

**RSPO PRINCIPLE AND CRITERIA –  
– ANNUAL SURVEILLANCE ASSESSMENT 4 (ASA4)–  
Public Summary Report**

<b>PT. Inti Indosawit Subur:</b>
Client company Address: Jl. MH. Thamrin No.31 Jakarta 10330 Indonesia
Certification Unit: PT. Gunung Melayu – Gunung Melayu II Palm Oil Mill  Location of Certification Unit: Gonting Malaha Village, Bandar Pulau District, Asahan Regency, Sumatera Utara 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>	6 <sup>th</sup> February 2006
<b>Parent Company Name</b>	PT. Inti Indosawit Subur		
<b>Address</b>	Jl. MH. Thamrin No.31 Jakarta 10330 Indonesia		
<b>Subsidiary (Certification Unit Name)</b>	PT. Gunung Melayu		
<b>Address</b>	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, Sumatra Utara Province		
<b>Contact Name</b>	Mr. Ivan Novrizaldie		
<b>Website</b>	<a href="http://www.asianagri.co.id">www.asianagri.co.id</a>	<b>E-mail</b>	<a href="mailto:Ivan_Novrizaldie@asianagri.com">Ivan_Novrizaldie@asianagri.com</a>
<b>Telephone</b>	+62 21 230 1119	<b>Facsimile</b>	+62 21 2301120

2. Certification Information			
<b>Certificate Number</b>	<b>RSPO 620707</b>	<b>Date of First Certification</b>	08/07/2015
		<b>Certificate Start Date</b>	8 <sup>th</sup> July 2015
		<b>Certificate Expiry Date</b>	7 <sup>th</sup> July 2020
<b>Scope of Certification</b>	Production of CPO and PK at Gunung Melayu II POM with 3 estates as supply base, namely Batu Anam Estate, Aek Tarum Estate, Sentral Estate. Mill capacity of Gunung Melayu II POM is 60 tonnes FFB/hour.		
<b>Applicable Standards</b>	RSPO P&C Indonesia National Interpretation, September 2016; RSPO Supply Chain Certification Standard 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 14001:2004	SGS	10 June 2020
ISCC	EU-ISCC-Cert-DE100-27292018	SGS	07 July 2019

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4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Gunung Melayu II POM	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	2° 44' 58.00" N	99° 28' 11.00" E
Batu Anam Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	02°42'12.00" - 02°46'54.00" N	99°26'35.00" - 99°33'34.00" E
Aek Tarum Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	02°42'05.00" - 02°46'54.00" N	99°23'12.00" - 99°33'34.00" E
Sentral Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	02°42'05.00" - 02°46'32.00" N	99°23'12.00" - 99°29'10.00" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Batu Anam Estate	3,160	95.85	284.00	3,539.85	89.27%
Sentral Estate	2,907	64.94	585.48	3,557.42	81.72%
Aek Tarum Estate	2,283	39.56	349.00	2,671.56	85.46%
<b>Total</b>	<b>8,350</b>	<b>200.35</b>	<b>1,218.48</b>	<b>9,768.83</b>	<b>85.48%</b>

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3*	4 - 10*	11 - 20	21 - 25	26 - 30		
Batu Anam Estate	0	1,717	1,443	0	0	3,160	0
Sentral Estate	0	2,907	0	0	0	2,907	0
Aek Tarum estate	0	2,283	0	0	0	2,283	0
<b>Total (ha)</b>	<b>0</b>	<b>6,907</b>	<b>1,443</b>	<b>0</b>	<b>0</b>	<b>8,350</b>	<b>0</b>

**\*Note:** *Planting age 0-3 and 4-10 is from replanting.*

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<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated</b> (July 2018 – June 2019)	<b>Actual</b> (April 2018 – March 2019)	<b>Forecast</b> (July 2019 – June 2020)
Batu Anam Estate	78,924	74,793.70	72,488.00
Sentral Estate	64,387	62,365.27	63,743.50
Aek Tarum estate	54,809	45,459.92	47,471.50
<b>Total</b>	<b>198,120</b>	<b>182,618.89</b>	<b>183,703.00</b>
<b>Note:</b> <i>Estimated and Forecast are the 12 months from the licence period.</i> <i>Actual are the 12 months from the last audit period.</i>			

<b>8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated</b> (July 2018 – June 2019)	<b>Actual</b> (April 2018 – March 2019)	<b>Forecast</b> (July 2019 – June 2020)
Nil	<b>N/A</b>		<b>N/A</b>
<b>Total</b>			
<b>Note:</b> <i>There is no FFB received from another certified unit.</i>			

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>			
<b>Independent FFB Supplier</b>	<b>Tonnage / year</b>		
	<b>Estimated</b> (July 2018 – June 2019)	<b>Actual</b> (April 2018 – March 2019)	<b>Forecast</b> (July 2019 – June 2020)
3 <sup>rd</sup> Party FFB	110,051	96,617.48	96,431

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<b>10. Certified Tonnage</b>			
	<b>Estimated</b> (July 2018 – June 2019)	<b>Actual</b> (April 2018 – March 2019)	<b>Forecast</b> (July 2019 – June 2020)
<b>Mill Capacity:</b> <b>60 MT/hr</b>	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>
	198,120	182,618.89	183,703.00
	<b>CPO (OER: 24.80 %)</b>	<b>CPO (OER: 24.30 %)</b>	<b>CPO (OER: 24.69 %)</b>
<b>SCC Model:</b> <b>MB</b>	49,133.76	44,374.94	45,362.15
	<b>PK (KER: 4,75 %)</b>	<b>PK (KER: 4.87 %)</b>	<b>PK (KER: 4,90 %)</b>
	9,410.70	8,888.89	9,001.45
<b>Note:</b> <i>Estimated and Forecast are the 12 months from the licence period.</i> <i>Actual are the 12 months from the last audit period.</i>			

<b>11. Actual Sold Volume (CPO) (April 2018 – March 2019)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSB</b>		
<b>CPO (MT)</b>	7,526.44	35,911.27	0	0	<b>43,437.71</b>

<b>12. Actual Sold Volume (PK) (April 2018 – March 2019)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSB</b>		
<b>PK (MT)</b>	8,378.51	0	0	0	<b>8,378.51</b>

<b>13. Actual Group certification Claims</b>		
	<b>Credit</b>	<b>Physical Volume (MT)</b>
<b>IS-CSPO</b>	N/A	N/A
<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  
59200 Kuala Lumpur  
Tel +603 2242 4211 Fax +603 2242 4218  
Nicholas Cheong: [Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com)  
[www.bsigroup.com](http://www.bsigroup.com)

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site initial assessment was conducted from 9 – 13 April 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 Major NC close out on-site assessment was conducted on 19 June 2019. The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2013, Indonesia National Interpretation 2016 and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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



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

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

All the previous nonconformities are remains closed. The assessment findings for the 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>1. 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 3)</b>	<b>Year 5 (ASA 4)</b>
Gunung Melayu II POM	x	x	x	x	x
Batu Anam Estate	x	x	x	x	x
Sentral Estate	x	x		x	x
Aek Tarum Estate			x		x

**Tentative Date of Next Visit: April 13, 2020 - April 18, 2020**

**Total No. of Mandays: 16 Mandays**

**2.2 BSI Assessment Team:**

Team Member Name	Role	Qualifications <i>(Short description of the team members)</i>
Mujinius Jalaraya	Lead Assessor	He hold Bachelor degree from Faculty of Forestry, Bogor Agricultural University (IPB) in 2008, Majoring in Forest Resources Conservation and Ecotourism. He have a working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk in 2008 - 2012 and as Supervisor Sustainability at Teladan Prima Group in 2012 – 2014. He involved in RSPO certification since 2014 as a team member subsequently as a Lead Auditor. He has completed the training, such as: Lead Auditor ISO 9001: 2008 course, Lead Auditor ISPO course, Lead Auditor RSPO endorsed course, RSPO SCCS Lead Auditor endorsed course, HCV Identification and management, Internal Auditor ISO 14001: 2004 Training, Training for Trainers, OHS Expert Training, etc. He is fluently speaking in English and Bahasa Indonesia. During this assessment, he assessed on the aspects of Legal, Environmental management and monitoring, OHS management and HCV management and monitoring.
Imam Fachrurozi	Assessor 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 aspects of Environmental and OHS management and monitoring for mill and estate.
Pratama Agung Sedayu	Assessor Team member	

**Accompanying Persons:** Nil

### 2.3 Assessment Plan

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

RSPO Annual Surveillance 4 Assessment Plan PT Gunung Melayu – Gunung Melayu II POM & Its Supply Bases

Date	Time	Subjects	MJ	PS	IF
Monday 08/04/2019	09.00 – 11.30	Flight Jakarta – Kualanamu	√	√	√
	12.30 – 17.30	Travelling Kualanamu – Gunung Melayu	√	√	√
Tuesday 09/04/2019	08.00 – 09.00	<b>Opening Meeting</b>	√	√	√
	09.00 – 12.00	<b>Batu Anam Estate</b> <b>Field Visit:</b> Herbicide application programmes, harvesting, fertilising operations, water management, road maintenance, terracing, HCV's, riparian zones, etc.	√		
		Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc.			√
		Boundaries inspection, worker interviews, social amenities, etc. Interview with: Labour Union and Gender Committee.		√	
	12.00 –14.00	<b>Break</b>	√	√	√
	14.00 – 17.00	<b>Document Review Batu Anam Estate</b>	√	√	√
Wednesday 10/04/2019	08.00 – 12.00	<b>Aek Tarum Estate</b> <b>Field Visit Aek Tarum Estate:</b> Herbicide application programmes, harvesting, fertilising operations, water management, road maintenance, terracing, HCV's, riparian zones, etc.	√		
		<b>Stakeholder consultation</b> Interview with: Badan Lingkungan Hidup (BLH), Badan Pertanahan Nasional (BPN), Dinas Perkebunan, Disnakertrans Kabupaten Asahan.		√	
		Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc.			√
	12.00 –14.00	<b>Break</b>	√	√	√
	14.00 – 17.00	<b>Document Review Aek Tarum Estate</b>	√	√	√
		Boundaries inspection, worker interviews, social amenities, etc. Interview with: Village head, local community, community leaders, local contractor, FFB supplier, etc		√	
	08.00 – 12.00	<b>Sentral Estate</b>	√		

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Thursday, 11/04/2019		<b>Field Visit:</b> Herbicide application programmes, harvesting, fertilising operations, , water management, road maintenance, terracing, HCV's, riparian zones, etc.			
		Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc.			√
		Boundaries inspection, worker interviews, social amenities, etc.		√	
	12.00 –14.00	<b>Break</b>	√	√	√
	14.00 – 17.00	<b>Document Review Aek Tarum Estate</b>	√	√	√
Friday 12/04/2019	08.00 – 12.00	<b>Gunung Melayu II POM</b> <b>Field Visit and Document Review:</b> Inspection of processing, warehouse, workshop, mill wastes management, Effluent Ponds, OHS, Environment issues, POME application, workers interview, Review on SEIA documents and records, Document review, etc. RSPO Supply Chain for CPO Mill	√	√	√
	12.00 – 14.00	<b>Break</b>	√	√	√
	14.00 – 17.00	<b>Document Review</b>	√	√	√
Saturday 13/04/2019	08.00 – 10.00	<b>Audit Continue for Estate and POM</b> Document Review Estate and POM RSPO Supply Chain for CPO Mill	√	√	√
		Document Review & Social Audit continue		√	
		Document Review & OHS and EMS audit continue			√
	10.00 – 10.30	Report Preparation	√	√	√
	10.30 – 12.00	<b>Closing Meeting</b>	√	√	√
	13.00 - up	Travel to Kualanamu & Stay at Hotel (Wings/Prime Plaza)	√	√	√
Sunday 14/04/2019	09.00 – 11.10	<b>Travel from Kualanamu to Jakarta</b>	√	√	√

### Section 3: Assessment Findings

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

- PT Inti Indosawit Subur Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C INA-NIWG 2016

#### 3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	PT. Gunung Melayu as a subsidiary of PT Inti Indosawit and Asian Agri Group has explained the certification plan for all of its subsidiaries; indicating all palm oil mills and company-owned estates, including smallholder as the supply base.	Comply
Have all the estates and mills certified within five years after obtaining RSPO membership?	The time bound plan is challenging. PT. Gunung Melayu – Asian Agri Group demonstrate progress overtime.  The age of plantation was generally mature. All of plantation has been incorporated with palm oil mill to process the FFB produced.  The location of plantations were covering three provinces in Sumatera Utara Province, Riau Province and Jambi Province – Indonesia.	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 changes.	Comply
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No changes.	Comply
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	Yes, there was a report related to company’s supply chain. Company has released official response. BSI was notified and provided response to this matter.  BSI has also provided response to this matter.	Comply
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of	There are no newly acquired subsidiaries.	Comply

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the plan? If yes a <b>Major</b> non-compliance shall be raised		
Have there been any stakeholder comments?	No isolated lapses. Company managed to demonstrate commitment to certify all of palm oil mill and supply base.	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>	Yes. PT. Mitra Unggul Pusaka – Segati POM conducted internal audit annually.	Comply
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	In area where BSI conducted audit, there are no replacement/conversion of primary forest after November 2005.	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.	There is new planting after January 1 <sup>st</sup> , 2010. New planting was performed through conversion from rubber plantation. Company has prepare for NPP submission to RSPO. NPP for conversion area is still in progress including supporting documents (conversion permit, HCV assessment, etc).  LUC supporting data for PT Mitra Unggul Pusaka has been sent by company to RSPO on 2 April 2019 including HGU 1 : Gondai Estate & Penarikan Estate (Integrated Report for Both Estate, for Annex 3a has use the new template); HGU 2 : Segati Estate (Integrated Report & Annex 3a). Citra Landsat Map (Stripping View) with sourcing date information to give clear analysis still in progress to complete.	in progress
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No more land compensation.	Comply
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No labor dispute noted. This was based on stakeholder interview with worker union in each company. In addition, audit team found the same based on stakeholder interview with “Dinas Tenaga Kerja” on each regency audited.	Comply
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes. PT. Mitra Unggul Pusaka – Segati POM conducted internal audit annually. Last audit performed in 2019 as follow: Segati Mill : 25 – 26 March 2019 Segati Estate : 25 – 26 March 2019 Penarikan Estate: 27 – 29 March 2019 Gondai Estate : 27 – 29 March 2019	Comply

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

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>Smallholder as a supply base of PT Inti Indosawit Subur (Asian Agri Group) as a parent company of PT Gunung Melayu has been certified comply with the standard within three years of the mill's initial certification as bellow:</p> <ul style="list-style-type: none"> <li>- Buatan Plasma Certified on 13<sup>th</sup> March 2012 as supply base of Buatan I &amp; II Mill which Certified on 16<sup>th</sup> September 2010.</li> <li>- Buatan KKPA Certified on 17<sup>th</sup> January 2013 as supply base of Buatan I &amp; II Mill which Certified on 16<sup>th</sup> September 2010.</li> <li>- Ukui Plasma Certified on 11<sup>th</sup> June 2012 as supply base of Ukui I &amp; II Mill which Certified on 1<sup>st</sup> March 2011.</li> <li>- Tungal Ulu Plasma Certified on 11<sup>th</sup> July 2013 as supply base of Tungal Ulu Mill which Certified on 15<sup>th</sup> August 2012.</li> <li>- Muara Bulian Plasma &amp; KKPA Certified on 12<sup>th</sup> July 2013 as supply base of Muara Bulian Mill which Certified on 28<sup>th</sup> August 2012.</li> </ul> <p>Bungo Tebo Plasma Certified on 7<sup>th</sup> February 2017 as supply base of Bungo Tebo Mill which Certified on 3<sup>rd</sup> December 2015.</p>	Comply

**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 Annual Surveillance Assessment 4 there were 3 Major & 4 Minor nonconformities raised. PT Gunung Melayu – Gunung Melayu II POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for it effectiveness and closed accordingly on 19 June 2019.

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1765667-201901-M1	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C 2013, INA-NI

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			September 2016, Indicator 1.2.1
<b>Date Issued</b>	<b>13 April 2019</b>	<b>Due Date</b>	<b>12 July 2019</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>19 June 2019</b>
<b>Statement of Nonconformity:</b>	List of publicly available document as in "Memorandum Group Manager PT. Gunung Melayu No.21/GM-GME/Int/03/18 tentang Daftar Dokumen yang Dapat Diakses Stakeholder", dated 29 March 2018 - has not included Pollution prevention and reduction plans (Criterion 5.6), Details of complaints and grievances (Criterion 6.3), Negotiation procedures (Criterion 6.4), Continual improvement plans (Criterion 8.1), Public summary of certification assessment report, Human Rights Policy (Criterion 6.13).		
<b>Requirement Reference:</b>	Publicly available documents shall include, but are not necessarily limited to: a) Land titles/user rights (Criterion 2.2) b) Occupational health and safety plans (Criterion 4.7) c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8) d) HCV documentation (Criteria 5.2 and 7.3) e) Pollution prevention and reduction plans (Criterion 5.6) f) Details of complaints and grievances (Criterion 6.3) g) Negotiation procedures (Criterion 6.4) h) Continual improvement plans (Criterion 8.1) i) Public summary of certification assessment report j) Human Rights Policy (Criterion 6.13).		
<b>Objective Evidence:</b>	List of publicly available document as in "Memorandum Group Manager PT. Gunung Melayu No.21/GM-GME/Int/03/18 tentang Daftar Dokumen yang Dapat Diakses Stakeholder", dated 29 March 2018 - however the document has not included Pollution prevention and reduction plans (Criterion 5.6), Details of complaints and grievances (Criterion 6.3), Negotiation procedures (Criterion 6.4), Continual improvement plans (Criterion 8.1), Public summary of certification assessment report, Human Rights Policy (Criterion 6.13).		
<b>Corrections:</b>	PT Gunung Melayu has revised the Memorandum of Group Manager of PT. Gunung Melayu by issued the new Memorandum No.21/GM-GME/Int/03/18 concerning List of Documents That Stakeholders Can Access "by updating information List of publicly available document. The available document has include the minimum requirement of RSPO: a) Land titles/user rights b) Occupational health and safety plans c) Plans and impact assessments relating to environmental and social impacts d) HCV documentation e) Pollution prevention and reduction plans f) Details of complaints and grievances g) Negotiation procedures h) Continual improvement plans		



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	<p>i) Public summary of certification assessment report</p> <p>j) Human Rights Policy</p> <p>The list of public information will inform to the stakeholder through stakeholder meeting which conducted each 3 month (quarter).</p> <p>PT Gunung Melayu also has assigned the PIC to monitor the update of publicly available document on behalf Dani (Sustainability Staff) by May 2019.</p>
<b>Root Cause Analysis:</b>	Company has not updated yet the data that can be accessed by stakeholders in Memorandum and there is no particular responsible person for updating the data for the stakeholders.
<b>Corrective Actions:</b>	<p>Perform periodic updates according to information List of publicly available documents and conduct communication with relevant stakeholders.</p> <p>Latest update of Publicly available document has been performed through issued the new Memorandum No.21/GM-GME/Int/03/18 concerning List of Documents That Stakeholders Can Access</p>
<b>Assessment Conclusion:</b>	Auditor conclude that company has effectively addressed the issue of non conformity and the NC has been CLOSED on 19 July 2019.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1765667-201901-M2	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C 2013, INA-NI September 2016, Indicator 5.3.2
<b>Date Issued</b>	<b>13 April 2019</b>	<b>Due Date</b>	<b>12 July 2019</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>19 June 2019</b>
<b>Statement of Nonconformity:</b>	The empty chemical container disposal practice in Sentral Estate was not carried out per Indonesian regulation and company procedure.		
<b>Requirement Reference:</b>	There shall be evidence that all chemicals and their empty containers are disposed of responsibly.		
<b>Objective Evidence:</b>	Based on field visit to Sentral Estate, Disivion I Housing, audit team found empty herbicide jerry cans, empty motorcycle lubricant bottles were disposed off at the back of worker housing, along with other household refuse.		
<b>Corrections:</b>	<p>Company has taken action by socialization and awareness to employees in housing Division I related to hazardous waste management in residential areas. Hazardous waste produced by employee housing includes used oil bottles, mosquito spray packaging, used TL lamps and used electronic goods. Socialization conducted on 11 April 2019. Evidence of socialization were available.</p> <p>Collect the empty herbicide jerry cans, empty motorcycle lubricant bottles in the housing area and evacuate them to licenced temporary hazardous Waste (TPS LB3). Company has evacuate the hazardous waste on 11 April 2019 as per "Berita Acara Penanggulangan Hasil Temuan Limbah B3" dated 11 April 2019. Evidence of hazardous waste evacuation also presented in "Neraca Limbah B3" dated 11 April 2019, hazardus waste evacuate consist of: 4 empty herbicide jerry cans, 1 empty motorcycle lubricant bottles and 1 used paint cans.</p>		

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<b>Root Cause Analysis:</b>	Lack of awareness regarding the hazardous waste type and its management and lack of monitoring from Asistant Afdeling to monitor the hazardous waste handling in emplacement.
<b>Corrective Actions:</b>	<p>Conduct inspections and checks to ensure there is no hazardous waste at every employee housing and no hazardous waste storage at housing area. Monitoring has been condcut each month by Assistant of Afdeling, record of monitoring and inspection are evident in "Monitoring Pengelolaan dan Pengangkutan Limbah B3 di area perumahan Kebun Sentral Tahun 2019". Sample seen on monitoring period April 2019 (15 April 2019 monitoring in Sentral housing).</p> <p>During field visit in Division I housing at NCR close out visit 19 June 2019 can be demonstrated that there is no longer hazardous waste storage in the housing area. During interview with employee at housing also confirmed that they have understood regarding hazardous waste handling and prohibition to dispose the hazardous in housing area.</p>
<b>Assessment Conclusion:</b>	Auditor conclude that company has effectively addressed the issue of non conformity and the NC has been CLOSED on 19 July 2019.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1765667-201901-M3	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C 2013, INA-NI September 2016, Indicator 4.7.2
<b>Date Issued</b>	<b>13 April 2019</b>	<b>Due Date</b>	<b>12 July 2019</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>19 June 2019</b>
<b>Statement of Nonconformity:</b>	HIRADC document has been set and determined by PT Gunung Melayu, however the HIRADC has not following the Risk Assessment Procedure No AA-SOP-HSE-03, HIRA-DC, version 00 dated 20 <sup>th</sup> May 2018.		
<b>Requirement Reference:</b>	A documented risk assessment shall be available and its implementation shall be recorded.		
<b>Objective Evidence:</b>	PT Gunung Melayu has prepared the document of risk assessment under "Analisa Resiko Tahun 2018", last review on 4 <sup>th</sup> January 2018. The risk assessment has covered for all activities in plantation and mill. However, the grade of the risk level and scale of severity and probability has not consistent with document of Risk Assessment Procedure No AA-SOP-HSE-03, HIRA-DC, version 00 dated 20 <sup>th</sup> May 2018.		
<b>Corrections:</b>	Revised the HIRADC document according to Risk Assessment Procedure document No. AA-SOP-HSE-03, HIRA-DC, version 00 dated May 20, 2018. PT Gunung Melayu has revised the HIRADC document as per procedure, updated on 1 April 2019. During audit can be demonstrated that all activity of Mill and estate has cover in HIRADC and the grade of risk level and scale of saverity and probability has been met and inline with the procedure No. AA-SOP-HSE-03, HIRA-DC, version 00 dated May 20, 2018		
<b>Root Cause Analysis:</b>	The HIRADC document still refers to the old SOP and has not been adjusted to the Risk Assessment Procedure document No. AA-SOP-HSE-03, HIRA-DC, version 00		

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	dated May 20, 2018. Lack of understanding from OHS Expert of PT Gunung Melayu .
<b>Corrective Actions:</b>	Regularly review and update the HIRADC document according to the procedure.
<b>Assessment Conclusion:</b>	Auditor conclude that company has effectively addressed the issue of non conformity and the NC has been CLOSED on 19 July 2019.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1765667-201901-N1	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C 2013, INA-NI September 2016, Indicator 1.1.1
<b>Date Issued</b>	<b>13 April 2019</b>	<b>Due Date</b>	<b>12 July 2019</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>Next Surveillance</b>
<b>Statement of Nonconformity:</b>	Company has determined the List of publicly available document as in "Memorandum Group Manager PT. Gunung Melayu No.21/GM-GME/Int/03/18, however the document has not included the necessary document as required in RSPO 1.2.1		
<b>Requirement Reference:</b>	List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available.		
<b>Objective Evidence:</b>	List of publicly available document as in "Memorandum Group Manager PT. Gunung Melayu No.21/GM-GME/Int/03/18 tentang Daftar Dokumen yang Dapat Diakses Stakeholder", dated 29 March 2018 - has not included Pollution prevention and reduction plans (Criterion 5.6), Details of complaints and grievances (Criterion 6.3), Negotiation procedures (Criterion 6.4), Continual improvement plans (Criterion 8.1), Public summary of certification assessment report, Human Rights Policy (Criterion 6.13).		
<b>Corrections:</b>	<p>PT Gunung Melayu has revised the Memorandum of Group Manager of PT. Gunung Melayu by issued the new Memorandum No.21/GM-GME/Int/03/18 concerning List of Documents That Stakeholders Can Access "by updating information List of publicly available document. The available document has include the minimum requirement of RSPO:</p> <ul style="list-style-type: none"> <li>a) Land titles/user rights</li> <li>b) Occupational health and safety plans</li> <li>c) Plans and impact assessments relating to environmental and social impacts</li> <li>d) HCV documentation</li> <li>e) Pollution prevention and reduction plans</li> <li>f) Details of complaints and grievances</li> <li>g) Negotiation procedures</li> <li>h) Continual improvement plans</li> <li>i) Public summary of certification assessment report</li> <li>j) Human Rights Policy</li> </ul> <p>The list of public information will inform to the stakeholder through stakeholder meeting which conducted each 3 month (quarter).</p>		

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	PT Gunung Melayu also has assigned the PIC to monitor the update of publicly available document on behalf Dani (Sustainability Staff) by May 2019.
<b>Root Cause Analysis:</b>	Company has not updated yet the data that can be accessed by stakeholders in Memorandum and there is no particular responsible person for updating the data for the stakeholders.
<b>Corrective Actions:</b>	Perform periodic updates according to information List of publicly available documents and conduct communication with relevant stakeholders.  Latest update of Publicly available document has been performed through issued the new Memorandum No.21/GM-GME/Int/03/18 concerning List of Documents That Stakeholders Can Access.
<b>Assessment Conclusion:</b>	Auditor conclude that company has effectively addressed the issue of non conformity however the NC Minor status remain OPEN and will be verified in the next surveillance.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1765667-201901-N2	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C 2013, INA-NI September 2016, Indicator 2.1.2
<b>Date Issued</b>	<b>13 April 2019</b>	<b>Due Date</b>	<b>12 July 2019</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>Next Surveillance</b>
<b>Statement of Nonconformity:</b>	PT. Gunung Melayu have not maintained written information on legal requirements.		
<b>Requirement Reference:</b>	A documented system, which includes written information on legal requirements, shall be maintained.		
<b>Objective Evidence:</b>	<p>PT. Gunung Melayu have prepared the list of relevant laws and regulation. However, the certificate holder unable to demonstrate a complete and applicable regulation, as identified in the RSPO P&amp;C 2013, Indonesia National Interpretation, September 2016 – appendix 1.</p> <p>PT. Gunung Melayu have not identified and evaluated these applicable regulations:</p> <ul style="list-style-type: none"> <li>• Undang-undang No.80 tahun 1957 tentang Ratifikasi Konvensi ILO No. 100 tahun 1951 tentang Pengupahan yang sama Bagi Pekerja Laki-laki dan Wanita untuk Pekerjaan yang Sama Nilainya;</li> <li>• Undang-undang No.19 tahun 1999 tentang Ratifikasi ILO Convention No.105 tahun 1957 mengenai Penghapusan Kerja Paksa;</li> <li>• Undang-undang No.20 tahun 1999 tentang Ratifikasi ILO Convention No.138 tahun 1973 tentang Batas Usia Minimum;</li> <li>• Undang-undang No.29 tahun 1999 tentang Ratifikasi Konvensi Internasional tentang Penghapusan Segala Bentuk Diskriminasi (Convention on the Elimination of All Forms of Racial Discrimination - CERD);</li> <li>• Undang-undang No.24 tahun 2011 tentang Badan penyelenggara Jaminan Sosial;</li> </ul>		

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	<ul style="list-style-type: none"> <li>Peraturan Menteri Tenaga Kerja No.4 tahun 1987 tentang P2K3 serta Tatacara Penunjukan Ahli K3;</li> <li>Peraturan Menteri Tenaga Kerja No.7 tahun 2007 tentang Baku Mutu Sumber Tidak Bergerak bagi Ketel Uap;</li> <li>Peraturan Menteri Tenaga Kerja No.9 tahun 2010 tentang Operator dan Petugas Pesawat Angkat dan Angkut;</li> <li>Keputusan Menteri Tenaga Kerja No.100 tahun 2004 tentang Ketentuan Pelaksanaan Perjanjian Kerja Waktu Tertentu (PKWT);</li> </ul>
<b>Corrections:</b>	<p>Updating the list of relevant law and regulation refer to RSPO P&amp;C 2013, Indonesia National Interpretation, September 2016 – appendix 1.</p> <p>Appoint the particular responsible person for updating the the relevant law and regulation annually. PT Gunung Melayu has assigned the PIC to monitor the update of publicly available document on behalf Dani (Sustainability Staff) by May 2019.</p>
<b>Root Cause Analysis:</b>	Company has not updated yet the relevant law and regulation relevant to Plantation and Mill operation and the particular responsible person for updating the the relevant law and regulation has been resign.
<b>Corrective Actions:</b>	Regularly updating the the relevant law and regulation by PIC Dani (Sustainability Staff) to ensure the compliance of all relevant law and regulation.
<b>Assessment Conclusion:</b>	Auditor conclude that company has effectively addressed the issue of non conformity however the NC Minor status remain OPEN and will be verified in the next surveillance.

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1765667-201901-N3	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C 2013, INA-NI September 2016, Indicator 5.2.4
<b>Date Issued</b>	<b>13 April 2019</b>	<b>Due Date</b>	<b>12 July 2019</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>Next Surveillance</b>
<b>Statement of Nonconformity:</b>	Company has not consistently implementing conservation management plan accordingly.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	PT Gunung Melayu has set the Conservation Management plan 2018/2019, the management plan including riparian conservation such as; <ul style="list-style-type: none"> <li>- Boundary marking in each 200 m of riparian area</li> <li>- Prohibit the chemical application for weeds control and fertilizing and substitute by manual weeding.</li> </ul>		

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	However during field visit to Sungai Masehi riparian there was no boundary marker found or install in riparian area and the information from Estate management stated that chemical application remain performed in the riparian area.
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- Identifying the boundary markers of HCV riparian area and installing the new poles with a distance 200 m along the riparian area.</li> <li>- Socialization to spraying workers regarding the protection of HCV area along the river body and prohibition of chemical application in riparian area with sign red pole and red paint in the 50 m left and right of the riparian area.</li> </ul>
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- Previously boundary markers has installed, however lack of monitoring and maintenance of boundary markers in riparian area so that many boundary markers are lost.</li> <li>- There is no sign of riparian area/unclear boundary markers which prohibit area for chemical application.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Monitoring and maintain the boundary markers and the sign of HCV area along the riparian area and regularly refresh the awareness of HCV area protection and prohibition to apply chemical in the riparian area.</li> </ul>
<b>Assessment Conclusion:</b>	Correction and Corrective Action plan has been made by company and will be verified in the next surveillance assessment. NC Minor status remain OPEN.

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1765667-201901-N3	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C 2013, INA-NI September 2016, Indicator 4.7.7
<b>Date Issued</b>	<b>13 April 2019</b>	<b>Due Date</b>	<b>12 July 2019</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>Next Surveillance</b>
<b>Statement of Nonconformity:</b>	Investigation report for each accident that was reported in "Kinerja K3" was not consistently as per regulation at the procedure of Investigasi Kecelakaan Kerja No" AA-SMK3-XXXX.YY-RO, edition RO dated 1 <sup>st</sup> April 2017 i.e: Form Investigasi Kecelakaan Kerja (AA-OP-14001.02.03-FM).		
<b>Requirement Reference:</b>	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.		
<b>Objective Evidence:</b>	PT Gunung Melayu has shown the record of occupational injuries using LTA metrics under document of "Kinerja K3 – was integrated with Report of OHS Performance". However, investigation report for each accident that was reported in "Kinerja K3" was not consistently as per regulation at the procedure of Investigasi Kecelakaan Kerja No" AA-SMK3-XXXX.YY-RO, edition RO dated 1th April 2017 i.e: Form Investigasi Kecelakaan Kerja (AA-OP-14001.02.03-FM).		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- Revise the Report of OHS Performance according to actual accident number based on Investigation report and report of "Kinerja K3"</li> <li>- Refreshment the procedure of Accident investigation in relation of reporting OHS performance.</li> </ul>		
<b>Root Cause Analysis:</b>	OHS expert are no aware regarding the Accident investigation Procedure AA-OP-14001.02.03-FM.		

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<b>Corrective Actions:</b>	Review and monitor regularly the report of H=OHS performance based on actual data/condition.
<b>Assessment Conclusion:</b>	Correction and Corrective Action plan has been made by company and will be verified in the next surveillance assessment. NC Minor status remain OPEN.

<b>Opportunity for Improvements</b>	
OFI #	Description
OFI 1	

<b>Positive Findings</b>	
PF #	Description
PF 1	

**3.4.1 Status of Nonconformities Previously Identified and Observations**

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1487836-201706-N3	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P & C INA NI 2016 Indicator 5.3.3 Escalated to Major NC
<b>Date Issued</b>	<b>19 April 2018</b>	<b>Due Date</b>	<b>18 June 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>9 June 2018</b>
<b>Statement of Nonconformity:</b>	Management plan of hazardous waste was not consistently implemented as per regulation and procedure.		
<b>Requirement Reference:</b>	A documented waste management plan to avoid or reduce pollution and its implementation shall be available.		
<b>Objective Evidence:</b>	<p>Lack of evidence the minor NC has followed up as per corrective action plan; data verified:</p> <ul style="list-style-type: none"> <li>Based on visit in hazardous waste store in Sentral Estate (date 18<sup>th</sup> April 2018), there was confirmed the record of hazardous waste "Neraca Limbah B3" found still inaccurate; a number of hazardous waste handover from Batu Anam Estate and Sentral Estate are not traceable in the balance record sheet. Example "Neraca Limbah B3" has just recorded of chemical waste on 14th January 2018 from Sentral Estate for 200 pcs of ex-chemical container, dated 17th April 2018 from Batu Anam Estate for 16 ex-knap sack, dated 15th January 2018 from Klinik (P3) Batu Anam Estate for 170 pcs.</li> <li>Based on visit at Sentral Estate warehouse (date 18<sup>th</sup> April 2018) auditor found the inner bag of fertilizer has not controlled properly and be scattered around in backside of fertilizer store. In addition there was found the ex-agrochemical container (&gt;10 bag) was not stored in hazardous waste store, based on record</li> </ul>		

	sheet (neraca limbah) the latest disposal on 14th January 2018 from Sentral Estate for 200 pcs.
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- Retracing and re-record the unregistered shipping/delivery administration of hazardous waste in TPS LB3 according to actual volume of hazardous waste. Company has retrace and re record the unregistered shipping of hazardous waste from estate (source of waste) and recorded in "Lembar Neraca Limbah B3". During NCR visit audit can be shown that the number of actual hazardous waste volume in TPS LB3 was met with the "Lembar Neraca Limbah B3". Latest update of hazardous waste was 30 May 2018. The hazardous waste traceability can be demonstrated in Delivery note "Berita Acara Pengiriman Limbah B3". For example used oil was received from Batu Anam Estate on 30 May 2018 was 47 L, the total of used oil from Batu Anam Estate since 2 – 30 May 2018 in TPS LB3 was 205 L.</li> <li>- Provide the special place for laying fertilizer sacks. Company has modified the fertilizer store and provide the special place for laying the ex fertilizer sack. During audit can be demonstrated that the place of laying the ex fertilizer sack was sufficient and protected from rain and flooded. placement of fertilizer sacks has also been neatly arranged and the number of sacks of fertilizer according to actual conditions is recorded.</li> </ul>
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- There were several delivery note "Berita Acara Pengiriman" of hazardous waste from estate (source of waste) were not copied which resulted in different records being sent from hazardous waste sources to temporary hazardous waste storage (TPS LB3).</li> <li>- There is no special place for laying fertilizer sacks</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Monitoring the administration of hazardous waste receiving from estate and record of hazardous waste volume from each estate (source of waste). Company has monitor the hazardous waste administration each month and record in "Lembar Neraca Limbah B3". In addition company also has reported each 3 month the hazardous waste management and monitoring to Environmental Agency "Badan Lingkungan Hidup". Latest report was sent on April 2018.</li> <li>- Monitoring the ex fertilizer sack receiving and storage from each estate. Company has monitor regularly the number of ex fertilizer sack and maintain the storage of ex fertilizer sack. Company also has appointed person in charge Mr. Chairul Sahar who responsible to monitor the ex fertilizer sack receiving and storage according to "Memorandum Nomor: 9/MGR/KSN/Mei/18" dated 10 May 2018.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Auditor conclude that company has effectively addressed the issue of non conformity and the NC has been CLOSED on 9 June 2018.</p> <p>During Surveillance audit 4, auditor verified the consistence of corrective action implementation. It was found that the corrective action remain consistence and effectively addressed. The NC remain CLOSED.</p>

<b>Nonconformity</b>			
<b>NCR Ref #</b>	1487836-201706-N4	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P & C INA NI 2016 Indicator 6.1.4



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			Escalated to Major NC
<b>Date Issued</b>	<b>19 April 2018</b>	<b>Due Date</b>	<b>18 June 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>9 June 2018</b>
<b>Statement of Nonconformity:</b>	Social impact reviewed by Company were not sufficient according to the current social condition in PT Gunung Melayu.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<p>The Company has performed re-assessed and re-identified the social impact aspect for the period of 2017 in SIA Report "Laporan Identifikasi Efektifitas Upaya Kelola Sosial", but there is insufficient evidence to take corrective action to close this non conformity.</p> <ul style="list-style-type: none"> <li>Based on the assessment and identification report can be shown that it remains inconsistent in the discussion with the determination of the social impact management program on "Matriks Arahan Program". The program's directives are not relevant to the current social conditions and do not consistently discuss the impacts that arise in SIA Report, but only address issues related to CSR.</li> <li>Does not specify the period/time of the social impact assessment done</li> <li>Does not specify assessment team and its competency</li> </ul>		
<b>Corrections:</b>	<p>PT Gunung Melayu has revised the SIA report review in "Laporan Identifikasi Efektifitas Upaya Kelola Sosial" report relevant to the current social conditions and attach the program Tindakan Efektivitas Upaya Kelola Sosial PT Gunung Melayu 2017". During audit can be demonstrated that the programs directives was relevant to the current social conditions and has consistently discuss the impacts that arise in SIA Report.</p> <p>Lists the time period for the report evaluation "Laporan Identifikasi Efektifitas Upaya Kelola Sosial PT Gunung Melayu 2017" has been included in the report.</p> <p>Lists the name of the assessment team and their competence has been included in the report of "Laporan Identifikasi Efektifitas Upaya Kelola Sosial PT Gunung Melayu 2017".</p>		
<b>Root Cause Analysis:</b>	<p>Company have not included some points for completeness of the SIA report, among others:</p> <ul style="list-style-type: none"> <li>✓ Has not included the program from the SIA report relevant to the current social conditions</li> <li>✓ Has not included the period / time of the social impact assessment conducted</li> <li>✓ Has not included the assessment team and competence</li> </ul>		
<b>Corrective Actions:</b>	Company will conducted the regular review of social impact assessment and the mitigation plan to reduce the negative impact and enhance the positive impact through "Matriks Arahan Program" relevant to current social condition. Latest review has been conducted on 2018 for monitoring period 2016/2017.		
<b>Assessment Conclusion:</b>	Auditor conclude that company has effectively addressed the issue of non conformity and the NC has been CLOSED on 9 June 2018.		

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	During Surveillance audit 4, auditor verified the consistence of corrective action implementation. It was found that the corrective action remain consistence and effectively addressed. The NC remain CLOSED.
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<b>Nonconformity</b>			
<b>NCR Ref #</b>	1621854-201804-M1	<b>Clause &amp; Category (Major / Minor)</b>	RSPO Supply Chain Module E Mass Balance indicator 5.7.2 Major
<b>Date Issued</b>	<b>19 April 2018</b>	<b>Due Date</b>	<b>18 June 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>9 June 2018</b>
<b>Statement of Nonconformity:</b>	Company has removed the RSPO certified volumes sold under other scheme (ISCC) however the number of removed was not inline according to Book Keeping record.		
<b>Requirement Reference:</b>	Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.		
<b>Objective Evidence:</b>	According to Book Keeping record October – December 2017 PT Gunung Melayu – Gunung Melayu II POM there was CPO delivery as ISCC certified as much as 10,315.49 MT in period October – December 2017 and in January – March 2018 CPO delivery as ISCC certified was 6,202.100 MT. However company done "Remove" the CSPO in the RSPO IT Platform was 6,249.26 MT.		
<b>Corrections:</b>	Company has performed additional removal for CPO sold as other sheme certified (ISCC) for the period of October 2017 - Mar 2018 as much as 11,988.31 MT. Record of removal detail can be demonstrated during audit and record in Palm trace. The number of removal for CPO sold as other scheme has been met.		
<b>Root Cause Analysis:</b>	Administrative errors related to Mass Balance data used as a reference to remove stock. Data removed stock was referring to Mass Balance Gunung Melayu II POM period August - December 2017; it should refer to Gunung Melayu II POM Period October 2017 - March 2018.		
<b>Corrective Actions:</b>	Re-examine the units and volumes sold for other certification schemes (ISCC) before the submit button is submitted at RSPO, and remove according to the period and volume sold as another certification scheme (ISCC). Company has performed removal stock of RSPO certified CPO according to actual voume of CPO sold as other sheme certified (ISCC).		
<b>Assessment Conclusion:</b>	Auditor conclude that company has effectively addressed the issue of non conformity and the NC has been CLOSED on 9 June 2018. During Surveillance audit 4, auditor verified the consistence of corrective action implementation. It was found that the corrective action remain consistence and effectively addressed. The NC remain CLOSED.		

<b>Nonconformity</b>			
<b>NCR Ref #</b>	1621854-201804-M2	<b>Clause &amp; Category (Major / Minor)</b>	RSPO Supply Chain Module E Mass Balance indicator 5.13.2

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			Major
<b>Date Issued</b>	<b>19 April 2018</b>	<b>Due Date</b>	<b>18 June 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>9 June 2018</b>
<b>Statement of Nonconformity:</b>	<p>Management review conducted by company was not cover the input/information on:</p> <ul style="list-style-type: none"> <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> </ul>		
<b>Requirement Reference:</b>	<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>		
<b>Objective Evidence:</b>	<p>PT Gunung Melayu has conducted the management review on 27 February 2018; Based on minutes of management review, inputs of information only covered:</p> <ul style="list-style-type: none"> <li>• The result of audits: based on result from internal audit on 18 February 2018;</li> <li>• Customer feedback – no customer complaint;</li> <li>• Review Continual improvement.</li> </ul>		
<b>Corrections:</b>	<p>Company has reconducted the management review of RSPO SCC for CPO mills according to standard agenda. Management review conducted on 19 May 2018 and include the agenda:</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>Minutes of management review can be demonstrated and the agenda has been met with the RSPO SCC standard. Attendant list and result of management review as well as company corrective action and preventive action has well recorded.</p>		
<b>Root Cause Analysis:</b>	<p>Basically, review management has been carried out comprehensively, but the agenda contained in the minutes of management review does not include the agenda set in the standard.</p>		
<b>Corrective Actions:</b>	<p>Conducted the regular management review according to the RSPO SCC standard and record in minutes of management review accordingly.</p>		
<b>Assessment Conclusion:</b>	<p>Auditor conclude that company has effectively addressed the issue of non conformity and the NC has been CLOSED on 9 June 2018.</p> <p>During Surveillance audit 4, auditor verified the consistence of corrective action implementation. It was found that the corrective action remain consistence and effectively addressed. The NC remain CLOSED.</p>		

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<b>Nonconformity</b>			
<b>NCR Ref #</b>	1621854-201804-M3	<b>Clause &amp; Category (Major / Minor)</b>	RSPO Supply Chain Module E Mass Balance indicator 5.13.3 Major
<b>Date Issued</b>	<b>19 April 2018</b>	<b>Due Date</b>	<b>18 June 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>9 June 2018</b>
<b>Statement of Nonconformity:</b>	<p>The output from management review was not include the decision and action related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>		
<b>Requirement Reference:</b>	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>		
<b>Objective Evidence:</b>	<p>PT Gunung Melayu has conducted the management review on 27 February 2018; Based on minutes of management review output from the management review was not include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>		
<b>Corrections:</b>	<p>Company has reconducted the management review of RSPO SCC for CPO mills according to standard agenda. Management review conducted on 19 May 2018 and include the agenda:</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>Minutes of management review can be demonstrated and the agenda has been met with the RSPO SCC standard.</p> <p>Output of management reviw has inline with the agenda or input of management review and has include the decisions and actions related to:</p> <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>Record of management review result can be demonstrated in "Notulen Management Review".</p>		

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<b>Root Cause Analysis:</b>	Basically, review management has been carried out comprehensively, but the agenda contained in the minutes of management review does not include the agenda set in the standard.
<b>Corrective Actions:</b>	Conducted the regular management review according to the RSPO SCC standard and record in minutes of management review accordingly.
<b>Assessment Conclusion:</b>	Auditor conclude that company has effectively addressed the issue of non conformity and the NC has been CLOSED on 9 June 2018. During Surveillance audit 4, auditor verified the consistence of corrective action implementation. It was found that the corrective action remain consistence and effectively addressed. The NC remain CLOSED.

Nonconformity			
<b>NCR Ref #</b>	1621854-201804-N1	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P & C INA I 2016 Indicator 4.8.2 Minor
<b>Date Issued</b>	<b>19 April 2018</b>	<b>Due Date</b>	Next Surveillance
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>13 April 2019</b>
<b>Statement of Nonconformity:</b>	Training record for each employee has not updated by company consistently.		
<b>Requirement Reference:</b>	Records of training for each employee shall be maintained.		
<b>Objective Evidence:</b>	<p>PT Gunung Melayu has prepared the training record for each employee as in document "Personal Data Training – Staff dan Karyawan". However, the training record inaccurate with "Program dan Realisasi Pelatihan tahun 2017". The latest update of "Personal Data Training" in 2013.</p> <p>Data verified of Personal Data Training, e.g:</p> <ul style="list-style-type: none"> <li>• Mr Selamat (upkeep supervisor) - training records: corporate culture (2012), first aid training (2013)</li> <li>• Mr Tumino (spraying supervisor) – training records: corporate culture (2012)</li> <li>• Mr Siden Tarigan (upkeep woker) – training record nill</li> <li>• Gatot Sibuea (estate manager) - the training record has not updated and last updated in 2013.</li> </ul>		
<b>Corrections:</b>	<p>Appointed PIC to update the employee's personal and staff training data and update the record of training records each personel of employee and staff. Company has appointed the PIC who responsible for updating the personal training data for employees and staff on behalf Wagiman based on "Memorandum Nomor: /MG/KBA/Mei/18 dated 30 May 2018. Personal data training has been apdated on May 2018 accordingly, for example:</p> <ul style="list-style-type: none"> <li>- Mr. Selamat Tuah Naibaho, training history: Budaya Perusahaan on 2015, Limited pesticide training on 2016, Basic Fire/First aid and PPGD training on 2017, Core Value training KBA on 2018.</li> <li>- Mr. Tumino, training history: Budaya Perusahaan on 2012, Basic Fire and HCV Training on 2016, First aid and PPGD training on 2017, Core Value training KBA on 2018.</li> </ul> <p>Personal data training has been available in the office.</p>		

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<b>Root Cause Analysis:</b>	There is no person in charge who responsible for updating personal training data for employees and staff.
<b>Corrective Actions:</b>	Coordinate with training centers to get training programs and realization so that they can update personal training data.
<b>Assessment Conclusion:</b>	Auditor conclude that company has effectively addressed the issue of non conformity. The NC status has been CLOSED on 13/04/2019.

Nonconformity			
<b>NCR Ref #</b>	1621854-201804-N2	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P & C INA I 2016 Indicator 4.7.5 Minor
<b>Date Issued</b>	<b>19 April 2018</b>	<b>Due Date</b>	Next Surveillace
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>13 April 2019</b>
<b>Statement of Nonconformity:</b>	First aid kit was available in the working areas provided by PT Gunung Melayu, however the monitoring of medicine and equipment of first aid kit was not consistently performed by company.		
<b>Requirement Reference:</b>	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		
<b>Objective Evidence:</b>	Based on visit in fertilizer store in Sentral Estate (date 18-04-2018), auditor found some of medicines in first aid box was expired. Example: bethadine (ED September 2016), Bioplacenton (ED January 2017)		
<b>Corrections:</b>	Company has checked all the first aid box medicine expiration date. Company has been removed the expired medicine in the first aid box and changing with new medicine. The checking and removal of expired medicine with the new one record in "Berita Acara Penggantian Isi Kotak P3K" dated 30 May 2018 and "Ceklist Pemeriksaan Kotak P3K" dated 30 May 2018.		
<b>Root Cause Analysis:</b>	The officer in charge only checks the availability of medicine and equipment of first aid box and does not check the expiration date of the medicine.		
<b>Corrective Actions:</b>	Monitoring regularly each month the expiration date of medicine in first aid box. Company has conducted the monitoring of medicine expiration date each month and recorded in "Ceklist Pemeriksaan Kotak P3K", lates updated on 30 May 2018.		
<b>Assessment Conclusion:</b>	Auditor conclude that company has effectively addressed the issue of non conformity. The NC status has been CLOSED on 13/04/2019.		

Opportunity for Improvement	
OFI#	Description
OFI 1	

Positive Findings	
PF #	Description
PF 1	Company has made the continual improvement of best management practise both in Mill and Estate.

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**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1128964M1		RSPO P & C, Generic Standard 2013 – Indicator 3.1	18/12/2014	Closed on 20/04/2015
128964M2		RSPO P & C, Generic Standard 2013 – Indicator 4.6.2	18/12/2014	Closed on 20/04/2015
128964M3		RSPO P & C, Generic Standard 2013 – Indicator 4.7.1	18/12/2014	Closed on 20/04/2015
1128964N1	Minor	RSPO P & C, Generic Standard 2013 - Indicator 4.6.7	18/12/2014	Closed on 31/05/2016
1128964N2	Minor	RSPO P & C 2013 - Indicator 2.2.2	18/12/2014	Closed on 31/05/2016
1338573M2	Major	RSPO P & C Generic Standard, 2013 - Indicator 4.7.2	02/06/2016	Closed on 30/07/2016
1338573N3	Minor	RSPO P & C Generic Standard, 2013 - Indicator 2.1.3	02/06/2016	escalated to Major NC Closed on 4/08/2017
1338573N4	Minor	RSPO P & C Generic Standard, 2013 - Indicator 4.7.5	02/06/2016	Closed on 09/06/2017
1338573N2	Minor	RSPO P & C Generic Standard, 2013 - Indicator 4.7.6	02/06/2016	escalated to Major NC Closed on 4/08/2017
1487836-201706-M1	Major	RSPO P & C INA NI 2016 Indicator 2.1.3	12/06/2017	Closed on 4/08/2017
1487836-201706-M2	Major	RSPO P & C INA NI 2016 Indicator 4.7.1	12/06/2017	Closed on 4/08/2017
1487836-201706-M3	Major	RSPO P & C INA NI 2016 Indicator 4.7.6	12/06/2017	Closed on 4/08/2017
1487836-201706-N1	Minor	RSPO P & C INA NI 2016 Indicator 2.2.2	12/06/2017	Closed on 12/04/2018
1487836-201706-N2	Minor	RSPO P & C INA NI 2016 Indicator 5.2.4	12/06/2017	Closed on 12/04/2018
1487836-201706-N3	Minor	RSPO P & C INA NI 2016 Indicator 5.3.3	12/06/2017	OPEN, escalated to Major NC Closed on 09/06/2018
1487836-201706-N4	Minor	RSPO P & C INA NI 2016 Indicator 6.1.4	12/06/2017	OPEN, escalated to Major NC Closed on 09/06/2018
1621854-201804-M1	Major	RSPO Supply Chain Module E Mass Balance indicator 5.7.2	19/04/2018	Closed on 09/06/2018

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1621854-201804-M2	Major	RSPO Supply Chain Module E Mass Balance indicator 5.13.2	19/04/2018	Closed on 09/06/2018
1621854-201804-M3	Major	RSPO Supply Chain Module E Mass Balance indicator 5.13.3	19/04/2018	Closed on 09/06/2018
1621854-201804-N1	Minor	RSPO P & C INA NI 2016 Indicator 4.8.2	19/04/2018	Closed on 13/04/2019
1621854-201804-N2	Minor	RSPO P & C INA NI 2016 Indicator 4.7.5	19/04/2018	Closed on 13/04/2019
1765667-201901-M1	Major	RSPO P & C INA NI 2016 Indicator 1.2.1	13/04/2019	Closed on 19/06/2019
1765667-201901-M2	Major	RSPO P & C INA NI 2016 Indicator 5.3.2	13/04/2019	Closed on 19/06/2019
1765667-201901-M3	Major	RSPO P & C INA NI 2016 Indicator 4.7.2	13/04/2019	Closed on 19/06/2019
1765667-201901-N1	Minor	RSPO P & C INA NI 2016 Indicator 1.1.1	13/04/2019	"Open"
1765667-201901-N2	Minor	RSPO P & C INA NI 2016 Indicator 2.1.2	13/04/2019	"Open"
1765667-201901-N3	Minor	RSPO P & C INA NI 2016 Indicator 5.2.4	13/04/2019	"Open"
1765667-201901-N4	Minor	RSPO P & C INA NI 2016 Indicator 4.7.7	13/04/2019	"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 PT Gunung Melayu – Gunung Melayu II POM Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

**List of Stakeholders Contacted**



<p><b>Internal Stakeholders:</b></p> <p><b>Workers</b> (fertilizing, spraying, mill processing, workshop).</p> <p><b>Komite Gender</b></p> <ul style="list-style-type: none"> <li>- Ketua : Herdelina Hutabarat</li> <li>- Sekretaris : Reni Suryaningsih</li> </ul>	<p><b>Union/Contractors/Local Communities:</b></p> <p><b>1. Serikat Pekerja/worker union</b></p> <ul style="list-style-type: none"> <li>- Ketua : Bahagio</li> <li>- Wakil Ketua : Djunarto</li> </ul> <p><b>2. Local Communities</b></p> <ul style="list-style-type: none"> <li>- Kadus III Batu Anam: Kamanl Manurung</li> <li>- Kadus III Sidomulyo: Sukardi</li> <li>- Tokoh Masyarakat: Hajarudin Panjaitan</li> <li>- Ketua BPD Batu Anam: Panco Manurung</li> </ul>
<p><b>Government Departments:</b></p> <p><b>1. Dinas Tenaga Kerja Kabupaten Asahan</b></p> <ul style="list-style-type: none"> <li>- Sekretaris Disnaker: Bpk. Nurdin</li> </ul> <p><b>2. Kantor Pertanahan Kabupaten Asahan:</b></p> <ul style="list-style-type: none"> <li>- Kasi Infrastruktur: Ir. Menang Karo Karo</li> </ul> <p><b>3. Dinas Pertanian dan Perkebunan Kabupaten Asahan:</b></p> <ul style="list-style-type: none"> <li>- Kasi Produksi Perkebunan: Hasudungan Siregar</li> <li>- Kasi Perbenihan &amp; Perinbun: Rohana marpaung</li> </ul> <p><b>4. Dinas Lingkungan Hidup Kabupaten Asahan:</b></p> <ul style="list-style-type: none"> <li>- Staff LH: Ilham Syahbana ST</li> </ul>	<p><b>NGO:</b></p> <p>Lembaga Swadaya Masyarakat (LSM) Kawal RI: Kiodi Basius Pribadi.</p>

IS #	Description
1	<p><b>Feedbacks:</b></p> <p><b>Dinas Tenaga Kerja Kabupaten Asahan (Manpower Service of Asahan Regency)</b></p> <ul style="list-style-type: none"> <li>- Payment of employee wages by PT Gunung Melayu is in accordance with the UMK (Minimum Payment Regency of Asahan); Payment of overtime wages according to calculations and regulation; LKS Bipartite (workers representative organisation) has been formed and approved by Disnakertrans Asahan; Trade Unions have been formed and ratified;</li> <li>- Collective Labor Agreement (PKB) still refers to PKB period 2015-2017, which is currently being re-drafted by related parties. The 2015-2017 PKB version can still be referenced, pending the approval of the new PKB;</li> <li>- Reporting the performance of Human Resources management to the Supervision Unit Disnakertrans in Labuhan Batu Regency has been reported by PT Gunung Melayu;</li> <li>- P2K3's performance is quite good; The engine test and analysis of Gunung Melayu II POM was carried out by the Supervision Unit Disnakertrans in Labuhan Batu Regency; PT Gunung Melayu has registered BPJS Employee Participants;</li> <li>- The agency said there were no reports/findings/indications of forced labor, child labor and discrimination of workers at PT. Gunung melayu; There are no industrial relations disputes;</li> </ul> <p><b>Management Responses:</b></p> <p>PT Gunung Melayu committed to comply to relevant regulation concerning employment and OSH.</p> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>- The company has implementing the employee wages and other benefit in accordance with applicable employment regulation (UU No. 13 tahun 2003) and local government regulation regarding minimum wages. Regulation of employment has well implemented.</li> </ul>



	- PT Gunung Melayu has implementing the OHS program in accordance with OHS regulation (SMK3).
<b>2</b>	<p><b>Feedbacks:</b>  <b>Dinas Pertanian - Bidang Perkebunan Kabupaten Asahan (Plantation Agency of Asahan Regency)</b></p> <ul style="list-style-type: none"> <li>- PT. Gunung Melayu has complied with all regulatory and statutory requirements;</li> <li>- PT. Gunung Melayu has owned and renewed licenses related to company operations;</li> <li>- PT. Gunung Melayu has reported and filled out questionnaires for plantation data well;</li> <li>- The realization of FFB processing and CPO &amp; PK production is still within limits, according to permit capacity;</li> <li>- The company has obtained HGU; The company paid employees according to the UMK ; The company includes employees for the BPJS employment and health program;</li> <li>- The company provides assistance and CSR to the community around the plantation;</li> <li>- Proactive companies in dealing with pest and disease attacks (Ganoderma);</li> </ul> <p><b>Management Responses:</b>  PT Gunung Melayu committed to comply to relevant regulation concerning Plantation permit and manage the HGU accordingly.  Company has prepared annual CSR program for surrounding community/village.  The company is completing the requirements of the terms provided by the Agriculture and Plantation Office in relation to Plantation Business Assessment (Penilaian Usaha Perkebunan)</p> <p><b>Audit Team Findings:</b>  PT Gunung Melayu has a commitment to comply with relevant regulation and during audit there is no issue regarding regulation compliance and best management practices Agronomy.</p>
<b>3</b>	<p><b>Feedbacks:</b>  <b>Dinas Lingkungan Hidup (DLH) Kabupaten Asahan (Environment Agency of Asahan Regency)</b></p> <ul style="list-style-type: none"> <li>- The company has completed all licensing requirements - to meet compliance with laws and regulations;</li> <li>- The company routinely sends environmental performance reports: Reports on RKL/RPL implementation, Report on Liquid Waste/Land Application Management, Hazardous Waste Management, Report on results of water quality testing, Report on air quality testing, Report on emission of immovable sources;</li> <li>- The Agency Office said there were no reports/findings/indications of environmental pollution by PT. Gunung Melayu;</li> <li>- Regarding the latest regulations on domestic wastewater management, the Asahan Regency Environmental Service is still conducting an evaluation before ensuring enforcement of the rules.</li> </ul> <p><b>Management Responses:</b>  PT Gunung Melayu committed to comply to relevant regulation concerning Environmental accordingly and improving in environmental management and monitoring.</p> <p><b>Audit Team Findings:</b>  PT Gunung Melayu has a commitment to comply with relevant regulation and during audit there is no issue regarding Environmental management and monitoring refer to AMDAL and environmental regulation.</p>
<b>4</b>	<p><b>Feedbacks:</b>  <b>Kantor Pertanahan Nasional (BPN) Kabupaten Asahan</b></p>

	<ul style="list-style-type: none"> <li>- The The company has 10,414,331 Ha of Cultivation Rights / HGUs which expire in 2026. These rights are a transfer from the previous land owner's company, to PT. Mount Malayu;</li> <li>- In the company's HGU land, there is occupancy in the river border. This will be reviewed at the time of filing an extension of the HGU;</li> <li>- The company is required to report if there is a damaged and / or replaced HGU stake;</li> <li>- The Office Agency said there were no reports / findings / indications of land conflicts in PT. Malay Mountain; There are no land disputes with parties around the company;</li> </ul> <p><b>Management Responses:</b>  PT Gunung Melayu has commitment and coordination with BPN Asahan Regency to keep HGU as per certificate and SK HGU. Regarding the occupancy, company will coordinate with BPN and the occupier to fix the land overlapping and to clear the HGU for next extension. Curently company has an agreement with occupier. PT. Gunung Melayu and "Kelompok Tani Tangkisan Mariam (KTTM)" have made the Letter of Agreement dated 1 August 2002 witnessed by local government "Kecamatan Bandar Pulau", "Kepala Desa Batu Anam", "Sekretaris Kecamatan", "Kepala Seksi Pembangunan", "Kepala Seksi Polisi Pamong Praja", "Danton PT AGG".</p> <p><b>Audit Team Findings:</b>  PT. Gunung Melayu and "Kelompok Tani Tangkisan Mariam (KTTM)" have made the Letter of Agreement dated 1 August 2002 witnessed by local government "Kecamatan Bandar Pulau", "Kepala Desa Batu Anam", "Sekretaris Kecamatan", "Kepala Seksi Pembangunan", "Kepala Seksi Polisi Pamong Praja", "Danton PT AGG". In the agreement stated that KTTM can harvest their oil palm crop in their cultivated area with the schedule determined on date 1, 2, 3, 15, 16 and 17 each month. It is stipulated the "Kelompok Tani Tangkisan Mariam (KTTM)" cannot harvest the company's oil palm crop and prohibit to add the new planting in the cultivated area.  These area of 645.5 ha was excluded from certified area.</p>
<p><b>5</b></p>	<p><b>Feedbacks:</b>  <b>Lembaga Swadaya Masyarakat (LSM) Kawal RI</b></p> <ul style="list-style-type: none"> <li>- The organization was founded in 2014 in Sidomulyo Village, as a representative for the Asahan Regency area;</li> <li>- The organization focuses on evaluating social performance for companies in the Asahan Regency area;</li> <li>- The company helps the surrounding community in terms of providing jobs, providing business opportunities, heavy equipment assistance to repair road facilities, assistance to repair educational facilities - religious facilities - public facilities;</li> <li>- The company provided basic needs (Sembako – food) assistance to the community around the plantation;</li> <li>- There was land cultivation by the community, the company tried to prevent and an agreement arose;</li> <li>- There are no reports / findings / indications of violence in the completion of land cultivation;</li> <li>- There are no reports / findings / indications of environmental pollution by the company;</li> <li>- There are no reports / findings / indications of child labor,</li> <li>- The company recruit/hire the workers without discrimination of ethnicity, religion, race, class;</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>- The company has implementing the applicable employment regulation (UU No. 13 tahun 2003) and local government regulation regarding minimum wages.</li> <li>- PT Gunung Melayu has implementing the OHS program in accordance with OHS regulation (SMK3).</li> <li>- Company has prepared annual CSR program for surrounding community/village.</li> </ul>

	<p><b>Audit Team Findings:</b>  PT Gunung Melayu has a commitment to comply with relevant regulation and during audit there is no issue regarding regulation compliance and best management practices Agronomy.  During audit can be shown that company has hire and involving the local workers as a permanent employee, casual workers and pice rate workers.  Company also has a program of CSR and well implemented.</p>
<p><b>6</b></p>	<p><b>Feedbacks:</b>  <b>Warga Desa Batu Anam (Village of Batu Anam), Desa Sidomulyo (Village of Sidomulyo), Desa Gonting Malaha (Village of Gonting Malaha),</b></p> <ul style="list-style-type: none"> <li>- In Batu Anam Village, half of the community is employed as laborers by the Company. The people of Batu Anam Village who work in the company get a salary in accordance with the UMK. The company is also included in the BPJS program. The company provides a package of food/basic needs to the community;</li> <li>- In Sidomulyo Village, around 90% of the community are workers who work in the company, both permanent workers (SKUs) and contract workers (BHL). But now, in general, the number of workers from Sidomulyo Village is reduced. The company helps Sidomulyo Village by providing heavy equipment to repair roads/infrastructure. The company provides a package of nine staple goods / basic needs to the community;</li> <li>- Gonting Malaha village has a good relationship with the company. The company helps Gonting Malaha Village by providing heavy equipment to repair roads/infrastructure, repair educational facilities, repair Islamic and Christian worship facilities. The company helped form a community-based farmer group in Gonting Malaha Village.</li> <li>- Land overlapping with the people of Gonting Malaha Village occurred, but there was an agreement and mutual respect.</li> <li>- Reduction of Casual workers work days, to a maximum of 20 work days - is felt to reduce the income of the residents of Gonting Malaha Village.</li> <li>- There are no reports / findings / indications of environmental pollution by the company;</li> <li>- There are no reports / findings / indications of child labor;</li> <li>- PT. Gunung Melayu has conducted socialization for social, corporate and HCV policies to the surrounding village communities;</li> </ul> <p><b>Management Responses:</b>  PT Gunung Melayu has commitment to hire the local employee based on the company employment needs. Company has promote many employee as permanent employee from Sidomulyo village and other surrounding village. PT Gunung Melayu will keep involving and hire the local employee based on ratio of employee needs and company condition.  Company has prepared annual CSR program for surrounding community/village.</p> <p><b>Audit Team Findings:</b>  During audit can be shown that company has hire and involving the local workers as a permanent employee, casual workers and pice rate workers.</p>
<p><b>7</b></p>	<p><b>Feedbacks:</b>  <b>Gender Committee of PT. Gunung Melayu</b></p> <ul style="list-style-type: none"> <li>- The Member of the Gender Committee at PT. Gunung Melayu received support from management. Facilities and infrastructure for activities have been completed by PT Gunung Melayu;</li> <li>- Gender committees routinely carry out activities, including pregnancy tests, HIV / AIDS counseling, cervical cancer counseling, and anti-drug socialization;</li> </ul>

	<ul style="list-style-type: none"> <li>- There are no reports / findings / indications of sexual harassment;</li> <li>- There are no reports / findings / indications of violations of reproductive rights. The committee secretary acknowledged that having the time to breastfeed a child while working</li> </ul> <p><b>Management Responses:</b>  PT Gunung Melayu has commitment to prevent the sexual harassment and support the Committee gender and provide the facility to performed their work program.</p> <p><b>Audit Team Findings:</b>  There is no sexual harassment issue and committee gender has formed by company and has the work programme implemented.</p>
<p><b>8</b></p>	<p><b>Feedbacks:</b>  <b>Worker Union of PT. Gunung Melayu</b></p> <ul style="list-style-type: none"> <li>- The Companies and trade unions are respect each other's existence;</li> <li>- Communication is going well, Union meetings are held every 4 months;</li> <li>- Discussion on the Collective Labor Agreement is underway, to renew the 2015-2017 Collective Labor Agreement which is still being used;</li> <li>- Discussions on the proportion of casual workers are being held with management;</li> <li>- There are no reports / findings / indications of environmental pollution by the company;</li> <li>- There are no reports / findings / indications of discrimination of workers and / or forced labor and / or the use of underage workers;</li> <li>- Trade unions and management are actively promoting and promoting anti-drug counseling, in collaboration with the police;</li> </ul> <p><b>Management Responses:</b>  PT Gunung Melayu has commitment to comply the labor regulation (UU No. 13 tahun 2003) and give the freedom to workers to have the union and support the trade union to fix the employment issue.</p> <p><b>Audit Team Findings:</b>  Ther is no issue regarding the industrial relation between workers and company. Worker union has run their role as a representative of all workers aspiration. Regular meeting has been performed to discuss the employment issue.</p>

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<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 PT. Gunung Melayu – Gunung Melayu II POM has complied with the 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 PT. Gunung Melayu – Gunung Melayu II POM is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<p><b>Name:</b> Mujinius Jalaraya</p>	<p><b>Name:</b> Putu G.Y.A PUTU SRHYATE YONATA AKSA.</p>
<p><b>Company Name:</b> On behalf BSI Services Malaysia Sdn Bhd</p>	<p><b>Company Name:</b> PT. Gunung Melayu</p>
<p><b>Title:</b> <b>Lead Auditor</b></p>	<p><b>Title:</b> Manager of Sustainability Operations</p>
<p><b>Signature:</b> </p>	<p><b>Signature:</b>  <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p>
<p><b>Date:</b> 12/08/2019</p>	<p><b>Date:</b> 26 '08 '19.</p>

**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.		
<p><b>1.1.1</b></p> <p>List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available.</p> <p>- Minor compliance -</p>	<p>PT. Gunung Melayu prepared list of publicly available document as in "Memorandum Group Manager PT. Gunung Melayu – PT. Saudara Sejati Luhur No.21/GM-GME/Int/03/18 tentang Daftar Dokumen yang Dapat Diakses Stakeholder", dated 29 March 2019. The memorandum listed:</p> <ul style="list-style-type: none"> <li>- "Izin Prinsip" – principal permit,</li> <li>- "Izin Lokasi" – location permit,</li> <li>- "Dokumen Pengelolaan Lingkungan Hidup" – Environmental Management plan,</li> <li>- "Izin Usaha Perkebunan/Surat Persetujuan Usaha Perkebunan" – plantation business permit,</li> <li>- "Pengukuran Kadastral/Surat Ukur" – measurement minutes,</li> <li>- "Risalah Panitia B (sebelum HGU/riwayat perolehan tanah)",</li> <li>- "Surat Keputusan Pemberian HGU" – decree for land title,</li> <li>- "Surat Keputusan Perpanjangan HGU" – decree for land title extension,</li> <li>- "Izin Gangguan/Hinder Ordonantie" – disturbance permit,</li> <li>- "Akta Pendirian Perusahaan" – deed of establishment,</li> <li>- "Pendaftaran Akta Pendirian Perusahaan" – deed of establishment registration,</li> <li>- "Surat Persetujuan Tetap Penanaman Modal Dalam Negeri" – investment permit,</li> <li>- "Izin Usaha Tetap" – business permit,</li> <li>- "Surat Izin Perdagangan (SIUP)" – business permit,</li> <li>- "Tanda Daftar Perusahaan (TDP)" - company registration,</li> </ul>	<p>NC # 1765667- 201901-M1 CLOSED on 19/06/2019 Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> <li>- "Kartu Nomor Pendaftaran Wajib Pajak (NPWP)" – tax registration number,</li> <li>- "Surat Keterangan Terdaftar" – registration code,</li> <li>- "Izin Mendirikan Bangunan" – building permit,</li> <li>- "Sertifikat Keanggotaan BKSPPS" – BKS-PPS membership,</li> <li>- "Pendaftaran Kerjasama Bipartit" – bi-partite organization,</li> <li>- "Perjanjian Kerja Bersama BKS-PPS" – collective work agreement,</li> <li>- "Izin Operasional Klinik" – clinic permit,</li> <li>- "Izin Koperasi" – cooperative permit,</li> <li>- "Izin Bejana Tekan" – pressure vessel permit,</li> <li>- "Izin Penyimpanan dan Distribusi Pestisida" – pesticide storage and distribution permit,</li> <li>- "Izin TPS Limbah B3" – hazardous waste storage permit,</li> <li>- "Izin Instalasi Pengolahan Limbah Cair" - land application permit,</li> <li>- "Izin Pemakaian Pesawat Energi – Motor Diesel Genset" – permit for generator,</li> <li>- "Laporan P2K3 tiap Triwulan" – HSE committee report,</li> <li>- "HCV Assessment",</li> <li>- "Conservation Management Plan",</li> <li>- "Rencana dan Realisasi Program CSR" – CSR plan and implementation,</li> <li>- "Laporan Pelaksanaan Izin Lingkungan (RKL-RPL)" – environmental report,</li> <li>- "Laporan Pengelolaan Area Konservasi" -conservation area management report,</li> <li>- "Laporan Pemantauan Kualitas Udara" – air quality analysis report,</li> <li>- "Laporan Pencegahan Penanganan Kebakaran Lahan/Area" – fire prevention report,</li> <li>- "Laporan Pemantauan Usaha Perkebunan",</li> <li>- "Sertifikat Penilaian Usaha Perkebunan" – plantation assessment certificate.</li> </ul> <p><u>Non conformity:</u></p>	



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	<p>List of publicly available document as in "Memorandum Group Manager PT. Gunung Melayu No.21/GM-GME/Int/03/18 tentang Daftar Dokumen yang Dapat Diakses Stakeholder", dated 29 March 2018 - has not included Pollution prevention and reduction plans (Criterion 5.6), Details of complaints and grievances (Criterion 6.3), Negotiation procedures (Criterion 6.4), Continual improvement plans (Criterion 8.1), Public summary of certification assessment report, Human Rights Policy (Criterion 6.13).</p> <p>PT Gunung Melayu – Gunung Melayu II POM has made correction and corrective action to address the nonconformity, the effectiveness of action taken has been verified by auditor NCR Visit on 19/06/2019 and the nonconformity has been CLOSED, detail of correction and corrective action presented in section 3.4 Details of findings.</p>	
<p><b>1.1.2</b></p> <p>Records of requests for information and responses to the information requested shall be available.</p> <p>- Major compliance -</p>	<p>PT. Gunung Melayu recorded all information request under "Surat Instansi" logbook. The company received 49 written information requests in 2018. All have been responded, accordingly. PT. Gunung Melayu received 20 written information requests in January – March 2019. All information request have been responded, accordingly. Sample taken: "Surat Dinas Ketenagakerjaan Kabupaten Asahan No.0450/III-DKT/II/2019 tentang Pembinaan LKS Bipartit" dated 8 February 2019. The letter received by company on 15 February 2019. As a response, the company's public relation officer and administration officers attended the socialization dated 21 February 2019.</p> <p>"Surat Kecamatan Rahuning No.300/463 tentang Permohonan Penjelasan atas Laporan Masyarakat" dated 1 November 2018. The information request related to explanation upon letter "Surat Ketua DPC LSM LKTR No.003/RH/AS/V/2018 tentang Data Lokasi Galian C" dated 29 May 2018. The said letter asking company's permit to for stone mining in HGU area. Company responded the the letter from "Kecamatan Rahuning" through evidence letter from "Surat Kementerian Energi dan Sumber Daya Mineral – Direktorat Jenderal Mineral dan Batubara No.43/03/DJB/2018 kepada Ketua Umum Gabungan Pengusaha Kelapa Sawit Indonesia", dated 8 January 2018. The letter from Ministry of Energy and Mineral stated the stone mining inside HGU for non-commercial purpose are legal – as per "Undang-undang No.4 tahun 2009 tentang Pertambangan Mineral dan Batubara pasal 105", therefore does not need to obtain "Izin Pertambangan Mineral".</p> <p>"Surat Bupati Asahan No.050/4596 tentang Permintaan Laporan kegiatan Corporate Social Responsibility Tahun 2018" dated 26 November 2018. The letter from Asahan Regent states company required to report their CSR implementation as of 12 December 2018 with given format. Company responded through "Surat</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	Group Manager No.27/GM-GME/Ext/12/2018 tentang Laporan Realisasi Program CSR PT. Gunung Melayu Tahun 2018”, dated 12 December 2018.	
<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><b>1.2.1</b></p>	<p>Publicly available documents shall include, but are not necessarily limited to:</p> <ul style="list-style-type: none"> <li>k) Land titles/user rights (Criterion 2.2)</li> <li>l) Occupational health and safety plans (Criterion 4.7)</li> <li>m) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)</li> <li>n) HCV documentation (Criteria 5.2 and 7.3)</li> <li>o) Pollution prevention and reduction plans (Criterion 5.6)</li> <li>p) Details of complaints and grievances (Criterion 6.3)</li> <li>q) Negotiation procedures (Criterion 6.4)</li> <li>r) Continual improvement plans</li> </ul>	<p>PT. Gunung Melayu prepared list of publicly available document as in “Memorandum Group Manager PT. Gunung Melayu – PT. Saudara Sejati Luhur No.21/GM-GME/Int/03/18 tentang Daftar Dokumen yang Dapat Diakses Stakeholder”, dated 29 March 2018. The memorandum listed:</p> <ul style="list-style-type: none"> <li>- “Izin Prinsip” – principal permit,</li> <li>- “Izin Lokasi” – location permit,</li> <li>- “Dokumen Pengelolaan Lingkungan Hidup” – Environmental Management plan,</li> <li>- “Izin Usaha Perkebunan/Surat Persetujuan Usaha Perkebunan” – plantation business permit,</li> <li>- “Pengukuran Kadastral/Surat Ukur” – measurement minutes,</li> <li>- “Risalah Panitia B (sebelum HGU/riwayat perolehan tanah)”,</li> <li>- “Surat Keputusan Pemberian HGU” – decree for land title,</li> <li>- “Surat Keputusan Perpanjangan HGU” – decree for land title extension,</li> <li>- “Izin Gangguan/Hinder Ordonantie” – disturbance permit,</li> <li>- “Akta Pendirian Perusahaan” – deed of establishment,</li> <li>- “Pendaftaran Akta Pendirian Perusahaan” – deed of establishment registration,</li> <li>- “Surat Persetujuan Tetap Penanaman Modal Dalam Negeri” – investment permit,</li> <li>- “Izin Usaha Tetap” – business permit,</li> <li>- “Surat Izin Perdagangan (SIUP)” – business permit,</li> <li>- “Tanda Daftar Perusahaan (TDP)” - company registration,</li> <li>- “Kartu Nomor Pendaftaran Wajib Pajak (NPWP)” – tax registration number,</li> </ul>

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Criterion / Indicator	Assessment Findings	Compliance
<p>(Criterion 8.1)</p> <p>s) Public summary of certification assessment report</p> <p>t) Human Rights Policy (Criterion 6.13).</p> <p>- Major Compliance -</p>	<ul style="list-style-type: none"> <li>- "Surat Keterangan Terdaftar" – registration code,</li> <li>- "Izin Mendirikan Bangunan" – building permit,</li> <li>- "Sertifikat Keanggotaan BKSPPS" – BKS-PPS membership,</li> <li>- "Pendaftaran Kerjasama Bipartit" – bi-partite organization,</li> <li>- "Perjanjian Kerja Bersama BKS-PPS" – collective work agreement,</li> <li>- "Izin Operasional Klinik" – clinic permit,</li> <li>- "Izin Koperasi" – cooperative permit,</li> <li>- "Izin Bejana Tekan" – pressure vessel permit,</li> <li>- "Izin Penyimpanan dan Distribusi Pestisida" – pesticide storage and distribution permit,</li> <li>- "Izin TPS Limbah B3" – hazardous waste storage permit,</li> <li>- "Izin Instalasi Pengolahan Limbah Cair" - land application permit,</li> <li>- "Izin Pemakaian Pesawat Energi – Motor Diesel Genset" – permit for generator,</li> <li>- "Laporan P2K3 tiap Triwulan" – HSE committee report,</li> <li>- "HCV Assessment",</li> <li>- "Conservation Management Plan",</li> <li>- "Rencana dan Realisasi Program CSR" – CSR plan and implementation,</li> <li>- "Laporan Pelaksanaan Izin Lingkungan (RKL-RPL)" – environmental report,</li> <li>- "Laporan Pengelolaan Area Konservasi" – conservation area management report,</li> <li>- "Laporan Pemantauan Kualitas Udara" – air quality analysis report,</li> <li>- "Laporan Pencegahan Penanganan Kebakaran Lahan/Area" – fire prevention report,</li> <li>- "Laporan Pemantauan Usaha Perkebunan",</li> <li>- "Sertifikat Penilaian Usaha Perkebunan" – plantation assessment certificate.</li> </ul> <p><u>Non conformity:</u></p> <p>List of publicly available document as in "Memorandum Group Manager PT. Gunung Melayu No.21/GM-</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>GME/Int/03/18 tentang Daftar Dokumen yang Dapat Diakses Stakeholder”, dated 29 March 2018 - has not included Pollution prevention and reduction plans (Criterion 5.6), Details of complaints and grievances (Criterion 6.3), Negotiation procedures (Criterion 6.4), Continual improvement plans (Criterion 8.1), Public summary of certification assessment report, Human Rights Policy (Criterion 6.13).</p> <p>PT Gunung Melayu – Gunung Melayu II POM has made correction and corrective action to address the nonconformity, the effectiveness of action taken has been verified by auditor NCR Visit on 19/06/2019 and the nonconformity has been CLOSED, detail of correction and corrective action presented in section 3.4 Details of findings.</p>	
<p><b>Criteria 1.3:</b>            Growers and millers commit to ethical conduct in all business operations and transactions.</p>			
<b>1.3.1</b>	<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>PT. Gunung Melayu adopted the company policy from “Asian Agri” signed by Managing Director on 1 December 2014, available in Bahasa Indonesia. The company policy in Section 16 “berkomitmen berperilaku etis dalam berbisnis pada seluruh transaksi dan operasi bisnis, pelarangan seluruh bentuk korupsi, penyuapan dan penipuan dalam penggunaan dana dan sumber daya” – committed to implement ethica conduct in business for alltransaction and business operation, prohibit all kind of corruption, bribery and fraud in financial or resources utilization.</p> <p>In Gunung Melayu II POM, the policy committing to code of ethical conduct communicated to workers, carried out in 7 January 2019. The communication attended by 39 workers; comprise of 5 office clerks, 7 security, 2 process operators, 8 laboratory workers, 16 mechanics.</p> <p>In Aek Tarum Estate, the policy committing to code of ethical conduct communicated to workers, sampled one carried out in 4 February 2019. The communication attended by 50 workers; comprise of office clerk, security, sprayers, harvesters, upkeep workers.</p> <p>In Sentral Estate, the policy committing to code of ethical conduct communicated to workers, sampled one carried out in 12 February 2019. The communication attended by 51 workers, comprise of 8 sprayers, 7 fertilizer packers, 6 fertilizer applicators, 2 carpenter, 2 mudim, 5 upkeep workers, 11 temporary workers, 7 umum, 3 supervisors; sampled worker (Mrs. Suningsih, Mrs. Rusni M, Mrs. Romendi – sprayers).</p>	Comply
<p><b>Principle 2: Compliance with applicable laws and regulations</b></p>			

Criterion / Indicator	Assessment Findings	Compliance
<p><b>Criterion 2.1:</b>            There is compliance with all applicable local, national and ratified international laws and regulations.</p>		
<p><b>2.1.1</b></p>	<p>Evidence of compliance with relevant legal requirements shall be available.</p> <p>- Major compliance –</p> <p>All legal requirements comply with the regulations and laws, including those related to land status, occupational health and safety, environmental, labour, agricultural practice, and mill operation, such as:</p> <ul style="list-style-type: none"> <li>• “Akta Perseroan Terbatas PT. Gunung Melayu No.26 di hadapan Wakil Notaris Albinus Panggabean”, dated 15 July 1980. Registered in Ministry of Law No.Y.A.5/513/6 dated 3 December 1980.</li> <li>• “Salinan Surat Keputusan Menteri Dalam Negeri No.SK.6/Iz/DJA/1981” dated 7 March 1981. The decree stipulated “Bahwa tanah HGU No.1/Gonting Malaha luas ±10,535.2 Ha terletak di Kecamatan Bandar Pulau, Kabupaten Asahan, Propinsi Sumatera Utara, yang dimohon izin pemindahan hak oleh PT. Gunung Melayu, menurut sertipikat tanggal 16 Maret 1972 HGU No.1/Gonting Malaha, tercatat atas nama PT. Balai Asahan berkedudukan di Medan, dan haknya akan berakhir pada 31 Desember 2001. Bahwa dengan akte jual beli tanggal 6 Januari 1981 No.01/RT/I/81 yang dibuat dihadapan Direktur Pendaftaran Tanah di Jakarta selaku Pejabat Pembuat Akta Tanah Khusus, tanah HGU No.1/Gonting Malaha, luas 10,535.2 Ha terletak di Kecamatan Bandar Pulau, Kabupaten Asahan, Provinsi Sumatera Utara, oleh pemegang haknya telah dijual kepada PT. Gunung Melayu berkedudukan di Medan. Bahwa Gubernur Kepala Daerah Tk.I Sumatera Utara cq. Kepala Direktorat Agraria Propinsi Sumatera Utara dalam suratnya tanggal 10 Desember 1980 No.DA/III/10946-3819/1980 menyatakan tidak keberatan/dapat menyetujui pengalihan hak atas tanah perkebunan Hak Guna Usaha No.1/Gonting Malaha, luas ±10,535.2 Ha terletak di Kecamatan Bandar Pulau, Kabupaten Asahan Propinsi Sumatera Utara, dari PT. Balai Asahan kepada PT. Gunung Melayu, dengan alasan pemohon adalah perusahaan yang bonafide dan sanggup mengelola perkebunan tersebut.”. Governor of Sumatera Utara Province decree “Mengijinkan pemindahan hak keatas nama PT. Gunung Melayu berkedudukan di Medan, Hak Guna Usaha No.1/Gonting Malaha atas tanah perkebunan, luas ±10,535.2 Ha, terletak di Kecamatan Bandar Pulau, Kabupaten Asahan, Propinsi Sumatera Utara.</li> <li>• “Keputusan Gubernur Kepala Daerah Tingkat I Sumatera Utara No.593/27309 tahun 1983 tentang Penetapan Lokasi dan Luas Tanah untuk Keperluan Perkebunan Kelapa Sawit, Pabrik Pengolahan Kelapa Sawit dan Pabrik Minyak Goreng atas nama PT. Gunung Melayu”, dated 10 November 1983.</li> </ul>	<p>Comply</p>

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	<p>The decree stated "Memberikan Izin Penetapan Lokasi dan Luas Tanah untuk keperluan perkebunan kelapa sawit, pabrik pengolahan kelapa sawit dan pabrik minyak goreng dalam rangka penanaman modal dalam negeri kepada PT. Gunung Melayu. Lokasi Desa Gonting Malaha, Kecamatan Bandar Pulau/Buntu Pane, Kabupaten Dati II Asahan. Luas tanah 5,080 Ha.</p> <ul style="list-style-type: none"> <li>• "Surat Badan Koordinasi Penanaman Modal tentang Persetujuan Tetap Penanaman Modal Dalam Negeri No.102/I/PMDN/1983, Nomor Proyek 1110/3115-07-03403 kepada PT. Gunung Melayu", dated 27 June 1983.</li> <li>• "Surat Menteri Pertanian Republik Indonesia No.072/RKL-RPL/BA/III/1996 tentang Persetujuan RKL-RPL PT. Gunung Melayu", dated 19 March 1996. The decree took into consideration "Hasil Rapat Komisi AMDAL Pusat Departemen Pertanian tanggal 18 Agustus 1994, mengenai penilaian dokumen RKL-RPL PT. Gunung Melayu; Hasil penilaian dokumen RKL-RPL yang disempurnakan sebagaimana tercantum dalam surat komisi AMDAL Pusat Departement Pertanian No.057/BA.5/96 tanggal 25 Januari 1996".</li> <li>• "Keputusan Menteri Negara Penggerak Dana Investasi Ketua Badan Koordinasi Penanaman Modal No.405/T/Pertanian/1996 tentang Pemberian Izin Usaha Tetap PT. Gunung Melayu, bidang usaha Perkebunan Kelapa Sawit Terpadu dengan Unit Pengolahannya menjadi Minyak Sawit dan Inti Sawit; Luas Lahan 10,535.2 Ha; Jenis dan kapasitas produksi terpasang setahun CPO 37,800 ton dan kernel 8,500 ton" dated 3 July 1996.</li> <li>• "Departemen Pertanian Direktorat Jenderal Bina Produksi Perkebunan - Surat Pendaftaran Usaha Perkebunan No.Hk.350/434/Dj.Bun.5/VI/2001 untuk PT. Gunung Melayu dengan Nomor dan tanggal SK HGU: No.6/HGU/DA/1971 tanggal 25 Juni 1971; Luas: 10,535.2 Ha; Jenis tanaman: Kelapa Sawit; Unit pengolahan, kapasitas izin: 30 ton/jam; kapasitas terpasang: 30 ton/jam", dated 11 June 2001.</li> <li>• "Surat Keputusan Kepala Badan Pertanahan Nasional No.20/HGU/BPN/2001 tentang Pemberian Perpanjangan Jangka Waktu Hak Guna Usaha Atas Tanah Terletak di Kabupaten Asahan, Propinsi Sumatera Utara", dated 7 August 2001;</li> <li>• "Surat Keputusan Kepala Badan Pertanahan Nasional No.20/HGU/BPN/2001/A/28 tentang Ralat Keputusan Kepala Badan Pertanahan Nasional tanggal 7 Agustus 2001 Nomor 20/HGU/BPN/2001 tentang Pemberian Perpanjangan Jangka Waktu Hak Guna Usaha Atas Tanah Terletak di Kabupaten Asahan, Propinsi Sumatera Utara", dated 19 December 2001. In the decree, stipulated revision upon</li> </ul>	

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		<p>previous decree: "a. Memberikan Perpanjangan Jangka Waktu Hak Guna Usaha No.1/Gonting Malaha selama 25 (dua puluh lima tahun) sejak berakhir haknya tanggal 31 Desember 2001 kepat PT. Gunung Melayu, berkedudukan di Jakarta, atas tanah seluas 10,427.773 Ha (10,891 – 463.227 Ha), terletak di Kecamatan Bandar Pulau dan Kecamatan Buntu Pane, Kabupaten Asahan, Propinsi Sumatera Utara" and "c. Menginstruksikan kepada Kepala Kantor Pertanahan Kabupaten Asahan untuk luas tanah yang langsung dapat didaftarkan seluas 10,414.331 Ha, dan seluas 13.442 Ha menunggu setelah eksekusi Putusan Mahkamah Agung Republik Indonesia tanggal 19 Februari 1983 nomor 726-K/Sib/1978".</p> <ul style="list-style-type: none"> <li>• "Sertifikat Hak Guna Usaha No.1, Desa Gonting Malaha, Kecamatan Bandar Pulau, Kabupaten Asahan, Propinsi Sumatera Utara; berdasarkan Surat Ukur No.01/Gonting Malaha/2004 tanggal 21 April 2004 untuk Luas: 10,414.331 Ha", dated 23 April 2004.</li> <li>• "Tanda Daftar Perusahaan Perseroan Terbatas No.021010100543 untuk PT. Gunung Melayu" dated 6 June 2014 – 5 May 2019.</li> <li>• "Surat Dinas Tenaga Kerja UPT Pengawasan Ketenagakerjaan Wilayah III, No.298-7/DTK-SU/WIL III/2018 tentang Tanda Pendaftaran Wajib Laport Ketenagakerjaan di Perusahaan PT. Gunung Melayu, No. Pendaftaran 349/01262/I/IV-2018 tanggal 9 April 2018", dated 23 April 2018.</li> </ul>	
<p><b>2.1.2</b></p>	<p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <p>- Minor compliance –</p>	<p>There is a documented system registering all relevant legal requirements to which the company must comply, and also there is a document of "Legal Register" edition January 2018 has been established, which includes relevant Environmental regulation, Plantation permit, etc. The list would be reviewed once a year by the EHS Department and all relevant department, updated as necessary.</p> <p>Evaluation of compliance for all regulation and other requirement related to environment, health and safety, manpower and land tenure has been performed (presented in "Evaluation of Compliance").</p> <p>The organization 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). The list would be reviewed once a year by the EHS Department and all relevant departments, updated as necessary, last update on January 2019.</p> <p>The company has "Update List of regulation/pemenuhan peraturan perundang undangan" in January 2019. Sample seen:</p> <p><b>Undang-undang:</b></p>	<p>Comply</p>

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	<p>UU Uap tahun 1930; UU No.5 tahun 1960; UU No.1 tahun 1970; UU No.11 tahun 1974; UU No.9 tahun 1985; UU No.5 tahun 1990; UU No.12 tahun 1992; UU No.24 tahun 1992; UU No.23 tahun 1997; UU No.41 tahun 1999; UU No.18 tahun 2004; UU No.18 tahun 2008; UU No.32 tahun 2009; UU No.13 tahun 2013; UU No.39 tahun 2014;</p> <p><b>Keputusan Presiden:</b>                      Kepres No.32 tahun 1990; Kepres No.35 tahun 1991;</p> <p><b>Peraturan Pemerintah:</b>                      PP Uap tahun 1930; PP No.7 tahun 1973; PP No.11 tahun 1974; PP No.35 tahun 1991; PP No.40 tahun 1996; PP No.47 tahun 1997; PP No.41 tahun 1999; PP No.8 tahun 2001; PP No.4 tahun 2001; PP No.74 tahun 2001; PP No.82 tahun 2001; PP No.43 tahun 2008; PP No.27 tahun 2012; PP No.101 tahun 2014;</p> <p><b>Peraturan Menteri:</b>                      Permen Agraria/Kepala BPN No.2 tahun 1999; Permen Agraria/Kepala BPN No.5 tahun 1999; PermenAgraria/Kepala BPN No.14 tahun 2018;                      Permentan No.98 tahun 2013; Permentan No.11 tahun 2015; Permentan No.5 tahun 2018;                      Permenaker No.1 tahun 1976; Permenaker No.2 tahun 1980; Permenaker No.4 tahun 1980; Permenaker No.1 tahun 1981; Permenaker No.2 tahun 1982; Permenaker No.3 tahun 1982; Permenaker No.5 tahun 1985; Permenaker No.1 tahun 1988; Permenaker No.2 tahun 1989; Permenaker No.2 tahun 1992; Permenaker No.5 tahun 1996; Permenaker No.1 tahun 1998; Permenaker No.14 tahun 2006; Permenaker No.15 tahun 2008; Permenaker No.8 tahun 2010; Permenaker No.12 tahun 2015; Permenaker No.37 tahun 2016; Permenaker No.38 tahun 2016; Permenaker No.5 tahun 2018;                      PermenLH No.28 tahun 2003; PermenLH No.5 tahun 2006; PermenLH No.11 tahun 2006; PermenLH No.7 tahun 2007; PermenLH No.5 tahun 2008; PermenLH No.18 tahun 2009; PermenLHK No.56 tahun 2015; PermenLHK No.68 tahun 2016; PermenLHK No.23 tahun 2018; PermenPU No.49 tahun 1990; Permenkes No.32 tahun 2017;</p> <p><b>Keputusan Menteri:</b>                      Kepmenhutbun No.32 tahun 1990; KepMenhutbun No.376 tahun 1998; Kepmenhutbun No.104 tahun 2000; KepmenLH No.13 tahun 1995; KepmenLH No.51 tahun 1995; KepmenLH No.48 tahun 1996; KepmenLH</p>	



Criterion / Indicator	Assessment Findings	Compliance
	<p>No.50 tahun 1996; KepmenLH No.28 tahun 2003; KepmenLH No.29 tahun 2003; KepmenLH No.112 tahun 2003; KepmenLH No.45 tahun 2005; KepBapedal No.01 tahun 1995; KepBapedal No.02 tahun 1995; KepBapedal No.05 tahun 1995; Kepmenaker No.311 tahun 2002;</p> <p><b>Keputusan Dirjen:</b>  KepDirJenPengawasan Ketenagakerjaan No.45 tahun 2008;</p> <p><u>Non Conformity:</u>  PT. Gunung Melayu have prepared the list of relevant laws and regulation. However, the certificate holder unable to demonstrate a complete and applicable regulation, as identified in the RSPO P&amp;C 2013, Indonesia National Interpretation, September 2016 – appendix 1.  PT. Gunung Melayu have not identified and evaluated these applicable regulations:</p> <ul style="list-style-type: none"> <li>- Undang-undang No.80 tahun 1957 tentang Ratifikasi Konvensi ILO No. 100 tahun 1951 tentang Pengupahan yang sama Bagi Pekerja Laki-laki dan Wanita untuk Pekerjaan yang Sama Nilainya;</li> <li>- Undang-undang No.19 tahun 1999 tentang Ratifikasi ILO Convention No.105 tahun 1957 mengenai Penghapusan Kerja Paksa;</li> <li>- Undang-undang No.20 tahun 1999 tentang Ratifikasi ILO Convention No.138 tahun 1973 tentang Batas Usia Minimum;</li> <li>- Undang-undang No.21 tahun 1999 tentang Ratifikasi ILO Convention No.111 tahun 1968 tentang Diskriminasi Pekerjaan dan Jabatan;</li> <li>- Undang-undang No.29 tahun 1999 tentang Ratifikasi Konvensi Internasional tentang Penghapusan Segala Bentuk Diskriminasi (Convention on the Elimination of All Forms of Racial Discrimination - CERD);</li> <li>- Undang-undang No.11 tahun 2005 tentang Ratifikasi International Covenant on Economic, Social and Cultural Rights;</li> <li>- Undang-undang No.12 tahun 2005 tentang Ratifikasi International Covenant on Civil and Political Rights;</li> </ul>	

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	<ul style="list-style-type: none"> <li>- Undang-undang No.24 tahun 2011 tentang Badan penyelenggara Jaminan Sosial;</li> <li>- Permenaker No.4 tahun 1987 tentang P2K3 serta Tatacara Penunjukan Ahli K3;</li> <li>- Permenaker No.7 tahun 2007 tentang Baku Mutu Emisi Sumber Tidak Bergerak bagi Ketel Uap;</li> <li>- Permenaker No.9 tahun 2010 tentang Operator dan Petugas Pesawat Angkat dan Angkut;</li> <li>- Kepmenaker No.100 tahun 2004 tentang Ketentuan Pelaksanaan Perjanjian Kerja Waktu Tertentu (PKWT);</li> <li>- Permentan No.39 tahun 2015 tentang Pendaftaran Pesticida;</li> </ul> <p>New regulation have not been identified:</p> <ul style="list-style-type: none"> <li>- "Surat Keputusan Gubernur Sumatera Utara No.188.44/1573/KPTS/2018 tentang Upah Minimum Sektoral Kabupaten Asahan Tahun 2019".</li> </ul> <p>Irrelevant regulation identified:</p> <ul style="list-style-type: none"> <li>- "Peraturan Gubernur Riau No.35 tahun 2007 tentang Persyaratan Baku Mutu Air Limbah Pabrik untuk Kegiatan Land Aplikasi Lahan di Provinsi Riau".</li> </ul> <p>PT Gunung Melayu – Gunung Melayu II POM has made correction and corrective action to address the nonconformity, the effectiveness of action taken will be verified by auditor on next surveillance assessment. The Non Conformity status remain OPEN, detail of correction and corrective action presented in section 3.4 Details of findings.</p>	
<p><b>2.1.3</b></p>	<p>A mechanism for ensuring compliance shall be implemented.</p> <ul style="list-style-type: none"> <li>- Minor compliance –</li> </ul>	<p>Comply</p>
<p><b>2.1.4</b></p>	<p>A system for tracking any changes in the law shall be available and implemented.</p> <ul style="list-style-type: none"> <li>- Minor compliance –</li> </ul>	<p>Comply</p>

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		<ul style="list-style-type: none"> <li>- "Peraturan Menteri Lingkungan Hidup dan Kehutanan No.P.106/MenLH/SetJen/KUM.1/12/2018 tentang Perubahan Kedua atas Peraturan Menteri Lingkungan Hidup dan Kehutanan No.P.20/MenLH/SetJen/KUM.1/6/2018 tentang Jenis Satwa dan Tumbuhan yang Dilindungi".</li> <li>- "Peraturan Menteri Pertanian No.5 tahun 2018 tentang Pembukaan dan/atau Pengolahan Lahan Perkebunan Tanpa Membakar".</li> </ul>	
<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.			
<b>2.2.1</b>	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	PT. Gunung Melayu has had the legal ownership of land tenure according to: <ol style="list-style-type: none"> <li>1. Land title as in "Hak Guna Usaha (HGU) No.6/HGU/DA/1971" dated 25 June 1971 (10,535.2 Ha), issued by "Menteri Dalam Negeri cq. Dirjen Agraria" (State Ministry Republic of Indonesia, cq. Director General of Land Authority).</li> <li>2. Renewal of land title as - "Surat Keputusan Kepala Badan Pertanahan Nasional No.20/HGU/BPN/2001 tentang Pemberian Perpanjangan Jangka Waktu Hak Guna Usaha Atas Tanah Terletak di Kabupaten Asahan, Propinsi Sumatera Utara", dated 7 August 2001;</li> <li>3. "Surat Keputusan Kepala Badan Pertanahan Nasional No.20/HGU/BPN/2001/A/28 tentang Ralat Keputusan Kepala Badan Pertanahan Nasional tanggal 7 Agustus 2001 Nomor 20/HGU/BPN/2001 tentang Pemberian Perpanjangan Jangka Waktu Hak Guna Usaha Atas Tanah Terletak di Kabupaten Asahan, Propinsi Sumatera Utara", dated 19 December 2001. In the decree, stipulated revision upon previous decree: "a. Memberikan Perpanjangan Jangka Waktu Hak Guna Usaha No.1/Gonting Malaha selama 25 (dua puluh lima tahun) sejak berakhir haknya tanggal 31 Desember 2001 kepat PT. Gunung Melayu, berkedudukan di Jakarta, atas tanah seluas 10,427.773 Ha (10,891 – 463.227 Ha), terletak di Kecamatan Bandar Pulau dan Kecamatan Buntu Pane, Kabupaten Asahan, Propinsi Sumatera Utara" and "c. Menginstruksikan kepada Kepala Kantor Pertanahan Kabupaten Asahan untuk luas tanah yang langsung dapat didaftarkan seluas 10,414.331 Ha, dan seluas 13.442 Ha menunggu setelah eksekusi Putusan Mahkamah Agung Republik Indonesia tanggal 19 Februari 1983 nomor 726-K/Sib/1978".</li> <li>4. "Sertifikat Hak Guna Usaha No.1, Desa Gonting Malaha berdasarkan Surat Ukur No.01/Gonting Malaha/2004 tanggal 21 April 2004 untuk Luas: 10,414.331 Ha", dated 23 April 2004.</li> </ol>	Comply

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<p><b>2.2.2</b> Legal boundaries are demonstrated clearly and maintained.</p> <p>- Minor compliance -</p>	<p>The company demonstrates to ensure all legal boundaries to be clearly demarcated and maintained in the form of boundary pegs. These pegs are also mapped with the relevant marker number in each estate along with GPS coordinates. The company consistently carries out monitoring of boundary markers regularly and this is recorded twice a year, the last maintenance performed on January 2019.</p> <p>Based on document verification upon "Laporan Pemeriksaan dan Perawatan Patok Batas PT. Gunung Melayu, 10 January 2019"; it can be demonstrated that company have a plan for maintenance/repair of poles. During audit, conducted observation for several HGU poles, e.g:</p> <p>Batu Anam Estate have 31 boundary poles; 9 available and identified on site; another 9 boundary poles planned to be renovated:</p> <ul style="list-style-type: none"> <li>- HGU pole No.37, on block G11i, Division I, bordering Pulau Maria Estate of PT. Saudara Sejati Luhur, coordinate 2°45'29.32" N; 99°33'36.80" E.</li> <li>- HGU pole No.40, on block G11g, Division I, bordering the Batu Anam Village, coordinate 2°45'18.53" N; 99°32'48.73" E.</li> <li>- HGU pole No.41, on block G11g, Division I, bordering the Batu Anam Village, coordinate 2°44'38.42" N; 99°32'50.96" E.</li> <li>- HGU pole No.44, on block H05g, Division I, bordering the Aek Sakur River, coordinate 2°43'52.66" N; 99°32'12.15" E.</li> </ul> <p>Based on document verification upon "Laporan Pemeriksaan dan Perawatan Patok Batas PT. Gunung Melayu, 5 February 2019"; it can be demonstrated that company have a plan for maintenance/repair of poles. During audit, conducted observation for several HGU poles, e.g: Sentral Estate have 19 boundary poles; 10 available and identified on site; another 9 boundary poles planned to be renovated:</p> <ul style="list-style-type: none"> <li>- HGU pole No.58, on block H08b, Division IV, bordering the Gonting Malaha Village, coordinate 2°42'30.01" N; 99°27'05.59" E.</li> <li>- HGU pole No.59, on block H08b, Division IV, bordering the Gonting Malaha village, coordinate 2°42'23.06" N; 99°26'55.25" E.</li> </ul> <p>All in good condition, the pole number are visibly maintained.</p>	<p>Comply</p>

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<p><b>2.2.3</b> 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>Based on interview with surrounding villages, local communities, field visit and verification of company documentation; there is no land dispute between company PT. Gunung Melayu and surrounding community.</p> <p>However there is a land occupation by "Kelompok Tani Tangkisan Mariam (KTTM)" within HGU area which is not planted and sets aside as conservation area by PT. Gunung Melayu. Total area cultivated by "Kelompok Tani Tangkisan Mariam (KTTM)" was 645.5 ha with 317 member of "Kelompok Tani Tangkisan Mariam (KTTM)".</p> <p>PT. Gunung Melayu and "Kelompok Tani Tangkisan Mariam (KTTM)" have made the Letter of Agreement dated 1 August 2002 witnessed by local government "Kecamatan Bandar Pulau", "Kepala Desa Batu Anam", "Sekretaris Kecamatan", "Kepala Seksi Pembangunan", "Kepala Seksi Polisi Pamong Praja", "Danton PT AGG". In the agreement stated that KTTM can harvest their oil palm crop in their cultivated area with the schedule determined on date 1, 2, 3, 15, 16 and 17 each month. It is stipulated the "Kelompok Tani Tangkisan Mariam (KTTM)" cannot harvest the company's oil palm crop and prohibit to add the new planting in the cultivated area.</p> <p>These area of 645.5 ha was excluded from certified area.</p>	<p>Comply</p>
<p><b>2.2.4</b> 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>There is no significant land conflict in PT. Gunung Melayu. Land occupation by Kelompok Tani Tangkisan Mariam (KTTM) since 2002 within HGU PT. Gunung Melayu has been resolved with the agreement of both parties witnessed by the local government presented in the Letter of Agreement dated 1 August 2002 witnessed by local government Kecamatan Bandar Pulau, Kepala Desa Batu Anam, and 4 section heads; in agreement stated that KTTM can harvest their oil palm crop in their cultivated area with the schedule determined on date 1, 2, 3, 15, 16 and 17 each month, but they cant harvest the company oil palm crop and prohibit to add the new planting in the cultivated area.</p>	<p>Comply</p>
<p><b>2.2.5</b> 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</p>	<p>PT. Gunung Melayu and Kelompok Tani Tangkisan Mariam (KTTM) has mapping the area of land occupation. Total area cultivated by KTTM was 645.5 ha with 317 member of KTTM.</p> <p>PT. Gunung Melayu and Kelompok Tani Tangkisan Mariam (KTTM) have made the Letter of Agreement dated 1 August 2002 witnessed by local government Kecamatan Bandar Pulau, Kepala Desa Batu Anam, and 4 section head. KTTM can harvest their oil palm crop in their cultivated area with the schedule</p>	<p>Comply</p>

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	affected parties (including neighboring communities and local government where applicable), shall be available. - Minor compliance –	determined on date 1, 2, 3, 15, 16 and 17 each month, but they cannot harvest the company oil palm crop and prohibit to add the new planting in the cultivated area.	
<b>2.2.6</b>	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and/or planned operations. - Major compliance –	The company has made two-way communication in the settlement of land occupation by Kelompok Tani Tangkisan Mariam (KTTM). The company also prioritizes the principle of in the completion of the land occupation. The Company has entered into an agreement with Kelompok Tani Tangkisan Mariam (KTTM) occupying the HGU area of PT. Gunung Melayu covering 645.5 Ha. Mediation is also conducted with the local government for land occupation settlement and no element of violence committed by the company.	Comply
<b>Criterion 2.3:</b>			
Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
<b>2.3.1</b>	Maps with appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities). - Major compliance -	PT. Gunung Melayu does not compensated land from previous land owners. The company was acquired the land and shift the land title from PT. Balai Asahan. Details of legality as per document - "Salinan Surat Keputusan Menteri Dalam Negeri No.SK.6/Iz/DJA/1981" dated 7 March 1981. The decree stipulated "Bahwa tanah HGU No.1/Gonting Malaha luas ±10,535.2 Ha terletak di Kecamatan Bandar Pulau, Kabupaten Asahan, Propinsi Sumatera Utara, yang dimohon izin pemindahan hak oleh PT. Gunung Melayu, menurut sertipikat tanggal 16 Maret 1972 HGU No.1/Gonting Malaha, tercatat atas nama PT. Balai Asahan berkedudukan di Medan, dan haknya akan berakhir pada 31 Desember 2001. Bahwa dengan akte jual beli tanggal 6 Januari 1981 No.01/RT/I/81 yang dibuat dihadapan Direktur Pendaftaran Tanah di Jakarta selaku Pejabat Pembuat Akta Tanah Khusus, tanah HGU No.1/Gonting Malaha, luas 10,535.2 Ha terletak di Kecamatan Bandar Pulau, Kabupaten Asahan, Provinsi Sumatera Utara, oleh pemegang haknya telah dijual kepada PT. Gunung Melayu berkedudukan di Medan. Bahwa Gubernur Kepala Daerah Tk.I Sumatera Utara cq. Kepala Direktorat Agraria Propinsi Sumatera Utara dalam suratnya tanggal 10 Desember 1980 No.DA/III/10946-3819/1980 menyatakan tidak keberatan/dapat menyetujui pengalihan hak atas tanah	Comply

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	<p>perkebunan Hak Guna Usaha No.1/Gonting Malaha, luas ±10,535.2 Ha terletak di Kecamatan Bandar Pulau, Kabupaten Asahan Propinsi Sumatera Utara, dari PT. Balai Asahan kepada PT. Gunung Melayu, dengan alasan pemohon adalah perusahaan yang bonafide dan sanggup mengelola perkebunan tersebut". Governor of Sumatera Utara Province decree "Mengijinkan pemindahan hak keatas nama PT. Gunung Melayu berkedudukan di Medan, Hak Guna Usaha No.1/Gonting Malaha atas tanah perkebunan, luas ±10,535.2 Ha, terletak di Kecamatan Bandar Pulau, Kabupaten Asahan, Propinsi Sumatera Utara".</p> <p>However there is a land occupation by "Kelompok Tani Tangkisan Mariam (KTTM)" within HGU area which is not planted and sets aside as conservation area by PT. Gunung Melayu. Total area cultivated by "Kelompok Tani Tangkisan Mariam (KTTM)" was 645.5 ha with 317 member of "Kelompok Tani Tangkisan Mariam (KTTM)".</p> <p>PT. Gunung Melayu and "Kelompok Tani Tangkisan Mariam (KTTM)" have made the Letter of Agreement dated 1 August 2002 witnessed by local government "Kecamatan Bandar Pulau", "Kepala Desa Batu Anam", "Sekretaris Kecamatan", "Kepala Seksi Pembangunan", "Kepala Seksi Polisi Pamong Praja", "Danton PT AGG". In the agreement stated that KTTM can harvest their oil palm crop in their cultivated area with the schedule determined on date 1, 2, 3, 15, 16 and 17 each month. It is stipulated the "Kelompok Tani Tangkisan Mariam (KTTM)" cannot harvest the company's oil palm crop and prohibit to add the new planting in the cultivated area.</p> <p>These area of 645.5 ha was excluded from certified area.</p> <p>PT. Gunung Melayu – Aek Tarum Estate have prepared a map identifying area occupied by communities. The map identifies 721 Ha area was occuppies by 128 individuals. Sample sighted: Mr. Untung (from Simpang Empat) occupied 4 Ha in block B09k; Mr. Lamudin (from Bandar Pulau) occupied 5 Ha in block A12a.</p>	
<p><b>2.3.2</b></p>	<p>Copies of negotiated agreements including the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and these include:</p> <p>Based on documents review and interview with local government Gonting Malaha and Sidomulyo Village as well as Land office of Asahan Regency and local communities surrounding the company, it was noted that there is no any customary land or legal rights within the company areas.</p> <p>As explained above: PT. Gunung Melayu does not compensated land from previous land owners. The company was acquired the land and shift the land title from PT. Balai Asahan. Details of legality as per document "Salinan Surat Keputusan Menteri Dalam Negeri No.SK.6/Iz/DJA/1981" dated 7 March 1981.</p>	<p>Comply</p>

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	a) Evidence of consultation b) Statement of transfer of rights c) Evidence of compensation See specific guidance 2.3.2 - Minor compliance -		
<b>2.3.3</b>	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 Desa Gonting Malaha and Desa Sidomulyo, Land office of Kabupaten Asahan and local communities surrounding the company, it was noted that there is no any customary land or legal rights within the company areas.  Company has provided all information related to all information/document accessible for public, as per RSPO P&C indicator 1.2.1, including environment evaluation document "Studi Evaluasi Lingkungan". The document explains in detail the presence of occupied land inside the HGU area of PT. Gunung Melayu.	Comply
<b>2.3.4</b>	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:**

There is an implemented management plan that aims to achieve long-term economic and financial viability.



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3.1.1	<p>A documented management plan, a minimum of three years shall be available, including, where appropriate, plan for scheme smallholders.</p> <p>- Major compliance-</p>	<p>The company has shown the management plan that aims to achieve long-term economic and financial viability as per document "Proyeksi Budget Produksi 5 tahun Kedepan (2018-2023), Kebun Batu Anam, Kebun Aek Tarum &amp; Kebun Sentral", the document consist of:</p> <ul style="list-style-type: none"> <li>- FFB projection 2018-2023 (Ton/Ha)</li> <li>- Estate Cost Estimation: Upkeep cost, fertilizing cost, pest and disease management cost, pruning cost, census cost, terrace maintenance cost, road and bridge maintenance cost, harvesting cost.</li> <li>- Nett Profit/Loss</li> </ul>	Comply																								
3.1.2	<p>An annual replanting program projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.</p> <p>- Minor compliance-</p>	<p>ASA-4 2019 - There was no any change information related to annual replanting program projected from last visit assessment.</p> <p>No replanting program in the near future. All areas have been replanted in 2003 – 2011.</p> <p>Based on document review and field visit, the planting year of Batu Anam Estate, PT. Gunung Melayu was 2003 up to 2011. The nearest replanting would be year 2028. Below are the planted year of Batu Anam Estate:</p> <table border="1"> <thead> <tr> <th>Planting year</th> <th>Hectarage (ha)</th> </tr> </thead> <tbody> <tr><td>2003</td><td>191</td></tr> <tr><td>2004</td><td>326</td></tr> <tr><td>2005</td><td>424</td></tr> <tr><td>2007</td><td>502</td></tr> <tr><td>2008</td><td>620</td></tr> <tr><td>2009</td><td>221</td></tr> <tr><td>2010</td><td>299</td></tr> <tr><td>2011</td><td>577</td></tr> <tr> <td><b>Total</b></td> <td><b>3,160</b></td> </tr> </tbody> </table> <p>In Aek Tarum Estate, the nearest replanting will be performed on 2034, planting year 2009 – 2015. Below are the planted year of Aek Tarum Estate:</p> <table border="1"> <thead> <tr> <th>Planting year</th> <th>Hectarage (ha)</th> </tr> </thead> <tbody> <tr><td>2009</td><td>555</td></tr> </tbody> </table>	Planting year	Hectarage (ha)	2003	191	2004	326	2005	424	2007	502	2008	620	2009	221	2010	299	2011	577	<b>Total</b>	<b>3,160</b>	Planting year	Hectarage (ha)	2009	555	Comply
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		2010	620	
		2011	463	
		2012	622	
		2015	53	
		<b>Total</b>	<b>2,313</b>	
		In Central Estate, the nearest replanting will be performed on 2033, planting year 2008 – 2015. Below are the planted year of Aek Tarum Estate:		
		<b>Planting year</b>	<b>Hectarage (ha)</b>	
		2008	1,039	
		2009	321	
		2010	615	
		2011	361	
		2012	248	
		2015	323	
		<b>Total</b>	<b>2,907</b>	
<b>Principle 4: Use of appropriate best practices by growers and millers</b>				
<b>Criterion 4.1:</b>				
Operating procedures are appropriately documented, consistently implemented and monitored.				
<b>4.1.1</b>	Standard Operating Procedures (SOPs) for estates (land clearing to harvesting) and SOP for mills (reception of FFB to dispatch of CPO and PKO) shall be available. - Major compliance -	The company has procedures for estate beginning from land preparation up to replanting, such as: 1. SOP AA-APM-OP-1100.01-R4 dated 5/09/2016 Nursery; 2. SOP AA-APM-OP-1100.02-R3 10/06/2015 New Planting; 3. SOP AA-APM-OP-1100.03-R2 24/07/2015 Road and Bridge Construction and Maintenance explains road and bridge construction and maintenance; 4. SOP AA-APM-OP-1100.04-R3 07/12/2015 Drainage Construction and Maintenance explains culvert/drainage construction and maintenance; 5. SOP AA-APM-OP-1100.05-R3 23/11/2016 Soil & Water Conservation;		Comply

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	<p>6. SOP AA-APM-OP-1100.06-R5 16/02/2017 Planting cover crops;</p> <p>7. SOP AA-APM-OP-1100.07-R6 16/02/2017, Oil Palm Planting;</p> <p>8. SOP AA-APM-OP-1100.08-R6 11/05/2016 Weed control;</p> <p>9. SOP AA-APM-OP-1100.09. R6 12/06/2017 Fertilizer application;</p> <p>10. SOP AA-APM-OP-1100.10. R6 23/11/2016 Pests and Disease Control;</p> <p>11. SOP AA-APM-OP-1100.11. R1 01/02/2009 Pesticide handling and Management;</p> <p>12. SOP AA-APM-OP-1100.12. R3 23/11/2016 Castration explain 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 Pruning;</p> <p>14. SOP AA-APM-OP-1100.14. R3 16/02/2017 Census and Palm identification;</p> <p>15. SOP AA-APM-OP-1100.15. R2 01/10/2010 Production census;</p> <p>16. SOP AA-APM-OP-1100.16. R1 01/02/2009 Consolidation, Provision of support to fallen palm;</p> <p>17. SOP AA-APM-OP-1100.17. R1 23/10/2014 Water management;</p> <p>18. SOP AA-APM-OP-1100.18. R3 20/04/2015 Harvesting;</p> <p>19. SOP AA-APM-OP-1100.19. R1 01/02/2009 FFB Transport;</p> <p>20. SOP AA-APM-OP-1100.20-R6 16/02/2017 Replanting;</p> <p>Gunung Melayu II POM has established a procedure to process the FFB to become CPO and PK begins from reception of FFB to dispatch of CPO and PKO:</p> <ol style="list-style-type: none"> <li>1. SOP AA-MPM-OP-1400.02.R2 FFB receiving station;</li> <li>2. SOP AA-MPM-OP-1400.03.R1 Sterilizer station;</li> <li>3. SOP AA-MPM-OP-1400.04.R1 Thresher station and loose fruit separation;</li> <li>4. SOP AA-MPM-OP-1400.05-R1 Pressing station;</li> <li>5. SOP AA-MPM-OP-1400.06-R1 Clarification station;</li> <li>6. SOP AA-MPM-OP-1400.07-R1 Nut and fiber separation;</li> </ol>	

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	<p>7. SOP AA-MPM-OP-1400.08-R1 Kernel station;</p> <p>8. SOP AA-MPM-OP-1400.09-R1 Boiler station;</p> <p>9. SOP AA-MPM-OP-1400.10-R1 Engine room station;</p> <p>10. SOP AA-MPM-OP-1400.11-R1 Water treatment station;</p> <p>11. SOP AA-MPM-OP-1400.12-R1 Laboratorium;</p> <p>12. SOP AA-MPM-OP-1400.13-R1 Palm oil mill effluent treatment;</p> <p>13. SOP AA-MPM-OP-1400.14-R2 CPO and kernel bulking and despatch operation;</p> <p>14. SOP AA-MPM-OP-1400.15-R1 Preventive maintenance;</p> <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>	
<p><b>4.1.2</b></p>	<p>Checking or monitoring of operations procedures is conducted at least once a year.</p> <p>- Minor compliance -</p> <p>To checking and monitoring of operations procedures, PT Gunung Melayu has conducted internal audit and visit both in estate and mill:</p> <ul style="list-style-type: none"> <li>- PT Gunung Melayu follows procedure for internal audit under Standard Operating Procedures AA-SOP-ES-6001-R3 10/06/2015. The procedure stated internal audit performed 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 internal audit has been performed once a year as per procedure. The latest RSPO internal audit was done in 23 February – 5 March 2019 for PT Gunung Melayu. Audit result findings can be demonstrated and the corrective action has been implemented to addressed issue found during audit.</li> <li>- R&amp;D Agronomic Visit Report, conducted once a year to check and monitoring the implementation of Agronomy best management practices particularly for pest and disease control and plant upkeep. Latest visit performed in Batu Anam Estate on 7 – 9 May 2018 by Abdul Azis, in Aek Tarum Estate on 30 – 31 January 2019 by Eny Fitri Rambe, in Sentral Estate on 2 – 4 April 2018 by Era Wahyudi. During visit found some issue such as in Batu Anam Estate the fertilizer warehouse floor was not good (very humid) consist of previous unpicked fertilizer layer (not use the terpal base), management has taken action by using the terpal layer base; issue in Aek Tarum Estate EFB application were not properly apply, only</li> </ul>	<p>Comply</p>

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	<p>20% applied and has not been systematic block by block, management estate has taken action by apply the EFB as per program and block by block.</p> <ul style="list-style-type: none"> <li>- R&amp;D Pest and Disease Visit Report, conducted once a year to check and monitoring the implementation of integrated pest management and pest and disease monitoring. Latest visit performed in Sentral Estate on 18 - 19 February 2019 by Albertus Prasetyadi. During visit found some issue such as: found 1 oil palm attacked by Ganoderma in block H08k Sentral Estate. Census Ganoderma has been done by company and control according to SOP AA-APM-OP-1100.10-R5. There is no other critical issue found in Sentral Estate during field visit, the pest and disease was under control.</li> <li>- Visiting Agent conducted once a year to check and monitoring the implementation of general Agronomy best management practices. Last visit performed in Batu Anam Estate on 23 – 27 July 2018 by Sinnaiha G. and in Aek Tarum Estate on 17 – 20 October 2018 by Liew Ah Cai During visit found some issue: <ul style="list-style-type: none"> <li>✓ Significant mg deficiency was seen in several blocks on the hilly section. Estate management has taken action by immediately liaise with R&amp;D department to study and rectify the nutrient deficiency and apply the additional fertilizer of Kieserite (Mg) and dolomite.</li> <li>✓ Verification done on ganoderma census was incomplete as only palms identified as infected were being verified while the accuracy of census on other palms were not checked. Estate management taken action by take a sample size of 5% of the block and check every palm for accuracy of the census, the manager has spot check on the accuracy of census and on the assistants verification regularly.</li> <li>✓ In sandy ravines, base of significant number of palms along drain edges were found eroded and some were on verge of toppling, estate management has taken action by immediately identify the eroded palms and speed up consolidating the base with sand bags; assistant will regularly inspect the drains for erosion and palms along the drains .</li> </ul> </li> <li>- Visiting Agent in Sentral Estate performed in 14 – 18 May 2018 by Sinnaiha G. During visit found some issue such as: In significant block over spraying of harvester path was seen, this was partly duw to sprayers crisscrossing between palms while spraying circles; estate management has taken action by skip spraying one round of harvesters path and maintain sift grasses and strengthen the supervision in the field. All finding from VA has been followed up by organization by corrective action plan, target and time frame to address the issue has been determined and implemented well.</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. Latest VE performed on 7 – 12 January 2019 by Sahat M. Sibuea from Head Office. There were some issues raised such as: Boiler ash in the burning room were not disposed regularly causing ash deposit and pipe dirt, mill management has taken action by regularly clean the boiler ash after shift end each day; Vibrating screen in sterilizer water condensate were sumbat and screen kendor, mill management has taken action by regular cleaning the vibrating screen and replace the new vibrating screen with regular check. Document of Action plan VE visit were available and can be demonstrated.</li> <li>- QC inspection performed minimum once a month by QC Departement from Head Office to monitor and check the mill operation including the quality of process and product. Latest QC inspection conducted on 1 – 4 March 2019 by Novan. There were some issue found during QC inspection mainly oil loses, Mill management has taken action to minimize the oil loses.</li> </ul> <p>Based on verification of document internal audit and visit above as well as the company correction and corrective action to the audit result indicated that the organization has well implemented of checking and monitoring of operations procedures.</p>	
<p><b>4.1.3</b></p> <p>Records of monitoring and any follow-up actions shall be available.</p> <p>- Minor compliance -</p>	<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 in 23 February– 5 March 2019. Audit result findings can be demonstrated and and the corrective action has been implemented to addressed issue found during audit.</li> <li>- R&amp;D Agronomic Visit Report Batu anam Estate No. KBA/R&amp;D-AGRO/01-18 dated 07 - 09 May 2018 by Abdul Azis. All issue found during visit has been addressed by company as explained in indicator 4.1.2 above.</li> <li>- R&amp;D Agronomic Visit Report Aek Tarum Estate No. KAT/R&amp;D-AGRO/01-19 dated 30 - 31 January 2019 by Eny Fitri Rambe. All issue found during visit has been addressed by company as explained in indicator 4.1.2 above.</li> <li>- R&amp;D Agronomic Visit Report Sentral Estate No. KSN/R&amp;D-AGRO/01-18 dated 2 - 4 April 2018 by Era Wahyudi. All issue found during visit has been addressed by company as explained in indicator 4.1.2 above.</li> </ul>	<p>Comply</p>

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	<ul style="list-style-type: none"> <li>- R&amp;D Pest and Disease Visit Report Sentral Estate No. KSN/R&amp;D-P&amp;D/01-2019 dated 18 - 19 February 2019 by Albertus Prasetyadi. All issue found during visit has been addressed by company as explained in indicator 4.1.2 above.</li> <li>- Visiting Agent Report Kebun Batu Anam No. KBA-VA-FULL 01-18, dated 23 – 27 July 2018 by Sinnaiha G. All issue found during visit has been addressed by company as explained in indicator 4.1.2 above.</li> <li>- Visiting Agent Report Kebun Sentral No. KSN-VA-FULL 01-18, dated 14 – 17 May 2018 by Sinnaiha G. All issue found during visit has been addressed by company as explained in indicator 4.1.2 above.</li> <li>- Production Performance report, explained the FFB production performance and evaluation as well as determined production target for next year. Evaluation FFB production each block to date March 2019 can be demonstrated in "Laporan Unit Kebun Batu Anam, Kebun Aek Tarum dan Kebun Sentral Maret 2019"</li> <li>- Asian Agri Connected Plantation Application Record, contain the information result of check and monitoring of harvesting and FFB quality, FFB harvest estimation, block and quality inspection, FFB harvesting quantity, pest and disease cencus.</li> <li>- Daily Report Gunung Melayu II POM, 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 addressed some issue has been develop by Gunung Melayu II POM.</li> <li>- Engineer Visit report (Mr. Sahat m. Sibuea) dated 7 – 12 January 2019 No. PGD-VE-FULL 01-19. There were some issues and mill management has taken action as explain above.</li> </ul>	
<p><b>4.1.4</b></p>	<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) PT Gunung Melayu – Gunung Melayu II POM and resume in document Mill Summary Operation. The FFB from third party coming from collectors, cooperative farmers association and outgrower. PT Gunung Melayu II has list of third party supplier who cooperated with Gunung Melayu II Palm Oil Mill, there are 40 list of outside FFB supplier however in year 2018/2019 only 4 outside FFB supplier were supplied FFB to Gunung Melayu II POM as follow:</p> <ul style="list-style-type: none"> <li>a. Nagali</li> </ul>	<p>Comply</p>

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	<p>b. Sinar Bakti  c. PT Sawit Trading Sejahtera 2  d. SG2  e. KTSL2</p> <p>Gunung Melayu also received the FFB supplied from CSV (independent smallholder) consist of:</p> <p>f. CSV PT STS (S) 2  g. CSV PT STS (KT) 2  h. CSV KT Sejahtera  i. CSV KT Berkat Tani Jaya  j. CSV KT Jaya Tani  k. CSV KT Sejahtera Sidomulyo  l. CSV KT Berumbung A Makmur  m. CSV STS (L)  n. CSV STS (A)</p> <p>Gunung Melayu II POM also received the FFB supplied from TKD (Tanah Kas Desa – Desa Batu Anam).  Based on document "Laporan Harian Pabrik" dated 31 December 2018, FFB received from own and third-party since January – December 2018, are as follows:</p> <ul style="list-style-type: none"> <li>- Own estate: 56,438,751 kg</li> <li>- Third party: 91,024,251 kg (Outside: 63,802,473 kg + CSV: 26,638,258 kg + 583,520 kg)</li> <li>- Total: 258,842,445 kg</li> </ul> <p>PT. Gunung Melayu – Gunung Melayu II POM shows SOP to communicate and evaluate the source of third party FFB (non-certified). SOP Pengawasan Sumber Pembelian TBS Luar AA-MM-506.2-R0, dated 1<sup>st</sup> January 2014. The procedure for monitoring and evaluation of source of FFB. Purpose to ensure third party FFB sourced from non-forest area, completed with legal use of the land. The procedure: check supporting document from supplier (delivery order, Surat pernyataan, plantation block maps); compare the plantation</p>	



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		<p>location map/coordinate against the legal documents; team will compare the plantation location map against the RTRWP; conduct field verification to the source of FFB (oil palm plantation belong to farmer), randomly selected; team prepares database, listing the complying suppliers. Supply of FFB from area which legally contested or coming from protected forest, plantation forest, conservation area – will be rejected.</p> <p>SOP Traceability – FFB Purchase AA-SOP-MM-506.3-R0, dated 1<sup>st</sup> January 2015. The procedure stated all supplier shall fulfill legal requirement, not limited to: legal ownership/legal use of the land, hectarage, planting year, production, type of soil, type of seedling, distance from palm oil mill, etc. All supplier shall completed with coordinate points, listed in weighbridge system. While grading and sortation follows SOP for FFB receiving.</p> <p>Verification process up to audit: UD Sahabat, Desa Asam Jawa, Kec. Torgamba, Bilah Hilir, verified on 15<sup>th</sup> July 2017, covering area plantation 2,000 Ha. The verification database completed with name of land owner, planting year, hectare per plantation block and GPS coordinates. “Pernyataan dan Jaminan”, stated the guarantee from the supplier that the FFB is coming from their own property, the plantation does not falls under protected forest, plantation forest, production forest, conservation area status; not a stolen FFB; FFB not coming from new plantation and converted from forest after September 2014; FFB not coming from new plantation, or plantation converted from peat area after September 2014 – signed on 15<sup>th</sup> July 2017.</p>	
<p><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.</p>			
<b>4.2.1</b>	<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 when fertilizer is applied.</p> <p>To maintain soil fertility by placing palm frond above ground level (L shape) and empty bunch application.</p>	Comply
<b>4.2.2</b>	<p>Records of fertilizer inputs shall be available.</p> <p>- Minor compliance -</p>	<p>The company has develop fertilizer recommendations each year and recorded in Recommendation Fertilization Batu Anam Estate, Aek tarum Estate and Sentral Estate 2019. Fertilizer realization in 2018 had completed 100% as recommendation both in Batu Anam, Aek Tarum and Sentral Estate.</p>	Comply

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	MOP (dosage 0,5 – 1.25 kg/ palm tree)	18,620	18,430	99.98																										
	Kieserite (dosage 1.00 – 1.50 kg/ palm tree)	367,600	367,617	100																										
	Dolomite (dosage 1,00 – 2.50 kg/ palm tree)	291,835	290,856	99.66																										
	HGFB (dosage 0,10 kg/ palm tree)	52,162	52,084	99.85																										
	CuSO4 (dosage 0,10 - 0.15 kg/ palm tree)	7,250	7,249	99.99																										
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		NPK 12.12.17.2 (dosage 1.5 – 2.0 kg/palm tree/rotation)	63,191	62,575	99																																	
		ZA (dosage 0.5 – 2.11 kg/ palm tree/rotation)	30,465	30,157	99																																	
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<b>4.2.3</b>	Records of periodical leaf, soil and visual analysis shall be available. - Minor compliance -	<p>PT Gunung Melayu provides soil fertility test/soil type analysis based on Research and Development Asian Agri Group dated 25/10/2018. The soil type/classification result of Batu Anam Estate consist of 5 soil profil as below:</p> <ul style="list-style-type: none"> <li>- Sample 1 Block F05c/2005, topography: hilly &gt; 30%, humidity regime: udik, Temperature regime: isohi[ertermik, drainage class: good, effective solum depth: &gt;120 cm, ground water depth: &gt;120 cm, epidedon: okrik, horizon: oksik, soil classification: typic hapludox, acid, isohipertermik.</li> <li>- Sample 2: Block F08f/2008, topography: 0 – 8 %, humidity regime: udik, Temperature regime: isohipertermik, drainage class: bad, effective solum depth: &gt;120 cm, ground water depth: &gt;120 cm, epidedon: okrik, horizon: argilik, soil classification: Typic hapludults, acid, isohipertermik.</li> </ul>				Comply																																

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	<ul style="list-style-type: none"> <li>- Sample 3: Block G03b/2003, topography: 0 – 8 %, humidity regime: udik, Temperature regime: isohipertermik, drainage class: good - middle, effective solum depth: &gt;120 cm, ground water depth: &gt;120 cm, epidedon: okrik, horizon: argilik, soil classification: Typic hapludults, netral, isohipertermik.</li> <li>- Sample 4: Block H08v/2008, topography: 0 – 8 %, humidity regime: udik, Temperature regime: isohipertermik, drainage class: middle - bad, effective solum depth: &gt;120 cm, ground water depth: &gt;120 cm, epidedon: okrik, horizon: argilik, soil classification: Typic hapludults, acid, isohipertermik.</li> <li>- Sample 5: Block E04d/2004, topography: 0 – 8 %, humidity regime: udik, Temperature regime: isohipertermik, drainage class: bad, effective solum depth: &gt;120 cm, ground water depth: &gt;120 cm, epidedon: okrik, horizon: kambik, soil classification: Typic endoaquepts, acid, isohipertermik.</li> </ul> <p>Soil type/classification result of Aek Tarum Estate consist of 5 soil profil as below:</p> <ul style="list-style-type: none"> <li>- Sample 1 Block B09l/2009, topography: Flat 0 - 8%, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: &gt;120 cm, ground water depth: &gt;120 cm, epidedon: okrik, horizon: kambik, soil classification: Typic endoaquepts, sandy, acid, isohipertermik.</li> <li>- Sample 2 Block B11b/2011, topography: Hilly &gt;30%, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good - midle, effective solum depth: &gt;120 cm, ground water depth: &gt;120 cm, epidedon: okrik, horizon: argilik, soil classification: Typic hapludults, acid, isohipertermik.</li> <li>- Sample 3 Block A11g/2011, topography: Flat 0 - 8%, humidity regime: udic, Temperature regime: isohipertermik, drainage class: bad, effective solum depth: &gt;120 cm, ground water depth: &gt;120 cm, epidedon: okrik, horizon: argilik, soil classification: Typic hapludults, acid, isohipertermik.</li> <li>- Sample 4 Block D11e/2011, topography: Flat Hilly &gt;15%, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: &gt;120 cm, ground water depth: &gt;120 cm, epidedon: okrik, horizon: argilik, soil classification: Typic hapludults, acid, isohipertermik.</li> </ul> <p>Soil type/classification result of Sentral Estate was based on Research and Development Asian Agri Group dated back 2012. The soil type/classification consist of Arenic hapludults, Typic hapludults, Typic endoaquepts.</p> <p>Soil Analysis report by laboratory Research and Development PT Nusa Kencana Analytical &amp; QC Laboratory were available both in Batu Anam Estate, Aek Tarum Estate and Sentral Estate.</p>	

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	<p>Leaf analysis was done in 2018 by PT Nusa Pusaka Kencana Analytical and QC Laboratory. Sample seen:</p> <p><u>Batu Anam Estate:</u></p> <ul style="list-style-type: none"> <li>- Analysis report No. 050/INT/R&amp;D/APR/L/18 dated 21/04/18 number of sample 30 (Division I, planting year 2004, 2005 &amp; 2008),</li> <li>- Analysis report No. 144/INT/R&amp;D/JUL/L/18 dated 11/07/18 number of sample 33 (Division II, planting year 2004, 2005 &amp; 2007),</li> <li>- Analysis report No. 113/INT/R&amp;D/JUN/L/18 dated 09/06/18 number of sample 43 (Division II, planting year 2007, 2008, 2010 &amp; 2011).</li> </ul> <p><u>Aek Tarum Estate:</u></p> <ul style="list-style-type: none"> <li>- Analysis report No. 143/INT/R&amp;D/JUL/L/18 dated 11/07/18 number of sample 25 (Division I, planting year 2010, 2011 &amp; 2012),</li> <li>- Analysis report No. 128/INT/R&amp;D/JUL/L/18 dated 03/07/18 number of sample 33 (Division III, planting year 2011, 2012 &amp; 2015),</li> <li>- Analysis report No. 092/INT/R&amp;D/MEI/L/18 dated 21/05/18 number of sample 33 (Division II, planting year 2009, 2010 &amp; 2011).</li> </ul> <p><u>Sentral Estate:</u></p> <ul style="list-style-type: none"> <li>- Analysis report No. 169/INT/R&amp;D/JUL/L/18 dated 19/07/18 number of sample 21 (Division I planting year 2010, 2012),</li> <li>- Analysis report No. 177/INT/R&amp;D/JUL/L/18 dated 21/07/18 number of sample 30 (Division II planting year 2008, 2009, 2010 &amp; 2015),</li> <li>- Analysis report No. 106/INT/R&amp;D/JUL/L/18 dated 07/06/18 number of sample 27 (Division III planting year 2000, 2011 &amp; 2012),</li> <li>- Analysis report No. 097/INT/R&amp;D/MEI/L/18 dated 25/05/18 number of sample 24 (Division IV planting year 2008, 2010).</li> </ul>	
<p><b>4.2.4</b></p>	<p>A nutrient recycling strategy is recorded, including use of Empty</p> <p>The company applied EFB to increase the soil fertility with dosage 250 kg/palm tree.</p>	<p>Comply</p>

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	<p>Fruit Bunches (EFB), land application, and palm residues after replanting.</p> <p>- Minor compliance -</p>	<p>In year 2018 total EFB applied in Batu Anam Estate was 16,652,510 kg : Division I total 1,248,000 kg; Division II total 1,469,600 kg; Division III total 9,681,680 kg, Division IV 2,817,600 kg.</p> <p>In year 2018 total EFB application in Aek Tarum Estate was 5,813,208 kg: Division I total 975,718 kg, Division II total 2,626,505 kg, Division III total 2,210,985 kg.</p> <p>In year 2019 total EFB application in Aek Tarum Estate was 1,155,085 kg: Division I total 168,080 kg, Division II total 645,000 kg, Division III total 342,005 kg.</p> <p>While in Sentral Estate EFB application in 2018 was 13,086,620 Kg. Applied in Division I as much as 3,360,660 kg, Division II as much as 3,961,250 kg, Division III as much as 2,428,050 kg, Division IV as much as 3,336,660 kg.</p> <p>In year 2019 total EFB applied in Sentral Estate was 4,311,450 Kg: Division I 1,060,000 Kg, Division II 361,500 Kg, Division III 2,348,450 Kg, Division IV 541,500 Kg.</p>	
<p><b>Criterion 4.3:</b>            Practices minimise and control erosion and degradation of soils.</p>			
<p><b>4.3.1</b></p>	<p>Maps of any fragile soils shall be available.</p> <p>- Major compliance -</p>	<p>PT Gunung Melayu showed Peta Sebaran Satuan Tanah for Batu Anam Estate and Sentral Estate. The map indicated the predominant soil type in Batu Anam Estate and Aek Tarum Estate consist of :</p> <ul style="list-style-type: none"> <li>- Typic hapludox</li> <li>- Typic hapludults</li> <li>- Typic endoaquepts</li> </ul> <p>predominant soil type in Sentral Estate consist of :</p> <ul style="list-style-type: none"> <li>- Typic hapludox</li> <li>- Typic hapludults</li> <li>- Typic endoaquepts</li> </ul> <p>There is also topographic map indicating the elevation of Batu Anam Estate, Aek Tarum Estate and Sentral Estate consist of 0-8% and &gt;30%. The limitation for the area is steep slope on some area. PT Gunung Melayu did not open the area with steep slope &gt; 30%. Topografi level consist of 40 – 90 m.</p>	<p>Comply</p>

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<p><b>4.3.2</b> A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific).                      - Minor compliance -</p>	<p>In procedure no. AA-SOP-OP-1100-05.R1 "Konservasi Tanah dan Air" has determined strategy control erosion particular in slope area, such as: 0 – 5° , 6 – 12° , 13 -20° , and more than 20°, The company has applied silt pit, L shape stacking frond and terracing in slope area to reduce erosion                      The realization of soil and water conservation work are:</p> <ol style="list-style-type: none"> <li>1. Maintenance of terraces, realization Aek Tarum Estate in 2018 was 149,122 meter and in 2019 since January - March was 111,089 meters. While in Sentral Estate terraces maintenance in 2018 was 101,636 m, in Batu Anam Estate terrace maintenance 2018 was</li> <li>2. Maintenance "Tapak Kuda" individual platform, realization in 2018 was 208 unit and in 2019 Aek tarum Estate since January – March was 174 unit. While in Sentral Estate total 2,059 unit of individual platform maintenance in 2018. In Batu Anam Estate individual platform maintenance 2018 has been realize 5,518 unit.</li> </ol>	<p>Comply</p>
<p><b>4.3.3</b> A road maintenance program shall be in place.                      - Minor compliance –</p>	<p>Road maintenance program and progress was made and recorded in "Program dan Realisasi Pemeliharaan Jalan Manual, Mekanis dan Pengerasan Jalan 2018/2019". Road maintenance implementation in Batu Anam Estate:</p> <ul style="list-style-type: none"> <li>- Road maintenance mechanically using Grader/Road Grading in 2018 total 195,495 m from Division I – Division IV. In 2019 to date March 2019 mechanical road maintenance has been realize 195,495 m.</li> <li>- Road maintenance manually and road service by spreading split stone in 2017 total 209,177 m and in 2017 ytd March 2018 was 269,353 m.</li> <li>- Road hardening in 2017 was 24,289 m with split stone volume 6,072 m<sup>3</sup>.</li> </ul> <p>Road maintenance implementation in Aek Tarum Estate:</p> <ul style="list-style-type: none"> <li>- Road maintenance mechanically using Grader/Road Grading in 2018 total planed was 134,531 m and realization was 262,140 m from afd I – III. In 2019 from January – March road maintenance planed was 53,088 m and realization was 39,160 m.</li> <li>- Road maintenance manually and road service by spreading split stone in in 2018 total planed was 754,640 m and realization was 319,036 m from afd I – III. In 2019 from January – March road maintenance planed was 281,336 m and realization was 128,924 m.</li> </ul>	<p>Comply</p>



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		<ul style="list-style-type: none"> <li>- Road hardening planed in 2019 since January – March was 2,300 m with 190 m3 split stone volume and realization was 810 m with 23 m3 split stone volume.</li> </ul> <p>In Sentral Estate road maintenance mechanically realize 200 m.</p> <p>During field visit and audit in PT Gunung Melayu found that road condition was in good condition and well maintained.</p>	
<b>4.3.4</b>	<p>Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.</p> <ul style="list-style-type: none"> <li>- Major compliance –</li> </ul>	<p>According to Soil Map of PT Gunung Melayu “Peta Sebaran Satuan Tanah for Batu Anam Estate and Sentral Estate” there is no peat soil in PT Gunung Melayu. The map indicated the predominant soil type consist of :</p> <ul style="list-style-type: none"> <li>- Typic hapludults</li> <li>- Typic hapludox</li> <li>- Typic endoaquepts</li> </ul> <p>Therefore no subsidence of peat soil management needed.</p>	Comply
<b>4.3.5</b>	<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> <ul style="list-style-type: none"> <li>- Minor compliance –</li> </ul>	<p>According to Soil Map of PT Gunung Melayu “Peta Sebaran Satuan Tanah for Batu Anam Estate and Sentral Estate” there is no peat soil in PT Gunung Melayu. The map indicated the predominant soil type consist of :</p> <ul style="list-style-type: none"> <li>- Typic hapludults</li> <li>- Typic hapludox</li> <li>- Typic endoaquepts</li> </ul> <p>Therefore no drainability assessment required.</p>	Comply
<b>4.3.6</b>	<p>A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils).</p> <ul style="list-style-type: none"> <li>- Minor compliance –</li> </ul>	<p>Based on soil analysis, there is no fragile soil in PT Gunung Melayu Batu Anam Estate, Sentral Estate and Aek tarum Estate. The Soil Type Map indicated the predominant soil type consist of :</p> <ul style="list-style-type: none"> <li>- Typic hapludults</li> <li>- Typic hapludox</li> <li>- Typic endoaquepts</li> </ul>	Comply

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<p><b>Criterion 4.4:</b>            Practices maintain the quality and availability of surface and ground water.</p>																				
<p><b>4.4.1</b></p>	<p>An implemented water management plan shall be in place.            - Minor compliance -</p> <p>PT Gunung Melayu has implemented water management plan based on related regulations. The management including the rainfall monitoring and all water usage, such as: water supply intake, water usage for consumption, mill process and total effluent.</p> <p>Data seen:            Batu Anam Estate            Izin Pengambilan Air Tanah, based on Keputusan Gubernur Sumatera Utara nomor 546.2/501/DPMPTSP/6/XI.3b/VII/2017, dated 18<sup>th</sup> July 2017            Sentral Estate:            Izin Pengambilan Air Tanah based on Keputusan Gubernur Sumatera Utara nomor 546.2/499/DPMPTSP/6/XI.3b/VII/2017, dated 18<sup>th</sup> July 2017            Aek Tarum Estate:            Permit on using of ground water based on:            Keputusan Gubernur Sumatera Utara nomor: 546.2/498/DPMPTSP/6/XI.3b/VII/2017 tentang Izin Pengambilan Air Tanah, debit maksimal 2.87 liter/deti, dated 18<sup>th</sup> July 2017 valid until 3 years.            Monitoring on using of ground water, location in employee housing in division II &amp; III year 2018, such as:</p> <table border="1" data-bbox="663 1075 1115 1375"> <thead> <tr> <th>Months</th> <th>Water volume (M3)</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>2,873</td> </tr> <tr> <td>February</td> <td>2,624</td> </tr> <tr> <td>March</td> <td>2,827</td> </tr> <tr> <td>April</td> <td>2,743</td> </tr> <tr> <td>May</td> <td>2,809</td> </tr> <tr> <td>June</td> <td>2,722</td> </tr> <tr> <td>July</td> <td>2,752</td> </tr> <tr> <td>August</td> <td>2,799</td> </tr> </tbody> </table>	Months	Water volume (M3)	January	2,873	February	2,624	March	2,827	April	2,743	May	2,809	June	2,722	July	2,752	August	2,799	<p>Comply</p>
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Criterion / Indicator		Assessment Findings		Compliance							
		<table border="1"> <tr> <td>September</td> <td>2,845</td> </tr> <tr> <td>November</td> <td>2,769</td> </tr> <tr> <td>December</td> <td>2,821</td> </tr> <tr> <td>Total</td> <td>33,333</td> </tr> </table> <p>Gunung Melayu II Mill has a surface water permit based on Decree of Governor of North Sumatera no. 610/2014/BPPTSU/2/12.1/XI/2015, dated November 18, 2015, on the Permission for Taking and Utilizing surface water from the Pinggul Toba River which is flowed into a holding pond, valid until November 18, 2018.</p>	September	2,845	November	2,769	December	2,821	Total	33,333	
September	2,845										
November	2,769										
December	2,821										
Total	33,333										
<b>4.4.2</b>	<p>Protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones, at the time of or prior to replanting shall be demonstrated.</p> <p>- Major compliance -</p>	<p>PT Gunung Melayu – Gunung Melayu II POM has prepared the document on protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones as in document “Praktek-praktek Mempertahankan Kualitas dan Ketersediaan Air Permukaan dan Air Tanah” – Water Sustainable”.</p> <p>PT Gunung Melayu – Gunung Melayu II POM has also developed a procedure to maintain soil fertility and water quality as stated in SOP for maintaining riparian zone is under SOP AA-APM-OP-1100.05. R1 “Konservasi Tanah dan Air”, it is stated that at during land clearing area along the river shall be conserved.</p> <p>PT Gunung Melayu – Gunung Melayu II POM has continuous terrace for hilly land, individual terrace for wave land, and drainage to collect rain water. based on document review “Penanaman Sempadan” and field visit to riparian zones, company have enriched the vegetation with vertiver grass, Albizia tree, bamboo tree along the riparian area.</p>	Comply								
<b>4.4.3</b>	<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>Monitoring of effluent especially BOD (Biochemical Oxygen Demand) performed each month by accredited laboratory by Balai Teknik Kesehatan Lingkungan dan Pengendalian Penyakit (BTKLPP) Kelas I Medan. Based on the test results of BOD parameters are still below the quality standard in accordance PERMEN-LH No.KEP-51/MENLH/10/1995, (5,000 mg/liters).</p> <p>Based on report of “Rencana Kelola Lingkungan dan Rencana Pemantauan Lingkungan (RKL-RPL)” for second semester year 2018, the record of monitoring of effluent especially BOD shown:</p> <table border="1"> <tr> <td>Month – 2018</td> <td>Result of analysis (mg/liters)</td> </tr> <tr> <td>January</td> <td>4,232</td> </tr> </table>	Month – 2018	Result of analysis (mg/liters)	January	4,232	Comply				
Month – 2018	Result of analysis (mg/liters)										
January	4,232										

Criterion / Indicator		Assessment Findings		Compliance																										
		February	4,128																											
		March	4,281																											
		April	4,224																											
		May	4,641																											
		June	4,424																											
		July	3,285.1																											
		August	4,822.1																											
		September	4,118.2																											
		October	4,527.8																											
		November	3,867.5																											
		December	3,896.5																											
<b>4.4.4</b>	Monitoring of mill water use per ton of FFB shall be recorded. - Minor compliance –	PT. Gunung Melayu – GM II POM recording the mill water use per tonne FFB each month. The record of water use available in “Pemakaian air dan HSD Oil per metrik FFB”. In 2019, the budget of water use for FFB process sets at 1.25 m3/ton FFB processed: Monitoring of water consumption for process of FFB (M3/ton of FFB) year 2018: <table border="1" data-bbox="660 944 1323 1380"> <thead> <tr> <th>Month – 2018</th> <th>Water consumption</th> </tr> </thead> <tbody> <tr><td>January</td><td>1.40</td></tr> <tr><td>February</td><td>1.27</td></tr> <tr><td>March</td><td>1.26</td></tr> <tr><td>April</td><td>1.15</td></tr> <tr><td>May</td><td>1.18</td></tr> <tr><td>June</td><td>1.14</td></tr> <tr><td>July</td><td>1.15</td></tr> <tr><td>August</td><td>1.11</td></tr> <tr><td>September</td><td>1.13</td></tr> <tr><td>October</td><td>1.15</td></tr> <tr><td>November</td><td>1.09</td></tr> <tr><td>December</td><td>1.07</td></tr> </tbody> </table>			Month – 2018	Water consumption	January	1.40	February	1.27	March	1.26	April	1.15	May	1.18	June	1.14	July	1.15	August	1.11	September	1.13	October	1.15	November	1.09	December	1.07
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Criterion / Indicator		Assessment Findings		Compliance
		<b>Average</b>	<b>1.16 – still under of budged</b>	
<b>Criterion 4.5:</b>				
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.				
<b>4.5.1</b>	Monitoring of Integrated Pest Management (IPM) plan implementation shall be available. - Major compliance -	<p>The company has Integrated Pest Management and its implemented, such as:</p> <p><u>Batu Anam Estate:</u></p> <ol style="list-style-type: none"> <li>1. Planting "Beneficial Plant" such as: Cassia tora, Antigonon leptosus and Tunera subulata were recorded every month in the "Monitoring Host plant", e.g. planting benefecial plant from January – December 2018: 8,878 spot of hostplan;</li> <li>2. Barn owl introduction and conservation as a natural enemies of pest/rats. Summary of the owl census in January 2019: the number of owl barn as much as 125 units, 81 % an active owl barn and the number of owls 54 burung dewasa, 38 burung muda dan 31 telur.</li> <li>3. Rats and thirataba census which performed each 3 month to monitor the rats and thirataba attack. Based on lates monitoring on period March 2019, there is no attack of rats and thirataba.</li> <li>4. Leaf eaters census recapitulation period January- March 2019, the leaf eater attack is below than 1% and control by biological ways using natural enemies.</li> <li>5. Census ganoderma. Grand total ganoderma census 2012-2018 was 30,044 palm attacked and palm suspect has been cutdown 29,095 palm tree.</li> </ol> <p><u>Aek Tarum Estate:</u></p> <ol style="list-style-type: none"> <li>1. Planting "Beneficial Plant" such as: Cassia tora, Antigonon leptosus and Tunera subulata were recorded every month in the "Monitoring Host plant", e.g. planting benefecial plant from January – December 2018: 8,878 spot of hostplan;</li> <li>2. Barn owl introduction and conservation as a natural enemies of pest/rats. Barn owl census performed each 3 month. Summary of the owl census in December 2018: the number of owl barn as much as 92 units, 73.91% an active owl barn and the number of owls 75 mature owl, 45 juvenile dan 34 egg. Summary of the owl census in March 2019: the number of owl barn as much as 92 units, 80.43% an active owl barn and the number of owls 83 mature owl, 39 juvenile dan 52 egg</li> </ol>		Comply

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	<p>3. Rats and thirataba census which performed each 3 month to monitor the rats and thirataba attack. Based on lates monitoring on period March 2019, rats attack 0.16% (below the threshold 5%) and there is no thirataba attack.</p> <p>4. Leaf eaters census recapitulation period January- March 2019, there is no leaf eater attack, Estate management has control by biological ways using natural enemies.</p> <p>5. Census Ganoderma up to December 2018 palm attacked was 1,605 palm and 1,302 palm was cut down until December 2018 and the rest will be cut down in March 2019. In 2019 since January – March 2019 palm attacked by ganoderma was 1,019 palm and 498 palm has been cut down and the rest will be cut down on April 2019.</p> <p>6. Census spearoot up to December 2018 palm attacked was 108 palm and has been cut down. In 2019 since January – March 2019 there is no spearoot attack.</p> <p><u>Sentral Estate:</u></p> <p>1. Planting "Beneficial Plant" such as: Cassia tora, Antigonon leptopus and Tunera subulata were recorded every month in the "Monitoring Host plant", e.g. planting benefecial plant from January – December 2018: 38,525 m of hostplan.</p> <p>2. Census Rats and Thirataba performed each 3 month. Since January 2018 – December 2018 there is no significant rats attack and only several spot attack with average 0.1% (below the threshold 5%). There is no Thirataba attack were identified. Estate management performing the rats control by introduction the rats predator/natural enemies Barn owl (<i>Tyto alba</i>).</p> <p>3. Census Ganoderma since January – December 2018 was 1,520 palm attacked and 1,453 palm has been cut down.</p> <p>4. Summary of the owl census to date December 2018: the number of owl barn as much as 114 units, 97 units an active owl barn and the number of mature owls 97, young owl 33 and 59 egg. For example in afdeling I; number of owl barn as much as 26 boxes, the number of active owl barn as many as 25 with owl totaled 25 mature owl, young owl 10 and egg owl 7.</p> <p>5. Leaf eaters census recapitulation period January- December 2018, the leaf eater attack is below than 1% and control by biological ways using natural enemies and manual picked up.</p>	

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<b>4.5.2</b>	<p>Training records of Integrated Pest Management (IPM) shall be available.</p> <p>- Minor compliance –</p>	<p>Integrated Pest management training has been conducted in Batu Anam Estate on 22 January &amp; 24 January 2019 by R&amp;D team, attended by 11 and 20 PHT workers.</p> <p>While in Aek tarum Estate training has been conducted on 14 February 2019 by R&amp;D team, attended by 20 PHT workers.</p> <p>While in Sentral Estate Integrated Pest management training conducted in 18 February 2019 by Ramsi (Estate Manager) attended by 24 PHT workers.</p> <p>Evidence of training can be demonstrated such as: attendant list, training material and photo documentation. Duing interview with several PHT wokers can be demonstrated that they have a sufficient understanding on integrated pest management in Palm Oil Plantation.</p>	Comply
<p><b>Criterion 4.6:</b>  Pesticides are used in ways that do not endanger health or the environment</p>			
<b>4.6.1</b>	<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>There is documented justification for all Agrochemical use determining the reason for the use of certain chemicals. There is an updated register which records products used, when required, amounts to be used and frequency of use.</p> <p>The justification of pesticide used in PT Gunung Melayu is explained under company procedure. PT Gunung Melayu Group shows "SOP Pengendalian Gulma No.AA-APM-OP-11100.08-R1" dated 01/11/2008. The procedure chapter IV explains the weed control program for woody, grass, fern, caladium, wild banana (Musa spp), Aystasia. It does explain active ingredients use to control such weed, dosage per application, type of nozzle used and volume of spraying per application.</p> <p>In chapter V explains selection of pesticide and its active ingredients content, nature of the pesticide and target species.</p> <p>Chapter VII describes calculation of actual area implemented per hectare plantation (spray factor), spraying rotation and spraying output. Chapter XIII related to work equipment, protective equipment and safe working practices.</p> <p>Based on interview with herbicide sprayer and chemical warehouse keeper, they understand the target species and active ingredients to control them. Sprayer shows knowledge on minimizing chemical impact on beneficial weed.</p>	Comply

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		Type of pesticide use by PT Gunung Melayu Batu Anam Estate, Aek Tarum Estate, Sentral Estate and its weeds target:																																														
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Metaprima 20 WDG	Metil Metsulfuron 20%		narrow and wide leafs weeds																																													
<b>4.6.2</b>	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications shall be available. - Major compliance -	PT Gunung Melayu has recorded the pesticide use and reported each month in "Laporan unit Kebun". Below is the sample record of pesticide use including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications. <u>Sentral Estate:</u>				Comply																																										
		<table border="1"> <thead> <tr> <th rowspan="2">Type of Pesticide</th> <th rowspan="2">Active Ingredients</th> <th colspan="2">Application in 2018 (Jan – March)</th> <th colspan="2">application</th> <th rowspan="2">LD50 mg/kg bw mouth</th> </tr> <tr> <th>Volume</th> <th>Active Ingredient</th> <th>Per ha</th> <th>Per kg FFB</th> </tr> </thead> <tbody> <tr> <td>Nordox 86 WG</td> <td></td> <td>5 kg</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Type of Pesticide	Active Ingredients	Application in 2018 (Jan – March)		application		LD50 mg/kg bw mouth	Volume	Active Ingredient	Per ha	Per kg FFB	Nordox 86 WG		5 kg																																
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		Ally	Metil Metsulfuron	68,500 kg	13,700				
		Gramoxone	Paraquat	86 L	17 L	0.01		65	
		Metsulindo 20WP	Metil Metsulfuron 20%	73 L	14.6 L	0.57		50	
		Bionasa 480AS	Glifosat	69 L	57 L	0.02		5,600	
		Polydor 25EC	Lamda sihalotrin	670.10 L					
		Metafuron 20WP	Metil Metsulfuron 20%	10 kg	2 kg	0.08			
		Solusi 865 SL	Karbaril 85%	191.4 L	162.69 L	6.30			
<b>4.6.3</b>	Any use of pesticides shall be minimized as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in Indonesia Best Practice guidelines. - Major compliance -	<p>There is no used of prophylactic use of pesticides throughout the company.</p> <p>The use of pesticides has been minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. Use of pesticides in the field was always lower than the planned budget. It also shows the company's commitment to always reduce pesticide usage and give priority to the prevention of mechanical, biological and integrated pest management.</p> <p>Company also has a policy of paraquat usage No. 001/HP/INT/IX/2009 dated 1 September 2009 regarding reducing of usage herbicide containing paraquat.</p>							Comply
<b>4.6.4</b>	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	<p>The company has demonstrated to reduce using paraquat and no using pesticides as categorized Class IA or 1B.</p> <p>Paraquat is still used in the Estates. Data of Paraquat used has been provided since 2012. Budget of Paraquat is decreased every year. It was observed that Paraquat used was under the target. To reduce Paraquat use, Estates implement Selective Spraying and Site Specific which agrochemical is only used in targeted weeds, no spraying in riparian buffer zones.</p> <p>Company also has a policy of paraquat usage No. 001/HP/INT/IX/2009 dated 1 September 2009 regarding reducing of herbicide usage containing paraquat.</p> <p>Below are the Paraquat usage (Gramoxone) from year 2015 – 2019 by PT Gunung Melayu Batu Anam Estate: 2015: 498.9 L</p>							Comply

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<p>used in exceptional circumstances.                      - Minor compliance -</p>	<p>2016: 472.6 L                      2017: 412.4 L                      2018: 405.3 L                      2019: 0 L                      Sentral Estate:                      2016: 41 L                      2017: 0                      2018: 0                      2019: 0                      Aek Tarum Estate:                      2016: 210.5 L                      2017: 81.3 L                      2018: 33.2 L                      2019: 0</p>	
<p><b>4.6.5</b> 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>Up to date records of training are kept in each estate for the following:                      Limited pesticides (Pelatihan Pestisida terbatas), Handling of pesticides, Integrated Pest Management Pesticide Mixers, Pesticide Sprayers, and pesticide handlers in stores.                      Latest training on limited pesticide use "Pelatihan Pestisida Terbatas" conducted on 22/02/2018 attended by 105 workers including pesticide operator, warehouse operator and pesticide foreman from Sentral Estate, Batu Anam Estate and Aek Tarum Estate. Certificate of training were available and issued by Komisi Pengawasan Pupuk dan Pestisida Provinsi Sumatera Utara, for example on behalf:</p> <ul style="list-style-type: none"> <li>- Rantini certificate No. 521.4/277.07/UPTTPH/II/2018</li> <li>- Nurainun Br. Rambe certificate No. 521.4/277.07/UPTTPH/II/2018</li> <li>- Sri Wahyuni certificate No. 521.4/277.07/UPTTPH/II/2018</li> <li>- Osni Jelita Br. Nababan certificate No. 521.4/277.07/UPTTPH/II/2018</li> </ul>	<p>Comply</p>

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<p>- Major compliance -</p>	<ul style="list-style-type: none"> <li>- Panco Manurung certificate No. 521.4/277.07/UPTTPH/II/2018</li> <li>- Sunarti certificate No. 521.4/277.07/UPTTPH/II/2018</li> <li>- Sulistina certificate No. 521.4/277.07/UPTTPH/II/2018</li> <li>- Itun certificate No. 521.4/277.07/UPTTPH/II/2018</li> <li>- Nilawati certificate No. 521.4/277.07/UPTTPH/II/2018</li> <li>- Ramayani certificate No. 521.4/277.07/UPTTPH/II/2018</li> <li>- Romenda certificate No. 521.4/277.07/UPTTPH/II/2018</li> <li>- Suningsih certificate No. 521.4/277.07/UPTTPH/II/2018</li> </ul> <p>Training of Limited Pesticide handling in Sentral Estate conducted on 22 February 2018</p> <p>The training data is also maintained to show the nature and content of the training covered.</p> <p>Material Safety Data Sheets (MSDS) are evident for all chemicals used and are available at the storage and areas of mixing.</p> <p>Interview with pesticide operator has been performed during audit. Based on interview indicated that pesticide operator understand against pesticide usage procedure, risk of pesticide use, active ingredient, pesticide dosage and technique how to apply pesticide in the field. During field visit they can demonstrated the adequate skill and understanding.</p>	
<p><b>4.6.6</b></p> <p>Storage of pesticides shall be according to recognised best practices. All pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers (see criterion 5.3).</p> <p>- Major compliance -</p>	<p>PT Gunung Melayu – Gunung Melayu II POM has prepared a SOP of waste pesticide management which is SOP of hazardous waste management No. AA-KL-06-EFP.</p> <p>Based on a field visit to the pesticides qarehouse in Batu Anam Esate (date 9<sup>th</sup> April 2019), there was found:</p> <ul style="list-style-type: none"> <li>- Permanent Buildings,</li> <li>- A good ventilation,</li> <li>- Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap",</li> <li>- Eye wash shower, first aid box, PPE and Fire extinguisher are provided.</li> </ul>	<p>Comply</p>

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	<ul style="list-style-type: none"> <li>- PPE box</li> <li>- MSDS are available for all types of existing pesticides</li> <li>- The pesticide management and safety instructions are available</li> <li>- A package management/ used pesticide package is available</li> <li>- Water wash of pesticides containers collected in "spillage trap"</li> <li>- The flow of waste water is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution.</li> </ul> <p>PT Gunung Melayu has disposed their hazardous waste included empty container pesticides to the approval company PT. Shali Riau Lestari (see 4.6.10 and 5.3.3).</p>	
<p><b>4.6.7</b></p> <p>Application of pesticides shall be by proven methods that minimize risk and negative impacts.</p> <p>- Minor compliance -</p>	<p>Based on field visit to Batu Anam Estate (date 9<sup>th</sup> April 2019) and Aek Tarum Estate (date 10<sup>th</sup> April 2019), spraying team using sign board indicating spraying/herbicide application is in progress for a block. Spraying supervisor was pre- mixing the herbicide in the chemical warehouse, transport the mixed chemical via truck, using cone and spill tray on the field to minimize spillage. The type and dosage of herbicide are carefully measured and prepared for targeted weed control; circle and path spray or selective weeding (wooden, bracken, or VOP).</p> <p>Sprayers and spraying supervisor are trained with limited pesticide training, best management practice for weed control, spraying techniques, using PPE and received regular medical checkup. Clean water and soap on the field are provided for sprayer.</p> <p>Nozzle calibration conducted regularly and recorded, e.g:</p> <ul style="list-style-type: none"> <li>- Record of flow rate calibration (cc/minute) Nozzle, dated 6<sup>th</sup> April 2019, flow rate average is 541 mL/minute, type of nozzle is Deflektor Kuning</li> <li>- Record of flow rate calibration (cc/minute) Nozzle, dated 14<sup>th</sup> March 2016, flow rate average is 534 mL/minute, type of nozzle is Deflektor Kuning</li> </ul> <p>Supervisor equipped with first aid kit.</p>	<p>Comply</p>
<p><b>4.6.8</b></p> <p>Pesticides may only be applied aerially where there is a</p>	<p>There is no aerial application of pesticide throughout the company plantation.</p>	<p>Not applicable</p>

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	documented justification. Surrounding communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -		N/A
<b>4.6.9</b>	Evidence of training on handling pesticide for workers and scheme smallholder (if any) shall be available. - Minor compliance -	PT. Gunung Melayu has provided limited pesticide training for sprayers. Data verified: <ul style="list-style-type: none"> <li>- Record of training on handling of pesticides, location in Kebun Batu Anam, dated 12<sup>th</sup> February 2019 – was attended by 28 workers</li> <li>- Certificates of training on limited pesticide use “Pelatihan Pestisida Terbatas” conducted on 22<sup>nd</sup> August 2018 by “Komisi Pengawasan Pupuk dan Pestisida – North Sumatera Propinca), was attended by 25 workers, e.g: Mrs Lisnawati, Mrs Nurhayati, Mrs Nganina, Mr Jumangin, Mr Chairul Sahar (chemical storekeeper)</li> <li>- Material Data Safety Sheets (MSDS) are available for all chemicals used and are available at the storage and areas of mixing.</li> </ul> During interview with spraying workers in -the field, indicated that they have a sufficient understanding related to pesticide handling such as: active ingredients, MSDS, spraying technique, weeds target, safe working practice, etc. No scheme smallholders.	Comply
<b>4.6.10</b>	Proof that pesticide waste has been handled as per legal regulations and understood by worker and manager, shall be demonstrated.	PT. Gunung Melayu – Gunung Melayu II POM has prepared a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” nomor: AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.	Comply

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	- Minor compliance -	PT Gunung Melayu – Gunung Melayu II POM has a waste management plan, identifying type and source of waste and the disposal plan. Pesticide waste have been identified and documented under the “Evaluasi Aspek-Dampak Lingkungan” (Environmental Aspect impacts).  Records of empty containers pesticides stock and disposal were available in “Neraca Limbah B3” and “Manifest Limbah B3”. During audit, indicated that company can be demonstrated the proper disposal of empty containers pesticides. Each quarter the waste management of empty containers pesticides also reported to local Environmental Agency of Asahan Regency and North Sumatera Province.	
<b>4.6.11</b>	Annual medical records of pesticide operators, and follow-up treatment of medical results, shall be available.  - Major compliance -	PT Gunung Melayu – Gunung Melayu II POM provides medical checkup for workers related to agrochemical and fertilizer. The test covers blood hematology (incl. cholinesterase), urine test, liver function, kidney function, and respiratory checks.  The latest medical checkup carried out in August 2018, conducted by Prodia Laboratory. MCU was attended by 89 workers. The result of MCU has communicated to workers and the follow-up treatment are available as evident.  Based on MCU result by cholinesterase check, all workers indicated normal and there is no workers with signs of intoxication the health status of sprayers are fit to work.	Comply
<b>4.6.12</b>	Records shall be available to show that spraying is not conducted by pregnant or breast-feeding women.  - Major compliance -	Based on interview with female workers in spraying application (in Batu Anam Estate dated 9 <sup>th</sup> April 2019), there was confirmed that no pregnant and/or breast-feeding allowed to performed chemical/pesticides work.  Estate Management conduct monthly pregnancy check for all female workers (spraying team and fertilizer applicator) by test pack. Record of monthly pregnancy check recorded in “Logbook Monitoring Pemeriksaan Kehamilan” year 2019.  Based on latest check in January, February and March 2019 shown no spraying workers and fertilizing workers who indicated positive pregnant.	Comply

**Criterion 4.7:**

An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:

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<p><b>4.7.1</b> A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored.</p> <p>- Major compliance -</p>	<p>PT Gunung Melayu – Gunung Melayu II POM has established OHS policy that was issued and signed by the Managing Director dated 01/12/2014. Point 3. Committed to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation</p> <p>PT. Gunung Melayu – Gunung Melayu II POM has prepared and documented the OHS Plan as in “Program Management K3 Tahun 2019”, dated 11<sup>th</sup> January 2019, such as:</p> <ul style="list-style-type: none"> <li>– Training on emergency response and preparedness</li> <li>– Training on implementation OHS management system (SMK3)</li> <li>– Implementation of risk assessment</li> <li>– Zero Accident and consistent on using of PPE</li> <li>– Review of accident report</li> <li>– Medical checkup for workers and provision of first aid kit,</li> <li>– Safety committee meeting,</li> <li>– OHS inspection</li> </ul> <p>The record of implementation of OHS program was provided at indicator 4.7.3</p>	<p>Comply</p>
<p><b>4.7.2</b> A documented risk assessment shall be available and its implementation shall be recorded.</p> <p>- Major compliance -</p>	<p>The company has prepared the procedure of risk assessment</p> <p>The document of risk assessment available under “Analisa Resiko KSN Tahun 2019”, last review on 4<sup>th</sup> January 2018. The risk assessment has covered for all activities in plantation and mill, such as: chemical mixing, fertilizer warehouse, herbicide and pesticide sprayer, harvesting, road maintenance, HCV Monitoring, Boundary Monitoring, land application maintenance.</p> <p>Batu Anam Estate</p> <p>Company has document 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, HCV Monitoring, Boundary Monitoring, land application maintenance, etc.</p> <p>The company has conducted HIRADC for all areas and it was observed that the workers understood their risk, last updated in 4<sup>th</sup> January 2018.</p>	<p>Comply</p>

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	<p>Engineering control was implemented to prevent hearing loss, e.g. install noise reduction agent and administrative by erected signboard of noise area, as described in Risk.</p> <p><u>Non Conformity:</u></p> <p>PT Gunung Melayu has prepared the document of risk assessment under "Analisa Resiko Tahun 2018", last review on 4<sup>th</sup> January 2018. The risk assessment has covered for all activities in plantation and mill. However, the grade of the risk level and scale of severity and probability has not consistent with document of Risk Assessment Procedure No AA-SOP-HSE-03, HIRA-DC, version 00 dated 20<sup>th</sup> May 2018.</p> <p>PT Gunung Melayu – Gunung Melayu II POM has made correction and corrective action to address the nonconformity, the effectiveness of action taken has been verified by auditor NCR Visit on 19/06/2019 and the nonconformity has been CLOSED, detail of correction and corrective action presented in section 3.4 Details of findings.</p>	
<p><b>4.7.3</b></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>PT Gunung Melayu – GM II POM has prepared the Standard Operating Procedure on personal protective equipment No. AA-SOP-OP-101.3-R0 dated 14/08/2013.</p> <p>Record of implementation of OHS program, e.g:</p> <ul style="list-style-type: none"> <li>- Refresh training on basic fire was conducted on 6<sup>th</sup> December 2018, location in Club House PT Gunung Melayu, instructor Mr Hafiz Hazalin Sinaga, was attended by 80 workers include Staff and supervisor.</li> <li>- Checklist on equipment of emergency response and preparedness updatet April 2019 – result shown OK</li> <li>- Medical checkup was carried out in August 2018, conducted by Prodia Laboratory, attended by 89 workers. The result of MCU has communicated to workers and the follow-up treatment are available as evident.</li> <li>- Record of socialization of MCU result dated 5<sup>th</sup> November 2018, was attended by 43 workers. Location in Sentral estate.</li> <li>- Record of handover of first aid kit, e.g: in month January 2019 for division II in Sentral Estate</li> <li>- Record of handover of PPE for fertilizer applicator month January 2019, e.g: Mr Maimunah, Mrs Syamsiah, Mrs Katemi, Mrs Farida H, Mrs Nur Aini.</li> <li>- Training for first aider, dated 4<sup>th</sup> February 2019, was attended by 8 workers.</li> </ul>	<p>Comply</p>



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	<ul style="list-style-type: none"> <li>- Checklist on monitoring of using of PPE for (daily), e.g: month March 2019 for harvester, fertilizer applicator, sprayers,</li> <li>- Refresh training on basic fire, dated 6<sup>th</sup> December 2018 was attended by 82 workers.</li> <li>- Permit of Sterilizer No 1, reference number: 3382/BU/IV-DTK/2016, last inspection was conducted on 6<sup>th</sup> June 2016 by Manpower Agency in North Sumatera Province (Pegawai Pengawas Spesialis PU/BT, namely Mr Muhammad Nuh Siregar, ST) – valid until 4 years.</li> <li>- Permit of Diesel Motor, reference number: 07/VI/PTP/W2/1999, last inspection was conducted on 8<sup>th</sup> April 2019 by Manpower Agency in North Sumatera Province (Pengawas K3) namely Mr Iskandar Zulkarnain, ST. Next inspection planned on 8<sup>th</sup> April 2020.</li> <li>- Permit of Turbin Uap, reference number: 3383/TU/IV-DTK/2016. Report of Last Inspection conducted by PT Putra Roburan Utama, dated 14<sup>th</sup> April 2018, was signed by Manpower Agency in North Sumatera (Kasi K3 Wilayah III) namely Mr Muhmmad Nur Siregar, ST.</li> </ul>	
<p><b>4.7.4</b></p> <p>The responsible person(s) for occupational health and safety shall be identified and there shall be records of periodical meetings on health and safety issues.</p> <p>- Major compliance -</p>	<p>PT Gunung Melayu – GM II POM has established a safety committee based on “Surat Keputusan Kepala Dinas Tenaga Kerja Sumatera Utara Nomor KEP.1025-7/DTK/SU/2017”, dated 8<sup>th</sup> June 2017.</p> <p>Batu Anam Estate has also assigned Mr. Christofel Paskah Lidang Lumban Tobing as responsible person for occupational Health and safety implementation (AK3-Umum, OHS expert).</p> <p>Report of P2K3 in Batu Anam Estate was sent to Dinas Tenaga Kerja Asahan Regency for period January – March 2019, reported on 5<sup>th</sup> April 2019.</p> <p>Aek Tarum Estate has registered OHS committee to Manpower Agency in North Sumatera Province under Surat Keputusan Kepala Dinas Tenaga Kerja Provinsi Sumatera Utara UPT Pengawas Ketenagakerjaan Wilayah IV Nomor: KEP.86-7/P2K3/DTK/2019 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) dan Tim TKD di Perusahaan, dated 27<sup>th</sup> March 2019.</p> <p>Report of P2K3 in Aek Tarum Estate was sent to Dinas Tenaga Kerja Asahan Regency for period October – December 2018, dated 7<sup>th</sup> January 2019.</p>	<p>Comply</p>
<p><b>4.7.5</b></p> <p>A procedure for emergency and work accident shall be available in Indonesian Language; and</p>	<p>PT Gunung Melayu – GM II POM has prepared an accidents and emergency procedure, such as:</p> <ul style="list-style-type: none"> <li>- Procedure no. AA-EMS-446-PR for operation control,</li> </ul>	<p>NC</p> <p>#1621854-201804-N2</p>

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<p>the workers, who have attended First Aids training, are available in the working areas.</p> <p>- Minor compliance -</p>	<ul style="list-style-type: none"> <li>- Procedure no. AA-EMS-447-PR for emergency and preparedness)</li> <li>- Procedure no. AA-EMS-001-FM for emergency plan,</li> <li>- Procedure no. AA-EMS-003-FM for emergency incident</li> <li>- Procedure no. AA-EMS-004-FM for emergency incident reporting</li> </ul> <p>Those procedures have socialized and available in notice board in site, during interviewed with workers, it was seen that they understood. Emergency call phone also is available in all site operation.</p> <p>PT Gunung Melayu – GM II POM has assigned the first aider namely Mr Elvinaria Situmorang (license No 22/P3K/2016), dated 1 June 2016.</p> <p>List of Attendance on refresh training of first aid dated 1<sup>st</sup> November 2018, location in Meeting Room in KSN Estate, was attended by 36 workers.</p> <p>During interview and field visit Foreman/Mandor has demonstrated the understanding of first aid handling and has completed by first aid kit.</p>	<p>OPEN</p>
<p><b>4.7.6</b></p> <p>All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).</p> <p>- Minor compliance –</p>	<p>All workers provided with medical care, and covered by accident insurance (BPJS Kesehatan and Company Medical Facility).</p> <p>For new temporary worker medical care covered by company medical facility until national insurance program issued.</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>- Izin Sarana Pelayanan Kesehatan based on Surat Izin Bupati Asahan nomor 503/BPS/BPPPM/0855/V/2013, dated 29<sup>th</sup> May 2013 valid until 5 years.</li> <li>- Payment on BPJS Ketenagakerjaan for period January 2019, amount Rp X6,802,617 covered for 141 workers in Aek Tarum Estate.</li> </ul>	<p>Comply</p>
<p><b>4.7.7</b></p> <p>Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance</p>	<p>PT Gunung Melayu – Gunung Melayu II POM has recorded the occupational injuries using LTA metrics.</p> <p>Aek Tarum Estate:</p> <p>Since 2018, there were 32 accidents reported with LTA is 11 man days.</p> <p>Sentral Estate:</p>	<p>Comply</p>

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		<p>Since 2018, there were 37 accidents reported with LTA is 10 man days.</p> <p>Gunung Melayu II POM</p> <p>(Laporan P2K3) Kinerja K3, year 2017 there were 5 accidents with LTA is 19 mandays and year 2018 there were 6 accidents with LTA is 45 man days.</p> <p><u>Non Conformity:</u></p> <p>PT Gunung Melayu has shown the record of occupational injuries using LTA metrics under document of "Kinerja K3 – was integrated with Report of OHS Performance". However, investigation report for each accident that was reported in "Kinerja K3" was not consistently as per regulation at the procedure of Investigasi Kecelakaan Kerja No" AA-SMK3-XXXX.YY-RO, edition RO dated 1th April 2017 i.e: Form Investigasi Kecelakaan Kerja (AA-OP-14001.02.03-FM).</p> <p>PT Gunung Melayu – Gunung Melayu II POM has made correction and corrective action to address the nonconformity, the effectiveness of action taken will be verified by auditor on next surveillance assessment. The Non Conformity status remain OPEN, detail of correction and corrective action presented in section 3.4 Details of findings.</p>	
<p><b>Criterion 4.8:</b>            All staff, workers, smallholders and contract workers are appropriately trained.</p>			
<b>4.8.1</b>	<p>Records of training program related to the aspects of RSPO Principles and Criteria shall be available.</p> <p>- Major compliance -</p>	<p>PT Gunung Melayu – GM II POM has shown the document of Training Program as in "Program Pelatihan Environment and Sustainability" year 2019, developed by Asian Agri Learning Institute. 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

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> <li>- Training on road maintenance</li> <li>- Training on certification of electrical (for operators)</li> </ul> <p>Record of training related to RSPO PnC (Bukti Realisasi Pelatihan), e.g:</p> <ul style="list-style-type: none"> <li>- Record of training on handling of pesticides, location in Kebun Batu Anam, dated 12<sup>th</sup> February 2019 – was attended by 28 workers</li> <li>- List of Attendance on refresh training of first aid dated 1<sup>st</sup> November 2018, location in Meeting Room in KSN Estate, was attended by 36 workers.</li> <li>- Refresh training on basic fire was conducted on 6<sup>th</sup> December 2018, location in Club House PT Gunung Melayu, instructor Mr Hafiz Hazalin Sinaga, was attended by 80 workers include Staff and supervisor.</li> </ul>	
<p><b>4.8.2</b></p> <p>Records of training for each employee shall be maintained.</p> <p>- Minor compliance –</p>	<p>PT Gunung Melayu – GM II POM has shown the record of training for each employee as in document “Personal Data Training – Staff dan Karyawan”.</p> <p>Personal Data Training, e.g:</p> <p>Namely Mrs Suriana (fertilizer applicator), consist of:</p> <ul style="list-style-type: none"> <li>- Training on packing of fertilizer dated 11<sup>th</sup> May 2017</li> <li>- Training on application of fertilizer dated 20<sup>th</sup> November 2017</li> <li>- Training on using of PPE dated 3<sup>rd</sup> January 2018</li> <li>- Training on calibration of fertilizer dosage dated 3<sup>rd</sup> September 2018</li> <li>- Refresh training on application of fertilizer dated 13<sup>th</sup> January 2019</li> <li>- Refresh training on using of PPE dated 17<sup>th</sup> February 2019</li> </ul> <p>Namely Mrs Suhayanti (chemical store keeper), consist of:</p> <ul style="list-style-type: none"> <li>- Training on handling of pesticides dated 8<sup>th</sup> September 2018</li> <li>- Training of handling of limited pesticides dated 8<sup>th</sup> September 2018</li> </ul> <p>Namley Mrs Poniseh (fertilizer applicator), consist of:</p> <ul style="list-style-type: none"> <li>- Training on packing of fertilizer dated 11<sup>th</sup> May 2017</li> <li>- Training on application of fertilizer dated 20<sup>th</sup> November 2017</li> </ul>	<p>NC</p> <p>#1621854-201804-N1</p> <p>OPEN</p>

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>- Training on calibration of fertilizer dosage dated 3<sup>rd</sup> September 2018</li> <li>- Refresh training on application of fertilizer dated 13<sup>th</sup> January 2019</li> <li>- Refresh training on using of PPE dated 17<sup>th</sup> February 2019</li> </ul>	
<b>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</b>			
<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.			
<b>5.1.1</b>	Environmental impact assessment document(s) shall be available. - Major compliance -	<p>In ASA-4 year 2019 there are no any changes related to environment document.</p> <p>PT Gunung Melayu – Gunung Melayu II POM has shown the document of environmental 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:</p> <p>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; 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 has approved by “Komisi Pusat AMDAL, Departement Pertanian” through “Surat No.220/687/B/IV/1994 dated 18<sup>th</sup> April 1994. The document has explained the positive and negative impact</p>	Comply

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	<p>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. Gunung Melayu – Gunung Melayu II POM has also shown the document of environmental evaluation “Dokumen Evaluasi Lingkungan Hidup (DELH)”. The document has approved by “Badan Lingkungan Hidup Provinsi Sumatera Utara, no 806/BLH-SU/BTL.A/2015 tentang Arahan Dokumen Lingkungan Hidup”, dated April 2015.</p> <p>The team on prepared the DELH document: Mr Lintong M I Pane, S.Si; Mrs Setia Megawati, SKM, M.Si; Mr Ir. Ramli Lubis, M.Si.</p> <p>The scope of DELH: PT Gunung Melayu, location Aek Nangali village, Gonting Malaha village, Batu Anam Village, Sidomulyo village, Asahan Regency, North Sumatera Province.</p> <p>AMDAL Biogas</p>	
<p><b>5.1.2</b></p>	<p>Environment management plan document to prevent negative impacts, its implementation report and revision (if the identification of impact requires changes in current company’s practices) shall be available. The company’s management shall appoint the responsible person(s) for the implementation of the document.</p> <p>- Minor compliance -</p> <p>PT Gunung Melayu – GM II POM 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 for second semeseter year 2018 as per “Laporan Pelaksanaan Rencana pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) Periode July-Desember 2018”, was sent to Environmental Agency in North Sumatera on 10<sup>th</sup> April 2019 was received by Mrs Imel (Staff in BLH Provinsi Sumatera Utara) and was received by Mr Bambang on 21th March 2019 (Staff in BLH Kabupaten Asahan)</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> <li>- Terganggunya keberadaan satwa liar</li> <li>- Penurunan kualitas udara (air quality)</li> <li>- Peningkatan kebisingan (noise)</li> </ul>	<p>Comply</p>

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	<ul style="list-style-type: none"> <li>- Solid waste source</li> <li>- Liquid waste source</li> <li>- Munculnya sikap dan persepsi masyarakat</li> </ul> <p>PT Gunung Melayu – GM II POM has been assigned Estate and Mill Manager who responsible person on implementation the management plan.</p>	
<p><b>5.1.3</b></p> <p>Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly basis.</p> <p>- 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). The company also has conducted monitoring of environmental impact year 2018, such as:</p> <ul style="list-style-type: none"> <li>- Report of Testing of water waste, no 9461/K /AL/12/2018 dated 27<sup>th</sup> November 2018 conducted by BTKLPP (Balai Teknik Kesehatan Lingkungan dan Pengendalian Penyakit Kelas I Medan). The 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> <li>- Report of Testing of water waste, no 0220/K /AL/01/2019 dated 17<sup>th</sup> December 2018 conducted by BTKLPP (Balai Teknik Kesehatan Lingkungan dan Pengendalian Penyakit Kelas I Medan). The 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> <li>- Report of Testing of water quality location in Air Sungai Hilir Pinggul Toba, no 5903/K/ABA/08/2018 dated 21<sup>th</sup> July 2018 conducted by BTKLPP (Balai Teknik Kesehatan Lingkungan dan Pengendalian Penyakit Kelas I Medan). The results shown comply with regulation of Government Degree No 82 year 2001 tentang Pengelolaan Kualitas Air dan Pengendalian Pencemaran Air Kelas II.</li> <li>- Report of Testing the quality of water consumption location in Air Sumur Bor Penduduk Gunung Melayu 2 POM, no 8641/K/AM/11/2018 dated 28<sup>th</sup> October 2018 conducted by BTKLPP (Balai Teknik Kesehatan Lingkungan dan Pengendalian Penyakit Kelas I Medan). The results shown comply with regulation of PERMENKES 492/MENKES/PER/IV/2010 tentang Persyaratan Kualitas Air Minum</li> </ul>	<p>Comply</p>

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		<ul style="list-style-type: none"> <li>- Analysis Report of air emission, no certificate 09834/CLACAL, dated 11<sup>th</sup> October 2018, conducted by SUCOFINDO, sample test location: Bolier No 1, Boiler No 2 and Boiler N 3. 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 09832/CLACAL, dated 29<sup>th</sup> October 2018 conducted by SUCOFINDO, sample test location: Gunung Melayu II POM. The result was complied with relevant regulation i.e: PEMENAKER NO 5 Tahun 2018.</li> <li>- Analysis Report of Odour (kebauan) no certificate: 09831/CLACAKL dated 29<sup>th</sup> October 2018 conducted by SUCOFINDO, sample test location: Gunung Melayu II POM (POME area). The result was complied with KepMenLH No 50/MENLH/II/1996</li> <li>- Analysis Report of Soil Quality no certificate: 104-13/T/BINA/VI/2018 dated 6<sup>th</sup> June 2018 conducted by BINALAB, sample test location: Sentral Estate</li> <li>- Matrik Pelaksanaan Pemantauan RKL PT Gunung Melayu – GM II POM for second semester year 2018, e.g: <ul style="list-style-type: none"> <li>• Potential erosion, in Batu Anam Estate (20.07 ton/ha/year), in Sentral Estate (11.39 ton/ha/year) and Aek Tarum Estate (16.09 ton/ha/year)</li> <li>• Social conflict – surrounding community who are working in PT Gunung Melayu 1,154 peoples consisted in all estate are 1,059 people and in POM is 95 people.</li> <li>• Construction of a biogas plant has been included at the report.</li> </ul> </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 and operations managed to best ensure that they are maintained and/or enhanced.</p>			
<b>5.2.1</b>	Record(s) on the results of High Conservation Value (HCV assessment) that includes both the planted area and the relevant wider landscape-level	Company has conducted the HCV identification in coordination with "Fakultas Kehutanan Institut Pertanian Bogor" back in 2014, under "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Gunung Melayu Kebun Sentral 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.	Comply



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<p>considerations (such as wildlife corridors) shall be available.                      - Major compliance -</p>	<p>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); Social-economic-cultural expert: Rae Birumbo (RSPO HCV Assessor and HCVRNI member); GIS: Arif Prasetyo, S.Hut (RSPO HCV Assessor and HCVRNI member).</p> <p>The HCV identification carried out with public stakeholder consultation with surrounding communities on 22-23/04/2013 in Desa Gonting Malaha and Desa Batu Anam. The HCV Identification report has been peer reviewed by Mr.Rachmad Darmawan (RSPO HCV Assessor and HCVRN member) on 01/2014.</p> <p>In the previous assessment, The total HCV identified in Sentral Estate was 80.50 Ha, consist of HCV 1.2 (47.66 Ha), HCV 4.1 (32.16 Ha) and HCV 6 (0.685 Ha). While HCV identification (2012) in Batu Anam Estate consist of HCV 1.3, 4.1, 5 and 6 is 119.85 – total HCV area is 200.35 Ha.</p> <p>Currently PT Gunung Melayu is divided the estate into three estate namely the Sentral estate, Batu anam Estate and the new estate Aek Tarum estate. The total HCV area remains the same 200.35 ha, but the proportion of the spread of HCV area in each estate is changed: Sentral Estate 64,94 ha, Batu Anam Estate 95,85 ha and Aek Tarum Estate 39,56 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>	
<p><b>5.2.2</b> Where rare, threatened or endangered (RTE) species and or other HCVs are present or affected by the plantation and mill operations, an appropriate measures that are expected to maintain or enhance them shall be implemented through a management plan.</p>	<p>Based on HCV Identification Report, 2014 shows in area of Sentral Estate, found 54 types of mammal, 42 types of bird, 4 types of reptile. Based on CITES, there are 11 species under Appendix II: 2 types of mammal, 6 types of bird and 3 types of reptile. While based on IUCN, there are 2 types of mammal under status Vulnerable (Vu) – bearded pig (<i>Sus barbatus</i>) and Southern pig-tailed macaque (<i>Macaca nemestrina</i>); and one with status Endangered (En) which is Pangolin (<i>Manis javanica</i>).</p> <p>Based on document verification upon "Laporan hasil monitoring Pengelolaan Tumbuhan dan Satwa" period Semester I &amp; II 2018 shows in the area of Batu Anam Estate, Aek Tarum Estate and Sentral Estate team identified 4 types of protected under IUCN and CITES. Report of HCV semester I &amp; II 2018 has been submitted to BKSDA Provinsi Sumatera Utara.</p>	<p>Comply</p>

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- Major compliance -	<p>Based on field verification, company 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 in 2017, 71% of planted vetiver were well grown. Wildlife monitoring recorded in Daftar Temuan Satwa Liar, latest monitoring in March 2019 shown presence of species such as: <i>Macaca nemestrina</i>, <i>Macaca fascicularis</i>, <i>Halcyon chloris</i>, <i>Varanus salvator</i>.</p> <p>Company also installed identity signboard and warning signboard on the field.</p>	
<p><b>5.2.3</b></p> <p>Program(s) to socialize the status of protected, rare, threatened or endangered (RTE) to all workers shall be available, including records of appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance –</p>	<p>Company has demonstrate consistency in providing training, communication and socialization of HCV. Batu Anam Estate has been performed the socialization to the workers and surrounding community as explain in minutes of socialization dated 12 January 2018 attend by 21 participants, dated 24 March 2018 attend by 25 participants, dated 8 January 2018 attend by 30 participants, dated 31 January 2018 attend by 33 participants. Socialization in Aek Tarum Estate on 8 March 2019 attend by 33 participant and in Sentral Estate on 6 February 2019 attend by 57 participant.</p> <p>Based on interview with worker representative and field workers – workers have understand protection of plant and animal. The workers also aware of company policy prohibits hunting, raising and killing protected animal.</p> <p>Refreshment and awareness regarding HCV and wildlife protection performed by company through master morning in each division/afdeling PT Gunung Melayu.</p>	Comply
<p><b>5.2.4</b></p> <p>Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan.</p>	<p>Company has prepared Conservation Management Plan 2019, 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>Company 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 Gunung Melayu periode Semester I &amp; II 2018" – monitoring period January – June 2018 and July - December 2018. The report explains the monitoring on status of pland and wildlife, disturbance and damage to the protected area.</p> <p>Wildlife observations are conducted monthly by Mandor HCV in each Afdeling. Observation result since January to March 2019 documented in the "Daftar Temuan satwa liar di areal kebun" observed several protected species at Batu Anam Estate, Aek Tarum and Sentral Estate such as: <i>Tyto alba</i>, <i>Macaca nemestrina</i>, <i>Macaca fascicularis</i>, <i>Varanus salvator</i>, <i>Spilornis cheela</i>, <i>Symphalangus sundactylus</i>,</p>	Comply

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<p>- Minor compliance –</p>	<p><i>Todirhampus chloris, Sus barbatus, Naja sumatrana.</i> Types of animal such as <i>Felis bengalensis, Tragulus javanica, Muntiacus muntjak, Manis javanica</i> 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> <p>Non Conformity:</p> <p>PT Gunung Melayu has set the Conservation Management plan 2018/2019, the management plan including riparian conservation such as;</p> <ul style="list-style-type: none"> <li>• Boundary marking in each 200 m of riparian area</li> <li>• Prohibit the chemical application for weeds control and fertilizing and substitute by manual weeding.</li> </ul> <p>However during field visit to Sungai Masehi riparian there was no boundary marker found or install in riparian area and the information from Estate management stated that chemical application remain performed in the riparian area.</p>	
<p><b>5.2.5</b> 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>	<p>Not Applicable N/A</p>
<p><b>Criterion 5.3:</b> Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>		
<p><b>5.3.1</b> A documented identified source of all waste and pollution, shall be available.</p> <p>- Major compliance -</p>	<p>PT Gunung Melayu – GM II POM has defined the document of identification on sources of all waste and pollution as in “Evaluasi Aspek-Dampak Lingkungan” (Environmental Aspect impacts). This document is updated once a year, last review on 10<sup>th</sup> January 2019.</p>	<p>Comply</p>

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	<p>PT Gunung Melayu – GM II POM has also prepared a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” No.AA-KL-03-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.</p>	
<p><b>5.3.2</b></p> <p>There shall be evidence that all chemicals and their empty containers are disposed of responsibly.</p> <p>- Major compliance -</p>	<p>PT. Gunung Melayu – GM II POM collects all hazardous waste from each estates and mill into temporary hazardous waste storage in central workshop compound.</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>- The temporary hazardous waste storage Sentral Estate has valid permit, “Keputusan Bupati Asahan No.660.1/0595/LH/2014 tentang Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun (B3) PT. Gunung Melayu Kebun Sentral Kabupaten Asahan-Sumatera Utara” dated 21/07/2014, valid for 5 years.</li> <li>- The temporary hazardous waste storage Sentral Estate has valid permit, “Keputusan Bupati Asahan No.503/LB3/DPMPPTSP/0001/II/2018 tentang Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun (B3) PT. Gunung Melayu PMKS Gunung Melayu 2 dated 23<sup>rd</sup> February 2018 valid for 5 years.</li> <li>- PT. Gunung Melayu has an agreement in transporting the hazardous waste with contractor consortiums PT. Prasadha Pamunah Limbah Industri, including PT. Inti Indosawit Subur (affiliation), PT. Sumatera Deli Lestari Indah- PT. Indostar Cargo and PT. Prasadha Pamunah Limbah Industri, based on the agreement between Hazardous Waste Management between PT SSL and PPLI, no. 002/IIS-SDLI-ISC-PPLI/III/2018 dated 2<sup>nd</sup> March 2018 valid for 1 year.</li> </ul> <p>Data verified:</p> <p>Record of hazardous waste management:</p> <ul style="list-style-type: none"> <li>- Record of hazardous sent dated 27<sup>th</sup> March 2019 for oil used 60 liters from Aek Tarum Estate</li> <li>- “Berita Acara Serah Terima Limbah B3”, dated 21<sup>th</sup> December 2018 was delivered to PT Indostar Cargo, consisted of: Oil used (1,980 Kg ~ 11 drum), filter used (160 Kg), empty chemical container (370 kg), medical waste (12 Kg) and battery used (270 Kg – 12 pcs)</li> <li>- Hazardous Waste Manifest nomor: OL 0026189 for item: oil used (1,980 Kg) transported by PT Indostar Cargo by vehicle BK 8486 EG, dated 12<sup>th</sup> December 2018.</li> </ul>	<p>Comply</p>

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		<ul style="list-style-type: none"> <li>Hazardous Waste Manifest nomor: OL 0026190 for item: filter used (160 Kg) transported by PT Indostar Cargo by vehicle BK 8486 EG, dated 12<sup>th</sup> December 2018.</li> <li>Hazardous Waste Manifest nomor: OL 0026192 for item: empty chemical container (370 kg) transported by PT Indostar Cargo by vehicle BK 8486 EG, dated 12<sup>th</sup> December 2018.</li> </ul>													
<b>5.3.3</b>	<p>A documented waste management plan to avoid or reduce pollution and its implementation shall be available.</p> <p>- Minor compliance –</p>	<p>Document of waste management plan is documented in "Evaluasi Aspek – Dampak Lingkungan", updated 20<sup>th</sup> January 2019. The document was explained waste management consists of medical waste, domestic waste, and hazardous waste to reduce pollution into the environment. Hazardous and medical waste is disposed to the register collector, while domestic waste disposed to the landfill, organic and an organic waste is separated in line site, organic waste to the landfill and some of inorganic waste is collected for re-cycle.</p> <p>Record seen:</p> <ul style="list-style-type: none"> <li>Program dan Realisasi Penaburan EFB tahun 2018 in Sentral Estate, such as:</li> </ul> <table border="1"> <thead> <tr> <th>Sentral Estate</th> <th>EFB application</th> </tr> </thead> <tbody> <tr> <td>Division I</td> <td>3,816.34 tonnes</td> </tr> <tr> <td>Division II</td> <td>4,868.5 tonnes</td> </tr> <tr> <td>Division III</td> <td>4,395.85 tonnes</td> </tr> <tr> <td>Division III</td> <td>3,664.15 tonnes</td> </tr> <tr> <td>Total</td> <td>16,919.84 tonnes</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li>Environmental measurements for emissions are carried out by Sucofindo and have been reported on Air Quality Monitoring (Based on KepMenLH No. 7/2007 and Kep Men LH No.48/1996) for second semester year 2018 to the Environment Agency, e.g: <ul style="list-style-type: none"> <li>Air emissions (Boiler and Genset) the result shown still below the quality standard</li> <li>Air ambient, the result shown still below the quality standard</li> </ul> </li> </ul>	Sentral Estate	EFB application	Division I	3,816.34 tonnes	Division II	4,868.5 tonnes	Division III	4,395.85 tonnes	Division III	3,664.15 tonnes	Total	16,919.84 tonnes	<p>NC</p> <p>#1487836-201706-N3</p> <p>CLOSED on 9 June 2018</p> <p>Comply</p>
Sentral Estate	EFB application														
Division I	3,816.34 tonnes														
Division II	4,868.5 tonnes														
Division III	4,395.85 tonnes														
Division III	3,664.15 tonnes														
Total	16,919.84 tonnes														
<p><b>Criterion 5.4:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>															

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<b>5.4.1</b>	<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>PT. Gunung Melalyu – Gunung Melayu II POM has prepared a plan for improving efficiency of the use of fossil fuels and to optimize renewable energy under “Program Management Lingkungan 2019” dated 10<sup>th</sup> January 2019.</p> <p>The program consisted of:</p> <p>Fossil fuel usage is recorded for operational purpose, including the efficiency analysis year 2018:</p> <p>Shell: 4,710 tonnes</p> <p>Fossil Fuel: 75,211 liters.</p> <p>Usage of electricity (KWH): 26.83 kwh/ton FFB.</p> <p>All energy used in both mills is monitored and recorded under document of “Pemakaian Energi 2018”. Fossil fuel records are maintained and trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. Company already maximizes the renewable energy use. All the shell is consumed internally as boiler fuel.</p>	Comply
<p><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.</p>			
<b>5.5.1</b>	<p>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.</p> <p>- Major compliance -</p>	<p>No open burning was noted during field visit and interviewed with local communities and workers.</p> <p>No replanting program in the near future. All areas have been replanted in 2003 – 2011.</p> <p>- Based on fire inspection report (Patrol) indicating there were no any fire incident since year 2018 and 2019.</p>	Comply
<b>5.5.2</b>	<p>Where fire has been used for eradication of pest during replanting, the records of the analysis of the use of fire and</p>	<p>PT. Gunung Melayu – Estate have developed an early warning system, to monitor the risk of fire. The system “Sistem Peringkat Bahaya Kebakaran 1 &amp; 2 PT Gunung Melayu”.</p> <p>The monitoring system calculating the field condition, ignition risk, potential drought and smoke, fire handling, weather index.</p>	Comply

Criterion / Indicator		Assessment Findings	Compliance
	<p>permit from the authorised agency shall be available.</p> <p>- Minor compliance -</p>		
<p><b>Criterion 5.6:</b> Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>			
<b>5.6.1</b>	<p>Document(s) assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent, shall be available. (see Criterion 4.4)</p> <p>- Major compliance -</p>	<p>PT Gunung Melayu – Gunung Melayu II POM has shown the document of assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent and has been developed mitigation program to reduce GHG emission.</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.</p> <p>Graph of emission and pollutant were provided to monitor trend of them in monthly basis, such as:</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 10<sup>th</sup> January 2019, consist of: input, environmental aspect, caused, environmental impact potential, and control.</p>	Comply
<b>5.6.2</b>	<p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plan to reduce or minimize them implemented.</p>	<p>PT Gunung Melayu – Gunung Melayu II POM has been identified the significant pollutant and GHG emissions, such as:</p> <ul style="list-style-type: none"> <li>- Usage of an-organic fertilizer,</li> <li>- Pesticide,</li> </ul>	Comply

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<ul style="list-style-type: none"> <li>- Major compliance -</li> </ul>	<ul style="list-style-type: none"> <li>- Fossil fuel usage,</li> <li>- POME.</li> </ul> <p>PT Gunung Melayu – GM II POM has also minimized pollutant and GHG through, such as</p> <ul style="list-style-type: none"> <li>- Using EFB as organic fertilizer, e.g:</li> </ul> <table border="1" data-bbox="707 571 1169 775"> <thead> <tr> <th>Sentral Estate</th> <th>EFB application</th> </tr> </thead> <tbody> <tr> <td>Division I</td> <td>3,816.34 tonnes</td> </tr> <tr> <td>Division II</td> <td>4,868.5 tonnes</td> </tr> <tr> <td>Division III</td> <td>4,395.85 tonnes</td> </tr> <tr> <td>Division III</td> <td>3,664.15 tonnes</td> </tr> <tr> <td>Total</td> <td>16,919.84 tonnes</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li>- Implementing IPM to reduce pesticides usage,</li> <li>- Using fibers and sell for boiler,</li> <li>- Capturing POME by Biogas Plant by Kubota. Thermophillic anaerobic process.</li> </ul>	Sentral Estate	EFB application	Division I	3,816.34 tonnes	Division II	4,868.5 tonnes	Division III	4,395.85 tonnes	Division III	3,664.15 tonnes	Total	16,919.84 tonnes	
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Total	16,919.84 tonnes													
<p><b>5.6.3</b></p> <p>A monitoring plan and results of regular reporting on emission and pollutants from estate and mill operations using appropriate methods, shall be available.</p> <ul style="list-style-type: none"> <li>- Minor compliance –</li> </ul>	<p>PT Gunung Melayu – Gunung Melayu II POM has shown the documeny of emission monitoring system by using “RSPO PalmGHG” system calculation. Emission from estate and mill operation was calculated and monitored, emission reduction achieved.</p> <p>PT Gunung Melayu – GM II POM has also 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:</p> <ul style="list-style-type: none"> <li>- Air quality ambient for boiler and generator,</li> <li>- Water quality test for river (upstream and downstream),</li> <li>- Effluent water quality,</li> <li>- Noise, etc.</li> </ul> <p>Monitoring of any pollutant has been done in daily, weekly and monthly basis, report of monitoring was recorded in the “RKL/RPL” report, and this report submitted to the related institution every 6 month</p>	<p>Comply</p>												



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	Regular monitoring and calculation of polluting and emission from estate and mill available using Palm GHG Calculator Version 3.0.1. Emission from estates and mill activities during year 2018 are 6.71tCO <sub>2</sub> e/tCPO and 6.71tCO <sub>2</sub> e/tPK. Detail of Summary of net GHG emissions from PalmGHG calculator available in appendix.	
<b>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers</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.		
<b>6.1.1</b> A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	<p>Social Impact Assessment was conducted as documented in "Laporan Identifikasi dan Upaya Kelola Sosial" which covering social impact assessment dated in 2017, 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, Sumatera Utara Province, by Team Corporate Social Responsibility 2017.</p> <p>The social impact assessment document was reporting the condition of: social interaction, organizational, institutionalization in communities, local community livelihood, economic impact, health condition, education, presence of worker union and gender committee. There is also</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. The SIA carried out 25-29 April 2017.</p> <p>Company continued the meeting with stakeholders, surrounding communities and filling in questionnaire on May 2018. Record sighted: 4 "Kuesioner Pendapat Masyarakat Sekitar Kegiatan Usaha" dated 14 May 2018 to villagers from Dusun VIII Batu Anam, Dusun VI Sidomulyo, Dusun III Gonting Malaha, Kecamatan Bandar Pulau. The questionnaire discussing social relationship between company and communities, basic need, information transparency, job vacancy and/or opportunity for economy development, input/comment/grievance handling satisfaction, environmental impact, perception.</p>	Comply

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		In 4 March 2019, PT. Gunung Melayu made a consultation meeting to review the social impact assessment program effectiveness with Desa Batu Anam, Desa Gonting Malaha, Desa Sidomulyo. Document sighted "Berita Acara Review Efektivitas Social Impact Assessment PT. Gunung Melayu", dated 4 February 2019. The meeting attended by 19 villagers. Photographic evidence attested.	
<b>6.1.2</b>	There shall be evidence that the assessment has been conducted with the participation of affected parties. - Major compliance -	<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> <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. Latest meeting with stakeholder and affected parties conducted on June 2017. Feedback from the stakeholder was serving as inputs in creating a social impact mitigation and management program 2017.</p> <p>Company continued the meeting with stakeholders, surrounding communities and filling in questionnaire on May 2018. Record sighted: 4 "Kuesioner Pendapat Masyarakat Sekitar Kegiatan Usaha" dated 14 May 2018 to villagers from Dusun VIII Batu Anam, Dusun VI Sidomulyo, Dusun III Gonting Malaha, Kecamatan Bandar Pulau. The questionnaire discussing social relationship between company and communities, basic need, information transparency, job vacancy and/or opportunity for economy development, input/comment/grievance handling satisfaction, environmental impact, perception.</p> <p>In 4 March 2019, PT. Gunung Melayu made a consultation meeting to review the social impact assessment program effectiveness with Desa Batu Anam, Desa Gonting Malaha, Desa Sidomulyo. Document sighted "Berita Acara Review Efektivitas Social Impact Assessment PT. Gunung Melayu", dated 4 February 2019. The meeting attended by 19 villagers. Photographic evidence attested.</p>	Comply
<b>6.1.3</b>	Plans for management and monitoring of social impacts to	The social plan and monitoring have been established. The plan was prepared based on analysis upon business process, its impact, stakeholder expectation and thus the proposed program.	Comply

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<p>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>	Business Process	Impact(s)	Stakeholder expectation	Social Program		
	Replanting	Change in micro-climate; dust, dry weather, heat	Community invited to participate: work for piece rate, work to reduce dust; Community can get oil palm plot	Prepare replanting plan, in order to improve community's welfare		
	FFB harvest	Worker's children left unattended	Children day care	Company prepares creche		
	FFB transport/ CPO transport	Dust from road; "illegal retribution"	Road maintained	Safety driving; Watering road;		
	Mill effluent	Leaking to water body	Clean water maintained	Land Application maintained and monitored;		
	Mill emission	Smoke, dust, low air quality	Better air quality	Mill machinery maintenance and service;		
	FFB purchase	Presence of middlemen; Income generation	Company buys FFB from local communities	Local FFB purchase, proportioned with FFB supplied from company-owned estate		
	Company operates school in estates	Better education, better facility, better future for children	Better education means better future for the children	Donation for schools, school building maintenance,		
	Company policy on zero tolerance for drug abuse	Illicit distribution of outside and inside company	Free of drug abuse, especially for young people	Socialization on risk of drug abuse;  Competition for secondary school and high school student		

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		All of the impact being prepared with plan "Review efektivitas SIA PT. Gunung Melayu 2019", indicating the activity, program, target, detailed implementation, timeframe.	
<b>6.1.4</b>	The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties. - Minor compliance –	In 4 March 2019, PT. Gunung Melayu made a consultation meeting to review the social impact assessment program effectiveness with Desa Batu Anam, Desa Gonting Malaha, Desa Sidomulyo. Document sighted "Berita Acara Review Efektivitas Social Impact Assessment PT. Gunung Melayu", dated 4 February 2019. The meeting attended by 19 villagers. Photographic evidence attested.	NC #1487836-201706-N4 CLOSED on 9 June 2018 Comply
<b>6.1.5</b>	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance –	PT. Gunung Melayu does not have obligation to develop scheme smallholder. However, this company is proactive in encouraging and assisting independent oil palm grower to organize and form independent smallholder in Batu Anam village and Gonting Malaha village. Company prepared a budget to assist the surrounding oil palm growers in form of trainings, sign boards, barn owl boxes, road maintenance, cooperative building renovation. Implementation of CSV Gunung Melayu year 2018: - Training "Organization dynamic" in April 2018; - Training related to pest and disease, soil and water conservation, fertilizer application, FFB quality criterion in August 2018; - Training limited herbicide on September 2018; - Signboards related to PPE usage; no spraying near water body; sign of nutrient deficiency; prohibit blanket spraying – have been erected on April 2018; - Provision of 5 barn owl boxes on March 2018; - Road maintenance by grader and compactor on August-September-October 2018;	Not applicable N/A

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		- Cooperative building renovation on August 2018; Implementation of CSV Gunung Melayu year 2019: Road maintenance by grader and compactor on February-March 2019;	
<b>Criterion 6.2:</b>			
There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
<b>6.2.1</b>	Communication and consultation procedures shall be documented. - Major compliance -	Company 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.	Comply
<b>6.2.2</b>	The company shall have official(s) who is responsible for consultation and communications with parties. - Minor compliance -	PT. Gunung Melayu have appointed Mr. Agus Salim Batubara as public relation officer, as per "Memorandum Regional Head Plantation-1 No.071/HR-RO1/MEMO/02/17 tentang Penugasan Sebagai Humas" dated 25 February 2017. The public relation officer is responsible for consultation and communication with stakeholders of PT. Gunung Melayu and PT. Saudara Sejati Luhur.  Based on stakeholder consultation with Manpower Office, Lands Office, Environmental Agency, Plantation Services in Asahan Regency, statement gathered that PT. Gunung Melayu is cooperative in sending reports and comply with regulations.	Comply
<b>6.2.3</b>	The company shall have a list of stakeholders, records of communications, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions	PT. Gunung Melayu prepared the list of their stakeholders, which consist of: Desa Batu Anam, Desa Sidomulyo, Desa Gonting Malaha, Tokoh Masyarakat Desa Batu Anam, Tokoh Masyarakat Desa Sidomulyo, Tokoh Masyarakat Desa Gonting Malaha (Village); Camat Rahuning, Camat Bandar Pulau, Camat Tinggi Raja (District head); Kepolisian Republik Indonesia Resor Asahan, Kepolisian Republik Indonesia Sektor Bandar Pulau (Police); batalyon Infanteri 126 Kala Cakti Asahan, Komando Distrik Militer 0206, Komando Rayon Militer 15 Bandar Pulau (Army); Badan Koordinasi Kebakaran (Fire Brigade); DPC.FSP.PP.SPSI (worker union), Dinas Pertanian Bidang Kehutanan Kabupaten Asahan (Plantation Service Agency), Badan Pertanahan Nasional Kabupaten Asahan (Lands Office), Dinas Ketenagakerjaan Kabupaten Asahan	Comply

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	<p>taken in response to input from stakeholders.</p> <p>- Minor compliance -</p>	<p>(Manpower Office), Dinas Lingkungan Hidup Kabupaten Asahan (Environment Office), Dinas Pendidikan dan Pengajaran Kabupaten Asahan (Education Service).</p> <p>Record of communication:</p> <p>On 24 October 2018, community from "Dusun I dan Dusun II – Desa Sidomulyo, Kecamatan Tinggi Raja, Kabupaten Asahan" made report of dead fish and murky water in Aliran Masihi River. Company and village authority made immediate verification and concluded the water condition was not affected from company operation. Based on "Surat Keterangan Desa Sidomulyo No.470/2005/SK/XI/2018" dated 5 November 2018, company and village authority spread small fish and committed to maintain the natural condition of Aliran Masihi River on the same date.</p>	
<p><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 effected parties.</p>			
<b>6.3.1</b>	<p>The mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested, as long as that information is supported with adequate initial evidence.</p> <p>- Major compliance -</p>	<p>Company have sets up hotline for whistle blower to prevent, identify, report and manages fraud or abuse. Regulated as per "Mekanisme Jaminan Pelapor dan Pengungkapan Kasus (Whistleblower)", with reference to "SOP AA-GL-5009.1 R0" and "SOP AA-HR-308.5-R0 Penyampaian dan Penyelesaian Keluhan Karyawan". The SOPs stipulated all report shall be responded in 14 days.</p> <p>In Gunung Melayu II POM, the whistleblower mechanism communicated to workers, carried out in 7 January 2019. The communication attended by 39 workers; comprise of 5 office clerks, 7 security, 2 process operators, 8 laboratory workers, 16 mechanics.</p>	Comply
<b>6.3.2</b>	<p>There shall be records of process and outcome of dispute resolution.</p> <p>- Major compliance -</p>	<p>Workers grievance recorded in the log book "Monitoring Keluhan Karyawan". Based on the Employee Complaint Book up to April 2019 there are 13 complaints in Batu Anam Estate, 11 in Sentral Estate, 41 Aek Tarum Estate and 3 complaints at Gunung Melayu II Mill</p> <p>Sample seen:</p>	Comply

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		<ul style="list-style-type: none"> <li>- Complaint sampled from Batu Anam Estate, date 6 January 2019 from Mr.Sawal (keamanan), complaint related to broken window pane, damaged room wall, broken bathroom door. The complaint related to housing condition has been responded and repaired on 8 January 2019. Evidence sighted: "Bukti Permintaan Pemakaian Barang No.SW119/01/0205 untuk triplek dan seng datar" warehouse issue note for board and zinc plate dated 8 January 2019.</li> <li>- Complaint from Aek Tarum Estate, date 19 November 2018 from Mr.Santok (workshop), complaint related to broken roof (leaking). The complaint related to housing condition has been responded and repaired on 20 November 2018. Evidence sighted: "Bukti Permintaan Pemakaian Barang No.SW18/11/0375 untuk seng, triplek paku, dan paku payung" warehouse issue note for board, nails and zinc plate dated 20 November 2018.</li> <li>- Complaint from Aek Tarum Estate, date 26 November 2018 from Mr.Suardi (traction), complaint related to broken room door. The complaint related to housing condition has been responded and repaired on 27 November 2018. Evidence sighted: "Bukti Permintaan Pemakaian Barang No.SW18/11/0403 untuk triplek dan paku" warehouse issue note for board and nail dated 27 November 2018.</li> <li>- Complaint from Sentral Estate, date 27 June 2018 from Mr.Togu Pakpahan (worker), complaint related to pot hole in road in front of housing. The complaint related to road condition has been responded and repaired on 30 June 2018. Evidence sighted: "Attendance and Gang Activity for Non-Harvesting" dated 30 June 2018, indicating there are 6 mandays allocated to repair the pot hole/maintain road condition in housing complex, mandore: Ucok.</li> </ul>	
<p><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.</p>			
<b>6.4.1</b>	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be available, referring to	There is a mechanism for land dispute resolution, SOP AA-GL-5003.1-R1 related to "Penanganan Konflik Lahan" effective 22 August 2011. The procedure covers land dispute handling mechanism, negotiation process and verification upon legal ownership evidence up to land compensation. Should negotiation process fails, any land dispute will be processed through legal/litigation mechanism. During the process, a complete record is maintained.	Comply

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	<p>decision of the Constitution Court.</p> <p>- Major compliance –</p>	<p>Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p> <p>PT. Gunung Melayu has not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company's HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner.</p>	
<b>6.4.2</b>	<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 August 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.</p> <p>The compensation calculated based on agreement of both parties through negotiation – upon participative measurement, and recorded under an agreement.</p>	Comply
<b>6.4.3</b>	<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 management statement, information from Batu Anam Village, Sidomulyo Village and Batu Anam Village, and hectare statement shows there is no land dispute between PT. Gunung Melayu with other party.</p>	Comply
<b>Criterion 6.5:</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>6.5.1</b>	<p>Documentation of pay and conditions for employees based</p>	<p>The company determines minimum wages based on the Government regulation every year, the minimum wages in 2018 was regulated in "Surat Keputusan Gubernur Sumatera Utara No.188.44/12/KPTS/2018", dated 1 November 2017 effective from 17 January 2018 for agriculture sector. Minimum wages for 2018</p>	Comply



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<p>on the existing manpower regulations shall be available.</p> <p>- Major compliance -</p>	<p>based on Specific for oil palm plantation sector sets at Rp. 2,569,254/month. The minimum wage 2018 have been implemented since May 2018 as per "Memorandum HR Manager No.011/HR-AAS/MEMO/05/18 Hal Petunjuk Kenaikan Upah Tahun 2018" and "Memorandum Regional Head No.023/HR-RO1/MEMO/05/18 Hal Kenaikan Upah Pekerja Golongan PHL, SKU-H dan SKU-B Tahun 2018" dated 4 May 2018. The 2018 minimum wage sets for temporary worker at Rp.2,569,255/month or Rp.102,770/manday; for permanent worker SKU-H at Rp.2,564,718/month;</p> <p>It was noted, at the time of this audit was still using UMSK wage in 2018. However, there is a new regulation on minimum wage 2019 "Surat Keputusan Gubernur Sumatera Utara No.188.44/1573/KPTS/2018 tentang Upah Minimum Sektoral Kabupaten Asahan Tahun 2019", dated 31 December 2018 effective from 1 January 2019 for agriculture sector. Minimum wages for 2019 based on specific for oil palm plantation sector sets at Rp.2,723,686/month and will be conducted wage adjustment in May 2019. In response to the salary increment lined out by government, company received letter from "Surat Kesepakatan Bersama Badan Kerja Sama Perusahaan Perkebunan Sumatera (BKS-PPS) dan Pengurus Daerah Federasi Serikat Pekerja Pertanian dan Perkebunan Serikat Pekerja Seluruh Indonesia (PD FSP.PP-SPSI) Propinsi Sumatera Utara mengenai Upah Pekerja Perkebunan Pada Perusahaan Anggota BKS-PPS di Propinsi Sumatera Utara tahun 2019", dated 6 February 2019 – whereby stipulated the minimum wage setas at Rp.2,757,072/month.</p> <p>Batu Anam Estate paid the temporary worker accordingly: Mrs. Evi Handayani, temporary worker for pest and disease census worked 11 mandays in February 2019 with rate Rp.102,770/day – basic salary Rp.1,130,470; deduction for BPJS Rp.51,385; take home pay Rp.1,079,085. She worked 14 mandays in March 2019 with rate Rp.102,770/day – basic salary Rp.1,438,780 + benefit Rp.3,000; deduction for BPJS Rp.51,385; take home pay Rp.1,390,395.</p> <p>Mrs. Afrilianti, temporary worker for pest and disease census worked 10 mandays in February 2019 with rate Rp.102,770/day – basic salary Rp.1,027,700; deduction for BPJS Rp.77,325; take home pay Rp.950,375. She worked 14 mandays in March 2019 with rate Rp.102,770/day – basic salary Rp.1,442,280 + benefit Rp.3,500; deduction for BPJS Rp.77,325; take home pay Rp.1,364,955.</p> <p>Aek Tarum Estate paid the temporary worker accordingly: Mrs. Suriana, temporary worker for fertilizer application worked 15 mandays in January 2019 with rate Rp.102,770/day – basic salary Rp.1,541,550 + benefit Rp.18,000; deduction for BPJS Rp.77,325; take home pay Rp.1,482,225. She worked 10 mandays</p>	

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	<p>in February 2019 with rate Rp.102,770/day – basic salary Rp.1,027,700 + benefit Rp.9,000; deduction for BPJS Rp.77,325; take home pay Rp.959,375. She worked 17 mandays in March 2019 with rate Rp.102,770/day – basic salary Rp.1,747,090 + benefit Rp.24,000; deduction for BPJS Rp.77,325; take home pay Rp.1,693,765.</p> <p>Mrs. Ponisah, temporary worker for fertilizer application worked 18 mandays in January 2019 with rate Rp.102,770/day – basic salary Rp.1,849,860 + benefit Rp.117,000; deduction for BPJS Rp.77,325; take home pay Rp.1,889,535. She worked 16 mandays in February 2019 with rate Rp.102,770/day – basic salary Rp.1,644,320 + benefit Rp.104,000; deduction for BPJS Rp.77,325; take home pay Rp.1,670,995. She worked 16 mandays in March 2019 with rate Rp.102,770/day – basic salary Rp.1,644,320 + benefit Rp.104,000; deduction for BPJS Rp.77,325; deduction for cooperative loan Rp.115,500; take home pay Rp.1,555,495.</p> <p>Gunung Melayu II POM paid the worker accordingly: Mrs. Sri Wahyuni, Office clerk worked 26 mandays in January 2019, basic salary Rp.1,222,766 + benefit Rp.427,455 + premium Rp.295,499 + no overtime; deduction for BPJS Rp.106,785 + from cooperative Rp.905,000 + from worker union Rp.25,000; take home pay Rp.1,898,885. The cooperative deduction in form of consumer goods, saving and glasses.</p> <p>She worked 25 mandays in February 2019, basic salary Rp.2,137,275 + benefit Rp.512,946 + premium Rp.271,937; deduction for BPJS Rp.106,785 + from cooperative Rp.920,200 + from worker union Rp.25,000; take home pay Rp.1,870,173. The cooperative deduction in form of monthly grocery, saving and glasses.</p> <p>Mrs. Dahlia Rabita Tambunan, Weighbridge Attendant worked 20 mandays in January 2019, basic salary Rp.2,055,400 + benefit Rp.0 + premium Rp.0 + overtime Rp.668,298 (45 hours in 20 mandays); deduction for BPJS Rp.103,018; take home pay Rp.2,620,680.</p> <p>She worked 20 mandays in February 2019, basic salary Rp.2,055,400 + benefit Rp.0 + premium Rp.0 + overtime Rp.564,341 (38 hours in 20 mandays); deduction for BPJS Rp.103,018 + for cooperative Rp. 0 + for worker union Rp.25,000; take home pay Rp.2,516,723.</p> <p>Mr. Eko Dimas Pramujji, Ripple Mill Operator worked 24 mandays in January 2019, basic salary Rp.2,051,784 + benefit Rp.598,437 + premium Rp.3,487,794 + overtime Rp.0; deduction for BPJS Rp.106,785 + from</p>	

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	<p>cooperative Rp.3,955,700; take home pay Rp.2,050,530. The cooperative deduction in form of monthly groceries, consumer goods and saving.</p> <p>He worked 23 mandays in February 2019, basic salary Rp.1,966,293 + benefit Rp.683,928 + premium Rp.2,753,914; deduction for BPJS Rp.106,785 + from cooperative Rp.4,108,100 + from worker union Rp.25,000; take home pay Rp.1,164,250. The cooperative deduction in form of monthly grocery and saving.</p>	
<p><b>6.5.2</b></p> <p>Collective Labor Agreement /Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the workers.</p> <p>- Major compliance -</p>	<p>Collective Work Agreement available in form of "Perjanjian Kerja Bersama (PKB) 2015-2017 antara Badan Kerja Sama Perusahaan Perkebunan Sumatera (BKS-PPS) dengan Pengurus Pusat Federasi Serikat Pekerja Pertanian dan Perkebunan Serikat Pekerja Seluruh Indonesia (PP.FSP.PP-SPSI)", signed by all parties in Medan, 21 April 2015. The collective work agreement valid for 2 years. The collective work agreement have registered and acknowledge by the Manpower Ministry, as per "Keputusan Direktur Jenderal Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No.KEP.88/PHIJSK-PKKADP/PKB?VI/2015 tentang Pendaftaran Perjanjian Kerja Bersama Badan Kerja Sama Perusahaan Perkebunan Sumater (BKS-PPS) dengan Pengurus Pusat Federasi Serikat Pekerja Pertanian dan Perkebunan Serikat Pekerja Seluruh Indonesia (PP.FSP.PP-SPSI)", dated 18 June 2015.</p> <p>Statement on continuing collective work agreement applicability (after 2017) as in letter from "Surat Badan Kerja Sama Perusahaan Perkebunan Sumatera/BKS-PPS No.72/BKS-PPS/2017 tentang Masa Berlaku Perjanjian Kerja Bersama" to PT. Inti Indosawit Subur, dated 12 July 2017 explained the collective work agreement period 2015-2017 remains applicable until new agreement validated. As at audit, the new collective work agreement is in process.</p> <p>The collective work agreement stipulated requirements related to: worker recruitment, working hour, working day, national holiday, working on holiday, protection for female worker, salary, in-kind benefit (rice), worker's dependant, sick benefit, overtime, religious day benefit, bonus, social insurance, housing, creche, education for children, transportation, working tools, health and safety, pension, temporary worker, PHK, industrial relation settlement, and timeframe of collective work agreement.</p> <p>Collective work agreement (BKS-PPS) period 2015-2017, and its latest status have been disseminated to all workers. Based on interview with "Dinas Ketenagakerjaan Kabupaten Asahan" noted the collective work agreement remains applicable, while process to establish new collective work agreement completed. Based on interview with worker union chairman, the "Badan Kerjasama – Perusahaan Perkebunan Sumatera/BKS-</p>	<p>Comply</p>

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	<p>PPS" is in process to complete the new collective work agreement, which will be applicable for all plantation in Sumatera.</p> <p>In Aek Tarum Estate communicating the rights and obligations both worker and employer (PT. Gunung Melayu) onto 22 workers, on 15 March 2019.</p> <p>In Sentral Estate, the communication of the use of collective work agreement carried out in 12 February 2019. The communication attended by 51 workers from Division III, comprise of 8 sprayers, 7 fertilizer packers, 6 fertilizer applicators, 2 carpenter, 2 mudim, 5 upkeep workers, 11 temporary workers, 7 umum, 3 supervisors; sampled worker (Mrs. Suningsih, Mrs. Rusni M, Mrs. Romendi – sprayers).</p> <p>For temporary worker:            Collective work agreement (BKS-PPS) period 2015-2017, and its latest status have been disseminated to all workers. In Batu Anam Estate, communicating the rights and obligations both worker and employer (PT. Gunung Melayu) onto 14 workers, on 2 January 2019.</p> <p>The appointed temporary worker into permanent worker signed work agreement. In Aek Tarum Estate, Mrs. Rehmalem br Brahmana: "Perjanjian Kerja No.51/ES-KAT/Int/07/2018 atas nama Rehmalem br Brahmana sebagai personalia". The work agreement stipulated job description, salary, in-kind benefit, rights and obligations.</p>	
<p><b>6.5.3</b></p>	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where such public facilities are unavailable or inaccessible.</p> <p>- Minor compliance –</p> <p>Housing, medical, educational and welfare amenities for Gunung Melayu II POM workers: housing type D (126 m<sup>2</sup>) 10 units; housing type E (96 m<sup>2</sup>) 76 units; POM office 1 unit; material godown 1 unit; workshop/garage 1 unit; clinic 1 unit; masjid 1 unit; employee hall 1 unit; power generator building 1 unit; washing bay 1 unit;</p> <p>Housing, medical, educational and welfare amenities for Batu Anam Estate workers: housing type B (154 m<sup>2</sup>) 1 unit; housing type C semi permanent (143 m<sup>2</sup>) 1 unit; housing type C (143 m<sup>2</sup>) 4 units; housing type D (126 m<sup>2</sup>) 28 units; housing type E (96 m<sup>2</sup>) 251 units; barrack (120 m<sup>2</sup>) 6 doors; estate office 1 unit; division office 3 units; fertilizer godown 4 units; workshop/garage 1 unit; masjid 2 unit; Quran school 1 unit; employee hall 1 unit; canteen 2 unit; creche 2 unit; power generator building 1 unit; washing bay 1 unit;</p> <p>Housing, medical, educational and welfare amenities for Aek Tarum Estate workers: housing type D (126 m<sup>2</sup>) 12 units; housing type E (96 m<sup>2</sup>) 183 units; division office 3 units; fertilizer godown 4 units; clinic 2</p>	<p>Comply</p>

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		units; masjid 2 units; church 1 unit; creche 2 unit; power generator building 1 unit; water pump building 1 unit;	
<b>6.5.4</b>	There shall be demonstrable efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance –	The employees in PT. Gunung Melayu organized themselves a cooperative. The cooperative provides basic necessities/groceries. 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.	Comply
<b>Criterion 6.6:</b>			
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.			
<b>6.6.1</b>	A record of the company's policy in understandable language recognising freedom of association, shall be available. - Major compliance –	<p>PT. Gunung Melayu adopted the company policy from "Asian Agri" signed by Managing Director on 1 December 2014, available in Bahasa Indonesia. The company policy in Section 16 "menghormati hak setiap karyawan untuk membentuk atau menjadi anggota serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif" – to respect the rights of each employee to establish and be member of worker union of their choice and to be able to collective bargaining.</p> <p>In Gunung Melayu II POM, the policy recognising freedom of association communicated to workers, carried out in 7 January 2019. The communication attended by 39 workers; comprise of 5 office clerks, 7 security, 2 process operators, 8 laboratory workers, 16 mechanics.</p> <p>In Sentral Estate, there are 198 member of "Serikat Pekerja Seluruh Indonesia". In Sentral Estate, the policy recognising freedom of association communicated to workers, sampled one carried out in 12 February 2019. The communication attended by 46 workers, comprise of harvester, FFB checker and temporary workers.</p> <p>The worker in PT. Gunung Melayu have organized themselves in form of "Struktur Organisasi Pengurus Unit Kebun F-SP.PP SPSI PT. Gunung Melayu &amp; PT. Saudara Sejati Luhur periode 29 October 2018 – 26 August 2022". The structure appointed Mr. Bahagiyo as the chairman. The organization structure have been formalized through "Surat Keputusan Pengurus Cabang Federasi Serikat Pekerja Pertanian dan Perkebunan Serikat Pekerja Seluruh Indonesia No.SK.267/ORG/PC.F.SP.PP-AS?X/2018 tentang</p>	Comply

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		<p>Pengesahan/Pengukuhan Penyisipan Jabatan Lowong Pengurus Unit Kerja Serikat Pekerja Pertanian dan Perkabunan Serikat Pekerja Seluruh Indonesia PT. Gunung Melayu/PT. Saudara Sejati Luhur Desa Batu Anam, Kecamatan Rahuning, Kabupaten Asahan” dated 29 October 2018.</p> <p>Based on interview with worker union chairman, noted that company is cooperative and supportive to presence of worker union.</p>	
<b>6.6.2</b>	<p>Records of meetings with labor unions or workers representatives shall be available.</p> <p>- Minor compliance –</p>	<p>Company and the worker union keeps record of meeting.</p> <p>“Notulen Rapat Koordinasi antara Managemen Perusahaan dengan PUK F-SP.PP SPSI PT. Gunung Melayu”, dated 30 May 2018. The meeting attended by 12 company (management) representative and 10 worker union representative. The meeting discussing criterion for bonus calculation, clarification for worker with low output. Attendance list and minutes are available.</p> <p>In Sentral Estate, latest meeting between worker union representative and managment carried out on 12 February 2019. The meeting including socialization on status of collective work agreement period 2015-2017 that still in use. The Meeting attended by 46 workers, comprise of harvester, FFB checker and temporary workers.</p>	Comply
<p><b>Criterion 6.7:</b>            Children are not employed or exploited.</p>			
<b>6.7.1</b>	<p>There shall be documented evidence that minimum age requirements are met.</p> <p>- Major compliance –</p>	<p>PT. Gunung Melayu adopted the company policy from “Asian Agri” signed by Managing Director on 1 December 2014, available in Bahasa Indonesia. The company policy in Section 14 “Melarang anak-anak bekerja dalam setiap kegiatan perusahaan” – to prevent children working in all company operation.</p> <p>In Gunung Melayu II POM, the policy prohibit use of child worker communicated to workers, carried out in 7 January 2019. The communication attended by 39 workers; comprise of 5 office clerks, 7 security, 2 process operators, 8 laboratory workers, 16 mechanics.</p> <p>Verification upon employee register Gunung Melayu II POM, the youngest worker: Mr. Jose Putra Alpindo Sembiring (temporary worker – workshop), born 6 January 1999, first working date 12 January 2018 at 19 years old; Mrs. Dahlia Rabita Tambunan (temporary worker) born 4 March 1999, first working date 1 August 2018, at 19 years old.</p>	Comply

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	<p>Verification upon employee register Aek Tarum Estate, the youngest worker: Mr. Dedek Agung Wijaya (temporary worker – workshop), born 10 January 2000, first working date 22 February 2018 at 18 years old; Mr. Yuditira (temporary worker – Division III), born 18 May 2000, first working date 28 June 2018 at 18 years old;</p> <p>In Sentral Estate, the communication minimum age policy (18 years old) carried out in 12 February 2019. The communication attended by 38 workers from Division IV, comprise of 27 harvesters, 1 harvest mandor, 2 harvest checkers, 1 fertilizer applicator supervisor, 3 upkeep mandors, 1 pest and disease mandor, 2 Division checker, 1 head mandor; sampled worker (Mr. Sujono, Mr. Joshner S. – harvester).</p> <p>Verification upon employee register Sentral Estate, the youngest worker: Mr. Rizki Hardiansyah Tanjung (temporary worker – workshop), born 1 May 2000, first working date 1 August 2018 at 18 years old; Mr. Muhammad Gusnawan (temporary worker – harvester Division IV), born 21 August 2000, first working date 1 August 2018 at 18 years old;</p> <p>Based on field visit, no underage worker on the field.</p>	
<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>		
<p><b>6.8.1</b></p>	<p>A company’s policy on equal opportunity and treatment for work shall be available and documented.</p> <p>- Major compliance –</p> <p>PT. Gunung Melayu adopted the company policy from “Asian Agri” signed by Managing Director on 1 December 2014, available in Bahasa Indonesia. The company policy in Section 14 “menghormati hak asasi manusia dengan memperlakukan seluruh karyawan secara adil, baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur” – to respect human rights by treating all employee in fair manner, during recruitment, evaluation, work condition and work environment, representability without discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age.</p> <p>In Gunung Melayu II POM, the policy prohibit use of child worker communicated to workers, carried out in 7 January 2019. The communication attended by 39 workers; comprise of 5 office clerks, 7 security, 2 process operators, 8 laboratory workers, 16 mechanics.</p>	<p>Comply</p>

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	<p>In Sentral Estate, the communication policy on equal opportunity and treatment for work carried out in 12 February 2019. The communication attended by 38 workers from Division IV, comprise of 27 harvesters, 1 harvest mandor, 2 harvest checkers, 1 fertilizer applicator supervisor, 3 upkeep mandors, 1 pest and disease mandor, 2 Division checker, 1 head mandor; sampled worker (Mr. Sujono, Mr. Joshner S. – harvester).</p>	
<p><b>6.8.2</b></p> <p>Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated.</p> <p>- Major compliance –</p>	<p>Based on record review upon worker register Gunung Melayu II POM, found the worker comprise of 77 permanent workers and 19 temporary workers (March 2019), total 95 workers. The 77 permanent workers demographic, based on education: 2 primary school, 5 secondary school, 66 high school, 3 diploma, 1 bachelor degree; Based on religion: 66 muslim, 6 catholic and 5 protestant; Based on tribe: 55 Javanese, 16 Batak, 2 Karo, 1 Simalungun, 2 Malay, 1 Banjar; Based on sex: 70 males and 7 females;</p> <p>The 19 temporary workers demographic, based on education: 1 secondary school, 16 high school, 1 diploma, a bachelor degree; Based on religion: 12 muslim, 5 catholic and 2 protestant; Based on tribe: 10 Javanese, 8 Batak, 1 Malay; Based on sex: 17 males and 2 females;</p> <p>Gunung Melayu II POM, in period June 2018 appointed 4 temporary workers into permanent workers, consist of helper mechanic, computer operator and boiler helper. Document sighted: “Memorandum HR OPS Plantation-1 No.250/HR-RO1/MEMO/06/2018 tentang Pengangkatan Karyawan SKU-H atas nama Halasan Sinaga sebagai Helper Mekanik”, dated 25 June 2018; “Memorandum HR OPS Plantation-1 No.196/HR-RO1/MEMO/06/2018 tentang Pengangkatan Karyawan SKU-H atas nama Hermansyah sebagai Helper Boiler”, dated 25 June 2018;</p> <p>Based on record review upon worker register Sentral Estate, found the worker comprise of 228 permanent workers and 244 temporary workers. The 228 permanent workers demographic, based on education: 75 primary school, 82 secondary school, 68 high school, 1 diploma, 2 bachelor degree; Based on religion: 193 muslim, 33 catholic and 2 protestant; Based on tribe: 163 Javanese, 57 Batak, 2 Malay, 2 Minang, 2 Nias; Based on sex: 217 male and 11 female;</p> <p>The 244 temporary workers demographic, based on education: 97 primary school, 70 secondary school, 74 high school, 1 diploma, 2 bachelor degree; Based on religion: 226 muslim, 7 catholic and 11 protestant; Based on tribe: 189 Javanese, 32 Batak, 16 Nias, 1 Minang, 5 malay; Based on sex: 175 male and 69 female;</p>	<p>Comply</p>



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	<p>Sentral Estate, in period June 2018 appointed 13 temporary workers into permanent workers, consist of harvester, FFB loader, security and teacher. The teacher is female. Document sighted: "Memorandum HR OPS Plantation-1 No.174/HR-RO1/MEMO/06/2018 tentang Pengangkatan Karyawan SKU-H atas nama Widia Astuti sebagai Guru", dated 25 June 2018; "Memorandum HR OPS Plantation-1 No.180/HR-RO1/MEMO/06/2018 tentang Pengangkatan Karyawan SKU-H atas nama Nurafihatta sebagai Tukang Muat", dated 25 June 2018.</p> <p>The worker evaluation for promotion taking into consideration the service time, work performance, productivity, innovation, etc.</p> <p>Batu Anam Estate, in period June 2018 appointed 37 temporary workers into permanent workers, consist of harvester, FFB loader, mechanic, security, driver, upkeep mandor and teacher. Document sighted: "Memorandum HR OPS Plantation-1 No.164/HR-RO1/MEMO/06/2018 tentang Pengangkatan Karyawan SKU-H atas nama Maruba Silaban sebagai Pemanen" - harvester, dated 25 June 2018; "Memorandum HR OPS Plantation-1 No.171/HR-RO1/MEMO/06/2018 tentang Pengangkatan Karyawan SKU-H atas nama Pefri Derianto sebagai Guru" - teacher, dated 25 June 2018.</p> <p>Further, in 23 February 2019, Batu Anam Estate proposed 23 temporary workers to become permanent workers.</p> <p>Aek Tarum Estate, as at March 2019, employed 289 workers, found the worker comprise of 139 permanent workers and 150 temporary workers. The 139 permanent workers demographic, based on education: 27 primary school, 23 secondary school, 38 high school, 3 diploma, 4 bachelor degree; Based on religion: 111 Islam, 10 Christian and 18 Catholic; Based on tribe: 163 Javanese, 57 Batak, 2 Malay, 2 Minang, 2 Nias; Based on sex: 134 males and 5 females;</p> <p>The 150 temporary workers demographic, based on education: 27 primary school, 28 secondary school, 89 high school, 2 diploma, 4 bachelor degree; Based on religion: 114 Islam, 18 Catholic and 18 Christian; Based on tribe: 102 Javanese, 12 Batak, 3 Aceh, 1 Malay, 1 Minang; Based on sex: 92 males and 58 females;</p> <p>Aek Tarum Estate, in period June 2018 appointed 10 temporary workers into permanent workers, consist of harvest checker, HRD, computer operator, FFB loader, driver, harvester. The HRD and computer operator is female. Document sighted: "Memorandum HR OPS Plantation-1 No.162/HR-RO1/MEMO/06/2018 tentang Pengangkatan Karyawan SKU-H atas nama Rehmalem br Brahmana sebagai Personalia", dated 25 June</p>	

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	<p>2018; "Memorandum HR OPS Plantation-1 No.161/HR-RO1/MEMO/06/2018 tentang Pengangkatan Karyawan SKU-H atas nama Ratna Sari Dewi sebagai Operator Komputer", dated 25 June 2018;</p> <p>Aek Tarum Estate, in year 2018 proposed to appoint 35 temporary workers into permanent workers, consist of driver, spraying supervisor, mechanic, driver and FFB loader.</p>	
<p><b>6.8.3</b></p> <p>Records of evidence that equal opportunity and treatment for work shall be available.</p> <p>– Minor compliance -</p>	<p>PT. Gunung Melayu – Gunung Melayu II POM made job vacancy announcement for 3 worker position as operational, dated 4 February 2019. The requirements unde rjob vacancy: minimum education high school, good attitude, no drug abuse, physically and mentally health. The announcement was circulated to surrounding of Asahan Regency. There were 4 applicants, 1 from Batubara Regency and 3 from Asahan Regency.</p> <p>Furthermore, based on interview with POM worker, two workers – Mr. R*****o and Mr. I**** W***** have disability (amputated hand) and employed by PT. Gunung Melayu II POM.</p> <p>Based on record review upon worker register Sentral Estate, found the worker comprise of 228 permanent workers and 244 temporary workers. The 228 permanent workers demographic, based on education: 75 primary school, 82 secondary school, 68 high school, 1 diploma, 2 bachelor degree; Based on religion: 193 muslim, 33 catholic and 2 protestant; Based on tribe: 163 Javanese, 57 Batak, 2 Malay, 2 Minang, 2 Nias; Based on sex: 217 male and 11 female;</p> <p>The 244 temporary workers demographic, based on education: 97 primary school, 70 secondary school, 74 high school, 1 diploma, 2 bachelor degree; Based on religion: 226 muslim, 7 catholic and 11 protestant; Based on tribe: 189 Javanese, 32 Batak, 16 Nias, 1 Minang, 5 malay; Based on sex: 175 male and 69 female;</p> <p>Furthermore, based on interview with harvester, one of compactor operator – Mr. S***** have disability (amputated leg) and employed by PT. Gunung Melayu.</p> <p>Interview with two lady worker (temporary) in Batu Anam Estate, both admitted they are issued with gum boot, sickle, stick, working tablet to perform IPM census in Division IV. Verification, document sighted: "Penyerahan Alat Pelindung Diri Afdeling IV/Sensus HPT - boot", dated March 2019 for 20 IPM census workers, sample taken: Mrs. Evi Handayani and Mrs. Afrilianti.</p> <p>Interview with two lady worker (temporary) in Aek Tarum Estate, both admitted they are issued with gum boot, apron, hand glove and masker to perform fertilizer application in Division III. Verification, document</p>	<p>Comply</p>

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		sighted: "Serah Terima Alat Pelindung Diri Afdeling III/Tahun 2019", dated 1 April 2019 for 18 fertilizer applicator, sample taken: Mrs. Suriana and Mrs. Poniseh. Another evidence sampled: "Serah Terima Alat Pelindung Diri Tukang Muat Tahun 2019", dated 12 March 2019 for 17 FFB loader (helmet, safety shoes, flashlight), sample taken: Mr. Santok and Mr. Suriyadi.	
<b>Criterion 6.9:</b>			
There is no harassment or abuse in the work place, and reproductive rights are protected.			
<b>6.9.1</b>	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 –	PT. Gunung Melayu adopted the company policy from "Asian Agri" signed by Managing Director on 1 December 2014, available in Bahasa Indonesia. The company policy in Section 15 "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya" – to prevent sexual harassment and all other form of violence towards women and to protect its reproductive rights.  In Gunung Melayu II POM, the policy to prevent sexual and all other forms of harassment and violence communicated to workers, carried out in 7 January 2019. The communication attended by 39 workers; comprise of 5 office clerks, 7 security, 2 process operators, 8 laboratory workers, 16 mechanics.  In Sentral Estate, gender committee made communication related to policy to prevent sexual harassment and domestic violence to 25 temporary workers (sampled: Mrs.Poniseh, Mrs.Suningsih), dated 12 September 2018.	Comply
<b>6.9.2</b>	A policy to protect the reproductive rights, shall be documented, implemented and communicated to all levels of the workforce. - Major compliance –	PT. Gunung Melayu adopted the company policy from "Asian Agri" signed by Managing Director on 1 December 2014, available in Bahasa Indonesia. The company policy in Section 15 "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya" – to prevent sexual harassment and all other form of violence towards women and to protect its reproductive rights.  In Gunung Melayu II POM, the policy policy to protect the reproductive rights communicated to workers, carried out in 7 January 2019. The communication attended by 39 workers; comprise of 5 office clerks, 7 security, 2 process operators, 8 laboratory workers, 16 mechanics.	Comply

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		<p>In Sentral Estate, gender committee made activity related to cervical cancer and papsmear check to 25 female workers (sampled: Mrs.Herdelina Hutabarat, Mrs.Dedek Chandra), dated 9 October 2018. The socialization related to cervical cancer by Prodia doctor, Tanjung Balai Regency.</p> <p>Based on interview with Gender Committee in Sentral Estate, one of the committee member admitted company allows her to breastfeed her baby during working hour. She was allowed time to go home and fed the infant.</p>	
<b>6.9.3</b>	<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>The company has had Standard Operating Procedure, No. SOP: XX-HR-308.5-RO; Revision: 0, dated 11<sup>th</sup> December 2009: Employees complaints: submission and settlement Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in company policy's document as in one of points of this policies stated that:</p> <p>"To provide appropriate information for those who inquiry it and to ported its confidentiality for whistleblower 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>Interview with two lady worker (temporary) in Batu Anam Estate, they understand the mechanism to report any case related to sexual harassment.</p>	Comply
<p><b>Criterion 6.10:</b>            Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>			
<b>6.10.1</b>	<p>Current and past prices paid for Fresh Fruit Bunches (FFB), shall be publicly available.</p> <p>- 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> <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:</li> </ol>	Comply

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	<ul 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> </ul> <p>Record seen: "Statement and Guarantee" on behalf of PT Sawit Trading Sejahtera (signed by Mr. Rudiyanto) as FFB supplier from Jl. Teuku Umar No. 55 D Tanjung Balai for ± 2,296 Ha planting area with distance approximately 10 – 35 km from Gunung Melayu II POM.</p>	
<p><b>6.10.2</b></p> <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).                      - 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 Tanjung Selamat 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> $((\text{CPO Price}/\text{Tax } 1.1\%) - \text{Transport cost}) \times \text{OER} = X$ $(\text{PK price} - \text{Transport cost}) \times \text{KER} = Y$ $X + Y - \text{Processing cost} - \text{other cost} = \text{FFB Price}$ <p>For Example FFB Price for 28 March 2019:</p> <p>CPO: <math>(6,550 - 450) \times 20.71\% = 1,263 (X)</math></p> <p>PK: <math>(3,818 - 280) \times 5.17\% = 183 (Y)</math></p> <p>Total: 1,446</p> <p>Processing cost: 66</p> <p>Other cost: 40</p> <p>FFB Bruto Price: 1,340</p> <p>FFB Price: <math>(1,263 + 183) - 66 - 40 = 1,340 \text{ IDR}</math></p>	<p>Comply</p>

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		Price changes will be informed one day before the changes, and it applicable for large size FFB (more than 8 kg). Mechanism for FFB price has been known, understood and explained to FFB suppliers. Based on interview with a number of FFB supplier, they can demonstrate their understanding.	
<b>6.10.3</b>	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	The agreement/contract documents between third party FFB supplier and organisation is sighted and presented in "Perjanjian Kerjasama Kemitraan". For example "Perjanjian Kerjasama Kemitraan antara PT Gunung Melayu dengan PT Kelompok Tani Berkat Tani Jaya Nomor: 16/BTJ/CSV/IX/2017". All contracts are acknowledged by all parties as part that contain of contract are well understood. The contract contains all relevant information such as payment method, work requirements, force majeure, contract period, cancellation of contract, etc. Contract documents are acknowledged by all parties. Based on document review that agreement between company and third party FFB supplier confirmed that contract is made fairly, legal and transparent.	Comply
<b>6.10.4</b>	Agreed payments shall be made in a timely manner. - Minor compliance -	A review to several payment records January - March 2019 demonstrated that the payment has been made via bank transfer. It was appropriate with the related MOU/Agreement. The payment was also been made periodically according to the contract agreement. Sample seen payment record dated 28 March 2019 to PT Sawit Trading Sejahtera BRI A/C No. 0154.01.**** debit from account PT Gunung Melayu II Panin Bank account No. 500.505.****	Comply
<b>Criterion 6.11:</b>			
Growers and millers contribute to local sustainable development where appropriate.			
<b>6.11.1</b>	Records of contributions to local development based on the results of consultation with local communities shall be available. - Minor compliance -	PT. Gunung Melayu prepared CSR program 2018. Program CSR 2019: "Bantuan Paket Dhuafa" – donation for poor; "Pengembangan Kambing Ettawa" – Ettawa goat project; "Bantuan Alat Permainan PAUD Pinggol Toba" – Provision of educational toy for playgroup in Pinggol Toba hamlet; "Pembangunan Sumur Bor SD Filial" – Provision of bore well (clean water) in primary school; "Perbaikan Jalan Desa Sidomulyo, Desa Gonting Malaha, Desa Batu Anam" – road maintenance in Sidomulyo village, Gonting Malaha village, Batu Anam village; "Bantuan Pembangunan Masjid Dusun Buntu Pagar" – Donation for masjid construction in Buntu Pagar hamlet; "Bantuan renovasi gereja HKBP Banuhase" – donation for church HKBP Banuhase renovation; "Bantuan Perbaikan Rumah Tinggal" – assistance for poor housing renovation. The total value of CSR program 2018 budgeted at Rp.163,000,000, while total CSR implemented Rp.163,176,000.	Comply

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	<p>Implemented CSR program in 2018: "Berita Acara Serah Terima CSR PT. Gunung Melayu di Desa Batu Anam, Kecamatan Rahuning" – handover CSR in provision of "Usaha Ternak Ayam Kampung Super", in form of 1 unit cage (3x8 meters), 800 day one chick, 1 set electrical installation, 1 set feeding tools, 22 sacks poultry feed, 1 set medicine and vitamin for poultry, dated 14 December 2018.</p> <p>"Berita Acara Serah Terima CSR PT. Gunung Melayu di Desa Sidomulyo dan Gonting Malaha untuk Paket Natal dan Tahun Baru" – handover minutes for christmas package, 145 package in Gonting Malaha village and 40 package in Sidomulyo village; dated 22 December 2018.</p> <p>"Berita Acara Serah Terima Bantuan Perbaikan Jalan Kampung Buntu Pagar Desa Sidomulyo – Kecamatan Tinggi Raja" – handover minutes for road maintenance of 4 km, with material rock-sand in Buntu Pagar hamlet; dated 29 October 2018.</p> <p>PT. Gunung Melayu prepared CSR program 2019. Some of the program for CSR 2019: "Bantuan Paket Dhuafa" – donation for poor; "Bantuan peralatan kesenian tradisional Melayu" – assistance for traditional Melayu cultural art; "Pengembangan UKM Desa Pulau Maria" – development of micro and small business in Pulau Maria Village; "Bantuan Alat Permainan PAUD Desa Batu Anam" – Provision of educational toy for playgroup in Batu Anam village; "Pembangunan Sumur Bor SD Satu Atap" – Provision of bore well (clean water) in primary school; "Sunat massal dan pemeriksaan kesehatan gratis" – mass circumcision and free medical examination activity; "Perbaikan Jalan Desa Sidomulyo, Desa Gonting Malaha, Desa Batu Anam" – road maintenance in Sidomulyo village, Gonting Malaha village, Batu Anam village; "Bantuan Pembangunan Masjid Desa Sidomulyo" – Donation for masjid construction in Sidomulyo village; "Bantuan renovasi gereja Desa Gonting Malaha" – donation for church renovation in Gonting Malaha Village. The total value of CSR program 2019 budgeted at Rp.131,000,000.</p> <p>Based on interview with stakeholder from Sidomulyo village, it is confirmed that company have meet and consulted village communities related to CSR plan to majid construction in Sidomulyo village.</p> <p>Implemented CSR program in 2019: "Berita Acara Serah Terima CSR PT. Gunung Melayu di Kampung Buntu Pagar, Desa Sidomulyo, Kecamatan Tinggi Raja" – Handover minute for CSR PT. Gunung Melayu in Buntu Pagar Hamlet, Sidomulyo Village, Tinggi Raja District, dated 7 March 2019 whereby company gives 4000 fish seedling, and sports equipment such as football goal, ball, football costumes, and 25 lamps for road lighting.</p>	

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		"Berita Acara Serah Terima CSR PT.Gunung Melayu untuk Polisi Sektor Bandar Pulau" – handover minute for CSR police of Bandar Pulau, dated 6 March 2019 whereby company provides laptop for office utensil.	
<b>6.11.2</b>	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve scheme smallholder productivity. - Minor compliance -	PT. Gunung Melayu does not have obligation to develop scheme smallholder. However, this company is proactive in encouraging and assisting independent oil palm grower to organize and form independent smallholder in Batu Anam village and Gonting Malaha village. Company prepared a budget to assist the surrounding oil palm growers in form of trainings, sign boards, barn owl boxes, road maintenance, cooperative building renovation. Implementation of CSV Gunung Melayu year 2018: - Training "Organization dynamic" in April 2018; - Training related to pest and disease, soil and water conservation, fertilizer application, FFB quality criterion in August 2018; - Training limited herbicide on September 2018; - Signboards related to PPE usage; no spraying near water body; sign of nutrient deficiency; prohibit blanket spraying – have been erected on April 2018; - Provision of 5 barn owl boxes on March 2018; - Road maintenance by grader and compactor on August-September-October 2018; - Cooperative building renovation on August 2018; Implementation of CSV Gunung Melayu year 2018: - Road maintenance by grader and compactor on February-March 2019;	Not applicable N/A
<b>Criterion 6.12:</b> No forms of forced or trafficked labour are used.			
<b>6.12.1</b>	There shall be evidence that no forms of forced or trafficked labor are used. - Major compliance -	Based on interview with worker union committee and gender committee, 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



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		Based on document verification and salary payment, shows employee have been paid in accordance to minimum wage regulation.	
<b>6.12.2</b>	It shall be demonstrated that no contract substitution has occurred. - Minor compliance -	Interview with two lady worker (temporary) in Batu Anam Estate performing IPM census, both admitted they signed temporary work agreement with PT. Gunung Melayu. Document verification: "Perjanjian Kerja Harian Lepas No.PKHL/KBA/2019 atas nama Afrilianti", dated 2 January 2019; "Perjanjian Kerja Harian Lepas No.PKHL/KBA/2019 atas nama Evi Handayani", dated 2 January 2019.  Interview with two lady worker (temporary) in Aek Tarum Estate performing fertilizer application, both admitted they signed temporary work agreement with PT. Gunung Melayu. Document verification: "Perjanjian Kerja Harian Lepas No.126/PKHL/KAT/2019 atas nama Suriana", dated 2 April 2019; "Perjanjian Kerja Harian Lepas No.46/PKHL/KAT/2019 atas nama Poniseh", dated 1 February 2019.  The work agreement stipulated type of work (upkeep), working hour, task and responsibilities, industrial relation, salary, timeframe (3 months), insurance provision, religious day benefit, health and safety, no child worker, force majeure, dispute resolution.	Comply
<b>6.12.3</b>	Where migrant/foreign/honorary workers are employed, a special worker policy and procedures and the evidence of implementation shall be available. - Major compliance -	Interview with two lady worker (temporary) in Batu Anam Estate, both admitted they are issued with gum boot, sickle, stick, working tablet to perform IPM census in Division IV. The provision of working tools and PPE equal to permanent worker.	Comply
<b>Criterion 6.13:</b>			
Growers and millers respect human rights.			
<b>6.13.1</b>	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations.	PT. Gunung Melayu adopted the company policy from "Asian Agri" signed by Managing Director on 1 December 2014, available in Bahasa Indonesia. The company policy to respect human rights in Section 14 "menghormati hak asasi manusia dengan memperlakukan seluruh karyawan secara adil, baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta,	Comply

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	- Major compliance -	<p>asal negara, agama/kepercayaan, cacat, gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur” – to respect human rights by treating all employee in fair manner, during recruitment, evaluation, work condition and work environment, representability without discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age.</p> <p>In Gunung Melayu II POM, the policy policy to respect human rights communicated to workers, carried out in 7 January 2019. The communication attended by 39 workers; comprise of 5 office clerks, 7 security, 2 process operators, 8 laboratory workers, 16 mechanics.</p> <p>In Sentral Estate, the communication policy to respect human rights carried out in 12 February 2019. The communication attended by 38 workers from Division IV, comprise of 27 harvesters, 1 harvest mandor, 2 harvest checkers, 1 fertilizer applicator supervisor, 3 upkeep mandors, 1 pest and disease mandor, 2 Division checker, 1 head mandor; sampled worker (Mr. Sujono, Mr. Joshner S. – harvester).</p> <p>Based on interview with workers in Sentral Estate, their religious rights are respected, for example on Friday, they can stop the work earlier to go for Friday prayer.</p>	
<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.			
<b>7.1.1</b>	<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 company has started replanting in 2003, no any new planting area/developing area since November 2005.</p> <p>Companies have environment document “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. The environment document has been 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>Not Applicable N/A</p>

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<b>7.1.2</b>	Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts. - Minor compliance -	The company has started replanting in 2003, no any new planting area/developing area since November 2005.	Not Applicable N/A
<b>7.1.3</b>	Where the development includes an outgrower scheme, the impacts of the scheme and the implications of the way it is managed shall be given particular attention. - Minor compliance -	As guidance for management and monitoring, company has environmental management and monitoring plan "Rencana Pengelolaan Lingkungan (RKL) – Rencana Pemantauan Lingkungan (RPL). The document have been approved by "Badan Agribisnis Departement Pertanian" through letter No.072/RLK-RPL/BA/III/1996 dated 19/03/1996. The environment management document explains activity components, type of impacts, impact management (program, project, technical), location and target for management.	Not Applicable N/A
<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.			
<b>7.2.1</b>	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 company has started replanting in 2003, no any new planting area/developing area since November 2005.  Soil type analysis based on Research and Development Asian Agri Group dated back 2012. The soil type/classification consist of Arenic hapludults, Typic hapludults, Typic endoaquepts.PT Gunung Melayu showed Peta Sebaran Satuan Tanah for Batu Anam Estate and Aek Tarum. The map indicated the predominant soil type consist of : - Typic hapludults - Typic eutrudox - Typic endoaquepts	Not Applicable N/A

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<b>7.2.2</b>	<p>Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available and taken into account in plans and operations.</p> <p>- Minor compliance -</p>	<p>There is also topographic map indicating the elevation of Batu Anam Estate and Aek Tarum Estate consist of 0-8% and &gt;30%. The limitation for the area is steep slope on some area. PT Gunung Melayu did not open the area with steep slope &gt; 30%. Topografi level consist of 40 – 90 m.</p>	<p>Not Applicable N/A</p>
<p><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.</p>			
<b>7.3.1</b>	<p>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).</p> <p>- Major compliance –</p>	<p>The company has started replanting in 2003, no any new planting area/developing area since November 2005.</p>	<p>Not Applicable N/A</p>
<b>7.3.2</b>	<p>Reports of comprehensive HCV assessment, which involves stakeholder consultation and includes record of land-use change since November 2005, shall be available. This HCV</p>	<p>The company has started replanting in 2003, no any new planting area/developing area since November 2005.</p> <p>Company has conducted the HCV identification in coordination with “Fakultas Kehutanan Institut Pertanian Bogor” back in 2014, under “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Gunung Melayu Kebun Sentral Provinsi Sumatera Utara”. The HCV</p>	<p>Not Applicable N/A</p>

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	assessment shall be conducted prior to any conversion or new planting. - Major compliance –	assessment conducted based on “Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.	
<b>7.3.3</b>	Records of land preparation and clearing dates shall be available. - Minor compliance –	The company has started replanting in 2003, no any new planting area/developing area since November 2005.	Not Applicable N/A
<b>7.3.4</b>	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 –	The company has started replanting in 2003, no any new planting area/developing area since November 2005. Company 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.	Not Applicable N/A
<b>7.3.5</b>	Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).	The company has started replanting in 2003, no any new planting area/developing area since November 2005. The HCV identification carried out in 2014 with public stakeholder consultation with surrounding communities on 22-23/04/2013 in Desa Gonting Malaha and Desa Batu Anam. The HCV Identification report has been peer reviewed by Mr.Rachmad Darmawan (RSPO HCV Assessor and HCVRN member) on 01/2014.	Not Applicable N/A

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
<b>Criterion 7.4:</b> Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.			
<b>7.4.1</b>	Maps identifying marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. - Minor compliance -	The company has started replanting in 2003, no any new planting area/developing area since November 2005. PT Gunung Melayu showed Peta Sebaran Satuan Tanah for Batu Anam Estate and Aek Tarum. The map indicated the predominant soil type consist of : <ul style="list-style-type: none"> <li>- Typic hapludults</li> <li>- Typic eutrudox</li> <li>- Typic endoaquepts</li> </ul> There is no peat soil and fragile soil identified.	Not Applicable N/A
<b>7.4.2</b>	Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and implemented to protect them without incurring adverse impacts. - Major compliance -	The company has started replanting in 2003, no any new planting area/developing area since November 2005. PT Gunung Melayu showed Peta Sebaran Satuan Tanah for Batu Anam Estate and Aek Tarum. The map indicated the predominant soil type consist of : <ul style="list-style-type: none"> <li>- Typic hapludults</li> <li>- Typic eutrudox</li> <li>- Typic endoaquepts</li> </ul> There is no peat soil and fragile soil identified. In procedure no. AA-SOP-OP-1100-05.R1 "Konservasi Tanah dan Air" has determined strategy control erosion particular in slope area, such as: 0 – 5° , 6 – 12° , 13 – 20° , and more than 20°, The company has applied silt pit, L shape stacking frond and terracing in slope area to reduce erosion The realization of soil and water conservation work are: 1. Maintenance of terraces, realization in 2016 total 210,632 m and in 2017 up to 05/2017 along the 43,387 meters.	Not Applicable N/A

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		2. Maintenance "Tapak Kuda" individual platform, realization in 2016 total 11,545 units and in 2017 up to 05/2017 along the 4,089 units.	
<b>Criterion 7.5:</b>			
No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
<b>7.5.1</b>	Evidence shall be available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the grower/miller is signed and ratified by these local peoples. - Major compliance -	The company has started replanting in 2003, no any new planting area/developing area since November 2005.	Not Applicable N/A
<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.			
<b>7.6.1</b>	Documented identification and assessment of demonstrable legal, customary and user rights shall be available.	The company has started replanting in 2003, no any new planting area/developing area since November 2005.	Not Applicable N/A

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	- Major compliance -		
<b>7.6.2</b>	<p>A system for identifying people entitled to compensation shall be in place.</p> <p>- Major compliance -</p>	<p>The company has started replanting in 2003, no any new planting area/developing area since November 2005.</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. Should negotiation process fails, any land dispute will be processed through legal/litigation mechanism. During the process, a complete record is maintained.</p> <p>Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p> <p>PT Gunung Melayu has not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company's HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner.</p>	<p>Not Applicable</p> <p>N/A</p>
<b>7.6.3</b>	<p>A system for calculating and distributing fair compensation (monetary or otherwise) shall be in place.</p> <p>- Major compliance -</p>	<p>The company has started replanting in 2003, no any new planting area/developing area since November 2005.</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.</p> <p>The compensation calculated based on agreement of both parties through negotiation – upon participative measurement, and recorded under an agreement.</p>	<p>Not Applicable</p> <p>N/A</p>
<b>7.6.4</b>	<p>Communities that have lost access and rights to land for plantation expansion shall be</p>	<p>The company has started replanting in 2003, no any new planting area/developing area since November 2005.</p>	<p>Not Applicable</p> <p>N/A</p>



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	given opportunities to benefit from plantation development. - Minor compliance -	As an output from land dispute resolution process, an agreement between both parties and/or copy of court ruling will be required. Based on management statement, information from Desa Gonting Malaha and Desa Sidomulyo, and hectare statement shows there is no land dispute between PT Gunung Melayu with other party.	
<b>7.6.5</b>	The process and outcome of any compensation claims shall be documented and made publicly available. - Minor compliance -	The company has started replanting in 2003, no any new planting area/developing area since November 2005.	Not Applicable N/A
<b>7.6.6</b>	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 company has started replanting in 2003, no any new planting area/developing area since November 2005.	Not Applicable N/A
<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.			
<b>7.7.1</b>	There shall be no land preparation by burning, other than in specific situations, as identified in the 'Guidelines for the Implementation of the	The company has started replanting in 2003, no any new planting area/developing area since November 2005. No open burning was noted during field visit and interviewed with local communities and workers. - Patrol report indicating any fire incident. In 2017 and 2018 there were no any fire reported.	Not applicable N/A

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	ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -		
<b>7.7.2</b>	In exceptional cases where fire has to be used for preparing land for planting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	PT. Gunung Melayu – Estate have developed an early warning system, to monitor the risk of fire. The system "Sistem Peringkat Bahaya Kebakaran 1 & 2 PT. Gunung Melayu". The monitoring system calculating the field condition, ignition risk, potential drought and smoke, fire handling, weather index.	Not applicable N/A
<b>Criterion 7.8:</b> New plantation developments are designed to minimise net greenhouse gas emissions.			
<b>7.8.1</b>	The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated. - Major compliance -	The company has started replanting in 2003, no any new planting area/developing area since November 2005.	Not applicable N/A
<b>7.8.2</b>	There shall be a plan to minimise net GHG emissions	The company has started replanting in 2003, no any new planting area/developing area since November 2005.	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
	<p>which takes into account avoidance of land areas with high carbon stocks and/or sequestration options.</p> <p>- Minor compliance -</p>	<p>The company also has minimized pollutant and GHG through using EFB as organic fertilizer, implementing IPM to reduce pesticides usage, using fiber and sell for boiler, and capturing POME by Biogas Plant by Kubota. Thermophilic anaerobic process.</p>	N/A
<b>Principle 8: Commitment to continual 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.			
<b>8.1.1</b>	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>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 pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> </ul>	<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, OHS aspect, etc.</p> <p>The latest Sustainability internal audit was done in 4-9 March 2019 for PT Gunung Melayu – GM II POM. Audit result findings can be demonstrated and the corrective action has been implemented to address issue found during audit.</p> <p>Evidence of several improvements was shown, e.g:</p> <ol style="list-style-type: none"> <li>1. Applied fertilizer in frond stacking to increase absorbing fertilizer.</li> <li>2. Applied EFB ashes as fertilizer, fibre and shell are burned in boiler for electricity</li> <li>3. Planting beneficial plant for natural predator.</li> <li>4. Improve the efficiency in water use, using condensate water circulation tank during extraction process in mill laboratory. The recycled condensed water then used as dilution water. Maintenance of water plumbing also planned.</li> <li>5. Recycle the water cooler turbine discharge water basin;</li> <li>6. Environment monitoring and management implementation according to AMDAL/ RKL-RPL</li> </ol> <p>Implementing CSR program.</p>	Comply

Criterion / Indicator	Assessment Findings	Compliance
<ul style="list-style-type: none"> <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 the supply base.</li> </ul> <p>- Major compliance -</p>		

**Appendix B: Approved Time Bound Plan**

PT INTI INDOSAWIT SUBUR  
RSPO Membership Number : 1-0022-06-000-00  
Latest Update : 1 January 2019

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	Simpang Perak Estate*	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		Certified on 16 September 2010 Re-Certified on 16 September 2015 <i>*Split From Buatan Estate Since 1 January 2019</i>	
		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	
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau			<i>*Split From Ukui &amp; Soga Estate Since 1 January 2019</i>
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau			Certified on 1 March 2011 Re-Certified on 1 March 2016
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			Certified on 1 March 2011 Re-Certified on 1 March 2016
Tungkal Ulu Mill	Pulau Pauh / Penyabungan / Mertung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Mertung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 15 August 2012 Re-Certification on August 2017	
		Tungkal Ulu (Plasma)	Renah Mendalo, Mertung, Muara Papalik District, Tanjung Jabung Barat Regency, Jambi			Certified on 11 July 2013 Re-Certification on August 2017
Muara Bulian Mill	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency,	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency, Jambi		Certified on 28 August 2012 Re-Certification on August 2017	

Representative : Ivan Novrizaldie

Sign : 

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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 Iir District, Batanghari Regency, Jambi		Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau		Certified on 30 March 2015
Taman Raja Mill	Lubuk Bernal / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernal Estate*	Lubuk Bernal / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 20 February 2015 *Bernal Estate Split From Taman Raja & Badang Estate Since 1 January 2019
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, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau		Certified on 7 January 2015

Representative : Ivan Novrizaldie

Sign : 

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 Latest Update : 1 January 2019

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
		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, Aek Tarum & 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)	Aek Natas District, Labuhan Batu Regency, North Sumatra		
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>

Representative : Ivan Novrizaldie

Sign :



**Appendix C: GHG Reporting Executive Summary**

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

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

The summary of the Net GHG emitted in 2018 for PT Gunung Melayu - Gunung Melayu II POM and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.09
PK	0.09

Extraction	%
OER	23.09
KER	4.8

Production	t/yr
FFB Process	258,842
CPO Produced	59,770
PK Produced	12,436

Land Use	Ha
OP Planted Area	8,289.8
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	200.36
<b>Total</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	81,875.27	0.49	0	0	0	0	0	0
CO <sub>2</sub> Emission from fertilizer	2,800.27	0.02	0	0	0	0	0	0
NO <sub>2</sub> Emmision	4,092.81	0.02	0	0	0	0	0	0
Fuel Consumption	1,883.8	0.01	0	0	0	0	0	0
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-77,606.9	-0.46	0	0	0	0	0	0
Conservation Sequestration	0	0	0	0	0	0	0	0



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<b>Total</b>	<b>13,045.25</b>	<b>1.57</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6,364.19</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	11,117.72	0.04
Fuel Consumption	417.82	0
Grid Electricity Utilisation	0	0
<b>Credit</b>		
Export of Grid Electricity	-541.86	0
Sales of PKS	-23,859	-0.09
Sales of EFB	0	0
<b>Total</b>	<b>-12,865.32</b>	<b>-0.05</b>

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

<b>Emissions</b>	<b>tCO<sub>2</sub>e</b>
PK from own mill	1,127.09
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</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) (%)	0

**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 Gunung Melayu – Gunung Melayu II Palm Oil Mill. Gunung Melayu II Palm Oil Mill physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK). Gunung Melayu II Palm Oil 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 Gunung Melayu – Gunung Melayu II 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 Gunung Melayu – Gunung Melayu II Palm Oil Mill 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 Gunung Melayu – Gunung Melayu II Palm Oil Mill has been registered in RSPO IT Paltform with ID number RSPO_PO1000002608, sub licence ID CB58443.	Yes

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5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	PT Gunung Melayu – Gunung Melayu II Palm Oil Mill does not include any processing aid into organization’s scope of certification.	Yes
<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 Gunung Melayu – Gunung Melayu II Palm Oil Mill 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 Gunung Melayu – Gunung Melayu II Palm Oil Mill uses Mass Balance as their RSPO Supply Chain Certification model, therefore the site can only claim its product as Mass Balance.	Yes
<b>5.3. Documented Procedures</b>			
5.3.1	<p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	<p>PT Gunung Melayu – Gunung Melayu II Palm Oil Mill can demonstrates:</p> <ol style="list-style-type: none"> <li>1. Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R6) dated 1 Sept 2017. The procedures cover traceability of CPO and PK, since FFB receiving from Tanjung Selamat and Pangkatan 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: January-March, April-June, July-September, and October-December each year. Head of</li> </ol>	Yes

		<p>Environment and Sustainability will inform to Certification Body in the case of projected overproduction.</p> <p>3. SOP of Palm Oil Mill operation:</p> <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> </ul>	
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		<ul style="list-style-type: none"> <li>i. 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> <li>n. SOP AA-MPM-OP-1400.15-R1, dated 1 February 2009, Perawatan (Preventive Maintenance and Repair)</li> </ul>	
	<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 Gunung Melayu – Gunung Melayu II Palm Oil Mill 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 2 times in a year, to ensure all operational and documentation activities are comply to the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	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. 20 February 2017 by Welly Joel Chandra, against RSPO SCCS 2017 – RSPO General Chain of Custody requirements and Module E: Mass Balance.	Yes

5.4. Purchasing and goods in			
5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <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 Gunung Melayu – Gunung Melayu II 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 Gunung Melayu – Gunung Melayu II POM receive FFB from certified and non-certified source. Certified source consist of own estate (Sentral, Batu Anam and Aek Tarum Estate. Non-certified FFB sourced from third party supplier, e.g.: Nagali, Sinar Bakti, PT Sawit Trading Sejahtera 2, SG2, KTSL2, CSV PT STS (S)2, CSV PT STS (KT)2, CSV KT Sejahtera, CSV KT Berkat Tani Jaya, CSV KT Jaya Tani, CSV KT Berumbung A Makmur, CSV STS (L), CSV STS (A).</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 FFB received:</p> <ul style="list-style-type: none"> <li>- Weighbridge Ticket No. PGDA119107288 dated 30/03/2019, commodity: certified FFB; source: Sentral Estate Afdeling 4 (KSN-4); to Gunung Melayu II Palm Oil Mill; net weight: 5,610 kg; amount: 432 bunch; Block: E10g, &amp; E10h; RSPO Cert: RSPO620707; Transporter: Internal; Vehicle: BK 9583 CJ; Driver: Heru Novianto; Batch number: 13-100-16462018-27028377.</li> <li>- Weighbridge Ticket No. PGDA119107288 dated 20/03/2019, commodity: certified FFB; source: Aek Tarum</li> </ul>	Yes

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		<p>Estate Afdeling 2 (KAT-2); to Gunung Melayu II Palm Oil Mill; net weight: 6,290 kg; amount: 483 bunch; Block: B09c, &amp; B09e; RSPO Cert: RSPO620707; Transporter: Internal; Vehicle: BK 9077 FA; Driver: M. Fadly; Batch number: 13-100-16462018-27025324.</p> <ul style="list-style-type: none"> <li>- Weighbridge Ticket No. PGDA11910 dated 13/02/2018, commodity: certified FFB; source: Batu Anam Estate Afdeling 4 (KBA-4); to Gunung Melayu II Palm Oil Mill; net weight: 6,410 kg; amount: 453 bunch; Block: G11h; RSPO Cert: RSPO620707; Transporter: Internal; Vehicle: BM 9020 TC; Driver: Triono; Batch number: 13-100-16462017-27025054.</li> </ul> <p>Non-certified FFB received:</p> <ul style="list-style-type: none"> <li>- Surat Pengantar No. 05 dated 09/03/2019 from PT STS (A)2 to PT Gunung Melayu-Gunung Melayu II POM; amount: 300 bunch, Truck No. BK 8208 YI, Driver: Y. Rizal</li> <li>- Weighbridge Ticket No. PGDA519102451 dated 09/03/2019, commodity: outside FFB; source: PT STS (A)2; ID: ST00121; to PT Gunung Melayu-Gunung Melayu II Palm Oil Mill; net weight: 6,278 kg; amount: 280 bunch; Sortasi: 4%; Transporter: general; Vehicle: BK 8208 YI; Driver: Yose Rizal.</li> <li>- Surat Pengantar No. 2911250 dated 09/03/2019 from Sinar Bakti to PT Gunung Melayu-Gunung Melayu II POM; amount: 375 bunch, Truck No. BK 8169 BS, Driver: Tukijo</li> <li>- Weighbridge Ticket No. PGDA519102477 dated 09/03/2019, commodity: outside FFB; source: Sinar Bakti; ID: ST00017; to PT Gunung Melayu-Gunung Melayu II Palm Oil Mill; net weight: 7,915 kg; amount: 375 bunch; Sortasi:</li> </ul>	
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		<p>3%; Transporter: general; Vehicle: BK 8169 BS, Driver: Tukijo.</p> <ul style="list-style-type: none"> <li>- Surat Pengantar No. 47 dated 19/03/2019 from CSV KT Berkat Tani Jaya to PT Gunung Melayu-Gunung Melayu II POM; amount: 400 bunch, Truck No. BK 8402 VN, Driver: Rizal.</li> <li>- Weighbridge Ticket No. PGDA519102894 dated 19/03/2019, commodity: outside FFB; source: CSV KT Berkat Tani Jaya; ID: ST00138; to PT Gunung Melayu-Gunung Melayu II Palm Oil Mill; net weight: 8,170 kg; amount: 385 bunch; Sortasi: 4%; Transporter: general; Vehicle: BK 8402 VN, Driver: Rizal.</li> <li>- Surat Pengantar No. 28 dated 19/03/2019 from CSV KT Jaya Tani to PT Gunung Melayu-Gunung Melayu II POM; amount: 300 bunch, Truck No. BK 9531 VN, Driver: Dirman.</li> <li>- Weighbridge Ticket No. PGDA519102875 dated 19/03/2019, commodity: outside FFB; source: CSV KT Jaya Tani; ID: ST00139; to PT Gunung Melayu-Gunung Melayu II Palm Oil Mill; net weight: 7,113 kg; amount: 294 bunch; Sortasi: 3.75%; Transporter: general; Vehicle: BK 9531 VN, Driver: Dirman.</li> </ul>	
	<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 is complete and presented in couple document, e.g. Surat Pengantar TBS and Weighbridge Ticket. Report of FFB receiving are documented in Laporan Harian Pabrik (Mill Daily Report), Laporan Unit Kebun (Monthly Mill Report) and Mill Summary Report.</p>	<p>Yes</p>
	<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</li> </ul>	<p>PT Gunung Melayu – Gunung Melayu II Palm Oil Mill has ensured that FFB received are RSPO certified based on the source of FFB. The Mill only received certified FFB from own estate (Sentral Estate, Aek Tarum Estate and Batu Anam Estate) which have</p>	<p>Yes</p>



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	Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.	been certified as supply bases of Gunung Melayu II POM. Other than that are non-certified FFB.	
	<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 Gunung Melayu – Gunung Melayu II Palm Oil Mill.	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.	<p>In the case on non-conforming raw material entering the process, PT Gunung Melayu – Gunung Melayu II Palm Oil Mill has the mechanism to handle non-conforming material and/or document according to “Mekanisme Ketidaksesuaian Proses Pengolahan CPO &amp; PK Nomor: 18/MGR/PGD/AGST/17 and “Mekanisme Penanganan Komplain Kualitas CPO/PK” PT Gunung Melayu – Gunung Melayu II Palm Oil Mill demonstrated the simulation on recall of non-conforming material.</p> <p>Until this 4<sup>th</sup> annual surveillance assessment, there has been no case of non-conforming material entering the process.</p> <p>QC inspection was performed minimum once a year by QC department Head Office to monitor and control the input and output of product in line with the company standard. Latest QC inspection performed on 1 – 4 April 2019, resul of QC inspection were available and indicated there is issue regarding no non conforming product/document.</p>	Yes
<b>5.5. Outsourcing activities</b>			
5.5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage,	The transport for RSPO certified sustainable CPO delivery was carried out by CV Jasa Sahabat Abadi and PK delivery was	Yes

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	<p>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>carried out by CV Jasa Sumber Asahan. This contractor was appointed, contracted and instructed by Marketing Asian Agri Medan. Mostly CPO certified is delivered to PT Sari Dumai Sejati (Bulking Station). PT Sari Dumai Sejati is a sister company of PT Indo Sepadan Jaya and has been certified RSPO SCCS by Control Union, Certificate No. CU-RSPO SCC-821960 dated 30 August 2017 valid until 29 August 2022. While PK certified is delivered to KCP PT Saudara Sejati Luhur (sister company of PT Gunung Melayu /one group company under Asian Agri)) and has been certified RSPO SCCS by PT BSI.</p> <p>PT Gunung Melayu control the CPO and PK transporter by "Surat Perintah Kerja (SPK)" and "Daftar Periksa Kesiapan Kerja Pengiriman".</p> <p>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 monitored by Weighbridge Card and SPK (with 0.20% tolerance).</p> <p>During field audit and document verification can be demonstrated that the transporter is under control of Marketing Asian Agri Medan and PT Indo Sepadan Jaya.</p>	
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5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	<p>The legal ownership of all CPO and PK are owned by PT Gunung Melayu during transport.</p>	<p>Yes</p>
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>The transport for RSPO certified sustainable CPO and PK delivery were carried out by transporter. CPO delivery was carried out by CV Jasa Sahabat Abadi and PK delivery was carried out by CV Jasa Sumber Asahan. This contractor was appointed, contracted and instructed by Marketing Asian Agri Medan.</p> <p>PT Gunung Melayu has an agreement or contract covering the outsourced process with each contractor through "Surat Perintah Kerja" for example SPK to CV Jasa Sahabat Abadi dated 01 March 2019; which covered information on:</p> <ul style="list-style-type: none"> <li>- Name of transporter: CV Jasa Sahabat Abadi</li> <li>- Name of goods: Crude Palm Oil in Bulk</li> <li>- Quantity: 1,000,000 kg</li> <li>- Tolerance: 0.20% per party</li> <li>- Location: PT Gunung Melayu – Gunung Melayu II POM</li> <li>- Destination: PT SDS (CET)</li> <li>- Transport Cost/Kg: Rp. ***</li> <li>- Delivery Time: Soon</li> <li>- Requirement: FFA max 5%, Moisture &amp; Impurities 0.5%</li> <li>- DO No. 03301/DD27/02/19</li> <li>- KP No. 03301/DD27/02/19</li> </ul> <p>The transporter also signed the Statement Letter which indicate that they willing to comply with RSPO SCCS standard and</p>	<p>Yes</p>

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		ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary., e.g. Statement Letter No. 97/EXT/IV/2/2019 dated 28 March 2019 from CV Jasa Sahabat Abadi.	
c.	The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	<p>PT Gunung Melayu – Gunung Melayu II POM has a Procedure of Traceability (AA-MPM-OP-1400.17-R6) dated 1 September 2017. The procedure covers the mechanism of CPO and PK delivery (Chapter B). The CPO and PK transporting also regulated in Work Instruction PMB/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 Statement Letter from transporter, e.g. Statement Letter No. 78/EXT/X/2018-Eks dated October 2018 from CV Jasa Sumber Asahan.</p> <p>PT Gunung Melayu – Gunung Melayu II 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 Kesiapan Pengiriman CPO/PK” 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 monitored by Weighbridge Card and SPK (with 0.20% tolerance).</p>	Yes
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	PT Gunung Melayu – Gunung Melayu II POM uses RSPO Supply Chain model Mass Balance, physical visit to transporter is not	Yes

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	respective operations, systems, and any and all information, when this is announced in advance.	necessary since PT Gunung Melayu – Gunung Melayu II POM has demonstrated the control of the transporter.	
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.	The site kept the contract of CPO and PK transporter which include name and contact detail of the contractors/transporter.	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 Gunung Melayu – Gunung Melayu II 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 Gunung Melayu – Gunung Melayu II Palm Oil Mill 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, etc), Supply chain model (Mass Balance).</p> <p>At the Mill, weighbridge operator printed out CPO or PK weighbridge ticket, 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>Sampled of Certified CPO Delivery Order/DO verified:</p> <ul style="list-style-type: none"> <li>- Delivery Order #07303/DC27/02/18 dated 25/07/2018; Seller is PT Gunung Melayu – Gunung Melayu II POM; Buyer</li> </ul>	Yes

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		<p>is PT Sari Dumai Sejati – Tangki Timbun Lubuk Gaung (CET); Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 500,000 kg; Supply Chain Certificate is RSPO 620707.</p> <ul style="list-style-type: none"> <li>- Delivery Order #10007/DC27/02/18; dated 30/10/2018; Seller is PT Gunung Melayu – Gunung Melayu II POM; Buyer is PT Sari Dumai Sejati Refinery; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 1,500,000 kg; Supply Chain Certificate is RSPO 620707.</li> </ul> <p>Sampled of certified CPO Delivery:</p> <ul style="list-style-type: none"> <li>- Weighbridge Ticket #PGDC118200931 dated 30/07/2018; Seller is PT Gunung Melayu – Gunung Melayu II POM; Buyer is PT Sari Dumai Sejati (CET); Delivery date is 30/07/2018; Commodity is CPO Certified RSPO; Supply Chain Model is Mass Balance; Quantity is 28,270 kg; based on DO #07303/DC27/02/18; Transporter is CV Jasa Sahabat Abadi, BK 9919 VP; Supply Chain Certificate number RSPO 620707; FFA: 3.94%; water: 0.210%; dirt: 0.022%; Seal number 0545005-0545011.</li> <li>- Weighbridge Ticket #PGDC118201683 dated 05/11/2018; Seller is PT Gunung Melayu – Gunung Melayu II POM; Buyer is PT Sari Dumai Sejati Refinery; Delivery date is 05/11/2018; Commodity is CPO Certified RSPO; Supply Chain Model is Mass Balance; Quantity is 28,290 kg; based on DO #10007/DC27/02/18; Transporter is CV Jasa Sahabat Abadi, BK 9472 VV; Supply Chain Certificate number RSPO 620707; FFA: 4.32%; water: 0.24%; dirt: 0.023%; Seal number 4462326-4462332.</li> </ul> <p>Sampled of certified PK Delivery Order/DO verified:</p>	
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		<ul style="list-style-type: none"> <li>- Delivery Order #08001/DC27/13/18 dated 03/08/2018; Seller is PT Gunung Melayu – Gunung Melayu II POM; Buyer is PT Saudara Sejati Luhur – Kernel Krushing Plant; Commodity is RSPO certified Palm Kernel; Supply Chain Model is Mass Balance; Quantity is 200,000 kg; Supply Chain Certificate is RSPO 620707.</li> </ul> <p>Sampled of certified PK Delivery:</p> <p>Weighbridge Ticket #PGDC218200222 dated 08/08/2018; Seller is PT Gunung Melayu – Gunung Melayu II POM; Buyer is PT Saudara Sejati Luhur – Kernel Krushing Plant; Delivery date is 08/08/2018; Commodity is PK Certified RSPO; Supply Chain Model is Mass Balance; Quantity is 25,310 kg; based on DO #08001/DC27/13/18; Transporter is CV Jasa Sumber Asahan, BK 9693 BM; Supply Chain Certificate number RSPO 620707; FFA: 0.22%; brokern kernel: 18.77%, water: 6.82%; dirt: 7.15%; Seal number 4359274-4359283.</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>Informations are complete and presented in couple document, e.g. Delivery Order and Weighbridge Ticket. 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 Gunung Melayu – Gunung Melayu II 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-701d93b0-a0a1 for 2,799.88 MT CSPO Mass Balance; from PT Gunung Melayu – Gunung Melayu II Mill as Seller to Buyer Wilmar Trading Pte Ltd (RSPO_PO1000002430). B/L</li> </ul>	<p>Yes</p>

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		<p>number MTMA TMA1803344, 1803345, 1803346 and 1803347. Confirmation has been made by Buyer on 03/10/2018.</p> <ul style="list-style-type: none"> <li>- Shipping Announcement, with transaction ID No. TR-99bc7883-f8b6 for 279.46 MT CSPO Mass Balance; from PT Gunung Melayu – Gunung Melayu II Mill as Seller to Buyer PT Sari Dumai Sejati. B/L number NOR-1805-NOV-601. Confirmation has been made by Buyer on 11/12/2018.</li> </ul> <p>Shipping Announcement, with transaction ID No. TR-f2aaaef3-f2cf for 532.91 MT CSPK Mass Balance; from PT Gunung Melayu – Gunung Melayu II Mill as Seller to Buyer PT Saudara Sejati Luhur Gunung Melayu I KCP. B/L number -. Confirmation has been made by Buyer on 21/09/2018.</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 Gunung Melayu – Gunung Melayu II 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_PO1000002608.</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 Gunung Melayu – Gunung Melayu II 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-701d93b0-a0a1 for 2,799.88 MT CSPO Mass Balance; from PT Gunung Melayu – Gunung Melayu II Mill as Seller to Buyer Wilmar Trading Pte Ltd (RSPO_PO1000002430). B/L</li> </ul>	Yes



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		<p>number MTMA TMA1803344, 1803345, 1803346 and 1803347. Confirmation has been made by Buyer on 03/10/2018.</p> <ul style="list-style-type: none"> <li>- Shipping Announcement, with transaction ID No. TR-99bc7883-f8b6 for 279.46 MT CSPO Mass Balance; from PT Gunung Melayu – Gunung Melayu II Mill as Seller to Buyer PT Sari Dumai Sejati. B/L number NOR-1805-NOV-601. Confirmation has been made by Buyer on 11/12/2018.</li> </ul> <p>Shipping Announcement, with transaction ID No. TR-f2aaef3-f2cf for 532.91 MT CSPK Mass Balance; from PT Gunung Melayu – Gunung Melayu II Mill as Seller to Buyer PT Saudara Sejati Luhur Gunung Melayu I KCP. B/L number -. Confirmation has been made by Buyer on 21/09/2018.</p>	
	<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 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.</li> </ul>	<p>Until this 4<sup>th</sup> annual surveillance audit, PT Gunung Melayu – Gunung Melayu II POM has not sold any CPO or PK to supply chain actor beyond the refinery.</p>	<p>Yes</p>
	<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>	<p>PT Gunung Melayu – Gunung Melayu II POM has done "Remove" in the RSPO IT Platform for CSPO sold as other scheme (ISCC), e.g.</p> <ul style="list-style-type: none"> <li>- Stock Transaction ID: ST-TR-8241A04C-306B for 12,983.42 MT of CSPO, Reason for Removal: Sold as ISCC, Removal date 21/03/2019, Removed by Siau Lin Go.</li> <li>- Stock Transaction ID: ST-TR-84ba753d-07f6 for 10,777.29 MT of CSPO, Reason for Removal: Sold as ISCC, Removal date 21/03/2019, Removed by Siau Lin Go.</li> </ul>	<p>Yes</p>

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		- Stock Transaction ID: ST-TR-a114d093-676a for 8,497.7 MT of CSPO, Reason for Removal: Sold as ISCC, Removal date 2103/2019, Removed by Siau Lin Go. April 2018 – March 2019 ISCC: 37,255 MT July 2018 – March 2019 ISCC: 29,781 MT	
	<ul style="list-style-type: none"> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	PT Gunung Melayu – Gunung Melayu II POM is a palm oil mill which does not need to confirm any purchase of FFB.	N/A
<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 Gunung Melayu – Gunung Melayu II POM has prepared a training program to staff, who is involved in RSPO Supply Chain Certification Standard implementation. As per training program, "Program Pelatihan Environmental & Sustainability Tahun 2019 PT Gunung Melayu – Gunung Melayu II POM" the RSPO supply chain and traceability refreshment training was planned on 19 February 2019. Competency and training records of all staff involved in RSPO Supply Chain were able to 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 1 April 2019 by instructure Welly Joel Chandra attended by production supervisor, weighbridge operators, dispatch operators and administrative controller. Training module attendance list were sighted.	Yes
<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.	Based on review of PT Gunung Melayu – Gunung Melayu II 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.	Yes

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		<p>Records and report verified are as follows:</p> <ul style="list-style-type: none"> <li>• Laporan Harian Pabrik (Mill Daily Report); dated 31/12/2018 and 31/03/2019.</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 Ticket) FFB;</li> <li>• Kartu Timbangan (Weighbridge Ticket) CPO;</li> <li>• Kartu Timbangan (Weighbridge Ticket) PK;</li> </ul>	
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
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	<p>PT Gunung Melayu – Gunung Melayu II 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 Tanjung Selamat Estate, Pangkatan estate and Third Party supplier, Extraction rates, Processing capacity, working hour, utilisation, etc.</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, as in “Book Keeping Mass Balance Report”.</p>	Yes
<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 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	<p>Conversion rate is applied to provide reliable estimation of CPO and PK produced.</p> <p>For year 2019, the budget for conversion from FFB into CPO are:</p> <ol style="list-style-type: none"> <li>For FFB from Sentral Estate: 24.30%</li> <li>For FFB from Batu Anam Estate: 25.10%</li> </ol>	Yes

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	<p>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>c. For FFB from Aek Tarum Estate: 24.60%  d. For FFB from third-party: 20.35 %  For year 2019, the budget for conversion from FFB into PK are:  e. For FFB from Sentral Estate: 4.90 %  f. For FFB from Batu Anam Estate: 4.90 %  g. For FFB from Aek Tarum Estate: 4.90 %  h. For FFB from third-party: 4.90 %  For actual 2018, actual conversion ratios from FFB into CPO are:  i. For FFB from Sentral Estate: 24.19 %  j. For FFB from Batu Anam Estate: 24.99 %  k. For FFB from Aek Tarum Estate: 24.47 %  l. For FFB from third-party: 20.32 %  For actual 2018, actual conversion ratios from FFB into PK are:  m. For FFB from Sentral Estate: 4.82 %  n. For FFB from Batu Anam Estate: 4.80 %  o. For FFB from Aek Tarum Estate: 4.82 %  For FFB from third-party: 4.80 %</p>	
<p>5.10.2</p>	<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 POM is able to demonstrate the work instruction for analysis of oil content.  Based on Laporan Harian Produksi dated 31/03/2018, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:  a. For FFB from Sentral Estate: 24.71%  b. For FFB from Batu Anam Estate: 25.51%</p>	<p>Yes</p>

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		<p>c. For FFB from Aek Tarum Estate: 25.00%</p> <p>d. For FFB from third-party: 20.70 %</p> <p>And actual conversion ratios from FFB into PK are:</p> <p>e. For FFB from Sentral Estate: 5.05 %</p> <p>f. For FFB from Batu Anam Estate: 5.05 %</p> <p>g. For FFB from Aek Tarum Estate: 5.05 %</p> <p>For FFB from third-party: 5.06 %</p>	
<b>5.11. Claims</b>			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	PT Gunung Melayu – Gunung Melayu II POM has made claims regarding the support of RSPO certified oil palm products in compliance with the RSPO Rules on Market Communications and Claims. However the RSPO trademark was not being used on products.	Yes
<b>General corporate communications</b>			
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 Gunung Melayu – Gunung Melayu II POM did not conducted corporate communication. Corporate communication are conducted by Asian Agri Group (PT Inti Indosawit Subur) as RSPO member with membership No. 1-0022-06-000-00, member since 6 <sup>th</sup> February 2006 on website: <a href="https://www.asianagri.com/id/">https://www.asianagri.com/id/</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.	In corporate communication, Asian Agri has display its RSPO membership status, display a link to the RSPO web address, stated that Asian Agri support the work of the RSPO and stated Asian Agri history with regard to the RSPO. Asian Agri did not uses RSPO trademark in the website.	Yes

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	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.		
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.	In the website, Asian Agri 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
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.	In the website, Asian Agri ensure that all communication is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Yes
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	In the website, Asian Agri is not uses the RSPO corporate logo.	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 Gunung Melayu – Gunung Melayu II POM made Busines to Busines communication by stated in sales documents, e.g. Sales Contract and Delivery Note that the product sold is RSPO Certified CPO 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.	Supply chain model and RSPO certificate number were satted in the delivery document, e.g. Delivery Note.	
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS	PT Gunung Melayu – Gunung Melayu II POM is not a distributor or wholesaler.	N/A

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	<p>certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. 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>	PT Gunung Melayu – Gunung Melayu II POM is not an end-product producer.	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>	PT Gunung Melayu – Gunung Melayu II POM did not performed Business to Consumer communication. Hanau POM sell its product in bulk.	N/A
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>	PT Gunung Melayu – Gunung Melayu II POM did not performed Business to Consumer communication. Hanau POM sell its product in bulk.	N/A
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	PT Gunung Melayu – Gunung Melayu II POM did not performed Business to Consumer communication. Hanau POM sell its product in bulk.	N/A

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6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	PT Gunung Melayu – Gunung Melayu II POM did not performed Business to Consumer communication. Hanau POM sell its product in bulk.	N/A
6.5	Members shall not communicate to consumers information about their suppliers’ RSPO membership status.	PT Gunung Melayu – Gunung Melayu II POM did not performed Business to Consumer communication. Hanau POM sell its product in bulk.	N/A
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.	PT Gunung Melayu – Gunung Melayu II POM did not performed Business to Consumer communication. Hanau POM sell its product in bulk.	N/A
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.	PT Gunung Melayu – Gunung Melayu II POM did not performed Business to Consumer communication. Hanau POM sell its product in bulk.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rsपो.org">www.rsपो.org</a> .	PT Gunung Melayu – Gunung Melayu II POM did not performed Business to Consumer communication. Hanau POM sell its product in bulk.	N/A

**5.12. Complaints**



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5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Based on document review, there was a complaint from Palm Kernel buyer KCP PT Saudara Sejati Luhur regarding dirty kernel (9.34% or >standard 8%), mill management has taken action by immediately re re analyse the delivered kernel together with the buyer (re analyse result was 8.35%) and improve the process ripple mill by monitoring daily lab, efficiency ripple mill. Record of complaint handling and follow up action were available in "Berita Acara Pemeriksaan Kernel Bersama PK dari PGD" dated 21 March 2019 and "e-mail correspondence between PT SSL and PT Gunung Melayu. 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 Gunung Melayu – Gunung Melayu II 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 Sept 2017 has also regulates the internal audit by Sustainability Internal Audit Manager, that planned 2 times in a year at minimum.	Yes
5.13.2	The input to management review shall include information on: <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> </ul>	The latest Internal audit carried out on 2 April 2019 by Welly Joel, against RSPO SCCS 2017 – RSPO General Chain of Custody requirements and Module E: Mass Balance.  The organization shows issues discussed during management review and attendance list, dated 16 March 2019. The management review inputs include information on:	Yes

	<ul style="list-style-type: none"> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	<ul style="list-style-type: none"> <li>- The result of audits: based on result from internal audit on 2 April 2018 by Welly Joel;</li> <li>- customer feedback – there was customer complaint regarding dirty kernel (9.34% or &gt;standard 8%), mill management has taken action by immediately re re analyse the delivered kernel together with the buyer (re analyse result was 8.35%) and improve the process ripple mill by monitoring daily lab, efficiency ripple mill ;</li> <li>- process performance and product conformity – no issue on FFB received, no issue on CPO and PK delivery, no RSPO certified CPO and PK delivery exceeds the quota;</li> <li>- status of corrective and preventive action – followed up through consistent management review;</li> <li>- changes that could affect the management system – no changes;</li> <li>- and recommendation for improvement – no changes.</li> </ul> <p>Management review was attended by key personnel involved in implementation of RSPO Supply Chain certification Standard. Minute of management review meeting and attendance register were available.</p>	
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>	<p>PT Gunung Melayu – Gunung Melayu II POM has conducted management review dated 2 April 2019. 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: Submit the mass balance report punctually</li> </ul>	Yes

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		<p>- Resource needs: manpower, machine, method and material to be prepared. Assigned the PIC who responsible for mass balance report.</p> <p>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: 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	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.	PT Gunung Melayu – Gunung Melayu II POM holds current RSPO P&C Certificate No. RSPO 620707. In the current certificate, PT Gunung Melayu – Gunung Melayu II 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.	Yes									
E.2 Explanation												
E.2.1	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&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>The projection for certified FFB and production of certified CPO and PK in Gunung Melayu II POM has been recorded in BSI's public summary report and registered in RSPO IT Platform.</p> <p>CB has been submitted to the RSPO Palm Trace Gunung Melayu II POM the projection of FFB, CPO and PK production.</p> <p>The actual CPO and PK produced verified during each subsequent visit to ensure that certified mill only deliver the allowed tonnage for the year. The projection of production in Palm Trace and actual as below:</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Projection in 2018</th> <th>Actual in 2018</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>308,171 MT</td> <td>258,842 MT</td> </tr> <tr> <td>CPO</td> <td>71,641 MT</td> <td>59,770 MT</td> </tr> </tbody> </table>	Description	Projection in 2018	Actual in 2018	FFB	308,171 MT	258,842 MT	CPO	71,641 MT	59,770 MT	Yes
Description	Projection in 2018	Actual in 2018										
FFB	308,171 MT	258,842 MT										
CPO	71,641 MT	59,770 MT										

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		<table border="1"> <tr> <td>PK</td> <td>14,638 MT</td> <td>12,436 MT</td> </tr> </table>	PK	14,638 MT	12,436 MT	
PK	14,638 MT	12,436 MT				
		During this assessment, the actual of production CPO and PK is recorded in daily, monthly and yearly basis.				
E.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	PT Gunung Melayu – Gunung Melayu II POM has met registration and reporting requirement as it has been registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000002608, sub licence ID CB58443.				
<b>E.3 Documented procedures</b>						
E.3.1	<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 Gunung Melayu – Gunung Melayu II Palm Oil Mill can demonstrates:</p> <ol style="list-style-type: none"> <li>1. Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R6) dated 1 Sept 2017. The procedures cover traceability of CPO and PK, since FFB receiving from Tanjung Selamat and Pangkatan 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: 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.</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> </ol> </li> </ol>	Yes			

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		<ul style="list-style-type: none"> <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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		n. SOP AA-MPM-OP-1400.15-R1, dated 1 February 2009, Perawatan (Preventive Maintenance and Repair)	
	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.	The person having responsibility for and authority over the implementation of the RSPO Supply Chain requirements identified in Procedure of Traceability (AA-MPM-OP-1400.17-R6). As explained in the SOP, Mill Unit Head is responsible for the implementation of RSPO Supply Chain requirements. During audit the Mill Unit Head able to demonstrate awareness of the organization's procedures for the implementation of these RSPO Supply Chain requirements.	Yes
E.3.2	The site shall have documented procedures for receiving and processing certifies an non-certified FFBS.	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. Mikael S. Depari, was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.	Yes
<b>E.4 Purchasing and goods in</b>			
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBS received.	Responsible Person is able to demonstrate mechanism to verify and documented the volumes of Certified and Non-certified FFBS received, which contains: <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> Sample taken during audit: Certified FFB received from own certified estate: Certified FFB received:	Yes

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		<ul style="list-style-type: none"> <li>- Weighbridge Ticket No. PGDA119107288 dated 30/03/2019, commodity: certified FFB; source: Sentral Estate Afdeling 4 (KSN-4); to Gunung Melayu II Palm Oil Mill; net weight: 5,610 kg; amount: 432 bunch; Block: E10g, &amp; E10h; RSPO Cert: RSPO620707; Transporter: Internal; Vehicle: BK 9583 CJ; Driver: Heru Novianto; Batch number: 13-100-16462018-27028377.</li> <li>- Weighbridge Ticket No. PGDA119107288 dated 20/03/2019, commodity: certified FFB; source: Aek Tarum Estate Afdeling 2 (KAT-2); to Gunung Melayu II Palm Oil Mill; net weight: 6,290 kg; amount: 483 bunch; Block: B09c, &amp; B09e; RSPO Cert: RSPO620707; Transporter: Internal; Vehicle: BK 9077 FA; Driver: M. Fadly; Batch number: 13-100-16462018-27025324.</li> <li>- Weighbridge Ticket No. PGDA11910 dated 13/02/2018, commodity: certified FFB; source: Batu Anam Estate Afdeling 4 (KBA-4); to Gunung Melayu II Palm Oil Mill; net weight: 6,410 kg; amount: 453 bunch; Block: G11h; RSPO Cert: RSPO620707; Transporter: Internal; Vehicle: BM 9020 TC; Driver: Triono; Batch number: 13-100-16462017-27025054.</li> </ul> <p>Non-certified FFB received:</p> <ul style="list-style-type: none"> <li>- Surat Pengantar No. 05 dated 09/03/2019 from PT STS (A)2 to PT Gunung Melayu-Gunung Melayu II POM; amount: 300 bunch, Truck No. BK 8208 YI, Driver: Y. Rizal</li> <li>- Weighbridge Ticket No. PGDA519102451 dated 09/03/2019, commodity: outside FFB; source: PT STS (A)2; ID: ST00121; to PT Gunung Melayu-Gunung Melayu II Palm Oil Mill; net weight: 6,278 kg; amount: 280 bunch;</li> </ul>	
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		<p>Sortasi: 4%; Transporter: general; Vehicle: BK 8208 YI; Driver: Yose Rizal.</p> <ul style="list-style-type: none"> <li>- Surat Pengantar No. 2911250 dated 09/03/2019 from Sinar Bakti to PT Gunung Melayu-Gunung Melayu II POM; amount: 375 bunch, Truck No. BK 8169 BS, Driver: Tukijo</li> <li>- Weighbridge Ticket No. PGDA519102477 dated 09/03/2019, commodity: outside FFB; source: Sinar Bakti; ID: ST00017; to PT Gunung Melayu-Gunung Melayu II Palm Oil Mill; net weight: 7,915 kg; amount: 375 bunch; Sortasi: 3%; Transporter: general; Vehicle: BK 8169 BS, Driver: Tukijo.</li> <li>- Surat Pengantar No. 47 dated 19/03/2019 from CSV KT Berkat Tani Jaya to PT Gunung Melayu-Gunung Melayu II POM; amount: 400 bunch, Truck No. BK 8402 VN, Driver: Rizal.</li> <li>- Weighbridge Ticket No. PGDA519102894 dated 19/03/2019, commodity: outside FFB; source: CSV KT Berkat Tani Jaya; ID: ST00138; to PT Gunung Melayu-Gunung Melayu II Palm Oil Mill; net weight: 8,170 kg; amount: 385 bunch; Sortasi: 4%; Transporter: general; Vehicle: BK 8402 VN, Driver: Rizal.</li> </ul>	
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 3 <sup>rd</sup> annual surveillance audit, there is no overproduction reported to CB.	Yes

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<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 Gunung Melayu – Gunung Melayu II 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 report 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 31/12/2017 and 31/03/2018.</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 Ticket) FFB;</li> <li>• Kartu Timbangan (Weighbridge Ticket) CPO;</li> <li>• Kartu Timbangan (Weighbridge Ticket) 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	All volumes of palm oil and palm kernel delivered are deducted from the material accounting system. There is no over deliveries of certified product neither negative stock of certified product. Volume of deliveries are controlled in "Book Keeping – Mass Balance – CPO and PK.	Yes
	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.	The procedure (AA-MPM-OP-1400.18-R4) has described the mechanism of "sell short" is allowed, however for safety reason the site has never practiced it.	Yes

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**Supply Chain Declaration** *(Applicable For Appendix E)*

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	April 2018	8,066.33	6,247.74	14,314.07
2	May 2018	10,129.04	6,624.08	16,753.12
3	June 2018	14,256.22	6,602.57	20,858.79
4	July 2018	16,533.36	7,307.35	23,840.71
5	August 2018	21,066.54	9,350.43	30,416.96
6	September 2018	18,663.34	9,922.28	28,585.62
7	October 2018	20,904.12	9,857.55	30,761.67
8	November 2018	17,751.93	8,841.09	26,593.02
9	December 2018	15,601.48	7,986.79	23,588.27
10	January 2019	15,377.67	7,251.86	22,629.53
11	February 2019	12,331.05	7,487.91	19,818.96
12	March 2019	11,937.82	9,137.84	21,075.66
<b>Total</b>		<b>182,618.89</b>	<b>96,617.48</b>	<b>279,236.38</b>

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	April 2018	1,972.32	372.32
2	May 2018	2,440.34	466.20
3	June 2018	3,441.62	667.10
4	July 2018	3,958.34	745.00
5	August 2018	5,134.86	1,016.82
6	September 2018	4,439.13	929.11
7	October 2018	5,020.28	1,023.76
8	November 2018	4,322.72	895.94
9	December 2018	3,877.27	775.87
10	January 2019	3,796.02	757.56
11	February 2019	3,029.26	626.08
12	March 2019	2,942.77	613.12
<b>Total</b>		<b>44,374.94</b>	<b>8,888.89</b>

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (April 2018 – March 2019)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading License Number</b>	<b>Certified CPO Sold (mt)</b>	<b>Certified PK Sold (mt)</b>
1	PT Saudara Sejati Luhur Gunung Melayu I KCP	TR-bde5233fd19c		348.68
2	PT Saudara Sejati Luhur Gunung Melayu I KCP	TR-efe921cb-24ac		281.78
3	PT Sari Dumai Sejati	TR-40d5ceb9-29ac	470.91	
4	PT Sari Dumai Sejati	TR-9af183d3-660a	315.8	
5	PT Sari Dumai Sejati	TR-e0f5428f-9df2	105.26	
6	PT Sari Dumai Sejati	TR-1de38585-07ed	84.21	
7	PT Saudara Sejati Luhur Gunung Melayu I KCP	TR-0b96a53ae8a4		544.05
8	PT Saudara Sejati Luhur Gunung Melayu I KCP	TR-cbfd8966-1436		502.38
9	PT Sari Dumai Sejati	TRae3c601a-59a3	500	
10	PT Sari Dumai Sejati	TR-f64a5ab5-f9ac	772.86	
11	Wilmar Trading, Pte. Ltd	TR-701d93b0-a0a1	2,799.88	
12	PT Saudara Sejati Luhur Gunung Melayu I KCP	TR-d819b4bf-3e8e		753.08
13	PT Saudara Sejati Luhur Gunung Melayu I KCP	TR-6ddf7e69-8a37		339.34
14	PT Saudara Sejati Luhur Gunung Melayu I KCP	TR-f2aaaef3-fc2f		532.91
15	PT Saudara Sejati Luhur Gunung Melayu I KCP	TR-025ea6e0-b3ca		62.25
16	PT Saudara Sejati Luhur Gunung Melayu I KCP	TR-1613a0e4-1e03		952.29
17	PT Sari Dumai Sejati	TR-48e9f6b0-ee52	139.37	
18	PT Sari Dumai Sejati	TR-5ae6bb92-a9ec	2,058.69	
19	PT Saudara Sejati Luhur Gunung Melayu I KCP	TR-af83a780-d4e5		956.97
20	PT Sari Dumai Sejati	TR-99bc7883-f8b6	279.46	
21	PT Saudara Sejati Luhur Gunung Melayu I KCP	TR-fc50184cd5ca		924.21
22	PT Saudara Sejati Luhur Gunung Melayu I KCP	TRda05221e-9f48		894.65

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23	PT Saudara Sejati Luhur Gunung Melayu I KCP	TR-2f731ec1-79e3		661.75
24	PT Saudara Sejati Luhur Gunung Melayu I KCP	TRd9c52188-3fdc		624.17
<b>Total</b>			<b>7,526.44</b>	<b>8,378.51</b>

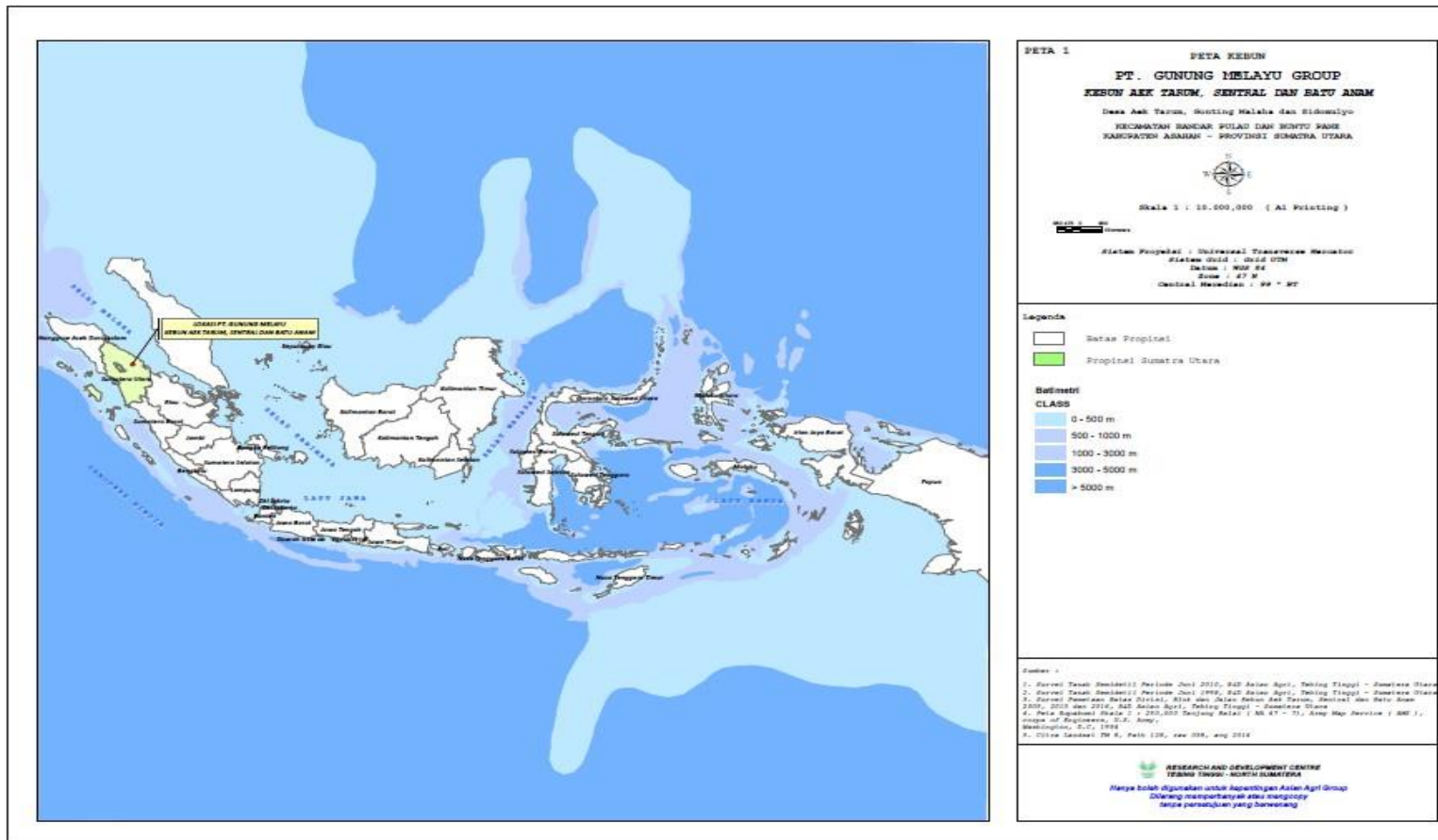
<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (April 2018 – March 2019)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Classified	ISCC	35,911.27	0

<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (April 2018 – March 2019)</b>			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
n/a			

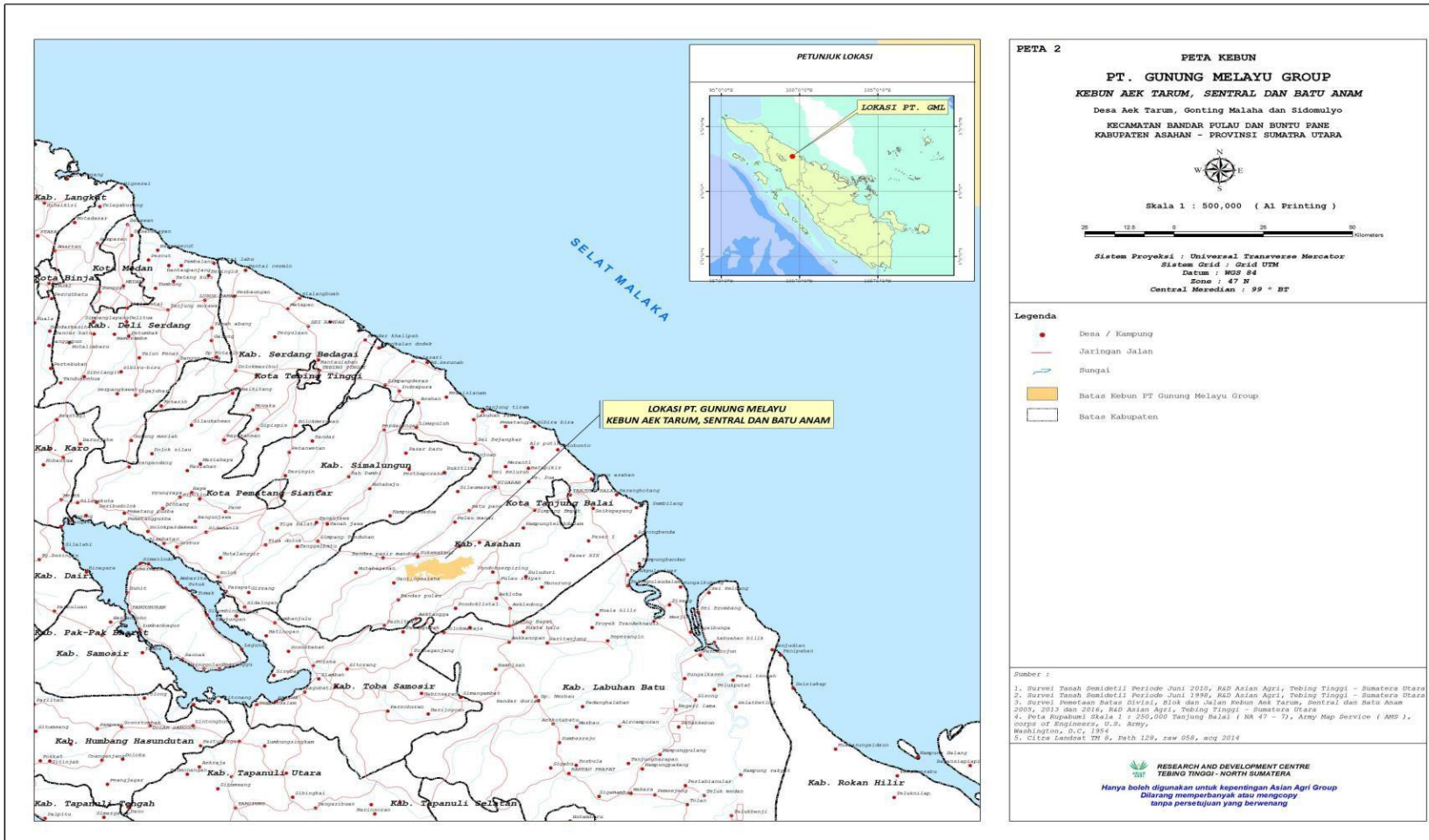
<b>F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (April 2018 – March 2019)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
n/a			

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

**Map 1.** Location of PT. Gunung Melayu in Indonesia

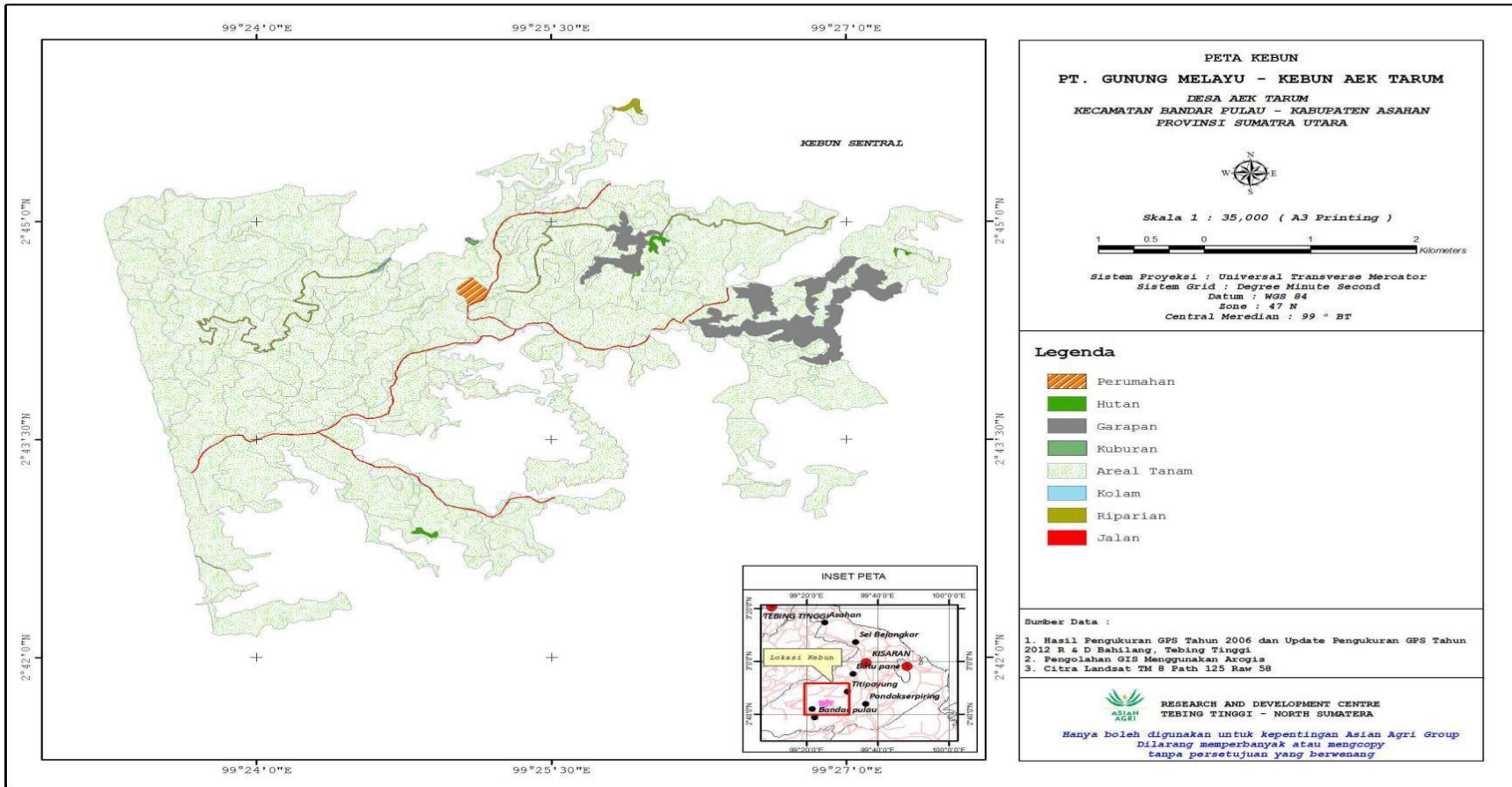


**Map 2.** Location of PT. Gunung Melayu in North Sumatera Province, Indonesia.



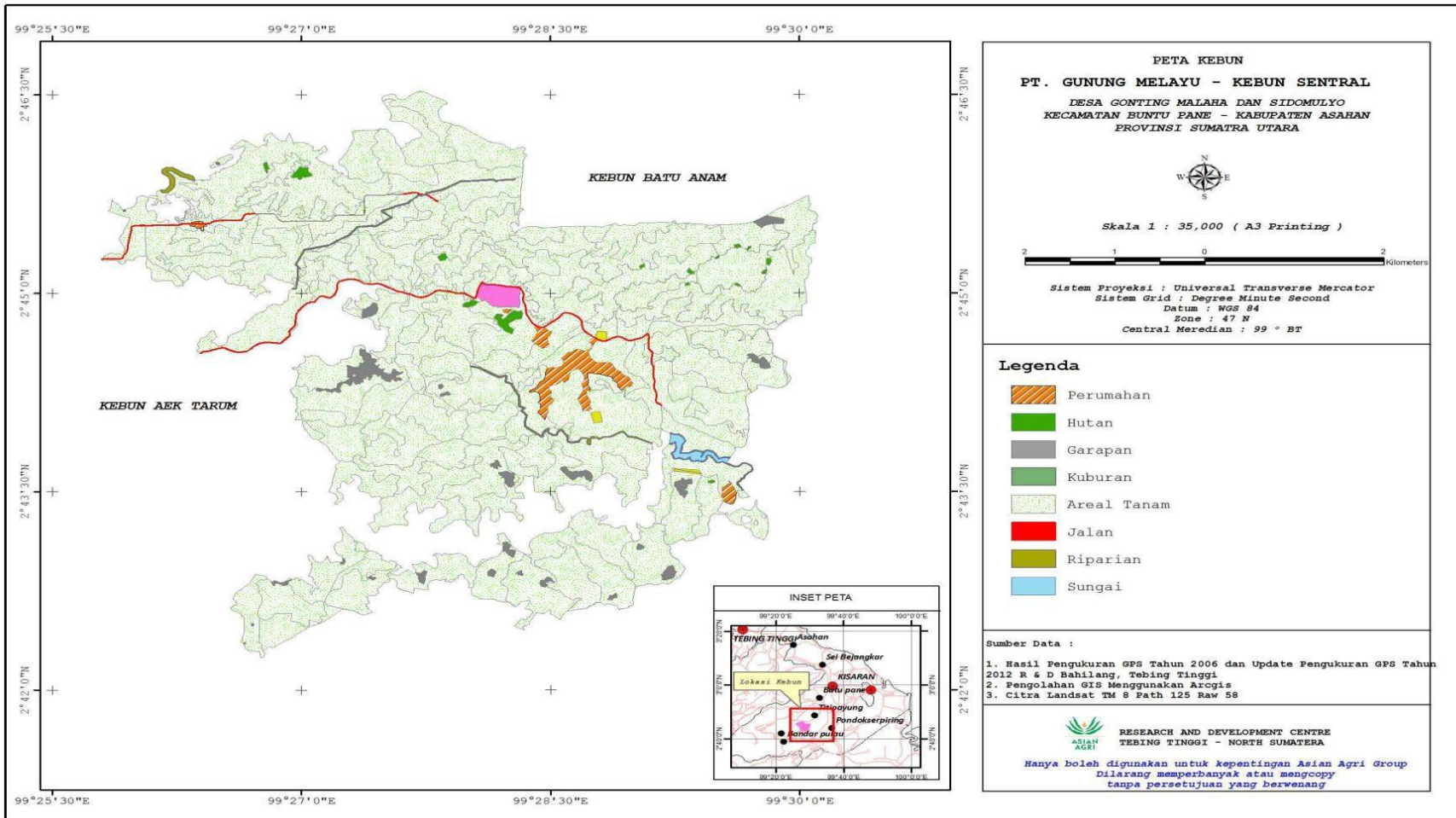
**Appendix G: Estate Field Map**

**Map 3.** Location of PT. Gunung Melayu (Aek Tarum Estate) and neighbouring entities

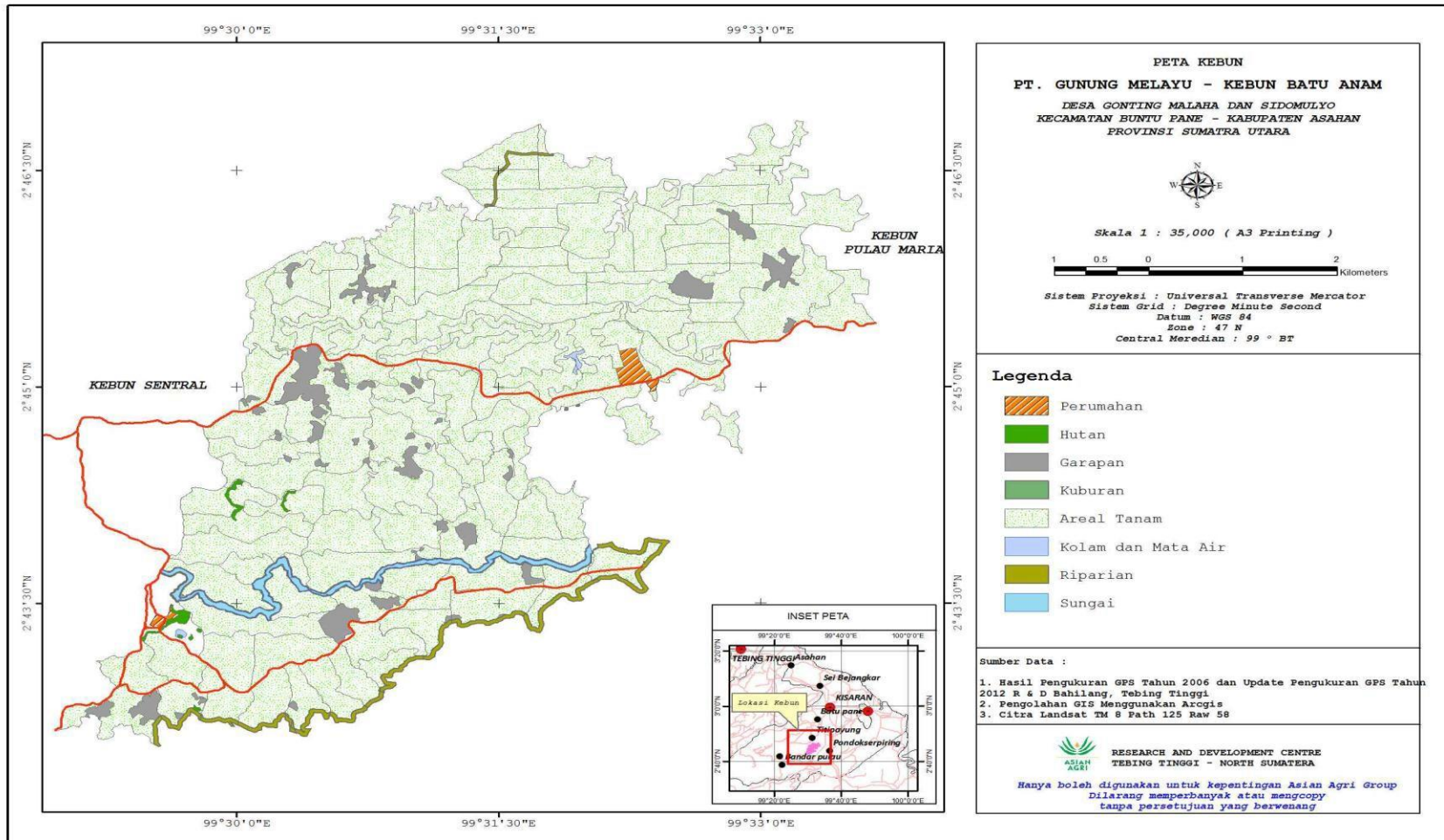




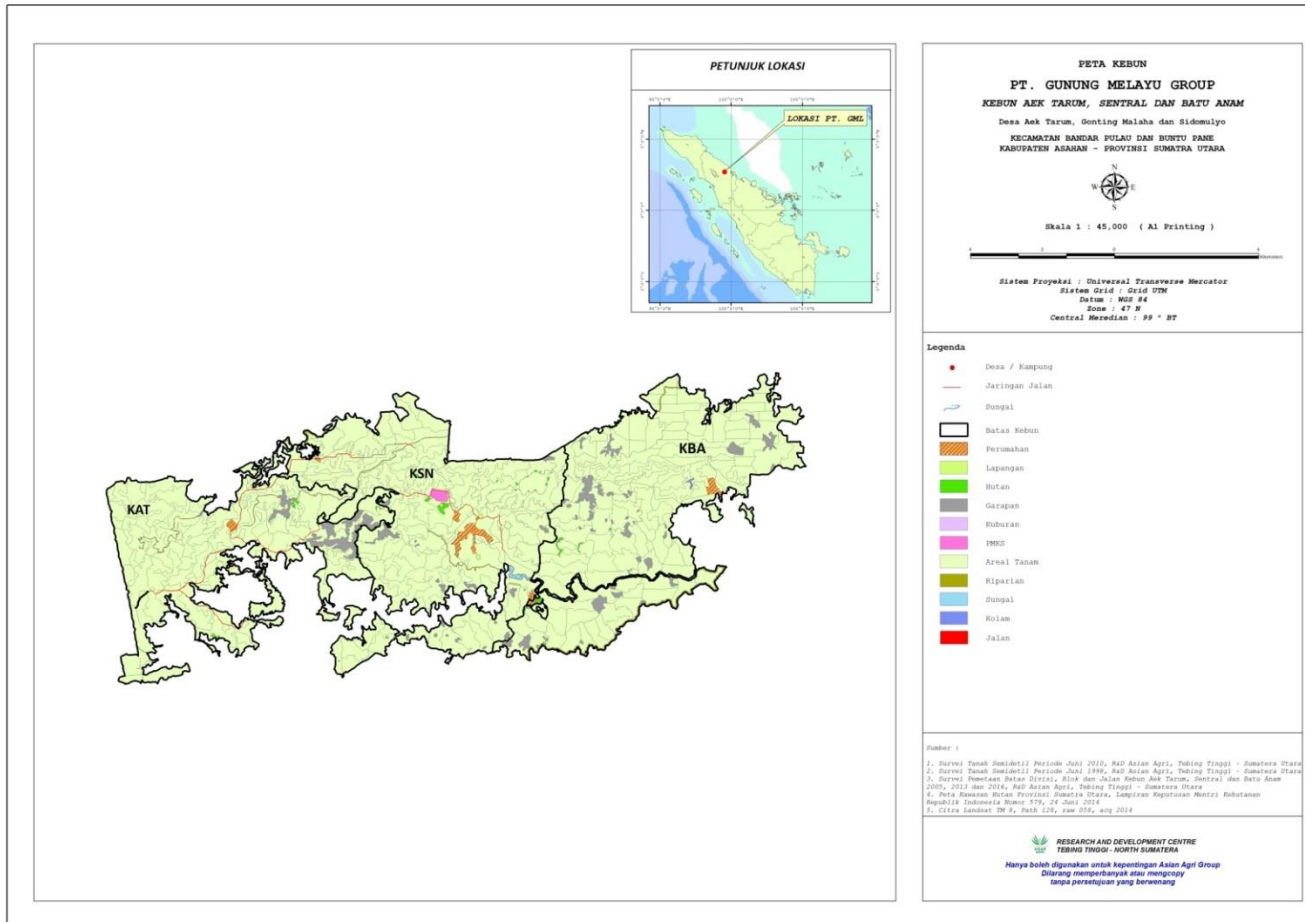
**Map 4.** Location of PT. Gunung Melayu (Sentral Estate) and neighbouring entities



**Map 5.** Location of PT. Gunung Melayu (Batu Anam Estate) and neighbouring entities



**Map 6.** Landscape Map of PT. Gunung Melayu - Batu Anam Estate (KBA), Sentral Estate (KSN) and Aek Tarum Estate(KAT)



**Appendix H: List of Smallholder Sampled** *(If applicable – scheme/associated/group certification)*

**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