p> <p>From this point, Gunung Melayu I POM can identify the equivalent diesel fuel being use to generate similar energy, and calculate the efficiency.</p> <p>Total shell use as boiler fuel since January – December 2018 was 4,956 tonnes and total fibre use as boiler fuel since January – December 2018 was 27,507 tonnes, in detail:</p> <table border="1" data-bbox="862 1284 1534 1385"> <thead> <tr> <th>Month</th> <th>Sheel (ton) – year 2018</th> <th>Fibre (ton) – year 2018</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>716</td> <td>1,952</td> </tr> </tbody> </table>	Month	Sheel (ton) – year 2018	Fibre (ton) – year 2018	January	716	1,952	<p>Comply</p>
Month	Sheel (ton) – year 2018	Fibre (ton) – year 2018							
January	716	1,952							

		<table border="1"> <tr><td>February</td><td>737</td><td>1,869</td></tr> <tr><td>March</td><td>616</td><td>1,710</td></tr> <tr><td>April</td><td>476</td><td>2,002</td></tr> <tr><td>May</td><td>449</td><td>2,140</td></tr> <tr><td>June</td><td>489</td><td>1,653</td></tr> <tr><td>July</td><td>347</td><td>2,966</td></tr> <tr><td>August</td><td>233</td><td>3,228</td></tr> <tr><td>September</td><td>275</td><td>2,808</td></tr> <tr><td>October</td><td>250</td><td>2,874</td></tr> <tr><td>November</td><td>100</td><td>2,169</td></tr> <tr><td>December</td><td>269</td><td>2,133</td></tr> <tr><td><b>Total</b></td><td><b>4,956</b></td><td><b>27,503</b></td></tr> </table> <p>Total solar use since January – December 2018 by Gunung Melayu I POM was 47,810 litre. Total solar use since January – April 2019 by Gunung Melayu I POM was 16,575 litre. Pulau Maria Estate monitor the diesel fuel usage each month. Diesel fuel usage for: genset, heavy equipment, truck and operational vehicle.</p>	February	737	1,869	March	616	1,710	April	476	2,002	May	449	2,140	June	489	1,653	July	347	2,966	August	233	3,228	September	275	2,808	October	250	2,874	November	100	2,169	December	269	2,133	<b>Total</b>	<b>4,956</b>	<b>27,503</b>	
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<b>Criterion 5.5</b>																																							
Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.																																							
5.5.1	Records of land clearing with zero burning shall be available, referring to the ASEAN Policy on Zero Burning (2003) or other recognised techniques based on the existing regulations. - Major compliance -	PT Saudara Sejati Luhur – Gunung Melayu I POM has established zero burning policy documented in “Kebijakan Perusahaan, 1 December 2014” stated: “Melakukan Praktek Tanpa Bakar dalam kegiatan pembangunan perkebunan dan secara aktif mendukung inisiatif mencegah dan mengatasi kebakaran hutan dan asap”.  During field visit and obervation on 14 <sup>th</sup> May 2019 there was not found open burning during audit, included in land preparation or replanting.	Comply																																				
5.5.2	Where fire has been used for eradication of pest during replanting, the records of the analysis of	No fire was used during land preparation or replanting.	Comply																																				



	the use of fire and permit from the authorised agency shall be available. - Minor compliance -		
<b>Criterion 5.6</b>			
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			
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>In annual surveillance assessment year 2019, there are no any significant changes related to document on assessing pollution and emission sources from last assessment.</p> <p>Based on Significant pollution and GHG emission was identified, for estates comes from using of pesticides, action plan to reducing pesticide was made such as program of 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"> <li>- Using EFB as organic fertilizer.</li> <li>- Planting beneficial plant</li> <li>- Efficiency of fossil fuel.</li> <li>- Using fibre and shell for boiler</li> <li>- Capturing methane gas from POME</li> <li>- Increasing renewable energy usage as electricity from methane capture facility</li> </ul> <p>Identification of significant pollution and GHG emission in each unit/station as documented in "Environmental Aspect &amp; Impact List", updated on 8<sup>th</sup> January 2019, consist of: input, environmental aspect, caused, environmental impact potential, and control.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has develop mitigation program to reduce GHG emission.</p>	Comply
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plan to reduce or minimize them implemented. - Major compliance -	<p>Identification of pollutant and GHG, such as: usage of an-organic fertilizer, pesticide, fossil fuel usage, peat land, and POME.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also minimized pollutant and GHG through using EFB as organic fertilizer, implementing IPM to reduce pesticides usage, using</p>	Comply

		fiber and sell for boiler, and capturing POME by Biogas Plant by Kubota. Thermophillic anaerobic process.	
5.6.3	<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. 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>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and Genset, water quality test for river (upstream and downstream), effluent water quality, noise, etc.</p> <p>Regular monitoring and calculation of polluting and emission from estate and mill available using Palm GHG Calculator V.3.0.1. Detail of Summary of net GHG emissions from PalmGHG calculator available in appendix.</p>	Comply

<b>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and mills</b>			
<b>Criterion 6.1</b>			
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.			
6.1.1	<p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>- Major compliance -</p>	<p>Social Impact Assessment was conducted as documented in "Laporan Identifikasi dan Upaya Kelola Sosial" by Team Corporate Social Responsibility PT Asian Agri which covering social impact assessment dated 25 - 29 April 2017. The team corporation Social Responsibility PT Asian Agri is including which is Leader of Team: Fajar Suryono and the members are: Juan Christie SS, Hendrik, Ari Azhari harahap and Eddy Lion.</p> <p>The company has published a report on the effectiveness of social management efforts of PT Gunung Melayu and PT Saudara Sejati Luhur Group Gunung Melayu Estate, Asahan Regency, North Sumatra Province, by Team Corporate Social Responsibility 2017. Stakeholder meeting involving 36 participants from surrounding village (Rahuning Village, Batu Anam Village, Gonting Malaha Village and Sidomulyo Village) was performed on 27 - 29 April 2017.</p> <p>During the preparation for Social Impact assessment team and company management have involved communities through interviews and meetings with village peoples, farmers, village officials and regency officials. Record of meeting with affected parties and stakeholder are available and can be demonstrated.</p>	Comply
6.1.2	<p>There shall be evidence that the assessment has been conducted with the participation of affected parties.</p> <p>- Major compliance -</p>	<p>Social impact aspect assessment is done by:</p> <ul style="list-style-type: none"> <li>- Focus group discussions (DKF)</li> <li>- Deep interview</li> <li>- Structured Interviews</li> <li>- Field observation</li> </ul>	Comply

		<p>During the preparation for Social Impact assessment team and company management have involved communities through interviews and meetings with village peoples, farmers, village officials and regency officials.</p> <p>Record of meeting with affected parties and stakeholder are available and can be demonstrated. The meeting with stakeholder and affected parties has been conducted. Feedback from the stakeholder was serving as inputs in creating a social impact mitigation and management program 2019.</p> <p>Based on interview with representative of Batu Anam village, at the first Social Impact Assessment all surrounding communities, including Batu Anam village already involved.</p>	
6.1.3	<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>Planning and programming and monitoring of social impacts in the period prior to the July – December 2019 have been recorded on "Matriks Upaya Pengelolaan", can be demonstrated that the program has implemented.</p> <p>Several negative impact on "Matriks Upaya Pengelolaan", such as:</p> <ul style="list-style-type: none"> <li>a) Impact: decrease of surface water quality to river body and community of Rahuning Village and Batu Anam village. Management efforts: Maintain conservation areas along the river that are sub-basins around the factory area and provide periodic health services for affected communities due to water bone diseases. Management plan to prevent the decrease of water quality and its effectiveness has been involving the community representative from Rahuning Village and Batu Anam Village.</li> <li>b) Impact: Reduced levels of public health. Management efforts: Providing health services to affected communities.</li> <li>c) Impact: Community attitude and perception, management effort: cooperate with community leaders and village government apparatus in solving problems in plantation. Company has set management and monitoring under Matriks Arahan Program which included on "Laporan Identifikasi Upaya Kelola Sosial PT Gunung Melayu dan PT Saudara Sejati Luhur, company can be shown the evidence that "Matrik Upaya Pengelolaan" has been implemented.</li> </ul>	Comply

6.1.4	<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>Based on Social Activity Monitoring Program of PT Gunung Melayu-SSL, there are several program activities in 2018, such as:</p> <ul style="list-style-type: none"> <li>- Activity Effectiveness Identification of Social Resource Efforts of PT Gunung Melayu-SSL conducted 2 times a year.</li> <li>- Review of the effectiveness of the PT Gunung Melayu-SSL Social Management report is done once a year</li> <li>- Meeting with CSR related community is done once a year.</li> </ul>	Comply
6.1.5	<p>Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme).</p> <p>- Minor compliance –</p>	<p>No scheme smallholders managed by company or associated with company.</p>	N/A
<p><b>Criterion 6.2</b></p> <p>There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.</p>			
6.2.1	<p>Communication and consultation procedures shall be documented.</p> <p>- Major compliance -</p>	<p>The Certificate Holder has developed a communication procedure under "Mekanisme Penanganan Permintaan Informasi Stakeholder "(No. SOP; AA-GL-5008.1-R1) dated 22<sup>nd</sup> August 2011, which explains the company responses against all information request sent by stakeholders including response time of 14 working days after information request accepted.</p> <p>Based on interview with representative of Batu Anam village, there is no obstacle on communication with Gunung Melayu I.</p>	Comply
6.2.2	<p>The company shall have official(s) who is responsible for consultation and communications with parties.</p> <p>- Minor compliance -</p>	<p>The company has appointed officers responsible to carried out communication and consultation with local communities is Public Relations Department.</p> <p>Based on interview with representative of Batu Anam village, he know the person who appointed for Community Relationship "HUMAS/Public Relations" (Mr. Agus Salim).</p>	Comply
6.2.3	<p>The company shall have a list of stakeholders, records of communications, including confirmation of receipt and that efforts are made</p>	<p>List stakeholders are available and records of stakeholders' communication and consultation were being documented into "Buku Masuk".</p>	Comply

	to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders. - Minor compliance -	Record of communication and consultation with stakeholders is documented in "Buku Masuk", up to February 2019 where noted 9 letters coming from stakeholders, e.g. Letter from the Office of Environment Asahan Regency on 01/21/2019; about the Environmental Agency's Visit Plan for Kab. Asahan, has been responded to on 21/01/2019	
<b>Criterion 6.3</b>			
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
6.3.1	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. - Major compliance -	"Mekanisme Penanganan Keluhan" – complaint handling mechanism (No. SOP-AA-GL-5005-R0 01) is documented procedure to response complaint from external party. For internal, the mechanism described under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (No. SOP-AAHR-3008-R0 05).  Company has also prepared "Mekanisme Jaminan Pelapor dan Pengungkapan Kasus" prepared by Public Relation officer PT. Gunung Melayu on 01/12/2015. The mechanism has explained policy to protect complainant/whistle blower anonymity – if requested. These mechanisms has been communicated to external parties and disseminated to all employees. Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company.	Comply
6.3.2	There shall be records of process and outcome of dispute resolution. - Major compliance -	Workers and stakeholder grievance recorded in the log book "Monitoring/Buku Keluhan Karyawan". Based on the Employee Complaint Book up to April 2019 there are 7 complaints in Pulau Maria Estate and 5 complaints at Gunung Melayu I Mill.  Sample seen:  Gunung Melayu I POM:	Comply
<b>Criterion 6.4</b>			
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.			

6.4.1	<p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be available, referring to decision of the Constitution Court.</p> <p>- Major compliance –</p>	<p>Mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) No. AA-GL-5003-1-R1, dated 5th December 2009 and has undergone first revisions on 22nd August 2011. The mechanism described is similar to conflict resolution procedures involving community representatives and others stakeholders.</p> <p>In the working area of PT. Saudara Sejati Luhur, land status is National Land, so there is no process of compensation to other parties including to the community. (See 2.3.2).</p>	Comply								
6.4.2	<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>There is a mechanism for land dispute resolution, SOP AA-GL-5003.1-R1 related to “Penanganan Konflik Lahan” effective 22/08/2011. The procedure covers land dispute handling mechanism, negotiation process, and verification upon legal ownership evidence up to land compensation.</p> <p>Should negotiation process fails, any land dispute will be processed through legal/litigation mechanism. During the process, a complete record is maintained. The compensation calculated based on agreement of both parties through negotiation – upon participative measurement, and recorded under an agreement.</p>	Comply								
6.4.3	<p>Compensation claims, process and outcome of any negotiated agreements shall be documented, with evidence of the participation of affected parties.</p> <p>- Major compliance –</p>	<p>As an output from land dispute resolution process, an agreement between both parties and/or copy of court ruling will be required. No any land compensation due to no customary land and/or local community land rights within the company area.</p> <p>Based on interview with chief of Batu Anam village, no land dispute or complaint within last 3 years.</p>	Comply								
<p><b>Criterion 6.5</b>  <b>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.</b></p>											
6.5.1	<p>Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.</p> <p>- Major compliance -</p>	<p>According to interview with 6 female sprayers in Block J02F, they informed that employee status is casual workers or “Pekerja Harian Lepas”. Based on sample of payslip document for three female sprayers (SRI, SNT, WNT) since January to April 2019, working days of these sprayers as follow:</p> <table border="1" data-bbox="857 1321 1933 1364"> <thead> <tr> <th>No</th> <th>Name</th> <th>No. of working days</th> <th>Regulation</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	No	Name	No. of working days	Regulation					Comply
No	Name	No. of working days	Regulation								

		Jan-19	Feb-19	Mar-19	Apr-19	Salary Adjusment paid on April-19	IDR/day	
		18	19	19	19	345,912	108,947.44	
	2	19	19	19	18	352,089	108,947.44	
	3	17	19	20	19	345,912	108,947.44	
	Basic Wage IDR/day	102,770	102,770	102,770	108,948		108,947.44	
*Deed of North Sumatra Governor No: 188.44/1573/KPTS/2018 re: Minimum Wage for 2019.								
6.5.2	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.  - Major compliance -	According to interview with 6 female sprayers in Block J02F, they informed that employee status is casual workers or "Pekerja Harian Lepas". Sample of Casual Worker Agreement or "Perjanjian Kerja Harian Lepas" as follow:  <ol style="list-style-type: none"> <li>Perjanjian Kerja Harian Lepas Nomor: 003/AFD.I/PKHL/KPM/04/2009, name SRI ASTUTI. Job: Upkeep. Validity: 1 April 2019 – 30 June 2019.</li> <li>Perjanjian Kerja Harian Lepas Nomor: 005/AFD.I/PKHL/KPM/04/2009, name SUSANTI. Job: Upkeep. Validity: 1 April 2019 – 30 June 2019.</li> <li>Perjanjian Kerja Harian Lepas Nomor: 008/AFD.I/PKHL/KPM/04/2009, name WANTI. Job: Upkeep. Validity: 1 April 2019 – 30 June 2019.</li> </ol>						Comply
6.5.3	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.	The company has prepared facilities for their workers, such as: housing, educational facilities (elementary and early childhood), polyclinics, religious facilities (mosques, churches and temples), and sports facilities (soccer field, badminton, table tennis and field, volly). Below are the list of facilities in PT Gunung Melayu-SSL:  - Housing Type B/CM (1 unit), Type C (5 Unit), Type D (6 unit), type E (99 Unit)						Comply



	<p>- Minor compliance –</p>	<ul style="list-style-type: none"> <li>- Polyclinic (1 units) that has been owned Permit from Bupati Asahan no. 503/BPS/BPPPM/1083/VII/2013, dated 31 July 2013</li> <li>- Mosque (2 units)</li> <li>- Church (1 unit)</li> <li>- Day care /TPA (BalaiPenitipan Anak) in Pondok Coklat and pondok Seng</li> <li>- PAUD (Pendidikan Anak Usia Dini) Kindergartens Bina Darma GM I and Bina Darma KPM SSL</li> <li>- Primary school Muara Tiga GM I</li> <li>- School bus (1 units)</li> <li>- Polyclinic (1 unit) including Medic and Paramedic</li> <li>- Ambulance (1 unit)</li> <li>- Sport facilities</li> <li>- Poliklinik</li> </ul> <p>The company has also facilitated its employees for water supply by building pump wells in each emplacement (in Pondok Seng and Pondok coklat) and electricity with the distribution of PLN (and its payments are subsidized by the company).</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 minimarket which managed by the cooperative and traditional market is nearby surrounding company area, mostly goods needed by employees is provided by the minimarket. Price in minimarket was affordable and cheaper than traditional market nearby company area. Price control by cooperative and all member including workers and company management.</p>	<p>Comply</p>
<p><b>Criterion 6.6</b></p> <p>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>			

6.6.1	<p>A record of the company's policy in understandable language recognising freedom of association, shall be available.</p> <p>- Major compliance –</p>	<p>Freedom of association policy is written in Bahasa Indonesia, so that all employees can understand as stated in "Kebijakan Perusahaan", dated 01st December 2014 "Menghormati hak setiap karyawan untuk membentuk atau menjadi serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif".</p> <p>This policy has been informed to all employees and being placed into public area easily accessed. The company also has involved forming labor union for workers, named "PUK SPSI PT. GM/SSL".</p>	Comply
6.6.2	<p>Records of meetings with labor unions or workers representatives shall be available.</p> <p>- Minor compliance –</p>	<p>In PT Saudara Sejati Luhur there is a labor unions organization based on letter decree of Pengurus Cabang SPSI Asahan Regency, no. 129/ORG/PC FSP.PP-AS/VIII/2017, regarding "pengesahan dan penguahan komposisi pengurus unit serikat pekerja masa bakti 2017-2022". And has been registered by Disnakertrans on 30 August 2001 recorded on "Bukti pencatatan di Disnakertrans" no. 26/DTKVIII/2001, dated 30 August 2001.</p>	Comply
<p><b>Criterion 6.7</b>  Children are not employed or exploited.</p>			
6.7.1	<p>There shall be documented evidence that minimum age requirements are met.</p> <p>- Major compliance –</p>	<p>The company has own policed signed by management on 01st December 2014 that stated that: "It is not allowed all children to work in every activities/processes in company".</p> <p>Based on document review of list of workers, interview with workers and observation during field visit, it was no found workers hired less than 18 years.</p> <p>Sample seen:</p> <p>Gunung Melayu I Mill: M. Harto Satria (Birth date 26-10-1996; Join date 5-3-2016).</p> <p>Pulau Maria Estate: Deni Atmajaya (Birth date 18-12-1998; Join date 1-7-2017).</p>	Comply
<p><b>Criterion 6.8</b>  Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p>			
6.8.1	<p>A company's policy on equal opportunity and treatment for work shall be available and documented.</p> <p>- Major compliance –</p>	<p>Equal Opportunity policy is written in Bahasa Indonesia, so that all employees can understand as stated in "Kebijakan Perusahaan", dated 01st December 2014 "Treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership, political affiliation and/or age.</p>	Comply

		This policy has been informed to all employees and being placed into public area easily accessed. Company also has SOP about the new employment recruitment. According on SOP CR. 01.01 about "Penerimaan Karyawan Baru" (Requirtment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications.	
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated. - Major compliance –	At the time of audit performed interviews of male and female workers confirmed that the company antidiscrimination policy was strictly enforced. They were not aware of any cases of discrimination, e.g. document review of salary payment did not find any evidence of discrimination.	Comply
6.8.3	Records of evidence that equal opportunity and treatment for work shall be available. – Minor compliance -	The company has had procedure hiring workers regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation. The company is conduct performance evaluation of workers annually as documented in "Rekapitulasi Appraisal PB 2017, with scoring for work quality, work quantity, behavior/attitude, team work, discipline, responsibility.	Comply
<b>Criterion 6.9</b>			
There is no harassment or abuse in the work place, and reproductive rights are protected.			
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 –	The company has implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mill and Estates muster areas. Interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy. (which is the latest circular letter to complement previous circulars).  The policy has disseminated to all employees on 8 February 2019, in Pulau Maria Estate, attended by 146 members; and on 12 October 2019 in Gunung Melayu I Mill, attended by 38 participants.	Comply
6.9.2	A policy to protect the reproductive rights, shall be documented, implemented and communicated to all levels of the workforce. - Major compliance –	As it is found in company policy that's signed by Managing Director (Mr. Kelvin Tio) on November 26 <sup>th</sup> 2012 and on one part of the policies stated that: "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights".  There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.	Comply

		<p>Based on interview with Gender Committee, company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides. The latest pregnancy test on March 2019.</p> <p>Monthly committee meeting gender committee, on December 8 February 2019; Related discussion: "The importance of maintaining the health of workers and families ", attended by 43 participants.</p>	
6.9.3	<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.</p> <p>- Minor compliance –</p>	<p>Standard Operating Procedure, No. SOP: XX-HR-308.5-RO; Revision: 0, December 11th 2009: Employees complaints: submission and settlement</p> <p>Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in company policy's draft as in one of points of this policies stated that:</p> <p>"To provide appropriate information for those who inquiry it and to protect its confidentiality for whistle blower cases in accordance to law regarding environmental and social issue, food safety, health and safety work, so that it enables them to more participate to the decision making processes for improving company's performance.</p> <p>Policies that have been made by companies related to the protection of women's rights such as;</p> <ul style="list-style-type: none"> <li>➤ The company has provided menstrual leave for female employee in accordance with the recommendation from paramedic in clinic, and this is in line with "Perjanjian Kerja Bersama" and applicable regulations.</li> <li>➤ The company has granted the right for maternity leave the women who gave birth in accordance with the applicable rules and "Perjanjian Kerja Bersama".</li> <li>➤ The company has consistently perform pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month.</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>➤ The company has a policy of not hiring female labor during pregnancy or breast-feeding for the kind of work that endanger such as fertilizer or spraying by temporarily moving the work force to other types of work.</li> <li>➤ The company has consistently performed regular health checks for sprayers every six months.</li> </ul> <p>The company has conducted training and socialization prevention of sexual harassment in the workplace to the Committee members for example gender socialization on 8 February 2019, on "Sosialisasi Pelecehan Seksual dan Kebijakan Hak Reproduksi", was attended by 37 participants.</p> <p>Work Program of Gender Committee Year 2018, e.g:</p> <ol style="list-style-type: none"> <li>1. Receiving complaints from employees including women's rights including when carrying out work (intimidation against female workers)</li> <li>3. Collaborate with the local Puskesmas to carry out routine childhood immunizations to mothers who have toddlers</li> <li>4. Carry out health education on the importance of family health with environmental hygiene</li> <li>5. Promote Friday Clean for plants in residential areas (emplasmen).</li> </ol>	
<p><b>Criterion 6.10</b>          Growers and millers deal fairly and transparently with smallholders and other local businesses.</p>			
6.10.1	<p>Current and past prices paid for Fresh Fruit Bunches (FFB), shall be publicly available.          - Minor compliance -</p>	<p>The company has displayed the FFB price in Mill's notice board in front of the weighbridge station, all FFB suppliers can see it and able to access the FFB price by phone.</p> <p>The company cooperates with the surrounding community in terms of purchasing FFB and recorded in "Pernyataan dan Jaminan" - Statement and Guarantee as a supplier of FFB. The document stated that:</p>	Comply

		<ol style="list-style-type: none"> <li>1. FFB that supplied to Tanjung Selamat POM came from land that has been owned/controlled/cultivated in accordance with the legislation, especially in the field of land and plantation.</li> <li>2. FFB supplied does not originate from unauthorized areas, such as:             <ol style="list-style-type: none"> <li>a. Protected Forest Area</li> <li>b. Industrial Forest Area</li> <li>c. Production Forest Area</li> <li>d. Conservation area</li> </ol> </li> </ol> <p>FFB Price for third party suppliers period April and May 2019 as follow:  <b>April-19:</b> 1<sup>st</sup> week (IDR 1,370/kg); 2<sup>nd</sup> week (IDR 1,370/kg); 3<sup>rd</sup> week (IDR 1,330/kg); 4<sup>th</sup> week (IDR 1,310/kg); 5<sup>th</sup> week (IDR 1,290/kg).  <b>May-19:</b> 1<sup>st</sup> week (IDR 1,270/kg); 2<sup>nd</sup> week (IDR 1,250/kg); 3<sup>rd</sup> week (IDR 1,230/kg).</p>	
6.10.2	<p>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).</p> <p>- Major compliance -</p>	<p>FFB Pricing for third party is determined by market mechanism and set every day and recorded in the pricing of FFB Gunung Melayu I Palm Oil Mill. FFB price establishment was documented by company under "Mekanisme Penerimaan TBS Luar (Agen/Pengepul)". Formula of FFB price from third parties is as follow :</p> $((\text{CPO Price/Tax } 1.1\%) - \text{Transport cost}) \times \text{OER} = X$ $(\text{PK price} - \text{Transport cost}) \times \text{KER} = Y$ $X + Y - \text{Processing cost} - \text{other cost} = \text{FFB Price}$ <p>Sample seen for FFB pricing of third party supplier on April &amp; May 2019 PT. SSL-GM I.</p>	Comply
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.</p>	<p>The agreement/contract documents between the company and the contractor is sighted such as for replanting. The contract was acknowledged by both parties and well understood.</p>	Comply

	- Minor compliance -	<p>The contract contained all relevant information such as payment method, work requirements, force majeure, contract period, cancellation of contract, etc.</p> <p>Currently the company carried out replanting activity in cooperated with contractor. Based on document review, an agreement between company and local contractors confirmed that contract is made fairly, legal and transparent.</p> <p>Sample of third party FFB suppliers contract:</p> <ol style="list-style-type: none"> <li>1. PT. SSL &amp; PT. Sawit Trading Sejahtera have signed the Code of Procurement Ethics dated 12 February 2019.</li> <li>2. PT. SSL &amp; Hasan BP have signed the Code of Procurement Ethics dated 1 February 2019.</li> </ol>	
6.10.4	<p>Agreed payments shall be made in a timely manner.</p> <p>- Minor compliance -</p>	<p>Evidence of payment is reviewed and interview with local contractor confirmed that payment for contractor timely manner.</p> <p>Sample seen on third party FFB suppliers: PT. SSL have paid for FFB's sourced from PT. Sawit Trading Sejahtera, dated 12 April 2019 through bank transfer.</p>	Comply
<p><b>Criterion 6.11</b></p> <p>Growers and millers contribute to local sustainable development where appropriate.</p>			
6.11.1	<p>Records of contributions to local development based on the results of consultation with local communities shall be available.</p> <p>- Minor compliance -</p>	<p>Based on CSR Project Tracking Report 2018, there are 15 activities has completed.</p> <p>15 activities consist of 4 project in social aspect, 2 project in economic aspect, 2-project in education aspect, 7-project of infrastructure aspect.</p> <p>According to interview with Chief Batu Anam Village, the company has significant contribution to community development, particularly in road maintenance.</p>	Comply
6.11.2	<p>Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve scheme smallholder productivity.</p>	<p>Smallholders not available within this scope.</p>	N/A

	- Minor compliance -		
<b>Criterion 6.12</b>			
No forms of forced or trafficked labor are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labor are used.  - Major compliance -	Based on interview with representative of worker union committee and gender committee (both Mill and Estate), there was no indication of forced labour and/or human trafficking. All employees have had work agreement, regulating the rights and obligation of company and employee. The work agreement including working hour and salary payment.	Comply
6.12.2	It shall be demonstrated that no contract substitution has occurred.  - Minor compliance -	Based on interview with sample worker pesticide operator and harvester, there was no indication of contract substitution occurred. All employees have work agreement, explaining the rights and obligation  Working Agreement: Perjanjian Kerja  1. No: ___/SKU/KPM/09/2009, dated 1 September 2009. Name: SUHADI as Harvester. Worker status: Permanent (SKU-H). 2. No: ___/EST-KPM/MEMO/11/10, dated 1 November 2010. Name: SUGI HARIADI as Harvester. Worker status: Permanent (SKU-H).	Comply
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 -	Based on interview with worker union committee and gender committee, as well as the employee it can be demonstrated that there is no use of migrant/foreign/honorary worker.  During document review of employee data and list of employee shown that there is no migrant/foreign/honorary workers are employed by company. All employee including temporary workers are comes from North Sumatera and have work agreement; regulating the scope of work, work agreement timeframe, working hour, salary payment, overtime and Jamsostek.  Procedures against employee has been set by company in HR procedure regarding workers/employee. Company also has determined the policy to protect the employee presented in Company Policy that's signed by Managing Director, dated 1st December 2014.	Comply
<b>Criterion 6.13</b>			



Growers and millers respect human rights.			
6.13.1	<p>A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations.</p> <p>- Major compliance -</p>	<p>The company has established human rights policy, 2014, it has been communicated to the workforce. Company has a Company Policy, acknowledged by Managing Director on 01/12/2014 stating that company respects human rights by: "treat all employees in fair manner, in terms of recruitment, appraisal and representation without discrimination against tribe, caste, nationality, religion, disability, gender, sexual orientation, worker union, political affiliation and/or age".</p> <p>Based on interview with sample workers (pesticide applicator and harvesters), it is known that company respect to human rights and well communication.</p>	Comply
<b>Principle 7: Responsible development of new plantings</b>			
<b>Criterion 7.1</b>			
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.			
7.1.1	<p>An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented.</p> <p>- Major compliance –</p>	<p>The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.</p>	Not Applicable
7.1.2	<p>Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts.</p> <p>- Minor compliance -</p>	<p>The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.</p>	Not Applicable
7.1.3	<p>Where the development includes an outgrower scheme (<i>skema kemitraan</i>), the impacts of the scheme and the implications of the way it is managed shall be given particular attention.</p>	<p>The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.</p>	Not Applicable

	- Minor compliance -		
<b>Criterion 7.2</b>			
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 –	The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.  Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> .	Not Applicable
7.2.2	Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available.  - Minor compliance -	There is also topographic map indicating the elevation of Pulau Maria Estate consist of 0 – 8% and >30%. The limitation for the area is steep slope on some area. PT Saudara Sejati Luhur did not open the area with steep slope >30%. Topography level consist of 40 – 90 m.	Not Applicable
<b>Criterion 7.3</b>			
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 Saudara Sejati Luhur has started replanting in 2002 - 2008, no any new planting area/developing area since November 2005.	Comply
7.3.2	Reports of comprehensive HCV assessment, which involves stakeholder consultation and	PT Saudara Sejati Luhur has started replanting in 2002 - 2008, no any new planting area/developing area since November 2005.	Comply

	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 –	Company has conducted the HCV identification in coordination with “Fakultas Kehutanan Institut Pertanian Bogor” back in 2013, under “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Saudara Sejati Luhur Kebun Pulau Maria Provinsi Sumatera Utara”. The HCV assessment conducted based on “Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.	
7.3.3	Records of land preparation and clearing dates shall be available. - Minor compliance –	PT Saudara Sejati Luhur has started replanting in 2002 - 2008, no any new planting area/developing area since November 2005.	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 Saudara Sejati Luhur has started replanting in 2002 - 2008, no any new planting area/developing area since November 2005.	Comply
7.3.5	Evidence of consultation with the affected community shall be available in order to identify the area required by such community to fulfill its basic needs, by considering the positive and negative changes to the livelihood as a result of plantation operations. Such matters shall be included in the HCV analysis and management plan (see Criteria 5.2). - Minor compliance –	PT Saudara Sejati Luhur has started replanting in 2002 - 2008, no any new planting area/developing area since November 2005.	Comply

**Criterion 7.4**  
 Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.

7.4.1	<p>Indicative maps showing marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided.</p> <p>- Major compliance –</p>	<p>The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.</p> <p>Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i>. Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.</p>	Not Applicable
7.4.2	<p>Where limited planting on fragile and marginal soils, including peat, is proposed, a documented plan shall be developed and implemented to protect them without incurring adverse impacts.</p> <p>- Major compliance –</p>	<p>The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.</p> <p>Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i>. Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.</p>	Not Applicable
<p><b>Criterion 7.5</b></p> <p>No new plantings are established on local people’s 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>			
7.5.1	<p>Evidence shall be available that affected local peoples understand they have the right to say ‘yes’ or ‘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</p>	<p>The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.</p>	Not Applicable

	and ratified by these local peoples (see Criteria 2.2, 2.3, 6.2, 6.4 and 7.6) - Major compliance –		
<b>Criterion 7.6</b>			
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.			
7.6.1	Records of identification and assessment of legal, customary and user rights shall be available. - Major compliance –	The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.	Not Applicable
7.6.2	A procedure for identifying people entitled to compensation shall be available. - Major compliance –	The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.	Not Applicable
7.6.3	Records of calculation system and distribution of fair compensation shall be available. - Major compliance –	The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.	Not Applicable
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 –	The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.	Not Applicable
7.6.5	The process and outcome of any compensation claims shall be documented and made available to the affected communities and their representatives. - Minor compliance –	The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.	Not Applicable

7.6.6	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.  - Minor compliance –	The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.	Not Applicable
<b>Criterion 7.7</b> 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.			
7.7.1	Records of zero burning implementation on land clearing, referring to the ASEAN Policy on zero burning (2003) and recognised techniques based on the existing regulations shall be available.  - Major compliance –	PT Saudara Sejati Luhur has started replanting in 2002 - 2008, no any new planting area/developing area since November 2005.	Not Applicable
7.7.2	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 on Zero Burning' 2003, or comparable guidelines in other regions.  - Minor compliance –	PT Saudara Sejati Luhur has started replanting in 2002 - 2008, no any new planting area/developing area since November 2005.	Not Applicable
<b>Criterion 7.8</b> New plantation developments are designed to minimize net greenhouse gas emissions.			
7.8.1	The carbon stock of the proposed development area and major potential sources of emissions	PT Saudara Sejati Luhur has started replanting in 2002 - 2008, no any new planting area/developing area since November 2005.	Not Applicable

	that may result directly from the development shall be identified and estimated. - Major compliance –																													
7.8.2	Records of a plan to minimize net GHG emissions shall be available. - Minor compliance –	PT Saudara Sejati Luhur has started replanting in 2002 - 2008, no any new planting area/developing area since November 2005.	Not Applicable																											
<b>Principle 8: Commitment to continuous improvement in key areas of activity</b>																														
<b>Criterion 8.1</b>																														
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	<p>The action plan for monitoring shall be available, based on a consideration of the social and environmental impacts and routine evaluation of the plantation and mill operations. As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of certain chemicals (Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);</li> <li>• Optimising the yield of FFB production (Criterion 4.2)</li> </ul> <p>- Major compliance –</p>	<p>A continuous improvement plan has been prepared and internal audit conducted to identify compliance to the RSPO P&amp;C. Internal audit has been conducted to monitor implementation of RSPO P&amp;C, based on consideration of social and environment impact, good agriculture practice for estate, best manufacturing practice for mill and OHS aspect.</p> <p>Data seen:</p> <ul style="list-style-type: none"> <li>– Improvement Result on %tase shell dikabar berkurang dari 33.51% menjadi 32.11%.</li> <li>– Internal Audit Sustainability Intergrasi was conducted 26<sup>th</sup> – 27<sup>th</sup> namely, internal auditor team: Mr Hendryk Simanjutak, Mr Ridho Illahi and Mr Ian Septian Arifin</li> <li>– Continuous program on optimising the yield of FFB production under document of “Meningkatkan produktivitas tabut EFB dari 7.05 Ton/HK menjadi 8.75 Ton/Hk dalam 7 jam kerja”, data reported on productivity year to year:</li> </ul> <table border="1"> <thead> <tr> <th>Year</th> <th>2012</th> <th>2013</th> <th>2014</th> <th>2015</th> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>IDR/Ton</td> <td>25,559</td> <td>17,819</td> <td>18,853</td> <td>20,685</td> <td>31,500</td> <td>17,795</td> <td>17,609</td> <td>15.934</td> </tr> <tr> <td>Ton/HK</td> <td>4.2</td> <td>6.3</td> <td>8.3</td> <td>7.2</td> <td>6.7</td> <td>7.4</td> <td>7.0</td> <td>8.75</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li>– Applied fertilizer in frond stacking to increase absorbing fertilizer.</li> <li>– New standard for harvesting criteria for ripe bunch classification, from previously 5</li> </ul>	Year	2012	2013	2014	2015	2016	2017	2018	2019	IDR/Ton	25,559	17,819	18,853	20,685	31,500	17,795	17,609	15.934	Ton/HK	4.2	6.3	8.3	7.2	6.7	7.4	7.0	8.75	Comply
Year	2012	2013	2014	2015	2016	2017	2018	2019																						
IDR/Ton	25,559	17,819	18,853	20,685	31,500	17,795	17,609	15.934																						
Ton/HK	4.2	6.3	8.3	7.2	6.7	7.4	7.0	8.75																						

		<p>loose fruit into 10 loose fruit in circle.</p> <ul style="list-style-type: none"><li>– Reduction of potential particulate release to the atmosphere by increase boiler ash capture by the chimney</li></ul>	
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**Appendix B: Approved Time Bound Plan**

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
Buatan I Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		Certified on 16 September 2010 Re-Certified on 16 September 2015
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Buatan II Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		Certified on 16 September 2010 Re-Certified on 16 September 2015
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Ukui I Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau		
Ukui II Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau		
Tungkal Ulu Mill	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 15 August 2012 Re-Certification on August 2017
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency, Jambi		
Muara Bulian Mill	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batang Hari Regency,	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batang Hari Regency, Jambi		Certified on 28 August 2012 Re-Certification on August 2017

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Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
	Jambi	Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi		Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz & Seed Garden Estate	Petapahan Village, Tapung District, Kampar Regency, Riau		Certified on 30 March 2015
Taman Raja Mill	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja & Badang Estate	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 20 February 2015
Segati Mill	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2020
		Penarikan & Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2020
Tanah Datar Mill	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera		Certified on 18 May 2015
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera		
Aek Nabara Mill	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera		Certified on 6 March 2015
Teluk Panjie Mill	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera		Certified on 21 April 2015
		Teluk Panjie Estate (801 Ha)		2020	HGU is still in Process
Peranap Mill	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency,	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau		Certified on 7 January 2015

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	Riau	Peranap (Plasma)	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau		Certified on 18 August 2016
Bungo Tebo Mill	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi		Certified on 3 December 2015
		Bungo Tebo (Plasma)	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi		Certified on 7 February 2017
Tanjung Selamat Mill	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 26 May 2015
		Pangkatan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 26 May 2015
Gunung Melayu I	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 7 September 2015
Gunung Melayu II	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	Sentral & Batu Anam Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 8 July 2015
Negri Lama II	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		<ul style="list-style-type: none"> <li>- Certified on 23 December 2016 as Independent Mill</li> <li>- Audit in 2016 as Mill and Supply Base</li> <li>HGU Complete Audit at ASA 3 (2018)</li> </ul>
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra		
		Aek Kuo (501 Ha)			
Negri Lama I	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3 <sup>rd</sup> party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		<ul style="list-style-type: none"> <li>- Certified on 8 April 2015</li> <li>- Audit in 2016 as Independent Mill</li> </ul>

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2018** for **Gunung Melayu 1 Palm Oil Mill** 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 **2018** for **Gunung Melayu 1 Palm Oil Mill** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	-0.34
PKO	-0.34

Extraction	%
OER	19.49
KER	5.25

Production	t/yr
FFB Process	250,440
CPO Produced	48,804
PKO Produced	13,140

Land Use	Ha
OP Planted Area	2,063
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	12.29
<b>Total</b>	<b>2,307</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	20,375.48	0.42	594.6	0.44			20,970.08	0.86
CO <sub>2</sub> Emission from fertilizer	577.59	0.01	22.06	0.02			599.65	0.03
NO <sub>2</sub> Emmision	2,234.35	0.05	19.08	0.01			2,253.43	0.06
Fuel Consumption	270.81	0.01	13.76	0.01			284.57	0.02
Peat Oxidation	0	0	0	0			0	0
<b>Sink</b>								
Crop Sequestration	-19,313.3	-0.4	-563.6	-0.41			-19,876.90	0.01
Conservation Sequestration	0	0	0	0			0	0

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<b>Total</b>	<b>4,144.97</b>	<b>0.09</b>	<b>85.89</b>	<b>0.06</b>	<b>10,054</b>		<b>14,284.86</b>	<b>0.15</b>
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*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	2,439.15	0.01
Fuel Consumption	165.3	0
Grid Electricity Utilisation	0	0
<b>Credit</b>		
Export of Grid Electricity	-1,984.86	-0.01
Sales of PKS	-35,844.6	-0.14
Sales of EFB	0	0
<b>Total</b>	<b>-35,225</b>	<b>-0.14</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

<b>Emissions</b>	<b>tCO<sub>2</sub>e</b>
PK from own mill	-4,442.06
PK from other source	4,313.4
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>-128.66</b>

\*This mill has no kernel crusher operation.

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

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

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

<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (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.	The General Chain of Custody requirements of the RSPO Supply Chain Standard is applicable for PT Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill. Gunung Melayu I Mill physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK). Gunung Melayu I Mill also process non-certified FFB into non-certified CPO and PK, therefore the applicable RSPO SCC model is Module E - CPO Mills: Mass Balance.  No change in the supply chain module since last assessment.	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 Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill is not a trader or distributors. This unit was physically process Fresh Fruit Bunch (FFB) into CPO and PK. This clause is not applicable for the certification unit.	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 Saudara Sejati Luhur is a subsidiary of PT Inti Indosawit Subur, which is a member of RSPO with membership number 1-0022-06-000-00, since 6 February 2006.  PT Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill has been registered in RSPO IT Paltform with ID number RSPO_PO1000002609.	Yes

5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	PT Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill does not include any processing aid into organization’s scope of certification.	
<b>5.2 Supply chain model</b>			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	The site is a palm oil mill that uses RSPO supply chain model Mass Balance, therefore the site can process FFB from certified and non-certified sources. Management of PT Saudara Sejati Luhur – Gunung Melayu I POM aware that they can only claim their product (CPO and PK) as Mass Balance.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	PT Saudara Sejati Luhur – Gunung Melayu I POM uses Mass Balance as their RSPO Supply Chain Certification model, therefore the site can only claim its product as Mass Balance (MB).	Yes
<b>5.3. Documented Procedures</b>			
5.3.1	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: <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	PT Saudara Sejati Luhur – Gunung Melayu I POM can demonstrate: <ol style="list-style-type: none"> <li>1. Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R6) dated 1 September 2017. The procedures cover traceability of CPO and PK, since FFB receiving from Pulau Maria Estate, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years.</li> <li>2. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction.</li> <li>3. SOP of Palm Oil Mill operation:</li> </ol>	Yes



		<ul style="list-style-type: none"> <li>a. SOP AA-MPM-OP-1400.02.R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station)</li> <li>b. SOP AA-MPM-OP-1400.03.R1, dated 1 February 2009, Stasiun Rebusan (Sterilizer)</li> <li>c. SOP AA-MPM-OP-1400.04.R1, dated 1 February 2009, Stasiun Pemisahan Berondolan (Loose Fruit Separation)</li> <li>d. SOP AA-MPM-OP-1400.05-R1, dated 1 February 2009, Stasiun Pengadukan dan Pengempaan (Pressing Station)</li> <li>e. SOP AA-MPM-OP-1400.06-R1, dated 1 February 2009, Stasiun Pemurnian (Clarification)</li> <li>f. SOP AA-MPM-OP-1400.07-R1, dated 1 February 2009, Stasiun Pemisahan Nut dan Fiber (Nut and Fiber separation)</li> <li>g. SOP AA-MPM-OP-1400.08-R1, dated 1 February 2009, Stasiun Kernel (Kernel Station)</li> <li>h. SOP AA-MPM-OP-1400.09-R1, dated 1 February 2009, Stasiun Boiler</li> <li>i. SOP AA-MPM-OP-1400.10-R1, dated 1 February 2009, Stasiun Engine Room</li> <li>j. SOP AA-MPM-OP-1400.11-R1, dated 1 February 2009, Stasiun Water Treatment</li> <li>k. SOP AA-MPM-OP-1400.12-R1, dated 1 February 2009, Laboratorium</li> <li>l. SOP AA-MPM-OP-1400.13-R1, dated 1 February 2009, Stasiun Pengelolaan Limbah (Palm Oil Mill Effluent Treatment)</li> <li>m. SOP AA-MPM-OP-1400.14-R2, dated 1 September 2011, Stasiun Penimbunan dan Pengiriman CPO dan Kernel (CPO and PK Storage and Despatch)</li> </ul>	
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		SOP AA-MPM-OP-1400.15-R1, dated 1 February 2009, Perawatan (Preventive Maintenance and Repair).	
	<ul style="list-style-type: none"> <li>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	PT Saudara Sejati Luhur – Gunung Melayu I POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain’s general requirement and modular requirement, including training records (see Clause 5.8 – Training).	Yes
	<ul style="list-style-type: none"> <li>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.</li> </ul>	As per Procedure of Traceability (AA-MPM-OP-1400.17-R6), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.	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.	As per Procedure of Traceability (AA-MPM-OP-1400.17-R6) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit to ensure operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Procedure of Internal Audit (AA-SOP-ES-6001-R40 dated 1 September 2017) described requirement of RSPO Supply Chain Internal Auditor, reference documents and other general requirements.	Yes
	ii) effectively implements and maintains the standard requirements within its organization	The site has effectively implements and maintains the standard requirement by performing internal audit. Latest RSPO SCC Internal audit in Gunung Melayu I POM carried out on 8 April 2019 by Mr. Welly Joel Candra, against RSPO SCCS 2017 – RSPO General Chain of Custody requirements and Module E:	Yes

		Mass Balance. Audit result findings can be demonstrated and the corrective action has been implemented to address issue found during audit.	
<b>5.4. Purchasing and goods in</b>			
5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R6), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on “Surat Pengantar TBS”, 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>PT Saudara Sejati Luhur – Gunung Melayu I POM receive FFB from certified and non-certified source. Certified source consist of own estate, Pulau Maria Estate and sister company (Batu Anam Estate - PT Gunung Melayu). Non-certified FFB sourced from third party supplier, e.g.: Sipanjang, PT AP, Abdul Gani, UD Saudara, PT Sawit Trading Sejahtera, LU, BD Siregar, Hasan BP and CV Mitra Langgeng Sukses.</p> <p>Document “Surat Pengantar TBS” (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified:</p> <ul style="list-style-type: none"> <li>- Weighbridge Card #PGSA119202630 dated 14/05/2019, commodity: certified FFB; source: Pulau Maria Estate; to Gunung Melayu I Palm Oil Mill; net weight: 5,210 kg; Afdeling: 3; amount: 246 bunches; Block: I06a (235</li> </ul>	Yes

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		<p>bunches) and I06b (11 bunches); RSPO Cert: RSPO620755; Transporter: Internal; Vehicle: BK 9075 FA; Driver: Suriono II; Batch number: 13-100-16462018-28039051.</p> <ul style="list-style-type: none"> <li>- Weighbridge Card #PGSA119102346 dated 02/05/2019, commodity: certified FFB; source: Pulau Maria Estate; to Gunung Melayu I Palm Oil Mill; net weight: 4,890 kg; Afdeling: 3; amount: 276 bunches; Block: I08j; RSPO Cert: RSPO620755; Transporter: Internal; Vehicle: BK 9075 FA; Driver: Suriono II; Batch number: 13-100-16462018-28035216.</li> </ul> <p>Non-certified:</p> <ul style="list-style-type: none"> <li>- Surat Pengantar dated 14/05/2019 from CV Mitra Langgeng Sukses to PT Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill; amount: 730 bunches.</li> <li>- Weighbridge Card #PGSA519112304 dated 14/05/2019, commodity: outside FFB; source: CV Mitra Langgeng Sukses, ID: ST00181; to PT Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill; net weight: 13,821 kg; amount: 730 bunches; Transporter: general; Vehicle: BK 9185 BV; Driver: Merdi.</li> <li>- Surat Pengantar dated 02/05/2019 from PT Sawit Trading Sejahtera to PT Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill; amount: 428 bunches.</li> <li>- Weighbridge Card #PGSA519110993 dated 02/05/2019, commodity: outside FFB; source: PT Sawit Trading Sejahtera, ID: ST00107; to PT Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill; net weight: 8,604 kg; amount: 428 bunches; Transporter: general; Vehicle: BK 9849 BS; Driver: Edy.</li> </ul>	
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	<ul style="list-style-type: none"> <li>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).</li> </ul>	Information is complete and presented in couple document, e.g. Surat Pengantar TBS and Weighbridge Card. Report of FFB receiving are documented in Laporan Harian Pabrik (Mill Daily Report), Laporan Unit Kebun (Monthly Mill Report) and Mill Summary Report.	Yes
	<ul style="list-style-type: none"> <li>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.</li> </ul>	PT Saudara Sejati Luhur – Gunung Melayu I Mill has ensured that certified FFB received are RSPO certified based on the source of FFB. The Mill only received certified FFB from own estate (Pulau Maria Estate) which have been certified as supply bases of Gunung Melayu I POM. Other than that are non-certified FFB.	Yes
	<ul style="list-style-type: none"> <li>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 (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>	The site does not need to check the certificate validity of the FFB source, because it is fall under PT Saudara Sejati Luhur – Gunung Melayu I POM.	N/A
	<ul style="list-style-type: none"> <li>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.</li> </ul>	The site has never purchased any certified FFB from traders or distributors.	N/A
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	In the case on non-conforming raw material entering the process, PT Saudara Sejati Luhur – Gunung Melayu I POM has the mechanism to handle non-conforming material and/or document. PT Saudara Sejati Luhur – Gunung Melayu I POM	Yes

		demonstrated the simulation on recall of non-conforming material.  Until this 4 <sup>th</sup> annual surveillance assessment, there has been no case of non-conforming material entering the process.	
<b>5.5. Outsourcing activities</b>			
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 mill 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>The transport for RSPO certified sustainable CPO delivery was carried out by CV JAYA. This contractor was appointed, contracted and instructed by PT Saudara Sejati Luhur.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM control the outsourced transporter by “Surat Perintah Kerja” and “Daftar Periksa Kesiapan Kerja Pengiriman”. SPK covered information as explain in indicator 5.5.2 b. while “Daftar Periksa Kerja” is the tool to control the transporter:</p> <ul style="list-style-type: none"> <li>- Before shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out);</li> <li>- After shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out, seal number and seal condition)</li> </ul> <p>The quantity of CPO was monitored by Weighbridge Card and SPK (with 0.20% tolerance).</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>	The legal ownership of all CPO and PK was owned by PT Saudara Sejati Luhur – Gunung Melayu I POM during transport.	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</p>	During this period of annual surveillance assessment, there is no delivery of RSPO certified CPO, all certified CPO are delivered	Yes

	<p>certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>as another scheme. Whilst certified PK area transferred to Gunung Melayu I KCP which located at the same facility.</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>PT Saudara Sejati Luhur – Gunung Melayu I POM has a Procedure of Traceability (AA-MPM-OP-1400.17-R6) dated 1 September 2017. The procedure covers the mechanism of CPO delivery (Chapter B). The CPO transporting also regulated in Work Instruction PGS/IK-SKP/11 as internal control for transporter to ensure compliance with company standard/requirement. The procedure has been communicated to all relevant contractor based on letter from Mill Manager No.111/MI-PGS/Ext/06/18 dated 5 June 2018.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM control the outsourced transportation by "Surat Perintah Kerja" and "Daftar Periksa Kesiapan Kerja Pengiriman". SPK covered information as explain in indicator 5.5.2.b. whilst "Daftar Periksa Kerja" is the tool to control the transporter:</p> <ul style="list-style-type: none"> <li>- Before shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out);</li> <li>- After shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out, seal number and seal condition).</li> </ul> <p>The quantity of CPKO was monitored by Weighbridge Card and SPK (with 0.20% tolerance).</p>	<p>Yes</p>
	<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 Saudara Sejati Luhur and Transporter Jaya have signed Statement Letter No. 198/EXT/VI/JY/2018 dated 6 June 2018 that the transporter will provide the relevant access for duly accredited CBs to their respective operations, systems, and any and all information if needed.</p>	<p>Yes</p>

5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	During this period of annual surveillance assessment, there is no delivery of RSPO certified CPO, all certified CPO are delivered as another scheme. Whilst certified PK area transferred to Gunung Melayu I KCP which located at the same facility.	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.	PT Saudara Sejati Luhur – Gunung Melayu I POM aware to inform its CB regarding the name and contact detail of any new contractor prior to next assessment.	Yes
<b>5.6. Sales and goods out</b>			
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"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R6), chapter 5.2 indicates the Marketing Manager issued Delivery Order (DO) with information: name and address of production unit, name and address of buyer, contract number, type of product transportation (land/sea), distance, type of product (CPO or PK, certified or non-certified), quantity of product, delivery date, product qualification specification (CPO or PK: FFA, water content, dirt), Supply chain model (Mass Balance).</p> <p>At the Palm Oil Mill, weighbridge operator printed out CPO or PK weighbridge card, based on DO from marketing which indicates: type of commodity, CPO or PK certified or not-certified; source and destination address; Supply Chain model: (Mass Balance); Certificate number of the Mill; date of delivery, Product quality specification (moisture, FFA, dirt); Contract number/DO number; Quantity, Transport detail (driver name, vehicle number); Buyer address.</p> <p>There is no delivery of RSPO certified CPO from last audit until this 4<sup>th</sup> annual surveillance assessment. Below are sample of delivery document from previous period.</p>	Yes

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		<p>Sampled Delivery Order/DO:</p> <ul style="list-style-type: none"> <li>- Delivery Order #08004/DC28/02/17 dated 31/08/2017; Seller is PT Saudara Sejati Luhur – Gunung Melayu I POM; Buyer is PT Sari Dumai Sejati; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 500,000 kg; Supply Chain Certificate is RSPO 620755.</li> </ul> <p>Sampled of certified CPO Delivery:</p> <ul style="list-style-type: none"> <li>- Weighbridge Card #PGSC117201596 dated 18/09/2017; Seller is PT Indo Saudara Sejati Luhur – Gunung Melayu I POM; Buyer is PT Sari Dumai Sejati, Lubuk Gaung Refinery; Delivery date is 18/09/2017; Commodity is CPO Certified RSPO; Supply Chain Model is Mass Balance; Quantity is 29,200 kg; based on DO #08004/DC28/02/17; Transporter is Jaya, BK 8533 CT; Supply Chain Certificate number RSPO 620775; FFA: 4.3%; water: 0.22%; dirt: 0.024%; Seal number 4016688 - 4016694.</li> </ul> <p>Certified PK are sent to Gunung Melayu I Kernel Crushing Plant which located in the same facility with Gunung Melayu I POM. Certified PK transfers are documented in Delivery Form.</p> <p>Sampled of certified PK Delivery:</p> <ul style="list-style-type: none"> <li>- Delivery Form #KCP PGS 2801 SS dated 31 January 2019 from PT Saudara Sejati Luhur – Gunung Melayu I POM to PT Saudara Sejati Luhur – Gunung Melayu I KCP; commodity is certified Palm Kernel, Supply Chain Model is Mass Balance; RSPO certificate number is RSPO 641800; total quantity as per January 2019 is 159,930 MT; transporter is Conveyor/Pipe.</li> </ul> <p>Delivery Form #KCP PGS 2804 SS dated 30 April 2019 from PT Saudara Sejati Luhur – Gunung Melayu I POM to</p>	
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		<p>PT Saudara Sejati Luhur – Gunung Melayu I KCP; commodity is certified Palm Kernel, Supply Chain Model is Mass Balance; RSPO certificate number is RSPO 641800; total quantity as per April 2019 is 191,950 MT; transporter is Conveyor/Pipe.</p>	
	<ul style="list-style-type: none"> <li>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).</li> </ul>	<p>Information are complete and presented in couple document, e.g. Delivery Order and Weighbridge Card. Report of CPO and PK deliveries are documented in Laporan Harian Pabrik (Mill Daily Report), Mill Operation Report and Book Keeping Mass Balance Report.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> <li>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.</li> </ul>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has made Shipping Announcement in RSPO IT Platform to announce sales of RSPO certified CPO or PK per group of shipments (DO).</p> <p>For example:</p> <ul style="list-style-type: none"> <li>- Shipping Announcement, with transaction ID No. TR-8d7f6b85-2e9f for 265.56 MT CSPO Mass Balance; from PT Saudara Sejati Luhur – Gunung Melayu I Mill (RSPO_PO1000002609) as Seller to Buyer PT Sari Dumai Sejati (RSPO_PO1000006430). B/L dated 30 August 2018, number SZV221733-35 (Ship: MT Susanne Victory Voy 22). Confirmation has been made by Buyer on 5 September 2018.</li> <li>- Shipping Announcement dated 31 January 2019, with transaction ID No. TR-61a6f9f94a-ec42 for 130.44 MT CSPK Mass Balance; from PT Saudara Sejati Luhur – Gunung Melayu I Mill (RSPO_PO1000002609) as Seller to Buyer PT Saudara Sejati Luhur – Gunung Melayu I KCP (RSPO_PO1000002914). B/L date 31 January 2019. Confirmation has been made by Buyer on 28 February 2019.</li> </ul>	<p>Yes</p>

<b>5.7. Registration of transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>are mills, traders, crushers and refineries and;</li> <li>take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000002609.</p>	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>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.</li> </ul>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has made Shipping Announcement for certified CPO and PK sold.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>Shipping Announcement, with transaction ID No. TR-8d7f6b85-2e9f for 265.56 MT CSPO Mass Balance; from PT Saudara Sejati Luhur – Gunung Melayu I Mill (RSPO_PO1000002609) as Seller to Buyer PT Sari Dumai Sejati (RSPO_PO1000006430). B/L dated 30 August 2018, number SZV221733-35 (Ship: MT Susanne Victory Voy 22). Confirmation has been made by Buyer on 5 September 2018.</li> <li>Shipping Announcement dated 31 January 2019, with transaction ID No. TR-61a6f9f94a-ec42 for 130.44 MT CSPK Mass Balance; from PT Saudara Sejati Luhur – Gunung Melayu I Mill (RSPO_PO1000002609) as Seller to Buyer PT Saudara Sejati Luhur – Gunung Melayu I KCP (RSPO_PO1000002914). B/L date 31 January 2019. Confirmation has been made by Buyer on 28 February 2019.</li> </ul>	Yes
	<ul style="list-style-type: none"> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be</li> </ul>	<p>Until this 4<sup>th</sup> annual surveillance audit, PT Saudara Sejati Luhur – Gunung Melayu I POM has not sold any CPO or PK to supply</p>	N/A

	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.	chain actor beyond the refinery. This indicator is not applicable.	
	<ul style="list-style-type: none"> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>	PT Saudara Sejati Luhur – Gunung Melayu I POM has done “Remove” in the RSPO IT Platform for CSPO sold as other scheme, e.g. - Stock Transaction ID: ST-TR-fc07278c-186d for 8,393.3 MT of CSPO, period June to December 2018, reason for removal: Sold as ISCC. Balance volume: 4,717.25 MT. Stock Transaction ID: ST-TR-a6ec2394-1961 for 3,045.92 MT of CSPO, period January to April 2019, reason for removal: Sold as ISCC. Balance volume: 1,671.33 MT.	Yes
	<ul style="list-style-type: none"> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	PT Saudara Sejati Luhur – Gunung Melayu I POM is a palm oil mill, which does not need to confirm any purchase of FFB. This indicator is not applicable.	Yes
<b>5.8. Training</b>			
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.	PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared a training program to staff, who are involved in RSPO Supply Chain Certification Standard implementation. As per training program, “Program Pelatihan Environmental & Sustainability Tahun 2019 PT Saudara Sejati Luhur” the RSPO supply chain and traceability refreshment training is planed on April 2019.  Competency and training records of all staff involved in RSPO Supply Chain could be demonstrated.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	Latest training on “Supply Chain, Mass Balance and Traceability” performed on 6 April 2019 attended by Mill/KCP Manager (Rudi Markus Sagala), Head Assistant (Juden Samosir), KTU (Simson Ginting), Operational Assistant (Chandra Kesuma, Jaka Brama Lubis, Michael J Gultom), Workshop Assistant (Samsul Bahri),	Yes

		weighbridge operators (Indah Julaika, Gunarti). Training module and attendance list were sighted.	
<b>5.9. Record Keeping</b>			
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.	<p>Based on review of PT Saudara Sejati Luhur – Gunung Melayu I POM document and record, the Mill is able to demonstrate complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements.</p> <p>Records and report verified are as follows:</p> <ul style="list-style-type: none"> <li>• Laporan Harian Pabrik (Mill Daily Report); dated 31 December 2018 and 30 April 2019.</li> <li>• Book Keeping – Mass Balance – CPO and PK period of January – March 2018, April – June 2018, July – September 2018, October – December 2018, January – March 2019;</li> <li>• Kartu Timbangan (Weighbridge Card) FFB;</li> <li>• Kartu Timbangan (Weighbridge Card) CPO;</li> </ul> <p>Kartu Timbangan (Weighbridge Card) PK;</p>	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.	The procedure of Traceability (AA-MPM-OP-1400.7.R6) requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.	Yes

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<p>5.9.3</p>	<p>The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM is able to provide estimate volume of CPO and PK in a year period as in “Distribusi Produksi Bulanan Anggaran Tahun 2019” consists estimate of FFB receiving from Pulau Maria Estate and Third Party supplier, Extraction rates, Processing capacity, working hour, utilisation.</p> <p>The Mill also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month prior to audit, as in “Book Keeping Mass Balance Report”, as follow:</p> <table border="1" data-bbox="1151 762 1899 1378"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">FFB</th> <th colspan="2">CPO</th> <th colspan="2">PK</th> </tr> <tr> <th>Pulau Maria (Cert)</th> <th>Outside</th> <th>Pulau Maria (Cert)</th> <th>Outside</th> <th>Pulau Maria (Cert)</th> <th>Outside</th> </tr> </thead> <tbody> <tr><td>May-18</td><td>3,537.22</td><td>30,222.52</td><td>855.78</td><td>7,311.91</td><td>183.52</td><td>1,568.55</td></tr> <tr><td>Jun-18</td><td>4,368.86</td><td>10,141.89</td><td>1,056.99</td><td>2,453.70</td><td>226.67</td><td>526.36</td></tr> <tr><td>Jul-18</td><td>5,012.52</td><td>21,316.17</td><td>1,238.45</td><td>5,157.18</td><td>260.15</td><td>1,106.31</td></tr> <tr><td>Aug-18</td><td>5,693.98</td><td>23,801.87</td><td>1,427.79</td><td>5,758.56</td><td>303.60</td><td>1,235.32</td></tr> <tr><td>Sep-18</td><td>5,310.29</td><td>20,865.96</td><td>1,322.81</td><td>5,048.25</td><td>288.54</td><td>1,082.94</td></tr> <tr><td>Oct-18</td><td>5,293.56</td><td>22,577.85</td><td>1,335.73</td><td>5,462.42</td><td>278.50</td><td>1,171.79</td></tr> <tr><td>Nov-18</td><td>4,270.00</td><td>16,749.29</td><td>1,080.23</td><td>4,052.28</td><td>220.97</td><td>869.29</td></tr> <tr><td>Dec-18</td><td>4,100.28</td><td>16,525.01</td><td>1,042.28</td><td>3,998.02</td><td>213.13</td><td>857.65</td></tr> <tr><td>Jan-19</td><td>3,551.25</td><td>16,550.75</td><td>902.22</td><td>4,004.24</td><td>183.76</td><td>858.98</td></tr> <tr><td>Feb-19</td><td>3,027.52</td><td>17,383.37</td><td>761.88</td><td>4,205.68</td><td>156.02</td><td>902.20</td></tr> <tr><td>Mar-19</td><td>2,793.16</td><td>17,727.52</td><td>702.30</td><td>4,288.95</td><td>144.25</td><td>920.06</td></tr> <tr><td>Apr-19</td><td>2,639.01</td><td>18,792.22</td><td>658.44</td><td>4,546.54</td><td>136.79</td><td>975.32</td></tr> </tbody> </table>	Month	FFB		CPO		PK		Pulau Maria (Cert)	Outside	Pulau Maria (Cert)	Outside	Pulau Maria (Cert)	Outside	May-18	3,537.22	30,222.52	855.78	7,311.91	183.52	1,568.55	Jun-18	4,368.86	10,141.89	1,056.99	2,453.70	226.67	526.36	Jul-18	5,012.52	21,316.17	1,238.45	5,157.18	260.15	1,106.31	Aug-18	5,693.98	23,801.87	1,427.79	5,758.56	303.60	1,235.32	Sep-18	5,310.29	20,865.96	1,322.81	5,048.25	288.54	1,082.94	Oct-18	5,293.56	22,577.85	1,335.73	5,462.42	278.50	1,171.79	Nov-18	4,270.00	16,749.29	1,080.23	4,052.28	220.97	869.29	Dec-18	4,100.28	16,525.01	1,042.28	3,998.02	213.13	857.65	Jan-19	3,551.25	16,550.75	902.22	4,004.24	183.76	858.98	Feb-19	3,027.52	17,383.37	761.88	4,205.68	156.02	902.20	Mar-19	2,793.16	17,727.52	702.30	4,288.95	144.25	920.06	Apr-19	2,639.01	18,792.22	658.44	4,546.54	136.79	975.32	<p>Yes</p>
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		TOTAL	49,597.6 5	232,654.4 2	12,384.9	56,287.7 3	2,595.9	12,074.77																																													
		<p>Claimed/Sold as RSPO Certified</p> <table border="1"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">Claimed</th> </tr> <tr> <th>CSPO</th> <th>CSPK</th> </tr> </thead> <tbody> <tr> <td>May-18</td> <td>0</td> <td>0</td> </tr> <tr> <td>Jun-18</td> <td>0</td> <td>0</td> </tr> <tr> <td>Jul-18</td> <td>0</td> <td>0</td> </tr> <tr> <td>Aug-18</td> <td>0</td> <td>417.76</td> </tr> <tr> <td>Sep-18</td> <td>309.22</td> <td>493.94</td> </tr> <tr> <td>Oct-18</td> <td>0</td> <td>252.37</td> </tr> <tr> <td>Nov-18</td> <td>0</td> <td>312.19</td> </tr> <tr> <td>Dec-18</td> <td>0</td> <td>253.09</td> </tr> <tr> <td>Jan-19</td> <td>0</td> <td>0</td> </tr> <tr> <td>Feb-19</td> <td>0</td> <td>405.6</td> </tr> <tr> <td>Mar-19</td> <td>0</td> <td>131.76</td> </tr> <tr> <td>Apr-19</td> <td>0</td> <td>0</td> </tr> <tr> <td>TOTAL</td> <td>309.22</td> <td>2,266.71</td> </tr> </tbody> </table>								Month	Claimed		CSPO	CSPK	May-18	0	0	Jun-18	0	0	Jul-18	0	0	Aug-18	0	417.76	Sep-18	309.22	493.94	Oct-18	0	252.37	Nov-18	0	312.19	Dec-18	0	253.09	Jan-19	0	0	Feb-19	0	405.6	Mar-19	0	131.76	Apr-19	0	0	TOTAL	309.22	2,266.71
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<b>5.10. Conversion factors</b>			
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	Conversion rate is applied to provide reliable estimation of CPO and PK produced. For year 2019, the budget for conversion from FFB into CPO are:	Yes

	<p>which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.</p>	<p>a. For FFB from Pulau Maria Estate: 24.90%  b. For FFB from third-party: 18.10%  For year 2019, the budget for conversion from FFB into PK are:  a. For FFB from Pulau Maria Estate: 5.36%  b. For FFB from third-party: 5.36%  For year 2018, the budget for conversion from FFB into CPO are:  a. For FFB from Pulau Maria Estate: 25.20%  b. For FFB from third-party: 18.30%  For year 2018, the budget for conversion from FFB into PK are:  a. For FFB from Pulau Maria Estate: 5.36%  For FFB from third-party: 5.36%</p>	
5.10.2	<p>Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. Gunung Melayu I POM is able to demonstrate the work instruction for analysis of oil content.</p> <p>Based on Laporan Harian Produksi dated 30/05/2019, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:  a. For FFB from Pulau Maria Estate: 25.18%  b. For FFB from third-party: 18.29%  And actual conversion ratios from FFB into PK are:  a. For FFB from Pulau Maria Estate: 5.17%  For FFB from third-party: 5.17%</p>	Yes
<b>5.11. Claims</b>			
5.11.1	<p>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.</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has made claims regarding the support of RSPO certified oil palm products by indicating RSPO Mass Balance (MB) on the delivery document such as Delivery Order, Delivery Note and Weighbridge Ticket. However the organization aware about the RSPO Rules on Market Communications and Claims.</p>	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 Saudara Sejati Luhur is a subsidiary of RSPO registered member PT Inti Indosawit Subur. The corporate communication of PT Inti Indosawit Subur can be seen in the company website, under brand Asian Agri at the address <a href="http://www.asianagri.com">www.asianagri.com</a> .	Yes
4.2	In corporate communications a member is allowed to: 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.	Corporate communication in Asian Agri website: a. Display its RSPO membership status: In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. b. Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website. c. State the member supports the work of the RSPO: Not in direct manner. In the website, Asian Agri wrote "In 2006, Asian Agri became a member of the Roundtable of Sustainable Palm Oil (RSPO), a global multi-stakeholder certification system to develop and implement global standards for sustainable palm oil production. We received our 1 <sup>st</sup> RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme." d. State the member's history with regards to the RSPO: Yes. In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. Use of RSPO Trademark to promote its membership of the RSPO: in the website, the company does not display RSPO Trademarks and corporate logo.	Yes
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Yes. In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement did not lead consumers to believe that RSPO	Yes



		membership by itself implies the selling of RSPO-certified oil palm products.	
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Yes. In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, 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 their own products.	Yes
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, the Asian Agri website did not display the RSPO Corporate Logo. The certificate holder did not use any RSPO corporate logo in the letterheads or emails.	Yes
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	PT Saudara Sejati Luhur – Gunung Melayu I POM stated in sales documents, e.g. Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK model MB.	Yes
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	It was verified that when selling certified oil palm product, PT Saudara Sejati Luhur – Gunung Melayu I POM stated the supply chain model and certificate number, e.g. in Delivery Order and Weighbridge Card.	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: e. 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	PT Saudara Sejati Luhur – Gunung Melayu I POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process Fresh Fruit Bunch into Crude Palm Oil and Palm Kernel. Not applicable.	<b>N/A</b>

	<p>the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>f. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>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.</p> <p>For example, a retailer or food service company may require 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.</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process Fresh Fruit Bunch into Crude Palm Oil and Palm Kernel.</p> <p>Not applicable.</p>	N/A
<b>Business to consumer communication</b>			
6.1	<p>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.</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM is an RSPO certificate holder with certificate number RSPO 620755 valid until 6 September 2020. The certificate holder make business to consumer claims about the certified sustainable oil palm products on sales documents, such as Sales Contract, Delivery Order, Delivery Note and Weighbridge Ticket. The document stated that the product is RSPO certified with supply chain model Mass Balance (MB).</p>	Yes
6.2	<p>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.</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM is an RSPO certificate holder with certificate number RSPO 620755 valid until 6 September 2020. Up to this annual surveillance assessment period, the certificate holder does not use RSPO trademark and/or RSPO label within the business to consumer communication.</p>	Yes

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 Saudara Sejati Luhur – Gunung Melayu I POM is an RSPO certificate holder with certificate number RSPO 620755 valid until 6 September 2020. Up to this annual surveillance assessment period, the certificate holder does not use RSPO trademark and/or RSPO label within the business to consumer communication.	Yes
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	PT Saudara Sejati Luhur – Gunung Melayu I POM communication does 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.	The certification of PT Saudara Sejati Luhur – Gunung Melayu I POM suppliers, fall under PT Saudara Sejati Luhur itself, it was the company estate (Pulau Maria Estate). The Certificate Holder communication has not mentioned to consumers information about their suppliers’ 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 annual surveillance assessment period, PT Saudara Sejati Luhur – Gunung Melayu I POM has not use RSPO trademark.	Yes
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Up to this annual surveillance assessment period, PT Saudara Sejati Luhur – Gunung Melayu I POM has not use other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products.	Yes
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	PT Saudara Sejati Luhur – Gunung Melayu I POM is not a retailer or food service company.  Not applicable.	<b>N/A</b>

	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 <a href="http://www.rspo.org">www.rspo.org</a> .		
<b>5.12. Complaints</b>			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Based on document review, there has been no complaint from stakeholder related to certified CPO or PK from PT Saudara Sejati Luhur – Gunung Melayu I POM. In the case of any complaint, the mill provided procedure AA-GL-5.08-R1 related to information request from any stakeholders to resolving stakeholder complaints.	Yes
<b>5.13. Management Review</b>			
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.	PT Saudara Sejati Luhur – Gunung Melayu I POM has Standard Operating Procedures for Internal Audit and Management Review (AA-SOP-ES-6001-R1). The management review planned once a year at minimum, considering the critical area.  The Standard Operating Procedures of Traceability (AA-MPM-OP-1400.17.R6) dated 1 September 2017 has also regulates the internal audit by Sustainability Internal Audit Manager, to ensure operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	Yes

5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	<p>The latest Internal audit of PT Saudara Sejati Luhur – Gunung Melayu POM carried out on 8 April 2019 by Mr. Welly Joel Candra, against RSPO SCCS 2017 – RSPO General Chain of Custody requirements and Module E: Mass Balance.</p> <p>The organization shows issues discussed during management review on 8 April 2019. Minutes of management review and attendance list were evident.</p> <p>The management review inputs include information on:</p> <ul style="list-style-type: none"> <li>- The result of audits: based on result from internal audit on 8 April 2019;</li> <li>- Customer feedback – customer feedback can be delivered through Stakeholder Information mechanism, the site also prepared logbook to receive feedbacks monitor in responding if there is feedback; no customer feedback;</li> <li>- Process performance and product conformity – Gunung Melayu I POM has performed regular VE visit as supervision of Mill performance; input from VE visit followed by corrective action and reported therefore can be check during next visit.</li> <li>- Status of corrective and preventive action – updating mass balance and book keeping per 3 months and develop training program;</li> <li>- Changes that could affect the management system – no changes;</li> <li>- Recommendation for improvement – conducted regular evaluation to minimized discrepancy in RSPO Supply Chain.</li> </ul>	Yes
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has conducted management review dated 8 April 2019.</p>	Yes

	<ul style="list-style-type: none"> <li>Improvement of the effectiveness of the management system and its processes.</li> <li>Resource needs.</li> </ul>	<p>The management review output indicates decision and actions related to:</p> <ul style="list-style-type: none"> <li>Improvement of the effectiveness of the management system and its processes: conducted regular evaluation to minimized discrepancy in RSPO Supply Chain</li> </ul> <p>Resource needs: manpower, machine, method and material to be prepared. Add the CCTV in critical area such as in grading station to control the performance. The organization will optimize the existing resources to achieve all indicators of performance defined. According to the minutes of management review meeting, it was noted that output of review has not required additional resources.</p>	
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**Appendix E**

**Appendix E: CPO Mill Supply Chain Assessment Report (Module *E* - CPO Mills: *Mass Balance*)**

E.1 Definition			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
E.1.1	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM holds current RSPO P&amp;C Certificate No. RSPO 620755. In the current certificate, PT Saudara Sejati Luhur – Gunung Melayu I POM uses Mass Balance supply chain system. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate and sister company estate. The other supply base, were come from third party suppliers as non-certified FFB source.</p>	Yes

E.2 Explanation																																																																																																											
E.2.1	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&amp;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>	<p>The projection for certified FFB and production of certified CPO and PK in PT Saudara Sejati Luhur – Gunung Melayu I POM has been recorded in BSI's public summary report and registered in RSPO IT Platform.</p> <table border="1" data-bbox="981 539 1890 1187"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">FFB</th> <th colspan="2">CPO</th> <th colspan="2">PK</th> </tr> <tr> <th>Pulau Maria</th> <th>Outside</th> <th>Pulau Maria</th> <th>Outside</th> <th>Pulau Maria</th> <th>Outside</th> </tr> </thead> <tbody> <tr><td>May-19</td><td>4,448.76</td><td>20,510.00</td><td>1,107.74</td><td>3,712.31</td><td>238.45</td><td>1,099.33</td></tr> <tr><td>Jun-19</td><td>4,146.73</td><td>17,940.00</td><td>1,032.53</td><td>3,247.14</td><td>222.26</td><td>961.58</td></tr> <tr><td>Jul-19</td><td>5,441.78</td><td>23,840.00</td><td>1,355.00</td><td>4,315.04</td><td>291.68</td><td>1,277.82</td></tr> <tr><td>Aug-19</td><td>5,379.93</td><td>25,840.00</td><td>1,339.60</td><td>4,677.04</td><td>288.36</td><td>1,385.02</td></tr> <tr><td>Sep-19</td><td>5,388.70</td><td>23,250.00</td><td>1,341.78</td><td>4,208.25</td><td>288.83</td><td>1,246.20</td></tr> <tr><td>Oct-19</td><td>4,976.06</td><td>22,920.00</td><td>1,239.04</td><td>4,148.52</td><td>266.72</td><td>1,228.51</td></tr> <tr><td>Nov-19</td><td>4,086.07</td><td>22,140.00</td><td>1,017.43</td><td>4,007.34</td><td>219.01</td><td>1,186.70</td></tr> <tr><td>Dec-19</td><td>4,044.52</td><td>21,250.00</td><td>1,007.08</td><td>3,846.25</td><td>216.78</td><td>1,139.00</td></tr> <tr><td>Jan-20</td><td>3,194.00</td><td>14,700.00</td><td>799.00</td><td>2,690.00</td><td>176.00</td><td>809.00</td></tr> <tr><td>Feb-20</td><td>2,928.00</td><td>13,475.00</td><td>732.00</td><td>2,466.00</td><td>161.00</td><td>741.00</td></tr> <tr><td>Mar-20</td><td>3,407.00</td><td>15,680.00</td><td>852.00</td><td>2,869.00</td><td>187.00</td><td>862.00</td></tr> <tr><td>Apr-20</td><td>3,833.00</td><td>17,640.00</td><td>958.00</td><td>3,228.00</td><td>211.00</td><td>970.00</td></tr> <tr><td>TOTAL</td><td>51,274.55</td><td>239,185.00</td><td>12,781.20</td><td>43,414.89</td><td>2,767.09</td><td>12,906.16</td></tr> </tbody> </table>	Month	FFB		CPO		PK		Pulau Maria	Outside	Pulau Maria	Outside	Pulau Maria	Outside	May-19	4,448.76	20,510.00	1,107.74	3,712.31	238.45	1,099.33	Jun-19	4,146.73	17,940.00	1,032.53	3,247.14	222.26	961.58	Jul-19	5,441.78	23,840.00	1,355.00	4,315.04	291.68	1,277.82	Aug-19	5,379.93	25,840.00	1,339.60	4,677.04	288.36	1,385.02	Sep-19	5,388.70	23,250.00	1,341.78	4,208.25	288.83	1,246.20	Oct-19	4,976.06	22,920.00	1,239.04	4,148.52	266.72	1,228.51	Nov-19	4,086.07	22,140.00	1,017.43	4,007.34	219.01	1,186.70	Dec-19	4,044.52	21,250.00	1,007.08	3,846.25	216.78	1,139.00	Jan-20	3,194.00	14,700.00	799.00	2,690.00	176.00	809.00	Feb-20	2,928.00	13,475.00	732.00	2,466.00	161.00	741.00	Mar-20	3,407.00	15,680.00	852.00	2,869.00	187.00	862.00	Apr-20	3,833.00	17,640.00	958.00	3,228.00	211.00	970.00	TOTAL	51,274.55	239,185.00	12,781.20	43,414.89	2,767.09	12,906.16	Yes
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E.2.2	<p>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).</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has met registration and reporting requirement as it has been registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000002609.</p>	Yes																																																																																																								
E.3 Documented procedures																																																																																																											

<p>E.3.1</p>	<p>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:</p> <p>a. Complete and up to date procedures covering the implementation of all the elements in these requirements;</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM can demonstrates:</p> <ol style="list-style-type: none"> <li>1. Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R6) dated 1 September 2017. The procedures cover traceability of CPO and PK, since FFB receiving from Pulau Maria Estate, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years.</li> <li>2. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction.</li> <li>3. SOP of Palm Oil Mill operation:             <ol style="list-style-type: none"> <li>a. SOP AA-MPM-OP-1400.02.R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station)</li> <li>b. SOP AA-MPM-OP-1400.03.R1, dated 1 February 2009, Stasiun Rebusan (Sterilizer)</li> <li>c. SOP AA-MPM-OP-1400.04.R1, dated 1 February 2009, Stasiun Pemisahan Berondolan (Loose Fruit Separation)</li> <li>d. SOP AA-MPM-OP-1400.05-R1, dated 1 February 2009, Stasiun Pengadukan dan Pengempaan (Pressing Station)</li> <li>e. SOP AA-MPM-OP-1400.06-R1, dated 1 February 2009, Stasiun Pemurnian (Clarification)</li> <li>f. SOP AA-MPM-OP-1400.07-R1, dated 1 February 2009, Stasiun Pemisahan Nut dan Fiber (Nut and Fiber separation)</li> <li>g. SOP AA-MPM-OP-1400.08-R1, dated 1 February 2009, Stasiun Kernel (Kernel Station)</li> <li>h. SOP AA-MPM-OP-1400.09-R1, dated 1 February 2009, Stasiun Boiler</li> <li>i. SOP AA-MPM-OP-1400.10-R1, dated 1 February 2009, Stasiun Engine Room</li> <li>j. SOP AA-MPM-OP-1400.11-R1, dated 1 February 2009, Stasiun Water Treatment</li> </ol> </li> </ol>	<p>Yes</p>
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		<p>k. SOP AA-MPM-OP-1400.12-R1, dated 1 February 2009, Laboratorium</p> <p>l. SOP AA-MPM-OP-1400.13-R1, dated 1 February 2009, Stasiun Pengelolaan Limbah (Palm Oil Mill Effluent Treatment)</p> <p>m. SOP AA-MPM-OP-1400.14-R2, dated 1 September 2011, Stasiun Penimbunan dan Pengiriman CPO dan Kernel (CPO and PK Storage and Despatch)</p> <p>n. SOP AA-MPM-OP-1400.15-R1, dated 1 February 2009, Perawatan (Preventive Maintenance and Repair).</p>	
	<p>b. The name 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 procedures for the implementation of this standard.</p>	<p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R6), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager, Mr. Rudy Markus Sagala, was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p>	<p>Yes</p>
E.3.2	<p>The site shall have documented procedures for receiving and processing certifies an non-certified FFBs.</p>	<p>The Mill has had documented procedures for receiving and processing of Certified and Non-certified FFBs in form of SOP AA-MPM-OP-1400.17-R6 "Traceability" and SOP for FFB Receiving Station (AA-MPM-OP-1400.02-R2). The Mill uses RSPO Supply Chain model Mass Balance, therefore does not required to separated receiving and processing of certified and non-certified FFB.</p>	<p>Yes</p>
<p><b>E.4 Purchasing and goods in</b></p>			
E.4.1	<p>The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>Responsible Person is able to demonstrate mechanism to verify and documented the volumes of Certified and Non-certified FFBs received, which contains:</p> <ul style="list-style-type: none"> <li>• Name of Estate, Division and Block (Sources of certified FFB)</li> <li>• Date of harvesting</li> <li>• Certificate Number</li> </ul> <p>Document verified, i.e.:</p>	<p>Yes</p>

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		<p>Certified:</p> <ul style="list-style-type: none"> <li>- Weighbridge Card #PGSA119202630 dated 14/05/2019, commodity: certified FFB; source: Pulau Maria Estate; to Gunung Melayu I Palm Oil Mill; net weight: 5,210 kg; Afdeling: 3; amount: 246 bunches; Block: I06a (235 bunches) and I06b (11 bunches); RSPO Cert: RSPO620755; Transporter: Internal; Vehicle: BK 9075 FA; Driver: Suriono II; Batch number: 13-100-16462018-28039051.</li> <li>- Weighbridge Card #PGSA119102346 dated 02/05/2019, commodity: certified FFB; source: Pulau Maria Estate; to Gunung Melayu I Palm Oil Mill; net weight: 4,890 kg; Afdeling: 3; amount: 276 bunches; Block: I08i; RSPO Cert: RSPO620755; Transporter: Internal; Vehicle: BK 9075 FA; Driver: Suriono II; Batch number: 13-100-16462018-28035216.</li> </ul> <p>Non-certified:</p> <ul style="list-style-type: none"> <li>- Surat Pengantar dated 14/05/2019 from CV Mitra Langgeng Sukses to PT Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill; amount: 730 bunches.</li> <li>- Weighbridge Card #PGSA519112304 dated 14/05/2019, commodity: outside FFB; source: CV Mitra Langgeng Sukses, ID: ST00181; to PT Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill; net weight: 13,821 kg; amount: 730 bunches; Transporter: general; Vehicle: BK 9185 BV; Driver: Merdi.</li> <li>- Surat Pengantar dated 02/05/2019 from PT Sawit Trading Sejahtera to PT Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill; amount: 428 bunches.</li> <li>- Weighbridge Card #PGSA519110993 dated 02/05/2019, commodity: outside FFB; source: PT Sawit Trading Sejahtera, ID: ST00107; to PT Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill; net weight: 8,604 kg; amount: 428 bunches; Transporter: general; Vehicle: BK 9849 BS; Driver: Edy.</li> </ul>	
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E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. Until this 4 <sup>th</sup> annual surveillance audit, there is no overproduction happened.	
<b>E.5 Record keeping</b>			
E.5.1	a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis by RSPO.	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has record and balances all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on three-monthly basis, as shown in Book Keeping Mass Balance Report. Three monthly reports was generated from weighbridge card, summarized daily in mill daily report, summarized monthly in Mill Operation Summary, then summarized in Book Keeping Mass Balance Report.</p> <p>Records and report verified are as follows:</p> <ul style="list-style-type: none"> <li>• Laporan Harian Pabrik (Mill Daily Report); dated 31 December 2018 and 30 April 2019.</li> <li>• Book Keeping – Mass Balance – CPO and PK period of January – March 2018, April – June 2018, July – September 2018, October – December 2018, January – March 2019;</li> <li>• Kartu Timbangan (Weighbridge Card) FFB;</li> <li>• Kartu Timbangan (Weighbridge Card) CPO;</li> <li>• Kartu Timbangan (Weighbridge Card) PK;</li> </ul>	Yes
	b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated	Conversion rate is only applied to provide reliable estimation of CPO and PK produced for annual budget. The management of PT Saudara Sejati Luhur – Gunung Melayu I POM has mechanism and knowledge that all volumes of CPO and PK delivered are deducted from the material accounting system.	Yes

	<p>c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) For further details refer to Module C.</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM only deliver certified CPO and PK sales from a positive stock. The volume of certified CPO and PK are deducted on three-monthly basis. Audit team verified there was no short-selling and/or negative stock at the end of three-monthly period.</p>	<p>Yes</p>
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**Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	June 2018	4,368.86	10,141.89	14,510.75
2	July 2018	5,012.52	21,316.17	26,328.69
3	August 2018	5,693.98	23,801.87	29,495.85
4	September 2018	5,310.29	20,865.96	26,176.25
5	October 2018	5,293.56	22,577.85	27,871.41
6	November 2018	4,270.00	16,749.29	21,019.29
7	December 2018	4,100.28	16,525.01	20,625.29
8	January 2019	3,551.25	16,550.75	20,102.00
9	February 2019	3,027.52	17,383.37	20,410.89
10	March 2019	2,793.16	17,727.52	20,520.68
11	April 2019	2,639.01	18,792.22	21,431.23
<b>Total</b>		<b>46,060.43</b>	<b>202,431.90</b>	<b>248,492.33</b>
<b>Note:</b>				

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	June 2018	1,056.99	226.67
2	July 2018	1,238.45	260.15
3	August 2018	1,427.79	303.60
4	September 2018	1,322.81	288.54
5	October 2018	1,335.73	278.50
6	November 2018	1,080.23	220.97
7	December 2018	1,042.28	213.13
8	January 2019	902.22	183.76
9	February 2019	761.88	156.02
10	March 2019	702.30	144.25
11	April 2019	658.44	136.79
<b>Total</b>		<b>11,529.12</b>	<b>2,412.38</b>
<b>Note:</b>			

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<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	PT SSL – Gunung Melayu I KCP	TR-862aeda7-1680	-	226.73
2	PT SSL – Gunung Melayu I KCP	TR-71eafdef-b7d4	-	191.03
3	PT Sari Dumai Sejati	TR-05515abb-8050	43.66	-
4	PT Sari Dumai Sejati	TR-8d7f6b85-2e9f	265.56	-
5	PT SSL – Gunung Melayu I KCP	TR-544fb315-71e1	-	203.85
6	PT SSL – Gunung Melayu I KCP	TR-ac3d2d84-e6f3	-	81.67
7	PT SSL – Gunung Melayu I KCP	TR-562d055b-3a0b	-	208.42
8	PT SSL – Gunung Melayu I KCP	TR-c05f4033-5bd9	-	36.76
9	PT SSL – Gunung Melayu I KCP	TR-b4df7143-57a9	-	215.61
10	PT SSL – Gunung Melayu I KCP	TR-fdc45aac-e936	-	312.19
11	PT SSL – Gunung Melayu I KCP	TR-ad3ba1cb-0522	-	253.09
12	PT SSL – Gunung Melayu I KCP	TR-0d1fdfd7-6a17	-	275.16
13	PT SSL – Gunung Melayu I KCP	TR-61a6f94a-ec42	-	130.44
14	PT SSL – Gunung Melayu I KCP	TR-0ba9c055-6d2e	-	131.76
	<b>Total</b>		<b>309.22</b>	<b>2,266.71</b>
<b>Note:</b>				

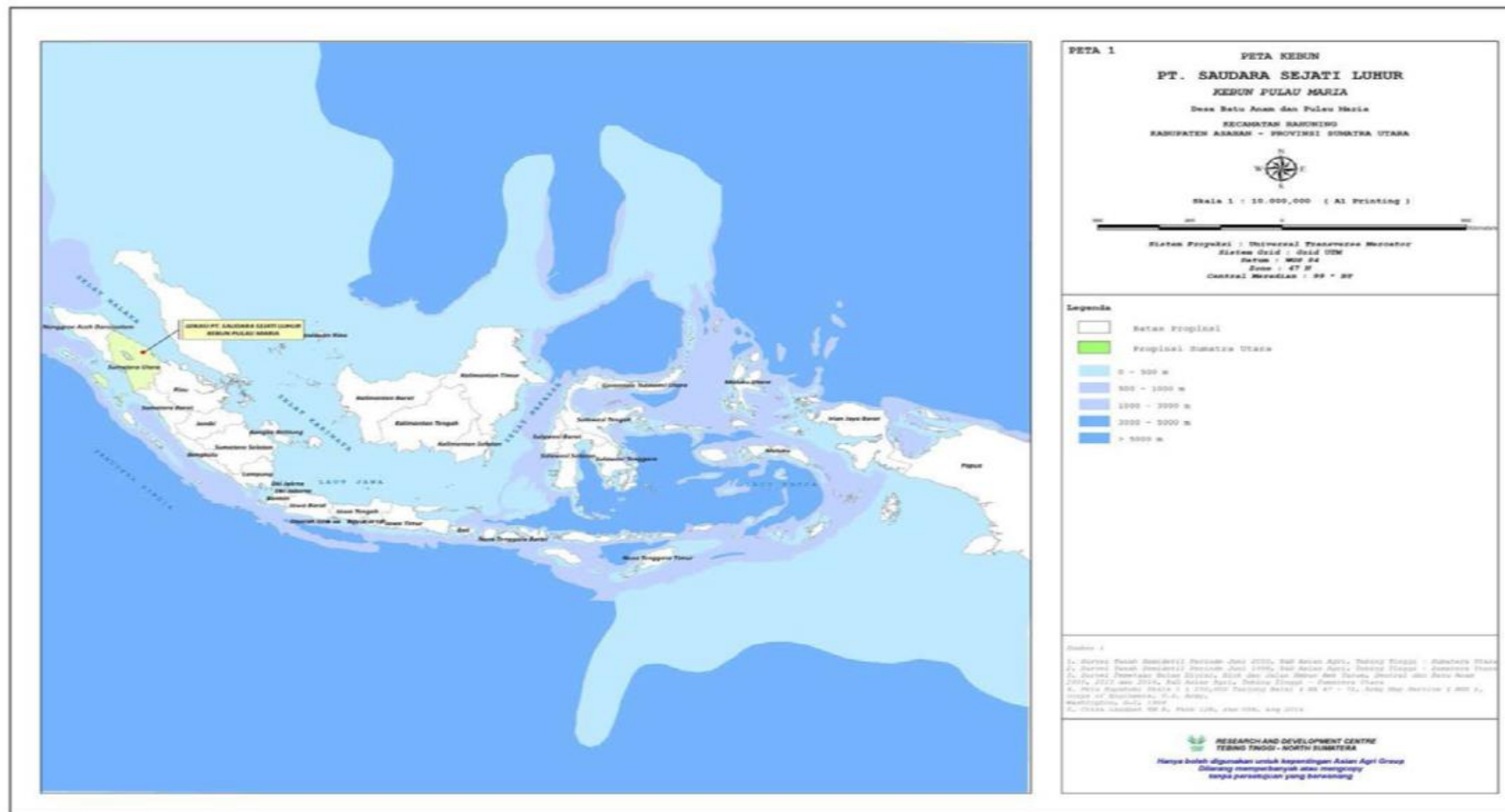
<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Classified	ISCC	11,130	-
<b>Note:</b>				

<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
	Null	-	-
<b>Note:</b>			

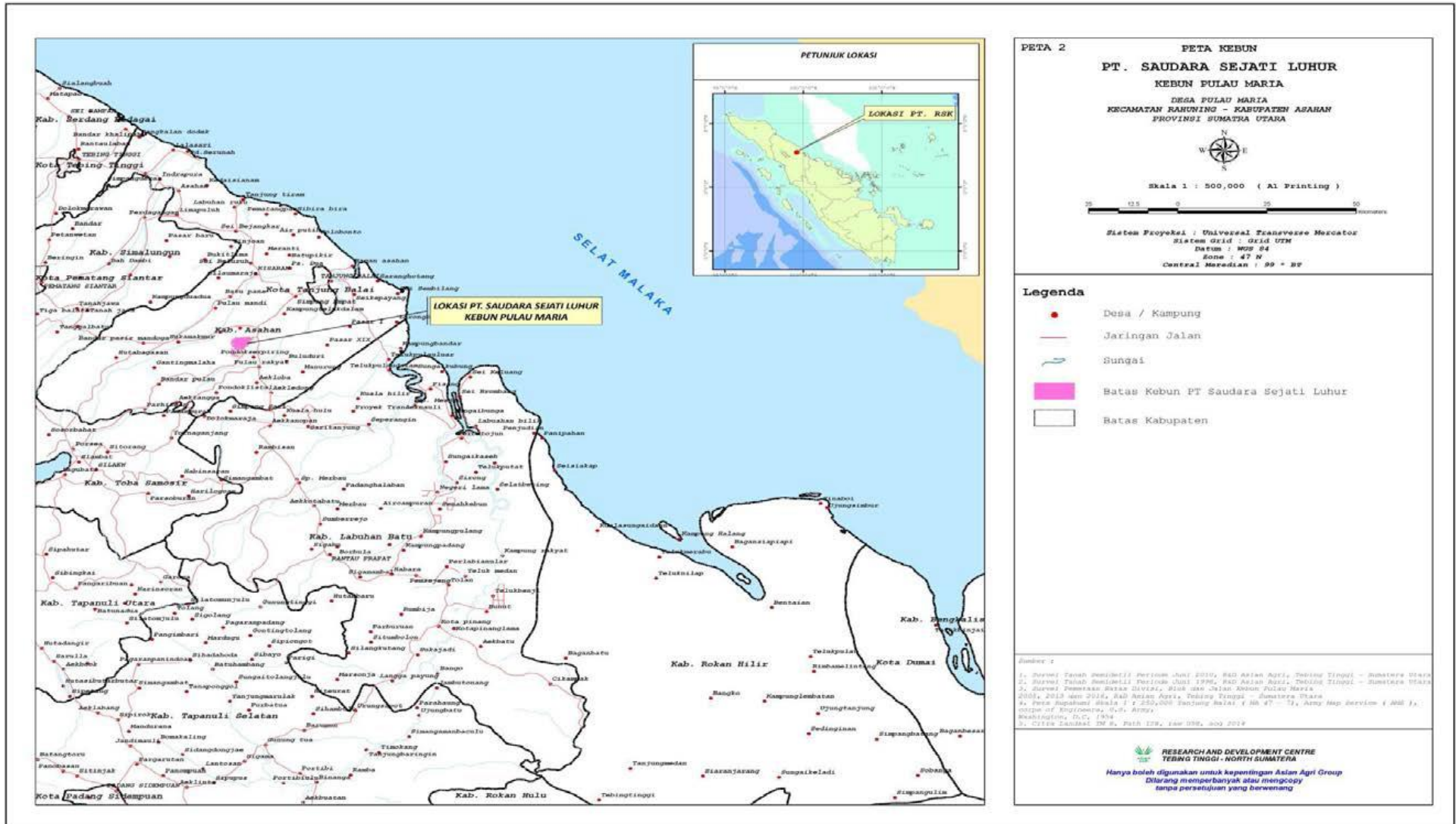
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<b>F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>RSPO Credits of Certified CPO Sold (mt)</b>
	Nil	-	-
<b>Note:</b>			

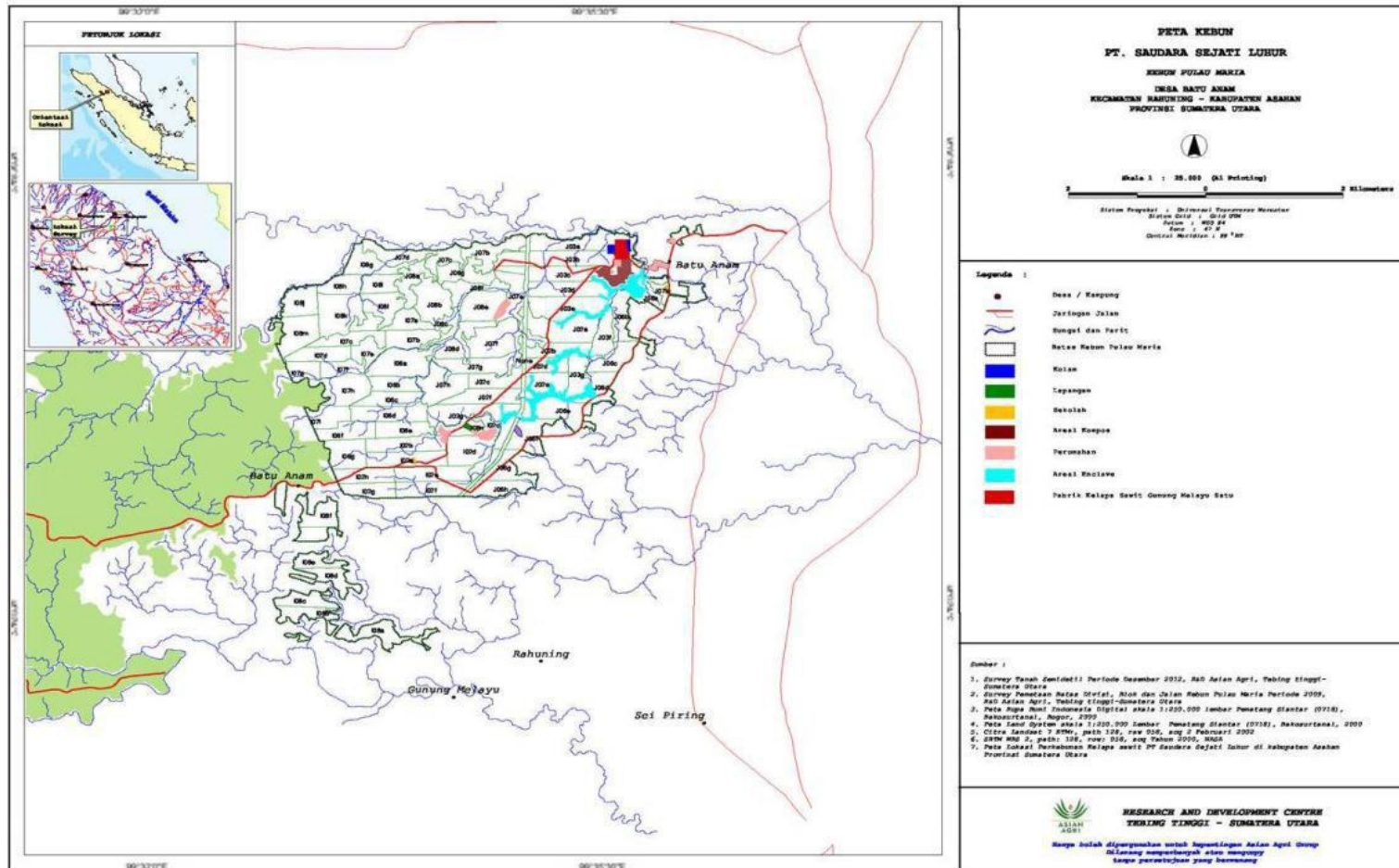
**Appendix F: Location Map of Certification Unit and Supply bases**







**Appendix G: Estate Field Map**



**Appendix H: List of Smallholder Sampled** – No smallholder scheme within this certification scope. Not applicable

**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