

**RSPO PRINCIPLE AND CRITERIA –
4th Annual Surveillance Assessment (ASA 1_4)
Public Summary Report**

Sime Darby Plantation Berhad
Level 3A, Main Block, Plantation Tower No. 2, Jalan P.J.U 1A/7 47301 Ara Damansara Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 9) West Palm Oil Mill Location of Certification Unit: Ladang West 42960 Carey Island Selangor, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	06/09/2004
Parent Company Name	Sime Darby Plantation Berhad		
Address	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia		
Subsidiary (Certification Unit Name)	Strategic Operating Unit (SOU 9) – West Palm Oil Mill		
Address	Ladang West 42960 Carey Island, Selangor, Malaysia		
Contact Name	Mdm. Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mohd Idzaruddin Bin Hasan (SOU Chairman)		
Website	www.simedarbyplantation.com	E-mail	Idzaruddin.hasan@simedarbyplantation.com
Telephone	+603-78484379 (Head Office) +6013-2086959 (Mill)	Facsimile	03-78484356 (Head Office) +603-31220526 (Mill)

2. Certification Information			
Certificate Number	RSPO 543594	Date of First Certification	19/05/2010
		Certificate Start Date	19/05/2015
		Certificate Expiry Date	18/05/2020
Scope of Certification	Palm Oil and Palm Kernel Production from West Palm Oil Mill and supply base (West Estate)		
Applicable Standards	RSPO P&C MY-NIWG 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
Mill: MSPO 682052	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	12/02/2023
Plantations: MSPO 690774	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	12/02/2023

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4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
West Palm Oil Mill	KKS West, Carey Island, 42960 Selangor, Malaysia	2° 54' 20" N	101° 21' 42" E
West Estate	Ladang West, Carey Island 42960, Selangor, Malaysia	2° 54' 17" N	101° 21' 13" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
West Estate	5,064.64	157.00	691.05	5,912.69	86%

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 – 3	4 - 10	11 - 20	21 - 25	26 - 30		
West Estate	325.25	1,468.36	2,771.37	499.66	-	4,739.39	325.25

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (May 2018-April 2019)	Actual (Feb 2018-Dec 2018)	Forecast (May 2019-April 2020)
West Estate	125,483.00 mt	118,488.80 mt	149,235.00 mt

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (May 2018-April 2019)	Actual (Feb 2018-Dec 2018)	Forecast (May 2019-April 2020)
East Estate	77,759.94	58,971.75	90,507.93
Sungai Buloh		566.80	
Tennamaram		135.38	
Dusun Durian		334.72	
Sepang		132.91	

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Bukit Kerayong		127.79	
Bukit Talang		397.32	
Bukit Cheraka		731.93	
Total	77,759.94	61,398.60	90,507.93

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (May 2018-April 2019)	Actual (Feb 2018-Dec 2018)	Forecast (May 2019-April 2020)
N/A			
Total			

10. Certified Tonnage			
Mill Capacity: 50 MT/hr	Estimated (May 2018-April 2019)	Actual (Feb 2018-Dec 2018)	Forecast (May 2019-April 2020)
	FFB	FFB	FFB
	203,242.94 mt	179,887.40 mt	239,742.93 mt
SCC Model: IP	CPO (OER: 21.45 %)	CPO (OER: 20.88%)	CPO (OER : 21.54%)
	*58,403.70 mt	37,567.70 mt	51,640.63 mt
	PK (KER: 5.50%)	PK (KER: 4.95%)	PK (KER: 5.50%)
	*14,984.34 mt	8,900.49 mt	13,185.86 mt

*volume extension, sub license ID: CB 72423 [CPO 14,800.11 mt, PK 3,805.98 mt]

11. Actual Sold Volume (CPO) (Feb 2018 – Dec 2018)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	34,488.46 mt	-	-	3,012.58 mt	37,501.04 mt

12. Actual Sold Volume (PK) (Feb 2018 – Dec 2018)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	7,694.39 mt	-	-	1,206.10 mt	8,900.49 mt

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site annual surveillance assessment was conducted from 29-30/01/2019. 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 was closed offsite.

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 & Criterias MYNI 2014 and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance.

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

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

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made.

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At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
West Palm Oil Mill	√	√	√	√	√
West Estate	√	√	√	√	√

Tentative Date of Next Visit: January 20, 2020 – January 21, 2020

Total No. of Mandays: 7 mandays (including 1 day for mill – SC audit)

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Elzy Ovktafia Chairul	Trainee Lead Auditor	She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the AISP level (professional certificate and recognition from the Incorporated Society of Planters). She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI, etc) for 2 years in more than 11 countries. She is a qualified Lead

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		Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, MSPO P&C, MSPO SCC, ISO 9001:2015, ISO 14001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.
Ragu Samy A Erulappan	Team member	Holds a Bachelor Degree in Civil Engineering from University Technology Malaysia. He has more than 5 years working experience in environmental and occupational health safety engineer. He has more than 5 years of auditing experience in ISO 9001:2008, ISO 14001, IS 45001, C-TPAT (Supply Chain Security), SCAN, EICC/RBA, RSPO and GDPMD (Good Distribution Practice for Medical Devices). He has completed ISO 9001:2008 Quality Management System Lead Auditor Course, ISO 14001 Lead Auditor Course, ISO 45001 Lead Auditor Training and Endorsed RSPO P&C Lead Auditor Course. In this assessment he assessed the mill and estate OSH, Legal, and Environment aspects. He is fluent in both verbal/written in English.
Amir Bahari	Team member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English.

Accompanying Persons:

No.	Name	Role
1	Nicholas Cheong	Qualifying Review

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2.3 Assessment Plan

Date	Time	Subjects	EO	RE	AB	NC
Monday 28/01/2019 West POM RS	0900-1200	West POM <u>RSPO Supply Chain</u> Site visit: Incoming of FFB and outgoing of CSPO & PK weighbridge, ramp, storage area, loading bays, etc.	√	-	-	-
	1230-1330	LUNCH	√	-	-	-
	1330-1630	West POM Documentation review: RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records. Interim Closing Briefing for RSPO Supply Chain.	√	-	-	-
Tuesday 29/01/2019 West POM RSPO	0830-0900	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). Verification on previous audit findings 	√	√	√	√
	0900–1230	West POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	√	√
	1230–1330	LUNCH	√	√	√	√
	1330–1630	West POM Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain form CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√	√
	1630–1700	Interim Closing Briefing	√	√	√	√
Wednesday 30/01/2019 West Estate RSPO	0830-1230	West Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant, etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√	√
	1030–1230	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-	√
	1230–1330	LUNCH	√	√	√	√
	1330–1630	West Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation etc).	√	√	√	√
	1630–1700	Interim Closing Briefing	√	√	√	√

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Date	Time	Subjects	EO	RE	AB	NC
Thursday 31/01/2019 West POM MSPO	0900–1230	West POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	-	√	√
	1230–1330	LUNCH	√	-	√	√
	1330–1630	West POM Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	-	√	√
	1630–1700	Interim Closing Briefing	√	-	√	√
Friday 01/02/2019 West Estate MSPO	0830-1230	West Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	-	√	√
	1200–1430	LUNCH & Friday Prayer	√	-	√	√
	1430–1530	West Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	-	√	√
	1530-1600	Verify any outstanding issues & Preparation for closing meeting	√	-	√	√
	1630-1700	Closing Meeting	√	-	√	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Sime Darby Plantation Berhad Time Bound Plan
- RSPO Supply Chain Certification Checklist June 2017
- RSPO P&C MY-NIWG 2014 Checklist

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?	The time bound plan includes all SOUs in Malaysia and Indonesia. Malaysia - Effectively 34 SOUs: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. Indonesia - Effectively 25 SOUs. For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1 st quarter of 2019.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1 st quarter of 2019.	Yes
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.	In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified. A new mill has been set up in Liberia and planned for commissioning in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. *RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in completed. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1 st quarter of 2019.	Yes

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<p>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?</p>	<p>Sime Darby Plantation’s time bound plan for certification is initially 3 years, starting 2008-2011. SDP has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets). The 2 new mills have been RSPO Certified in Jan and Feb 2014. For Indonesian operations, currently, 1 SOU in Indonesia (PT MAS) is pending for RSPO Certification due to social legacy issues. SDP’s is actively working on its certification targets given the span across a large geographical location and over 200 estates and mills in operation.</p> <p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes and a new oil mill in Liberia has been commissioned in Feb 2016. SDP’s time bound plan has been revised to take into consideration the social challenges encountered in Indonesia for the remaining SOU (PT MAS) yet to be certified. Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. For Indonesia operation, the reported Case No: DSF 007 between the parties PT Mistra Austral Sejahtera (a subsidiary of Sime Darby Plantation Sdn Bhd) and Kerunang/Entapang community. New status has been updated for dispute tracker for following case, http://www.rspo.org/members/dispute-settlement-facility/status-of-disputes#007</p>	<p>Yes</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>No lapses.</p>	<p>Yes</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No.</p>	<p>Yes</p>
<p>Have there been any stakeholder comments?</p>	<p>Up to date, there is no comment. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat.</p>	<p>Yes</p>
<p>Un-Certified Units or Holdings</p>		
<p>No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with </p>	<p>HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p>	<p>Yes</p>

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<p>RSPO P&C criterion 7.3.</p> <p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1st quarter of 2019. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p> <p>*Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</p>	<p>Yes</p>																																																																			
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</p>	<p>Latest update based on RSPO Case Tracker (19 potential liabilities; 5 LUCA submitted, 1 LUCA is passed, 1 CN submitted, 1 CN approved) on LUCA submission status as per below table:</p> <p style="text-align: center;">SIME DARBY PLANTATION: LUCA SUBMISSION TIMELINE</p> <table border="1" data-bbox="639 965 1233 1406"> <thead> <tr> <th>No.</th> <th>PT/ Company</th> <th>Report Submission to RSPO</th> <th>Current Status (14 Aug 2018)</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>PT Lahan Tani Sakti</td> <td>Submitted on 31 May 2017</td> <td>LUCA approved by reviewer</td> </tr> <tr> <td>2.</td> <td>PT Bina Sains Cemerlang</td> <td>Submitted on 29 Sept 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>3.</td> <td>PT Swadaya Andika</td> <td>Submitted on 6 Oct 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>4.</td> <td>PT Langgeng Muara Makmur</td> <td>Submitted on 8 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>5.</td> <td>PT Laguna Mandiri</td> <td>Submitted on 20 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>6.</td> <td>PT Kridatama Lancar</td> <td>Submitted on 22 Sept 2017</td> <td rowspan="19">Shapefiles to be submitted to RSPO by 17 Aug 2018</td> </tr> <tr> <td>7.</td> <td>PT Paripurna Swakarsa</td> <td>Submitted on 29 Sept 2017</td> </tr> <tr> <td>8.</td> <td>PT Sime Indo Agro</td> <td>Submitted on 10 Nov 2017</td> </tr> <tr> <td>9.</td> <td>PT Bhumireksa Nusa Sejati</td> <td>Submitted on 12 Dec 2017</td> </tr> <tr> <td>10.</td> <td>PT Budidaya Agro Lestari</td> <td>Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017</td> </tr> <tr> <td>11.</td> <td>PT Teguh Sempurna</td> <td>Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017</td> </tr> <tr> <td>12.</td> <td>PT Bahari Gembira Ria</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>13.</td> <td>PT Guthrie Pecconina Indonesia</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>14.</td> <td>PT Sajang Heulang</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>15.</td> <td>PT Bersama Sejahtera Sakti</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>16.</td> <td>PT Tunggal Mitra Plantation</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>17.</td> <td>PT Ladangrumpun Suburabadi</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>18.</td> <td>PT Aneka Inti Persada</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>19.</td> <td>PT Mitra Austral Sejahtera</td> <td>Submitted on 29 Dec 2017</td> </tr> </tbody> </table> <p>Note: SDP's LUCA is still in queue for review process pending finalization of the contract between RSPO and the reviewer. Sime Darby Plantation has also submitted its RSPO Compensation Plan (CP) for evaluation by RSPO.</p>	No.	PT/ Company	Report Submission to RSPO	Current Status (14 Aug 2018)	1.	PT Lahan Tani Sakti	Submitted on 31 May 2017	LUCA approved by reviewer	2.	PT Bina Sains Cemerlang	Submitted on 29 Sept 2017	Shapefiles submitted to RSPO	3.	PT Swadaya Andika	Submitted on 6 Oct 2017	Shapefiles submitted to RSPO	4.	PT Langgeng Muara Makmur	Submitted on 8 Dec 2017	Shapefiles submitted to RSPO	5.	PT Laguna Mandiri	Submitted on 20 Dec 2017	Shapefiles submitted to RSPO	6.	PT Kridatama Lancar	Submitted on 22 Sept 2017	Shapefiles to be submitted to RSPO by 17 Aug 2018	7.	PT Paripurna Swakarsa	Submitted on 29 Sept 2017	8.	PT Sime Indo Agro	Submitted on 10 Nov 2017	9.	PT Bhumireksa Nusa Sejati	Submitted on 12 Dec 2017	10.	PT Budidaya Agro Lestari	Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017	11.	PT Teguh Sempurna	Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017	12.	PT Bahari Gembira Ria	Submitted on 29 Dec 2017	13.	PT Guthrie Pecconina Indonesia	Submitted on 29 Dec 2017	14.	PT Sajang Heulang	Submitted on 29 Dec 2017	15.	PT Bersama Sejahtera Sakti	Submitted on 29 Dec 2017	16.	PT Tunggal Mitra Plantation	Submitted on 29 Dec 2017	17.	PT Ladangrumpun Suburabadi	Submitted on 29 Dec 2017	18.	PT Aneka Inti Persada	Submitted on 29 Dec 2017	19.	PT Mitra Austral Sejahtera	Submitted on 29 Dec 2017	<p>Yes</p>
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<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p>	<p>No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>None noted. No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>Yes</p>	<p>Yes</p>																																																																			

3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	N/A	N/A

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 4th annual surveillance assessment there were there (3) Major & three (3) Minor nonconformities raised. The West Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly during off-site verification on 05/04/2019.

Non-Conformity			
NCR Ref #	1737255-201901-M1	Clause & Category (Major/Minor)	Indicator 4.7.2 Major
Date Issued	30/01/2019	Due Date	29/04/2019
Closed (Yes/No)	Yes	Date of nonconformity closure	05/04/2019
Statement of Nonconformity	Hazard Identification Risk Assessment & Determination Control (HIRADC) was not adequately assessed & implemented.		
Requirement Reference	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.		
Objective Evidence	HIRADC for following sampled operations was not carried out: West POM: a) Rain water harvesting pond b) Roro bin domestic waste dumping & collection site		
Corrections	The HIRADC failed to be conducted for both rain water harvesting pond and Roro Bin domestic waste due to interpretation that these new activities are not major processing activities to be covered under HIRADC.		
Root Cause Analysis	To carry out HIRADC for these activities.		
Corrective Action	Any new activities will be discussed during Safety Committee meeting to ensure these activities will be captured in HIRADC.		
Assessment Conclusion	Audit team have reviewed the evidence submitted and the major NC is satisfactorily closed. Continuous implementation of corrective action taken will be further verified in the next assessment visit. The major NC was closed out on 05.04.2019. Evidence reviewed: Newly revised HIRARC.		

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Non-Conformity			
NCR Ref #	1737255-201901-M2	Clause & Category (Major/Minor)	RSPO SCCS 5.4.1
Date Issued	30/01/2019	Due Date	29/04/2019
Closed (Yes/No)	Yes	Date of nonconformity closure	05/04/2019
Statement of Nonconformity	The incoming document is having insufficient information as per requirement.		
Requirement Reference	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 		
Objective Evidence	<p>West POM have a Mill Weigh System to verify at the weighbridge However, for incoming document, the information is not include the minimum traceability requirement as below: West Estate, Carey Island Code : E-152, Consignment note# 162451, Field no: 09B, Div. Bangkok Mill tonnage: 9020 kg Transport: BDM5241W20 Date: 26.01.2019 RSPO Cert: Nil</p> <p>East Estate, Carey Island (Crop Diversion) Code : E-167, Consignment note# 039361, Field no: 05, Div. C Mill tonnage: 8980 kg Transport: PAG5878E54 Date: 26.01.2019 RSPO Cert: SPO 543543 (wrong certificate number)</p>		
Corrections	Insufficient communication with the supplying estate on the SCCS requirement and insufficient on-the-job training for the effective implementation/monitoring of the requirements of RSPO SCCS by the person-in-charge.		
Root Cause Analysis	<ol style="list-style-type: none"> 1. To immediately inform supplying estates to ensure correct/ valid Certificate Number on the DNs. 2. SQM to conduct SCCS on-the-job training based on the SOP to the weighbridge operator 		
Corrective Action	<ol style="list-style-type: none"> 1. Assignment of PIC for continuous monitoring of the adequacy of relevant info required on the DNs based on certificate details published on RSPO website: https://www.rspo.org/certification/search-for-certified-growers & Palmtrace. 		

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	<ol style="list-style-type: none"> 2. To establish and emphasize on manual stamping if the SIME WEIGH system is not in place. 3. SQM to conduct evaluation for the effective implementation of the RSPO SCCS requirements at the mill at least twice a year.
Assessment Conclusion	<p>Audit team have reviewed the evidence submitted and the major NC is satisfactorily closed. Continuous implementation of corrective action taken will be further verified in the next assessment visit. The major NC was closed out on 05.04.2019.</p> <p>Evidence reviewed: The revised incoming document having the correct RSPO certification number verified and further interview session online with weighbridge clerk, Ms Inthumadi and Ms Zurina on 03.04.2019, it was confirmed that both of them attended the RSPO SCC training on 29.03.2019 and shown awareness on the RSPO SCC implementation on their workscope.</p>

Non-Conformity			
NCR Ref #	1737255-201901-M3	Clause & Category (Major/Minor)	RSPO SCCS 5.6.1
Date Issued	30/01/2019	Due Date	29/04/2019
Closed (Yes/No)	Yes	Date of nonconformity closure	05/04/2019
Statement of Nonconformity	The outgoing document is having insufficient information as per requirement.		
Requirement Reference	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 		
Objective Evidence	<p>West POM have a Mill Weigh System to verify at the weighbridge However, for outgoing document, the information in the sales contract and invoices is having insufficient information as below:</p> <p><u>CSPO</u> Despatch Ticket: 017695 Buyer: SDP Joma Ref – Sime Darby Plantation Sdn Bhd Address: Teluk Panglima Garang Industrial EAS Contract No: S/C-PSD/1812/CPO0719H Shipment date: 02/01/2019 Quantity: 38,170 KG Product: PQ RSPO CPO IP Transport: Jasa Bumi Logistics Sdn Bhd Supply chain cert no: SPO 543594 (SC MODEL IP) (wrong certificate number)</p> <p><u>CSPK</u></p>		

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	<p>Despatch Ticket: 017521 Buyer: SDP KCP – Sime Darby Plantation Berhad Address: KCP-Pulau Carey Contract No: S/C-PSD/1811/PK0651B Shipment date: 19/11/2018 Quantity: 28,420 KG Product: Palm Kernel RSPO IP Transport: STB Maju – STB Maju (M) Sdn Bhd Supply chain cert no: SPO 543594 (SC MODEL IP) (wrong certificate number)</p>
Corrections	<ol style="list-style-type: none"> To liaise with GSQM & IT Dept. to update the latest/ valid certificate number on Sime Weigh System. SQM to conduct SCCS on-the-job training based on the SOP to the weighbridge operator.
Root Cause Analysis	<p>Insufficient communication with the supplying estate on the SCCS requirement and insufficient on-the-job training for the effective implementation/monitoring of the requirements of RSPO SCCS by the person-in-charge.</p>
Corrective Action	<ol style="list-style-type: none"> Assignment of PIC for continuous monitoring of the adequacy of relevant info required on the DNs based on certificate details published on RSPO website: https://www.rspo.org/certification/search-for-certified-growers & Palmtrace. SQM to conduct evaluation for the effective implementation of the RSPO SCCS requirements at the mill at least twice a year.
Assessment Conclusion	<p>Audit team have reviewed the evidence submitted and the major NC is satisfactorily closed. Continuous implementation of corrective action taken will be further verified in the next assessment visit. The major NC was closed out on 05.04.2019.</p> <p>Evidence reviewed: The revised outcoming document having the correct RSPO certification number verified and further interview session online with weighbridge clerk, Ms Inthumadi and Ms Zurina on 03.04.2019, it was confirmed that both of them attended the RSPO SCC training on 29.03.2019 and shown awareness on the RSPO SCC implementation on their workscope.</p>

Non-Conformity			
NCR Ref #	1737255-201901-N1	Clause & Category (Major/Minor)	Indicator 6.1.4 Minor
Date Issued	30/01/2019	Due Date	Next annual surveillance assessment
Closed (Yes/No)	No	Date of nonconformity closure	"Open"
Statement of Nonconformity	The SIA management plan is inadequately reviewed.		
Requirement Reference	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties.		

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Objective Evidence	The issues captured in the stakeholder meeting for West POM were not included in SIA management plan for West POM. Example were list for paint from Jega, using ash for levelling the school field and requesting the resource for school tuition class.
Corrections	To immediately follow up and review all issues highlighted during stakeholder meeting to be summarised into the social management plan for next action.
Root Cause Analysis	Incomplete follow up process upon completion of stakeholder meeting to identify and translate relevant social issues into the social management plan.
Corrective Action	To include SIA agenda into management review to ensure development of social management plan is comprehensive (capture issues highlighted in stakeholder/ gender committee meetings and any social related issues).
Assessment Conclusion	Audit team have reviewed and accept the Corrective Action Plan (CAP) submitted and the minor NC CAP implementation will be further verified in the next assessment visit.

Non-Conformity			
NCR Ref #	1737255-201901-N2	Clause & Category (Major/Minor)	Indicator 2.1.3 Minor
Date Issued	30/01/2019	Due Date	Next annual surveillance assessment
Closed (Yes/No)	No	Date of nonconformity closure	"Open"
Statement of Nonconformity	The monitoring of external party's legal compliance is not effectively demonstrated.		
Requirement Reference	A mechanism for ensuring compliance shall be implemented.		
Objective Evidence	<p>The monitoring of compliance was made through the internal audit by SQM team annually however, the monitoring is not effective as below:</p> <p>West POM:</p> <ol style="list-style-type: none"> In West POM, it was found that the contractor's workers for Lotus Two in West POM are having different work permit contractor worker: Md Alim (Passport no: BK0979582) hired for A&M manpower Sdn Bhd. Through the interview session with the contractor and contractor's worker, it is made understand that the worker also has paid half of the Levi cost to the contractor in 2018. The employment contract mentioned that that for overtime, it is according to the Bangladesh Labour Laws. <p>West Estate:</p> <ol style="list-style-type: none"> In West Estate, it was found that the contractor's workers for YGNT Enterprise, Sobhan Talukder (Passport no: BL0057497) is receiving the normal rate for work in rest day/public holiday as sighted in pay slip for October 2018 (28 days) and November 2018 (27 days). 		
Corrections	To immediately conduct a briefing session with contactors on relevant requirement specifically on labour and immigration as stated in the contract agreement, to rectify the issues stated above.		
Root Cause Analysis	Legal compliance in relation with contractor's worker were not emphasized in the internal audit exercise due to the understanding by the estate management that		

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	the mechanism for ensuring legal compliance is mainly for the operations handled/managed directly by the management unit.
Corrective Action	Internal Audit to monitor the compliance of contractors' engaged on the relevant requirement stated in the contract agreement.
Assessment Conclusion	Audit team have reviewed and accept the Corrective Action Plan (CAP) submitted and the minor NC CAP implementation will be further verified in the next assessment visit.

Non-Conformity			
NCR Ref #	1737255-201901-N3	Clause & Category (Major/Minor)	Indicator 5.3.3 Minor
Date Issued	30/01/2019	Due Date	Next annual surveillance assessment
Closed (Yes/No)	No	Date of nonconformity closure	"Open"
Statement of Nonconformity	The mill has not established the EFB monthly disposal distribution for 2018.		
Requirement Reference	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.		
Objective Evidence	There was no record available during the audit for the distribution of EFB disposal in West POM.		
Corrections	<ol style="list-style-type: none"> To immediately submit EFB application report to DOE on monthly basis. Person in charge to review the waste management and disposal plan to ensure all relevant compliance matters is addressed and implemented. 		
Root Cause Analysis	No mechanism to include this requirement in the waste management and disposal plan for effective implementation.		
Corrective Action	To conduct periodical comprehensive review of the waste management disposal plan (on all aspects) in the coming EPMC meeting onwards.		
Assessment Conclusion	Audit team have reviewed and accept the Corrective Action Plan (CAP) submitted and the minor NC CAP implementation will be further verified in the next assessment visit.		

Opportunity for Improvements	
OFI #	Description
Nil	-

Positive Findings	
PF #	Description
PF 1	Good cooperation & hospitality from the management.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity			
NCR Ref #	1590312-201801-M1	Clause & Category (Major / Minor)	Indicator 2.1.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/04/2018
Statement of Nonconformity:	Compliance to the EMPLOYMENT ACT 1955 was not effectively implemented.		
Requirement Reference:	Evidence of compliance with relevant legal requirements shall be available.		
Objective Evidence:	West Estate: As per EMPLOYMENT ACT 1955, Work on rest day: 60. (d) In the case of an employee employed on piece rates who works on a rest day, he shall be paid twice his ordinary rate per piece. However, sampled worker's pay slips showed that working on Sunday for worker ID (India): 103990 is not having the double paid which is incompliance with Malaysia Employment Act 1955. The sampled pay slips are as below: a. Estate worker ID (India): 103990, pay slip for June 2017.		
Corrective Actions:	<ol style="list-style-type: none"> 1) The management will issue the official memo on the works on rest day as per Employment Act 1955, part X11 – (60) Work on rest day. 2) If the management required to working on the rest day, the double pay is applicable to the workers. <p>There is a specific mechanism for the double pay. The clerk will key in '02' in the checkroll system which is means double pay applicable. This method using for the harvester gang during the Sunday harvesting.</p>		
Assessment Conclusion:	Verification during ASA1_4 assessment: During the audit, it has been verified in the pay slips sampled as per 6.5.1 that workers are not working on rest day, but if needed, they were paid in double rate.		

Non-Conformity			
NCR Ref #	1590312-201801-M2	Clause & Category (Major / Minor)	RSPO SCCS 5.3.2
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/04/2018
Statement of Nonconformity:	The internal audit has yet to be conducted. The written procedure (SOP for Sustainable Supply Chain and Traceability, dated Feb 2018) was not adequately implemented.		
Requirement Reference:	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; <ol style="list-style-type: none"> i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii) effectively implements and maintains the standard requirements within its organization 		
Objective Evidence:	The internal audit has yet to be conducted.		
Corrective Actions:	<ol style="list-style-type: none"> 1) To review and include the internal audit procedure in the existing SOP which is specific for the SCCS. 2) PSQM in the midst preparation to develop the latest SOP and to include the latest requirement as mention in the SCCS standard revised June 2017. 		

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Assessment Conclusion:	<p>Verification during ASA1_4 assessment: The SOP for Internal Audit, namely Internal Audit Procedure, SD/SDP/PSQM/IAP Revision 2 dated 01.11.2017 where the SCCS audit shall be conducted annually, as and when required for Independent External Assurance Audit. Sustainability Unit, GSQM Department & SQM Central has conducted MSPO & RSPO Internal audit Report for SOU 9: West POM on 14-16/01/2019. There is 11 Major, 6 Minor and 4 OFI has been raised. 2 Major NCs are related to RSPO SCC and all issues has been closed.</p>
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Non-Conformity			
NCR Ref #	1590312-201801-M3	Clause & Category (Major / Minor)	RSPO SCCS 5.13.1
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/04/2018
Statement of Nonconformity:	Management review on RSPO supply chain implementation has yet to be conducted.		
Requirement Reference:	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.		
Objective Evidence:	There is no evidence that management review has been conducted which contains the input and output according to the RSPO SCCS standard.		
Corrective Actions:	To incorporate the specific output or issues need to be concern during the management review meeting process.		
Assessment Conclusion:	Verification during ASA1_4 assessment: Verified in SOP of management review, the management review will be hold annually at planned intervals.		

Non-Conformity			
NCR Ref #	1590312-201801-M4	Clause & Category (Major / Minor)	RSPO SCCS 5.13.2
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/04/2018
Statement of Nonconformity:	There is no evidence that management review has been conducted which contains the input and output according to the RSPO SCCS standard.		
Requirement Reference:	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement 		
Objective Evidence:	There is no evidence that management review has been conducted which contains the input and output according to the RSPO SCCS standard.		
Corrective Actions:	PSQM in the midst preparation to develop the latest SOP and to include the latest requirement as mention in the SCCS standard revised June 2017.		
Assessment Conclusion:	Verification during ASA1_4 assessment: During this audit, the input as per requirement was available as per 5.13.2.		

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Non-Conformity			
NCR Ref #	1590312-201801-M5	Clause & Category (Major / Minor)	RSPO SCCS 5.13.3
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/04/2018
Statement of Nonconformity:	Management review on RSPO supply chain implementation has yet to be conducted.		
Requirement Reference:	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 		
Objective Evidence:	There is no evidence that management review has been conducted which contains the input and output according to the RSPO SCCS standard.		
Corrective Actions:	PSQM in the midst preparation to develop the latest SOP and to include the latest requirement as mention in the SCCS standard revised June 2017.		
Assessment Conclusion:	Verification during ASA1_4 assessment: During this audit, the input as per requirement was available as per 5.13.3		

Non-Conformity			
NCR Ref #	1590312-201801-M6	Clause & Category (Major / Minor)	RSPO SCCS D.5.1
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/04/2018
Statement of Nonconformity:	The standard requirement on record and balance shall be done on real-time basis was not implemented.		
Requirement Reference:	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.		
Objective Evidence:	The record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on real-time basis was not available for verification.		
Corrective Actions:	<ol style="list-style-type: none"> 1) Mill management will appoint the person in-charge to monitor and update all the product balance. 2) The monitoring result will be discussed in the management meeting and to review the total dispatch and balance of the certified product. The mill will establish a mass balance template for monthly monitoring against dispatched as certified product.		
Assessment Conclusion:	Verification during ASA1_4 assessment: During the audit, sighted the mass balance record prepared by assistant in charge and balance is tally.		

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1151638M1	5.3.2	Major	6/3/2015	Closed out on 20/04/2015
1151638M2	2.1.1	Major	6/3/2015	Closed out on 20/04/2015
1304223M1	7.1.1	Major	9/3/2016	Closed out on 10/6/16
1304223M2	7.3.2	Major	9/3/2016	Closed out on 10/6/16
1304223M3	7.8.1	Major	9/3/2016	Closed out on 10/6/16
1304223N1	7.1.2	Minor	9/3/2016	Closed out on 28/2/2017
1304223N2	7.8.2	Minor	9/3/2016	Closed out on 28/2/2017
1304223N3	4.7.5	Minor	9/3/2016	Upgraded to Major Closed out on 14/4/2017
1443573-201702-M1	2.1.1	Major	28/02/2017	Closed out on 14/04/2017
1443573-201702-M2	6.5.1	Major	28/02/2017	Closed out on 14/04/2017
1443573-201702-M3	6.5.2	Major	28/02/2017	Closed out on 14/04/2017
1443573-201702-M4	SCCS 4.2	Major	28/02/2017	Closed out on 14/04/2017
1443573-201702-M5	4.7.5	Major	28/02/2017	Closed out on 14/04/2017
1443573-201702-N1	2.1.2	Minor	28/02/2017	Closed out on 14/2/2018
1590312-201801-M1	2.1.1	Major	14/2/2018	Closed out on 15/4/2018
1590312-201801-M2	SCCS 5.3.2	Major	14/2/2018	Closed out on 15/4/2018
1590312-201801-M3	SCCS 5.13.1	Major	14/2/2018	Closed out on 15/4/2018
1590312-201801-M4	SCCS 5.13.2	Major	14/2/2018	Closed out on 15/4/2018
1590312-201801-M5	SCCS 5.13.3	Major	14/2/2018	Closed out on 15/4/2018
1590312-201801-M6	SCCS D 5.1	Major	14/2/2018	Closed out on 15/4/2018
1737255-201901-M1	4.7.1	Major	30/01/2019	Closed out on 05/04/2019
1737255-201901-M2	SCCS 5.4.1	Major	30/01/2019	Closed out on 05/04/2019
1737255-201901-M3	SCCS 5.6.1	Major	30/01/2019	Closed out on 05/04/2019
1737255-201901-N1	6.1.4	Minor	30/01/2019	"Open"
1737255-201901-N2	2.1.3	Minor	30/01/2019	"Open"
1737255-201901-N3	5.3.3	Minor	30/01/2019	"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 West Palm Oil Mill 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	
Government Bodies: Police Officer – Teluk Panglima Garang SMK Pulau Carey SJK (T) Pulau Carey Barat	Internal Stakeholders: Workers Representatives (Foreign & local workers) Gender Committee Representative NUPW Secretary NEST (daycare centre)
Communities: Kampung Sungai Kurau	Contractors/Vendors/Suppliers: Lotus Two Enterprise TK Das Enterprise

IS #	Description
1	Issues: <u>Kg Sungai Kurau</u> The new re-route for the villagers from estate road is far and takes long hour for them to go out to town.
	Management Responses: All the while, villagers used estate road to go out to the town, the re-routing is due to the replanting area where fences built for the cattle.
	Audit Team Findings: Verified the cattle issue in the stakeholder’s meeting and no further issue.
2	Issues: Police Officer – Teluk Panglima Garang <ol style="list-style-type: none"> Police officer would like to express their appreciation for West Estate contribution of grass cutter machine. So far, no crime issue reported in regards of West Estate and West POM.
	Management Responses: <ol style="list-style-type: none"> Noted on the appreciation.
	Audit Team Findings:

	No further issue.
3	<p>Issues: <u>SMK Pulau Carey & SJK (T) Pulau Carey Barat</u> School has received contribution and assistance for grass cutting, sports day and field usage.</p>
	<p>Management Responses: Management will continue to give supports and cooperation to the school management.</p>
	<p>Audit Team Findings: No further issue.</p>
4	<p>Issues: <u>Gender Committee</u> So far no sexual harassment case reported and gender committee members are actively conducting activities for women.</p>
	<p>Management Responses: Management will continue to provide awareness to all the employee on the grievance procedure, case reported and prevention action.</p>
	<p>Audit Team Findings: No other issue.</p>
5	<p>Issues: <u>Workers' Representatives & NUPW Secretary</u> Overtime and basic salary were on time and paid accordingly. No discrimination occur between locals and foreign worker as well as among male and female. Estate didn't stop the worker to join any trade union as most are join NUPW.</p>
	<p>Management Responses: Mill and estate will continue the good practices.</p>
	<p>Audit Team Findings: No further issue.</p>
6	<p>Issues: <u>NEST (Daycare centre)</u> Management has provided free service for kids daycare whom their parent worked in estate or mill. Overtime also being paid by the management accordingly and no complaint in regards to management. During site visit, it was noted that the building and environment is in neat and appropriate condition.</p>
	<p>Management Responses: Mill and estate will continue the good practices.</p>
	<p>Audit Team Findings: No further issue.</p>
7	<p>Issues: <u>Lotus Two Enterprise & TK Das Enterprise</u> Both contractors are having a long term contract with Sime Darby and payments were made accordingly. During the interview session, it was made understand that Lotus Two has supplied the foreign worker with employment contract mentioned that that for overtime, it is according to the Bangladesh Labour Laws, hence OFI was raised under clause 4.4.5.4-Part 4.</p>
	<p>Management Responses: Mill management noted on the OFI raised and will act accordingly.</p>
	<p>Audit Team Findings: This issue will be verified in the next surveillance assessment.</p>

Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that West Palm Oil Mill has complied with the RSPO P&C MY-NI 2014 & 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 West Palm Oil Mill is approved and continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Elzy Ovktafia Chairul	Name: 
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: West estate
Title: Trainee Lead Auditor	Title: Senior Manager.
Signature: 	Signature: (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.) 
Date: 14/04/2019	Date: MOHD IDZARUDDIN BIN HASAN Senior Manager

Appendix : Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Requests for information from the Regulatory Department such as DOSH, DOE visiting log book were attended accordingly. Stakeholder list was updated annually and includes various background such as villagers, NGO, government bodies, etc. During the audit, it was updated as at January 2019.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	The requests were normally from internal stakeholders related to the house repairing work. In West POM, seen the Repairs & Jobs Requisition – Bungalow & Linesite Besides form, the stakeholders will write in formal letter if they are requested for some assistance from the operating units. Most of the requests were fulfilled by the operating units. In West Estate, there is the records from stakeholders regarding various issues such as wild dogs, cattles & goats and stakeholders meeting were maintained. Senior/Assistant Manager of the mill/estate have been appointed as Social officer to handle all issues related to information and social (internal and external). Sighted the appointment letter of Mr. Izran Tugiran and Senior Assistant Manager (Ahmarul Asuwad) dated 25/01/2019 and 02/10/2017 respectively.	Complied
Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

Criterion / Indicator	Assessment Findings	Compliance
<p>1.2.1</p> <p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • 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>- Major compliance –</p>	<p>There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>SDPB continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available through SDPSB’s website at http://www.simedarbyplantation.com/Sustainability.aspx</p> <p>Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> • Good Agricultural Practices • Social Enhancement • Sustainability Management Programmes • Complaint and Grievances procedure. • Environmental Conservation <p>Besides, policies for SDPSB were published at the same website:</p> <ul style="list-style-type: none"> • Social • Quality • Food Safety • Occupational Safety & Health • Environment & Biodiversity • Slope Protection and Buffer Zone • Lean Six Sigma • Gender <p>The policies were also displayed at various strategic locations including the main notice boards of the estates, mill office, clinic, muster ground notice boards for employees and visitors to view.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.			
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	Sime Darby Plantation has established policy on code of ethical conduct and integrity (Code of Business Conduct-COBC) which covers all operations in the plantation operation. Policy displayed on the notice board and communicated to employees. Briefing of policies were given to the workers during the latest muster Briefing on 19.01.2019 in West POM to all 51 workers. In West Estate, the SDP Policies and COBC Training were conducted on 09.07.2019 at Muster Ground West Division.	Complied
Principle 2: Compliance with applicable laws and regulations			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>West Palm Oil Mill continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team. The Mill had obtained and renewed license and permits as required by the law. The licenses/permit viewed among others were:</p> <table border="1" data-bbox="1025 555 1809 1358"> <thead> <tr> <th>No</th> <th>Licence / Permit / Regulatory Requirement</th> <th>Validity Period/Ref</th> </tr> </thead> <tbody> <tr> <td colspan="3"><i>West Palm Oil Mill</i></td> </tr> <tr> <td>1</td> <td>MPOB License no 53323-800-4000</td> <td>1/10/18-30/9/19</td> </tr> <tr> <td>2</td> <td>DOE – Jadwal Pematuhan Ref 003054</td> <td>1/7/18-30/6/19</td> </tr> <tr> <td></td> <td>BOMBA – no 305799 – fire certificate</td> <td>1/3/18-28/2/19</td> </tr> <tr> <td>3</td> <td>Akta Kilang & Jentera – Perakuan Kebolehan N044/2000 – The Mill Manager</td> <td>Steam cert Grade 1</td> </tr> <tr> <td></td> <td>KPDNKK – 20000 diesoline/petrol</td> <td>12/7/19</td> </tr> <tr> <td>4</td> <td>Work on overtime –JTK 3 -3 years approval</td> <td>25/1/18</td> </tr> <tr> <td>5</td> <td>Sterilizer no 1 PMT 97112</td> <td>3/9/19</td> </tr> <tr> <td>6</td> <td>Sterilizer no 2 PMT 97113</td> <td>3/9/19</td> </tr> <tr> <td>7</td> <td>Sterilizer no 3 PMT 32669</td> <td>3/9/19</td> </tr> <tr> <td>8</td> <td>Boiler no 1 PMD 17422</td> <td>08/2/19</td> </tr> <tr> <td>9</td> <td>Boiler no 2 PMD 2293</td> <td>23/7/19</td> </tr> <tr> <td>10</td> <td>Air compressor no 2</td> <td>3/9/19</td> </tr> <tr> <td>11</td> <td>Air receiver A PMT 148757</td> <td>3/9/19</td> </tr> <tr> <td>12</td> <td>Metrology Corporation w/bridge</td> <td>4/3/19</td> </tr> <tr> <td colspan="3"><i>West Estate</i></td> </tr> <tr> <td>1</td> <td>Permit <i>Barang Kawalan</i> KPDNKK No 5857-20000 litres</td> <td>13/7/18 - 12/7/19</td> </tr> </tbody> </table>	No	Licence / Permit / Regulatory Requirement	Validity Period/Ref	<i>West Palm Oil Mill</i>			1	MPOB License no 53323-800-4000	1/10/18-30/9/19	2	DOE – Jadwal Pematuhan Ref 003054	1/7/18-30/6/19		BOMBA – no 305799 – fire certificate	1/3/18-28/2/19	3	Akta Kilang & Jentera – Perakuan Kebolehan N044/2000 – The Mill Manager	Steam cert Grade 1		KPDNKK – 20000 diesoline/petrol	12/7/19	4	Work on overtime –JTK 3 -3 years approval	25/1/18	5	Sterilizer no 1 PMT 97112	3/9/19	6	Sterilizer no 2 PMT 97113	3/9/19	7	Sterilizer no 3 PMT 32669	3/9/19	8	Boiler no 1 PMD 17422	08/2/19	9	Boiler no 2 PMD 2293	23/7/19	10	Air compressor no 2	3/9/19	11	Air receiver A PMT 148757	3/9/19	12	Metrology Corporation w/bridge	4/3/19	<i>West Estate</i>			1	Permit <i>Barang Kawalan</i> KPDNKK No 5857-20000 litres	13/7/18 - 12/7/19	<p>Complied</p>
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Criterion / Indicator		Assessment Findings			Compliance
		2	LAJ Kejuruteraan Sdn Bhd – electrical instllation	Annually	
		3	Permit <i>Barang Kawalan</i> KPDNKK No 5857 fertilizer	Annually	
		4	MPOB – menjual & mengalih BTB – 52296800-2000	1/9/18-31/8/19	
		<p>Note: Under MPOB license issued on 16/7/2108 the approved FFB processed/annum is maximum 240000 mt and the actual FFB processed in 2017 was 210000 mt concluding compliance to the regulations. The mill was designed at 50 mt/hr.</p>			
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	<p>The Certification Unit continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that are applicable to the CU operation. Each office of the operating unit (mill and estates) has its own LORR and were being evaluated individually annually for compliance. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery Act, Labour Act, Pesticides Act, Workers’ Minimum Standard of Housing and Amenities Act, to name a few. The revised minimum Wages Order 2018 had also been included in the latest updated LORR.</p>			Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>2.1.3</p> <p>A mechanism for ensuring compliance shall be implemented.</p> <p>- Minor compliance -</p>	<p>The applicable legal requirements registered in the LORR. Periodically, the CU assigned its personnel to cross check the status of compliance against the LORR through various ways such as internal audit, routine inspections, etc. Whenever there is non-compliance detected, appropriate actions will be taken to address the issue.</p> <p>The monitoring of compliance was made through the internal audit by SQM team annually however, the monitoring is not effective as below:</p> <p><u>West POM</u></p> <ol style="list-style-type: none"> 1. In West POM, it was found that the contractor's workers for Lotus Two in West POM are having different work permit contractor worker: Md Alim (Passport no: BK0979582) hired for A&M manpower Sdn Bhd. 2. Through the interview session with the contractor and contractor's worker on 31.10.2019, it is made understand that the worker also has paid half of the Levi cost to the contractor in 2018. 3. The employment contract mentioned that that for overtime, it is according to the Bangladesh Labour Laws. <p><u>West Estate:</u></p> <p>In West Estate, it was found that the contractor's workers for YGNT Enterprise, Sobhan Talukder (Passport no: BL0057497) is receiving the normal rate for work in rest day/public holiday as sighted in pay slip for October 2018 (28 days) and November 2018 (27 days).</p>	<p>Minor non-conformance</p>

Criterion / Indicator		Assessment Findings	Compliance
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	A special department (PSQM) which is based in Kuala Lumpur was responsible in tracking the changes to the Acts and Regulations in their legal register by communicating with the publisher of the documents. This mechanism was outlined in its procedure. The revision of the legal register was done from time to time and should there be any update, it would be communicated to the respective CUs. As to-date no change to the CU activities and no new legal requirements associated to their operation.	Complied
Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	West Mill and Estate operation is on freehold land and no restriction on the land use right. Copy of land titles were available for verification. A total of 4 land titles (# 46219, 46220, 44294 and 47697) to demonstrate the right to use the land. The land title 47697 was shared with East estate.	Complied
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	The Estate has maps showing the locations of boundary stones that have been physically located and marked. Inspection of a sample of boundary stones at West Estate, during the field inspection confirmed that they were clearly marked and maintained.	Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the West POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the West POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied

Criterion / Indicator		Assessment Findings	Compliance
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the West POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied
2.2.6	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 planned operations. -Major compliance	There is no land dispute in the West POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an 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 neighbouring communities where applicable, and relevant authorities). - Major compliance -	There is no land dispute in the West POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Complied

Criterion / Indicator	Assessment Findings	Compliance
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	Complied
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	Complied
<p>Principle 3: Commitment to long-term economic and financial viability</p>		

Criterion / Indicator		Assessment Findings	Compliance												
Criterion 3.1:															
There is an implemented management plan that aims to achieve long-term economic and financial viability.															
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilisation rate, CAPEX etc. Sample for West POM: new weighbridge, new de-oiling tank, new steriliser liner and etc. The business or management plan for the estate was presented in the form of annual budget with 5 years projection. The annual budget contains the crop projection and the finance allocation for field operation and administrations. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.	Complied												
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	West Estate has prepared the replanting programme with minimum of 5 years projection. Below is the details of the programme: <table border="1" data-bbox="1061 912 1498 1118"> <thead> <tr> <th>Year</th> <th>Ha to be replanted</th> </tr> </thead> <tbody> <tr> <td>FY 2019</td> <td>229.78</td> </tr> <tr> <td>FY 2020</td> <td>323.29</td> </tr> <tr> <td>FY 2021</td> <td>234.16</td> </tr> <tr> <td>FY 2022</td> <td>164.38</td> </tr> <tr> <td>FY 2023</td> <td>198.50</td> </tr> </tbody> </table>	Year	Ha to be replanted	FY 2019	229.78	FY 2020	323.29	FY 2021	234.16	FY 2022	164.38	FY 2023	198.50	Complied
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FY 2020	323.29														
FY 2021	234.16														
FY 2022	164.38														
FY 2023	198.50														
Principle 4: Use of appropriate best practices by growers and millers															
Criterion 4.1:															
Operating procedures are appropriately documented, consistently implemented and monitored.															

Criterion / Indicator	Assessment Findings	Compliance
<p>4.1.1 Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>West Palm Oil Mill and Estate adopted the following manuals / guidelines for the day-to day operations of the estates and mill. It includes the operation activities in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security.</p> <ul style="list-style-type: none"> a) Agriculture Reference Manual (ARM) dated 01/07/2011. b) Estate Quality Management System (EQMS) Manual dated 01/11/2008, c) Safety Standard Operating Procedures (SSOP) dated 25/02/2015, d) Sustainable Plantation Management System Manual (SPMS), e) Guidelines on River Management" Manual, f) ESH Management System Manual dated 01/07/2012, g) Occupational Safety and Health Manual dated 03/03/2008, h) Pictorial Safety Standards and Security Guidelines (PSS). <p>Both the estate and mill operations are guided through the manuals and SOPs. The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and trainings. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. Field inspection and interviews with the workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs.</p> <p>The SOPs included the operation activities in the estates and the mills from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and dispatch of CPO & PK and security in the Certification Unit.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.1.2 A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p>	<p>The mechanisms to check the implementation of procedures were carried out through the following mechanism among others:</p> <ul style="list-style-type: none"> a) Internal audit, safety and health meeting and routine inspection (workplace inspection) by Assistant manager, Field staff and Hospital Assistant. b) Team from SQM (quality assurance) from HQ conduct quarterly monitoring - on quality of implementation procedure such as loose fruit collection, <ul style="list-style-type: none"> - harvested bunch left and un harvested bunches, - Safe working condition, mechanization and etc. - sighted the report from this team "Structured Crop Recover Assessment <p>During site visit at both estates all workers was wearing a proper PPE such as helmet, gloves, mask, apron, sickle cover.</p>	<p>Complied</p>
<p>4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -</p>	<p>The monitoring of the SOP implementation was closely made by the all levels of the supervisory personnel with records maintained and checked.</p> <p>Among others the records are;</p> <ul style="list-style-type: none"> a) Daily production/work records for the core activities at the estates b) field cost book, c) chemical consumption record d) mature/immature field work program <ul style="list-style-type: none"> - fertilizer application, - herbicide spraying, - rat baiting , - Harvesting and collection of FFB. <p>All the above records were kept for a minimum period of 12 months.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	The mill receive only crop from the SDP estates, mainly from the West Estate, other if any are from diversion from the sister mill as results of breakdown or annual maintenance.	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	<p>West Estate continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer applications. The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents;</p> <ul style="list-style-type: none"> a) EQMS chapter B8 - Leguminous Cover Crops b) EQMS chapter B14 – Manuring c) ARM Section 8 - Manuring <p>The process of the fertilizer application follows a flow chart Fertilizer application, which was of paramount importance for maintenance of soil commencing from an agronomist visit for a leaf sampling to determine the level of nutrient therein. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient at the desired level. Estate will use this input for the entire requirement in the field identified. In addition soil sampling was also made on a 5 years latest being on 12/9/18.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance																																										
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	<p>Fertiliser application program was monitored using records like program sheets, bin cards, field cost book, Fertiliser Application monitoring forms, etc. Records of programs and applications of fertilisers were reviewed by auditors.</p> <table border="1"> <thead> <tr> <th>Field no</th> <th>AS</th> <th>MOP</th> <th>RP</th> <th>Kieserite</th> <th>AS</th> </tr> </thead> <tbody> <tr> <td>P2013A</td> <td>2.25</td> <td>1.50</td> <td>2.50</td> <td>-</td> <td>2.25</td> </tr> <tr> <td>P 02B</td> <td>2.75</td> <td>1.00</td> <td>2.50</td> <td>-</td> <td>2.00</td> </tr> <tr> <td>P 002B2</td> <td>2.75</td> <td>1.00</td> <td>2.50</td> <td>-</td> <td>2.00</td> </tr> <tr> <td>P2010A</td> <td>2.75</td> <td>1.25</td> <td>2.00</td> <td>-</td> <td>2.25</td> </tr> <tr> <td>P05C</td> <td>2.75</td> <td>1.25</td> <td>2.00</td> <td>1.25</td> <td>2.25</td> </tr> <tr> <td>P2010C</td> <td>2.75</td> <td>1.50</td> <td>2.00</td> <td>-</td> <td>2.50</td> </tr> </tbody> </table>	Field no	AS	MOP	RP	Kieserite	AS	P2013A	2.25	1.50	2.50	-	2.25	P 02B	2.75	1.00	2.50	-	2.00	P 002B2	2.75	1.00	2.50	-	2.00	P2010A	2.75	1.25	2.00	-	2.25	P05C	2.75	1.25	2.00	1.25	2.25	P2010C	2.75	1.50	2.00	-	2.50	Complied
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4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>Periodic tissue and soil sampling were performed in West Estate to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. The soil nutrient sampling results was in Nov 2011. The analysis for the recent 12/9/18 has yet to be produced by the SD Research. Among others as shown below;</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Jawa</th> <th>Jugra</th> <th>Tualang</th> <th>Carey</th> <th>Sedu</th> </tr> </thead> <tbody> <tr> <td>PH</td> <td>4.5</td> <td>4.2</td> <td>3.8</td> <td>4.7</td> <td>3.50</td> </tr> <tr> <td>Organic C</td> <td>2.32</td> <td>0.84</td> <td>0.69</td> <td>1.35</td> <td>0.58</td> </tr> <tr> <td>Total N</td> <td>0.22</td> <td>0.09</td> <td>0.09</td> <td>0.16</td> <td>ND</td> </tr> <tr> <td>Total P</td> <td>464</td> <td>105</td> <td>300</td> <td>185</td> <td>35</td> </tr> </tbody> </table>	Parameter	Jawa	Jugra	Tualang	Carey	Sedu	PH	4.5	4.2	3.8	4.7	3.50	Organic C	2.32	0.84	0.69	1.35	0.58	Total N	0.22	0.09	0.09	0.16	ND	Total P	464	105	300	185	35	Complied
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4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	<p>West Estate had a nutrient recycling strategy practiced as follows;</p> <ul style="list-style-type: none"> a) Palm fronds were properly stacked in the inter row left to decompose. b) EFB were applied @30mt/ha i.e. 200kg of EFB in a layer; c) Effluent application – source from West Palm Oil Mill <table border="1"> <thead> <tr> <th>No</th> <th>Nutrient</th> <th>Field no.</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>EFB</td> <td>P13A</td> </tr> <tr> <td>2</td> <td>Effluent</td> <td>P96P 1</td> </tr> </tbody> </table> <p>Records of application were sighted and verified.</p>	No	Nutrient	Field no.	1	EFB	P13A	2	Effluent	P96P 1	Complied																					
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Criterion / Indicator		Assessment Findings	Compliance																				
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	<p>The soil series for the estate comprises of the following. There is no fragile/marginal soils in West Estate.</p> <table border="1"> <tbody> <tr> <td>Soil series</td> <td>Carey</td> <td>Jawa</td> <td>jugra</td> <td>linau</td> </tr> <tr> <td>%</td> <td>30.55</td> <td>21.25</td> <td>27.45</td> <td>1.67</td> </tr> <tr> <td>Soil series</td> <td>Sedu</td> <td>Selango r</td> <td>Tualang</td> <td>Nagor</td> </tr> <tr> <td>%</td> <td>1.63</td> <td>9.63</td> <td>5.98</td> <td>2.03</td> </tr> </tbody> </table> <p>Analysis was compiled by the Agronomy Dept. of SDPB.</p>	Soil series	Carey	Jawa	jugra	linau	%	30.55	21.25	27.45	1.67	Soil series	Sedu	Selango r	Tualang	Nagor	%	1.63	9.63	5.98	2.03	Complied
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Criterion / Indicator	Assessment Findings	Compliance																				
4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	<p>SDP had a management strategy in place for planting on slopes and to minimize and control erosion and degradation of soils. Among the strategies for plantings on slopes between 6 and 25 degrees are:</p> <ul style="list-style-type: none"> a) Slope & River Protection Policy – Buffer zone b) Item 8 Section 4 – Land preparation for terracing in ARM Manual. <p>West estate had also implemented prevention of soil erosion measures such as</p> <ul style="list-style-type: none"> a) Construction of moisture conservation pits (MCP). b) Cover crops were observed to be in place as the CU management had generally encouraged the establishment of soft growth. c) Visits to the site found that significant areas of the ground were covered with <i>Nephrolepis biserrata</i> and well established <i>Mucuna.bracteata</i> <p>In records West estate is on entire flat area on an island.</p>	Complied																				
4.3.3 A road maintenance programme shall be in place. - Minor compliance -	<p>During the field visit, it was observed that the main and field roads of West Estate were in satisfactory condition and accessibility was made possible by regular maintenance. There was evidence of road maintenance programmes which consist of road resurfacing with grading & compaction and culvert maintenance</p> <p>The estate had the following road program 2019 as follows. Mainly the road maintenance involved work related to grading and material for patching. The figures in ha otherwise stated.</p> <table border="1" data-bbox="1137 1173 1704 1339"> <thead> <tr> <th>Field no</th> <th>1-4</th> <th>5-8</th> <th>9-12</th> </tr> </thead> <tbody> <tr> <td>P1998B</td> <td>64.95</td> <td>64.95</td> <td>64.95</td> </tr> <tr> <td>P2004K2</td> <td>78.89</td> <td>78.89</td> <td>78.89</td> </tr> <tr> <td>P2000H</td> <td>64.36</td> <td>64.36</td> <td>64.36</td> </tr> <tr> <td>P2009G</td> <td>83.05</td> <td>83.05</td> <td>83.05</td> </tr> </tbody> </table>	Field no	1-4	5-8	9-12	P1998B	64.95	64.95	64.95	P2004K2	78.89	78.89	78.89	P2000H	64.36	64.36	64.36	P2009G	83.05	83.05	83.05	Complied
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Criterion / Indicator		Assessment Findings	Compliance
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	There is no peat soil in West Estate. This is captured through the soil map and interviews with the Estate Executives.	Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	There is no peat soil in West Estate. This is captured through the soil map and interviews with the Estate Executives.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	There is no soil series of problematic /fragile in the West Estate.	Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.			

<p>4.4.1</p>	<p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p>West Palm Oil Mill and Estate had its Water Management Plan for year 2019 which was developed in order to maintain the quality and availability of natural water resources by practicing efficient water consumption through various methods; among others</p> <ul style="list-style-type: none"> a) implementation of rain water harvest, b) construction of water gate for effective management of collection/main drain, c) Establishment of <i>Mucuna bracteata</i> to prevent erosion, side drain at field road to control water, frond stacking, enhancement of ground vegetation at bare ground area. <p>In the Water Management Plan, the CU has also identified actions to be taken in the event of water supply shortage, though the estate received supply of piped treated water from the local state authorities for the domestic consumption. Workers quarters were provided with separate tanks for rain water harvesting. This water is used for washing. Water for consumption is supplied in separate tanks and amount used being monitored. Water from triple rinsing of pesticide containers was reused for spraying. Records of rainfall data to assist in the water management plans were sighted from 2007 (10 years spectrum).</p> <p>The mill practices recycling processing water, Recycled condensate water, to use back water treated from POME to cleaning purpose at mill and hydro cyclone operation during water shortage, collection of rain Waters, Line site Water usage Monitoring, Contingency Plan during dry spell/shortage has been established. Included therein are the following documents which were sighted and verified;</p> <ul style="list-style-type: none"> a) Contingency plan during water shortage 	<p>Complied</p>
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Criterion / Indicator		Assessment Findings			Compliance	
		No	Area/incident	Action steps	PIC	
		1	Water shortage/ prolonged dry season	to obtain water from SYABAS/estate pond to train/educate staff/workers to conserve water to seek assistance from SYABAS to obtain treated water supply from mill's WTP	Mill Engineer Estate Executives	
		2	Severe water pollution/ contamination	to obtain water from SYABAS to train/educate staff/workers to conserve water to seek assistance from SYABAS - to obtain treated water supply from mill's WTP	Mill Engineer Estate Executives	

Criterion / Indicator		Assessment Findings	Compliance																																																				
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	<p>The mill sampled and analysed the water samples taken from 3 points. This is to detect for any sign of contamination/pollution resulting from the mill/estate activities.</p> <table border="1"> <thead> <tr> <th rowspan="2">Parameters</th> <th colspan="4">4/10/18</th> </tr> <tr> <th>Standard</th> <th>DAM</th> <th>DG</th> <th>DS</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>6-9</td> <td>9.6</td> <td>6.0</td> <td>7.5</td> </tr> <tr> <td>BOD</td> <td>3</td> <td>7</td> <td>8</td> <td><1</td> </tr> <tr> <td>COD</td> <td>25</td> <td>412</td> <td>440</td> <td>2220</td> </tr> <tr> <td>SS</td> <td>50</td> <td>82</td> <td>38</td> <td>120</td> </tr> <tr> <td>AN</td> <td>0.3</td> <td><1</td> <td>2</td> <td><1</td> </tr> </tbody> </table> <p>"DAM" is located after the mill water course, "DG" at ETP area, & "DS" is at stream leading to the surrounding sea. Results as observed yet to show sign of negative output from the mill activities to the surrounding.</p> <p>The water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as following:</p> <table border="1"> <thead> <tr> <th>No</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>This is also in the guidelines of the Drainage and Irrigation Dept.</p>	Parameters	4/10/18				Standard	DAM	DG	DS	pH	6-9	9.6	6.0	7.5	BOD	3	7	8	<1	COD	25	412	440	2220	SS	50	82	38	120	AN	0.3	<1	2	<1	No	River width	Buffer zone	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	Complied
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Criterion / Indicator		Assessment Findings	Compliance																																				
4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE through '<i>Borang Penyata Suku Tahunan</i>'. West POM DOE license was for land application and the requirement is for the BOD to be less than 5000 mg/l. The results from final discharge were compliance within parameter limit.</p> <table border="1"> <thead> <tr> <th>Sample date</th> <th>4/1018</th> <th>12/11/18</th> <th>5/12/18</th> </tr> </thead> <tbody> <tr> <td>PH</td> <td>7.10</td> <td>7.3</td> <td>7.3</td> </tr> <tr> <td>BOD</td> <td>4920</td> <td>2640</td> <td>1350</td> </tr> <tr> <td>COD</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Total solids</td> <td>-</td> <td>-</td> <td>20106</td> </tr> <tr> <td>Suspended solids</td> <td>20600</td> <td>11600</td> <td>11500</td> </tr> <tr> <td>Oil & grease</td> <td>4</td> <td>10</td> <td>4</td> </tr> <tr> <td>A Nitrogen</td> <td>123</td> <td>183</td> <td>117</td> </tr> <tr> <td>Total N</td> <td>408</td> <td>297</td> <td>190</td> </tr> </tbody> </table>	Sample date	4/1018	12/11/18	5/12/18	PH	7.10	7.3	7.3	BOD	4920	2640	1350	COD	-	-	-	Total solids	-	-	20106	Suspended solids	20600	11600	11500	Oil & grease	4	10	4	A Nitrogen	123	183	117	Total N	408	297	190	Complied
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4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	<p>Results of water consumption in 2018 are shown below.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Water consumption/L</th> <th>FFB processed/mt</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>16810</td><td>21914</td><td>0.77</td></tr> <tr><td>Feb</td><td>17337</td><td>13191</td><td>1.31</td></tr> <tr><td>Mac</td><td>15437</td><td>16351</td><td>0.94</td></tr> <tr><td>April</td><td>15844</td><td>16880</td><td>0.94</td></tr> <tr><td>May</td><td>14411</td><td>18107</td><td>0.80</td></tr> <tr><td>June</td><td>14713</td><td>17380</td><td>0.85</td></tr> <tr><td>July</td><td>15972</td><td>15800</td><td>1.01</td></tr> <tr><td>Aug</td><td>15500</td><td>15426</td><td>1.00</td></tr> <tr><td>Sept</td><td>15800</td><td>16845</td><td>0.94</td></tr> <tr><td>Oct</td><td>15500</td><td>18714</td><td>0.93</td></tr> <tr><td>Nov</td><td>15666</td><td>15017</td><td>1.00</td></tr> <tr><td>Dec</td><td>14836</td><td>15118</td><td>0.98</td></tr> </tbody> </table> <p>Variation is due to the following factors;</p> <ul style="list-style-type: none"> a) Production volume variance. b) Changes in the mill cleaning schedule. c) Mill machinery breakdown/pipe leakage. d) Weather condition i.e. rain fall 	Month	Water consumption/L	FFB processed/mt	Water/FFB	Jan	16810	21914	0.77	Feb	17337	13191	1.31	Mac	15437	16351	0.94	April	15844	16880	0.94	May	14411	18107	0.80	June	14713	17380	0.85	July	15972	15800	1.01	Aug	15500	15426	1.00	Sept	15800	16845	0.94	Oct	15500	18714	0.93	Nov	15666	15017	1.00	Dec	14836	15118	0.98	Complied
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Nov	15666	15017	1.00																																																				
Dec	14836	15118	0.98																																																				
<p>Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>																																																							

RSPO Public Summary Report
Revision 7 (Aug /2018)

Criterion / Indicator		Assessment Findings	Compliance												
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	West Estate continued to implement Integrated Pest Management (IPM) in all the estates. It continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Reference Manual (ARM) Section 15 -Plant Protection. The IPM program among others; <ul style="list-style-type: none"> a) includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and Ganoderma. b) For bagworm control the program includes the planting of beneficial plants such as <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i> and <i>Turnera subulata</i> c) In order to minimize use of pesticides the estates had planted beneficial plants mainly <i>Turnera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted. d) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year. Baiting was continued until bait acceptance fell below 20%. 	Complied												
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Trainings relating to IPM implementation were organized mainly at estate level by the executives. Guidelines as specified in the Agricultural Reference Manual (ARM) Section 15 Plant Protection This include beneficial plant and rat baiting management. Among others as extracted below: <table border="1" data-bbox="1003 1109 1816 1252"> <thead> <tr> <th>Date</th> <th>IPM Training</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>6/1/19</td> <td>Barn Owl Box</td> <td>3</td> </tr> <tr> <td>20/12/18</td> <td>Beneficial Plant</td> <td>10</td> </tr> <tr> <td>7/1/19</td> <td>LCC establishment</td> <td>10</td> </tr> </tbody> </table>	Date	IPM Training	Attendees	6/1/19	Barn Owl Box	3	20/12/18	Beneficial Plant	10	7/1/19	LCC establishment	10	Complied
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6/1/19	Barn Owl Box	3													
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Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment															

Criterion / Indicator		Assessment Findings	Compliance
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II class III & class IV pesticides. a) No illegal agrochemicals (stated by local and international laws) paraquat were used in their estates. b) The usage of the agrochemicals was based on the Agricultural Reference Manual (ARM) Section 15 and 16, SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations. c) The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs.	Complied
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	West Estate had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified. All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II ,class III & class IV pesticides. No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
<p>4.6.3</p>	<p>Any use of pesticides shall be minimised 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 national Best Practice guidelines. - Major compliance -</p>	<p>West Estate CU is committed to minimize the usage of agrochemicals through the implementation of IPM practices among others;</p> <ul style="list-style-type: none"> a) The planting of beneficial plants i.e. <i>Turnera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> rate of 10 dm: 1 ha. b) Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection c) No prophylactic use of such pesticides is permitted. d) Establishment of Barn Owl Boxes at ratio 20 ha: 1box. The census and recording in occupancy was sighted and verified. 	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance																														
<p>4.6.4 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -</p>	<p>The estate in the CU confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <ul style="list-style-type: none"> a) The review of the chemical register concluded that all pesticides used were of class II, III & class IV. The use of paraquat had been prohibited in all SDP estates. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. c) Sighted from records and interviews with workers, staff and estate assistants, concluded that trainings were held with all precautions being taken and all legal requirements met. <p>The chemical used in the estate captured from the chemical register updated on 21/1/19 among others as listed below;</p> <table border="1" data-bbox="981 879 1854 1110"> <thead> <tr> <th></th> <th>Chemical name</th> <th>Class</th> <th></th> <th>Chemical name</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Glyphosate isopropylamine</td> <td>III</td> <td>5</td> <td>Cypermethrin</td> <td>III</td> </tr> <tr> <td>2</td> <td>Sodium chlorate</td> <td>III</td> <td>6</td> <td>Tricilppyr butoxy e/ester</td> <td>III</td> </tr> <tr> <td>3</td> <td>Glufosinate ammonium</td> <td>III</td> <td>7</td> <td>Canyon 20G</td> <td>IV</td> </tr> <tr> <td>4</td> <td>Alion</td> <td>III</td> <td>8</td> <td>Amine 2.4 D</td> <td>III</td> </tr> </tbody> </table>		Chemical name	Class		Chemical name	Class	1	Glyphosate isopropylamine	III	5	Cypermethrin	III	2	Sodium chlorate	III	6	Tricilppyr butoxy e/ester	III	3	Glufosinate ammonium	III	7	Canyon 20G	IV	4	Alion	III	8	Amine 2.4 D	III	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers. #cross refer with indicator 4.8.2	Complied
4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). a) Records of purchase, storage and use were maintained. b) All store buildings were equipped with exhaust fans with the door was secured. c) Only authorized personnel are assigned to handle the chemicals. d) All the chemicals were segregated in storage accordingly. Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures.	Complied

Criterion / Indicator		Assessment Findings	Compliance																				
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	<p>The World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions.</p> <ul style="list-style-type: none"> a) Paraquat usage has been prohibited in all units and the entirety of the organization. b) The Safety Procedures for pesticides application were well described in Pictorial Safety Standard. c) Training on pesticide handling was made with details in 4.6.9. The training included the safety aspects and usage of PPE when handling with pesticides. <table border="1" data-bbox="1003 719 1839 887"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>No of attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>17/1/19</td> <td>Medical surveillance /CHRA</td> <td>30</td> </tr> <tr> <td>2</td> <td>13/8/18</td> <td>Spraying & operations</td> <td>17</td> </tr> <tr> <td>3</td> <td>14/8/18</td> <td>First Aid</td> <td>17</td> </tr> <tr> <td>4</td> <td>15/11/18</td> <td>Nozzle calibration</td> <td>7</td> </tr> </tbody> </table>	No	Date	Subject	No of attendees	1	17/1/19	Medical surveillance /CHRA	30	2	13/8/18	Spraying & operations	17	3	14/8/18	First Aid	17	4	15/11/18	Nozzle calibration	7	Complied
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4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	Aerial application of agrochemicals is not practiced in West Estate CU. This is confirmed through observation during the site visit, estate complex and interview with the employees.	Complied																				

Criterion / Indicator		Assessment Findings	Compliance																				
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	<p>The staffs and workers such as the storekeepers, sprayers, and fertilizer and rat bait workers were trained. They understood the hazards involved and how the chemicals should be used in a safe and correct method. The trainings in relation to the chemical handlings are shown below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>No of attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>17/1/19</td> <td>Medical surveillance /CHRA</td> <td>30</td> </tr> <tr> <td>2</td> <td>13/8/18</td> <td>Spraying & operations</td> <td>17</td> </tr> <tr> <td>3</td> <td>14/8/18</td> <td>First Aid</td> <td>17</td> </tr> <tr> <td>4</td> <td>15/11/18</td> <td>Nozzle calibration</td> <td>7</td> </tr> </tbody> </table>	No	Date	Subject	No of attendees	1	17/1/19	Medical surveillance /CHRA	30	2	13/8/18	Spraying & operations	17	3	14/8/18	First Aid	17	4	15/11/18	Nozzle calibration	7	Complied
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4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	<p>In West POM and estate, procedure SD/SDP/PSQM (ESH)/203- EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Management and disposal of wastewater 2019 has been established compiled by Assistant Engineer.</p> <p>b) Waste Management Plan 2019 has been established prepared by QA and verified by the Assistant Engineer dated Dec 18 addressing the source and disposal method of scheduled waste, domestic waste and industrial waste</p> <p>Based on Environmental Impact Evaluation (file no: SM/5.2/EIE) and Environment Aspect and Impact Identification (file no: SM/5.2/EAI) improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination. Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involve and how the chemicals should be used and disposed in a safe manner.</p>	Complied																				

<p>4.6.11</p>	<p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p>	<p>CHRA for the mill was conducted on 14/5/15. The assessment was made by DOSH registered Assessor Mr The Teong Beng JKKP HIE 127/171-2(166). Therein providing recommendation related Medical surveillance for the mill was made on 27/12/18. <i>Klinik Hartati Regn JKKP HQ/08/DOC/00/709.</i></p> <table border="1" data-bbox="981 523 1834 759"> <thead> <tr> <th></th> <th>Date</th> <th>category</th> <th>No of employees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>27/12 /18</td> <td>Effluent T Plant</td> <td>4</td> </tr> <tr> <td>2</td> <td>27/12/18</td> <td>Workshop Manganese</td> <td>9</td> </tr> <tr> <td>3</td> <td>27/12/18</td> <td>Workshop – confined space</td> <td>3</td> </tr> <tr> <td>4</td> <td>27/12/18</td> <td>laboratory</td> <td>10</td> </tr> <tr> <td>5</td> <td>27/12/18</td> <td>Water TP</td> <td>1</td> </tr> <tr> <td></td> <td></td> <td>TOTAL</td> <td>27</td> </tr> </tbody> </table> <p>The estate conducted medical surveillance made on 05/1/19 and 4/5/18 in 2 batches by <i>Klinik Hartati Regn JKKP HQ/08/DOC/00/709.</i></p> <table border="1" data-bbox="981 858 1834 1059"> <thead> <tr> <th></th> <th>Date</th> <th>category</th> <th>No of employees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>5/1/19</td> <td>Sprayers</td> <td>27</td> </tr> <tr> <td>2</td> <td>5/1/19</td> <td>Trunk injectors</td> <td>6</td> </tr> <tr> <td>3</td> <td>5/1/19</td> <td>Workshop</td> <td>2</td> </tr> <tr> <td>4</td> <td>5/1/19</td> <td>Fertilizer applicators</td> <td>8</td> </tr> <tr> <td></td> <td></td> <td>TOTAL</td> <td>43</td> </tr> </tbody> </table> <p>There was 2 UNFIT cases involving 2 lady workers and they have been transferred to another general work. This was verified in the records shown by the estate. Medical surveillance made on 04/5/18.</p> <table border="1" data-bbox="981 1190 1834 1391"> <thead> <tr> <th></th> <th>Date</th> <th>category</th> <th>No of employees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>4/5/18</td> <td>Sprayers</td> <td>10</td> </tr> <tr> <td>2</td> <td>4/5/18</td> <td>Trunk injectors</td> <td>2</td> </tr> <tr> <td>3</td> <td>4/5/18</td> <td>Chemical mixer</td> <td>1</td> </tr> <tr> <td>4</td> <td>4/5/18</td> <td>Fertilizer applicators</td> <td>7</td> </tr> <tr> <td></td> <td></td> <td>TOTAL</td> <td>20</td> </tr> </tbody> </table>		Date	category	No of employees	1	27/12 /18	Effluent T Plant	4	2	27/12/18	Workshop Manganese	9	3	27/12/18	Workshop – confined space	3	4	27/12/18	laboratory	10	5	27/12/18	Water TP	1			TOTAL	27		Date	category	No of employees	1	5/1/19	Sprayers	27	2	5/1/19	Trunk injectors	6	3	5/1/19	Workshop	2	4	5/1/19	Fertilizer applicators	8			TOTAL	43		Date	category	No of employees	1	4/5/18	Sprayers	10	2	4/5/18	Trunk injectors	2	3	4/5/18	Chemical mixer	1	4	4/5/18	Fertilizer applicators	7			TOTAL	20	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	There was no evidence of pregnant and breast-feeding women sprayers performed spraying activity in West Estate CU. Workers interviewed were aware that pregnant and breast-feeding women should not handle chemicals. Monitoring of pregnancy and lactating was conducted on every month by the estate HA.	Complied
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.1</p> <p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.</p> <p>- Major compliance -</p>	<p>SOU 09 estates and mill has maintained an approved Health and Safety Policy dated January 2015 by Sime Darby Plantations Sdn Bhd, Managing Director that is displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site safety officers and monitored by OSH Manager from Head Office. Environment safety and health (ESH) management plan for each operating unit had been established. The latest ESH plan was made available during this assessment.</p> <p><u>West POM</u> CHRA: The assessment was last conducted on 14/5/2015 by Env & IH Services (JKKP/HIE/127/171-2(166)). Sighted the CHRA report (SLK1710).</p> <p><u>Audiometric Testing:</u> The last audiometric was done on 19 March 2018 by Alam Hijau Integrasi for total of 111 employees by OHD (HQ/08/DOC/00/491). From the report, there were 5 employees found with hearing impairment.</p> <p>The Chemical Exposure Monitoring including personal monitoring was carried out by Alam Hijau Integrasi (HQ/12/JHI/00/181, JKKP HIE 127/171-3/1(181)) on 5/7/2018 for 5 personnel. The report (HQ/12/JHI/00/181-2018/024) was sighted and found that the concentration of Inhalable Dust and n-Hexane does not exceed the PEL as specified under USECHH Regulation 2000.</p> <p><u>West Estate</u> CHRA: The assessment was last conducted on 13/7/2015 by NIOSH (JKKP HIE/127/171-2(353)). Sighted the CHRA report (03-04/02/CHRA/2015/3) dated 23/11/2015.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.2 All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	<p>The risk of all operations were assessed and documented under HIRARC. The HIRARC for the mill operations was last reviewed on 14/1/19 (WPOM) and on 5/1/2019 (West Estate). HIRARC for the following stations/activities were sighted; Clarification, Effluent treatment, capstan, ramp, laboratory, sterilizer, harvesting, replanting, spraying, trunk injection and clinic.</p> <p>Hazard Identification Risk Assessment & Determination Control (HIRADC) was not adequately assessed & implemented.</p> <p>HIRADC for following sampled operations was not carried out: West POM: a) Rain water harvesting pond b) Roro bin domestic waste dumping & collection site</p>	<p>Major non-conformance</p>
<p>4.7.3 All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -</p>	<p>Observed at engine room, oil room, boiler station, workshop, store, circle spraying activity and harvesting activity, adequate and appropriate protective equipment was provided. The PPE was effectively implemented (eg: using safety helmet, nitrile glove and etc). Mill: PPE issuance record sampled for workshop workers - dated 23/12/18 (Hand Glove), dated 23/7/18 (Safety Helmet). West Estate: PPE issuance record sampled for sprayers - dated 11/10/18 (N95 mask), Hand Glove dated 27/10/18, Wellington Boot dated 20/11/18. The training was conducted accordingly at mill and estates. Cross refer to indicator 4.8.1.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.4 The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>The responsible persons are the Manager and Assistant Manager of the respective operating units. JKPP meeting members consist of employer & employee representatives. Records of regular meetings between the responsible person and workers were maintained. Sampled the following OHS meeting minutes :</p> <ol style="list-style-type: none"> OHS meeting at WPOM sampled dated 10/1/19, 8/10/18, 10/7/18, 6/4/18. All the agenda was discussed accordingly during OHS meeting, eg: accident review, workplace inspection, SIME card report, others and etc has been discussed and action to be taken. DOSH visit log book sighted latest visit dated 4/6/18. OHS meeting at West Estate sampled dated 10/1/19, 11/9/18, 26/6/18, 26/3/18. All the agenda was discussed accordingly during OHS meeting, eg: accident review, workplace inspection, training, safety campaign, others and etc has been discussed and action to be taken. DOSH visit log book sighted latest visit dated 16/7/18. <p>West POM: Although the necessary concerns of all parties about health, safety and welfare has been adequately discussed & recorded in the quarterly safety committee meetings, it would be beneficial if the effectiveness of action taken against the issues discussed are also routinely monitored e.g. issues spotted during mill visit on condition of the workers male toilet were the toilet flush pumps were broken with no water supply for washing and on the culvert near the toilet found with fungal water ponding. Thus, an opportunity for improvement been raised.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance						
<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p> <p>Accident and emergency procedures have been communicated to employees, contractors and visitors.</p> <ol style="list-style-type: none"> 1. WPOM - Fire evacuation drill was last conducted on 28/07/2018 to test the state of readiness during emergency situation. 2. WE - Fire evacuation drill was last conducted on 1/3/2018 to test the state of readiness during emergency situation. <p>3 accident reported at West POM. JKKP 8 was sent to DOSH on 4/01/2019. 25 accidents reported at West Estate. JKKP 8 was sent to DOSH on 13/01/2019.</p> <p>First aid equipment available at worksites. First aiders competency certificate available e.g. 791019-10-5587</p> <table border="1" data-bbox="981 847 1834 983"> <thead> <tr> <th data-bbox="981 847 1211 880">Estate/Mill</th> <th data-bbox="1211 847 1834 880">First Aid Box Station (Site Visit)</th> </tr> </thead> <tbody> <tr> <td data-bbox="981 880 1211 914">West POM</td> <td data-bbox="1211 880 1834 914">Security room, Workshop</td> </tr> <tr> <td data-bbox="981 914 1211 983">West Estate</td> <td data-bbox="1211 914 1834 983">Spraying (Field 2013A), Harvesting (Field 06A), workshop</td> </tr> </tbody> </table> <p>First aid box inspection was conducted on monthly basis by MA. Last first aid box inspection was done on January 2019.</p>	Estate/Mill	First Aid Box Station (Site Visit)	West POM	Security room, Workshop	West Estate	Spraying (Field 2013A), Harvesting (Field 06A), workshop	<p>Complied</p>
Estate/Mill	First Aid Box Station (Site Visit)							
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West Estate	Spraying (Field 2013A), Harvesting (Field 06A), workshop							

Criterion / Indicator		Assessment Findings	Compliance															
4.7.6	All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	<p>Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances. Malaysian workers are covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Refer to form 8A, "Jadual Caruman" for December December 2018.</p> <p>Foreign workers are covered by Foreign Workers Compensation Scheme Certificate of Insurance. Sample insurance policies checked:</p> <table border="1"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Mill/ Estate</th> </tr> </thead> <tbody> <tr> <td>Policy No. FW 240135</td> <td>23/11/18- 21/1/19</td> <td>West POM</td> </tr> <tr> <td>Policy No. MW200173</td> <td>16/1/18-15/1/19</td> <td>West POM</td> </tr> <tr> <td>MG158249</td> <td>7/3/18-6/9/19</td> <td>West Estate</td> </tr> <tr> <td>MG159590</td> <td>3/3/18-2/9/19</td> <td>West Estate</td> </tr> </tbody> </table>	Insurance	Period	Mill/ Estate	Policy No. FW 240135	23/11/18- 21/1/19	West POM	Policy No. MW200173	16/1/18-15/1/19	West POM	MG158249	7/3/18-6/9/19	West Estate	MG159590	3/3/18-2/9/19	West Estate	Complied
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4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	Records on Lost Time Accident (LTA) metrics had been verified to be satisfactory. LTA as to date for West Estate is 435 man days. JKPP 6 has been submitted to DOSH accordingly and JKPP 8 for year 2018 been submitted to DOSH on 13/1/19.	Complied															
<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>																		
4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -	A formal training programme on all aspects of RSPO Principles and Criteria has been established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs had been reviewed and found to be complied. Training programme planned for year 2018 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to workers exposed to machinery and high noise levels, workers working in confined space, harvesters, pesticides operators, manurers and etc.	Complied															

Criterion / Indicator		Assessment Findings	Compliance																										
4.8.2	Records of training for each employee shall be maintained. - Minor compliance -	<p>The records of training were available at mill and estate office. Sample training checked:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>28/7/18</td> <td>Boiler Operation</td> <td rowspan="4">WPOM</td> </tr> <tr> <td>24/7/18</td> <td>Weighing Bridge Safety Briefing</td> </tr> <tr> <td>1/9/18</td> <td>Ear Plug & PPE</td> </tr> <tr> <td>14/6/18</td> <td>Working at Height</td> </tr> <tr> <td>7/7/18</td> <td>Loto Training</td> <td rowspan="5">West Estate</td> </tr> <tr> <td>13/8/18</td> <td>Pesticide Spraying</td> </tr> <tr> <td>6/10/18</td> <td>Harvester Training</td> </tr> <tr> <td>14/08/18</td> <td>Manuring</td> </tr> <tr> <td>1/3/18</td> <td>Fire Extinguisher</td> </tr> <tr> <td>4/11/18</td> <td>First Aid Training</td> <td></td> </tr> </tbody> </table>	Date	Training	Remark	28/7/18	Boiler Operation	WPOM	24/7/18	Weighing Bridge Safety Briefing	1/9/18	Ear Plug & PPE	14/6/18	Working at Height	7/7/18	Loto Training	West Estate	13/8/18	Pesticide Spraying	6/10/18	Harvester Training	14/08/18	Manuring	1/3/18	Fire Extinguisher	4/11/18	First Aid Training		Complied
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Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

Criterion 5.1:

Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.

<p>5.1.1</p>	<p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p>The plans and impact assessments relating to environmental impacts based on documents for both estates and the mill are elaborated in the following records. The main purpose of for this assessment was to evaluate and analyze impact on soil, water, and air associated with the organization activities. Among environment aspects assessed were agrochemical applications, land and water contamination from hazardous material and farm vehicles, human settlement disturbance and abandonment areas:</p> <ul style="list-style-type: none"> a) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, <i>(version 1; year 2008 Issue no. 1; dated 1 April 2009 Register)</i> b) Appendix 5.4.1c - Environmental Aspect and Impact Identification form <i>(version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EAI)</i> c) Appendix 5.4.1d – Environmental Impacts Evaluation form <i>(version 1; year 2008 issue no. 1; dated 1 April 2009; MR-02/EIE)</i> <p>The EAI as detailed in the estates register covers all estates activities/operations. The latest register being reviewed dated 01/7/18 to include the following changes and continued being formalised for 2018/19.</p> <ul style="list-style-type: none"> a) EQA (scheduled waste) Regulation 2005 b) EQA (clean air) Regulations 2014 <p>Among others the significant environmental aspects related to the estate operation including the activities from;</p> <ul style="list-style-type: none"> a) FFB transportation to the mill. b) Movement of vehicles/transportation of estates machines and tractors. c) Herbicide/pesticides spraying d) Anti-malaria fogging e) Road resurfacing & grading f) Grass cutting /construction activities g) harvesting, pest and disease, upkeep programme 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> h) nursery / replanting i) Water treatment Plant j) Power station <p>Similarly, the environmental aspects for the mill are tabulated in the EAI master list (<i>EAI/MOM/2013/001—1ME to EAI/2015/MOM/020</i>) updated on 1/9/18. Among others the EIAs are divided into the all stations in the mill processing as listed below. The newest added activities being the MDS and ETP (additional dust cyclone being installed).</p> <ul style="list-style-type: none"> a) the boiler stack emission, black smoke b) palm oil mill effluent (POME) discharge and water contamination, c) Activities related to managing of scheduled wastes and general waste. d) Activities of all operations beginning from the mill entrance ending to the effluent, EFB operations. <p>Documents are maintained, sighted and verified.</p>	

5.1.2	<p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -</p>	<p>The mill monitors aspects and impacts among others the following activities This plan is available and similar to the reduction of pollution and emission. Mainly the areas relating to significant impact to the environment and the effort implemented are summarised below.</p> <table border="1" data-bbox="978 523 1834 1367"> <thead> <tr> <th data-bbox="978 523 1023 587">No</th> <th data-bbox="1023 523 1234 587">Environmental Issues</th> <th data-bbox="1234 523 1610 587">Solution Procedure/Action Plan</th> <th data-bbox="1610 523 1834 587">Main Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="978 587 1023 850">1</td> <td data-bbox="1023 587 1234 850">Water Quality</td> <td data-bbox="1234 587 1610 850">Continuous monitoring water quality at identified points of river for detection of quality/pollution Analysis made at certified laboratory Advisory/guidance from Health Ministry</td> <td data-bbox="1610 587 1834 850">Pond, Water Treatment Plant,</td> </tr> <tr> <td data-bbox="978 850 1023 1174">2</td> <td data-bbox="1023 850 1234 1174">Air Quality</td> <td data-bbox="1234 850 1610 1174">Adherence to the legislative requirement on boiler emission Prohibition of open burning Fibre and shell are used as fuel in the boiler furnace Monitoring of CEMS system Appointment of trained personnel for Air Pollution Control.</td> <td data-bbox="1610 850 1834 1174">Boiler operation mill complex</td> </tr> <tr> <td data-bbox="978 1174 1023 1367">3</td> <td data-bbox="1023 1174 1234 1367">Conductive EFB yard</td> <td data-bbox="1234 1174 1610 1367">Control of leachate at EFB yard An improved site construction to include concrete flooring, roofing & containment wall</td> <td data-bbox="1610 1174 1834 1367">EFB yard</td> </tr> </tbody> </table>	No	Environmental Issues	Solution Procedure/Action Plan	Main Location	1	Water Quality	Continuous monitoring water quality at identified points of river for detection of quality/pollution Analysis made at certified laboratory Advisory/guidance from Health Ministry	Pond, Water Treatment Plant,	2	Air Quality	Adherence to the legislative requirement on boiler emission Prohibition of open burning Fibre and shell are used as fuel in the boiler furnace Monitoring of CEMS system Appointment of trained personnel for Air Pollution Control.	Boiler operation mill complex	3	Conductive EFB yard	Control of leachate at EFB yard An improved site construction to include concrete flooring, roofing & containment wall	EFB yard	Complied
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Criterion / Indicator		Assessment Findings				Compliance
				Enforcement of site vehicle collection area.		
		4	Scheduled waste	Scheduled wastes are managed in accordance with the regulatory requirements.	Source of generation/store	
Records of periodical reporting of the listed issues were available. The plans were reviewed annually during the Management review/ESH meeting/EPMC where environmental issues were discussed.						

<p>5.1.3</p>	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -</p>	<p>West Estate adopted the following strategies in the reduction of chemicals in weeding control.</p> <table border="1" data-bbox="981 427 1798 858"> <thead> <tr> <th>No</th> <th>Strategies</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>To reduce usage of insecticide and pesticide (cypermethrin) by establishment of pheromone trap</td> </tr> <tr> <td>2</td> <td>Prevention of pest breeding area by doing good agricultural practices during replanting – ensuring thin chipping of trunks and all trunk debris must stack in close ended trenches</td> </tr> <tr> <td>3</td> <td>Conversion of chemical class 1 <i>methamidaphos</i> for control bagworm to class III chemical <i>acephate</i></td> </tr> <tr> <td>4</td> <td>To expand coverage of beneficial plants in the field targeted ratio of 10dm:1 ha,</td> </tr> <tr> <td>5</td> <td>To reduce usage of rat bait by through establishment of barn owl boxes.</td> </tr> </tbody> </table> <p>Similarly the West Mill implemented the Pollution Identification Environmental improvement action plan’ to monitor the effectiveness of the mitigation measures taken, are in place. The following indexes are being monitored :</p> <ul style="list-style-type: none"> a) Black Smoke Monitoring b) Effluent Discharge Monitoring c) Monitoring Water course d) Centralized collecting Scheduled Waste <p>Performance in 2018 was verified, and noted to be satisfactory. The monitoring in the mill was established based on DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling. The effluent monitoring as recorded below;</p>	No	Strategies	1	To reduce usage of insecticide and pesticide (cypermethrin) by establishment of pheromone trap	2	Prevention of pest breeding area by doing good agricultural practices during replanting – ensuring thin chipping of trunks and all trunk debris must stack in close ended trenches	3	Conversion of chemical class 1 <i>methamidaphos</i> for control bagworm to class III chemical <i>acephate</i>	4	To expand coverage of beneficial plants in the field targeted ratio of 10dm:1 ha,	5	To reduce usage of rat bait by through establishment of barn owl boxes.	<p>Complied</p>
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**RSPO Public Summary Report
Revision 7 (Aug /2018)**

Sample date	4/1018	12/11/18	5/12/18
PH	7.10	7.3	7.3
BOD	4920	2640	1350
COD	-	-	-
Total solids	-	-	20106
Suspended solids	20600	11600	11500
Oil & grease	4	10	4
A Nitrogen	123	183	117
Total N	408	297	190

The stack sampling report shown that the measured levels of gaseous emission emitted and stack leading from 2 boiler chimney monitored were found to be within the limit. The assessment was done by Alam Hijau Integrasi (M) Sdn Bhd.

Date	Activity	Boiler no 1/g Nm3	Boiler no 2 g/Nm3
9/2/18	Stack sampling	0.183	0.40
	Ringlemann Chart	7 min 20 sec	-
3/5/18	Stack sampling	0.198	
	Ringlemann Chart	8 min	
19/9/18	Stack sampling		0.181
	Ringlemann Chart		6 min 20 sec

The online scheduled waste inventory & consignment for the mill was updated. The recent despatch was on 22/10/18 with details as follows;

RSPO Public Summary Report
Revision 7 (Aug /2018)

Criterion / Indicator		Assessment Findings						Compliance
		No	SW code	Quantity/mt	No	SW code	Quantity/mt	
		1	SW 322	0.725	4	SW 409	0.108	
		2	SW 410	0.144	5	SW 305	0.300	
		The estate holds no SW stock as all maintenance are handled by SDI al licensed collector and vendor for machinery /vehicle for SDP estates.						
Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.								

<p>5.2.1</p>	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -</p>	<p>The HCV re-assessment was compiled by PSQM team on May 2016 for West Estate SOU 9. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ul style="list-style-type: none"> a) Overview of HCV assessment b) Description of assessment area <ul style="list-style-type: none"> - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values c) HCV criteria & application to agriculture <ul style="list-style-type: none"> - Visual observation & supporting information - Wildlife in plantation - decision on HCV status d) HCV management / Monitoring. <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the West Estate within SOU 9 are given below:</p> <table border="1" data-bbox="1032 1007 1805 1214"> <thead> <tr> <th>No</th> <th>Area</th> <th>Ha</th> <th>Present HCV</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Natural Ponds</td> <td>4.79</td> <td>HCV 4</td> </tr> <tr> <td>2</td> <td>Agro Forestry</td> <td>102.11</td> <td>HCV 4</td> </tr> <tr> <td>3</td> <td>Arboretum (herb)</td> <td>9.14</td> <td>HCV 4</td> </tr> <tr> <td>4</td> <td>Fringe mangroves</td> <td>39.84</td> <td>HCV 4</td> </tr> <tr> <td>5</td> <td>Hatters castle</td> <td>1.12</td> <td>HCV 6</td> </tr> </tbody> </table> <p>All areas were sighted and verified. All the HCVs were maintained by SDP special projects whilst the mangrove areas are under the jurisdiction of the state government. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries</p>	No	Area	Ha	Present HCV	1	Natural Ponds	4.79	HCV 4	2	Agro Forestry	102.11	HCV 4	3	Arboretum (herb)	9.14	HCV 4	4	Fringe mangroves	39.84	HCV 4	5	Hatters castle	1.12	HCV 6	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>and was documented. Map verification and site visit confirmed that west estate is surrounded by river/straits and villages. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.</p>	

5.2.2	<p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>No RTE species were observed, except HCVs areas of identified riparian Relevant action plans had been established and implemented concerning protection of the riparian, such as identification on map and ground, restriction of no chemicals activities, awareness training to workers and patrolling by Auxiliary Police.</p> <p>In records there is no RTE species observed/spotted within the member estates in SOU 9. The HCVs areas are as per the listed in 5.2.1 above. Relevant action plans had been established and implemented as described in the management and monitoring of all the identified possible threat.</p> <table border="1" data-bbox="981 719 1836 1394"> <thead> <tr> <th>No</th> <th>HCV area</th> <th>Possible threat</th> <th>Management & Monitoring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>>25 degree Rocky area</td> <td>Soil erosion (the steeper the slope the greater the erosive power) Eroded soil deposited down slope can cause road damage</td> <td>Education & awareness for workers Marking of slope on the map/in the field. Monitoring by photo of terracing in the field Monitoring of sedimentation and siltation</td> </tr> <tr> <td>2</td> <td>Water bodies</td> <td>Riverbanks erosion/sedimentation Eutrophication of aquatic environments and vegetation Over growth due to fertilizer applications. Interruption on aquatic biological health.</td> <td>Education/awareness for workers Monitoring of water sampling results Ensure no agrochemicals activities at bordering water bodies Cover any bare soil with planting of <i>vertivar</i> grasses,</td> </tr> </tbody> </table>	No	HCV area	Possible threat	Management & Monitoring	1	>25 degree Rocky area	Soil erosion (the steeper the slope the greater the erosive power) Eroded soil deposited down slope can cause road damage	Education & awareness for workers Marking of slope on the map/in the field. Monitoring by photo of terracing in the field Monitoring of sedimentation and siltation	2	Water bodies	Riverbanks erosion/sedimentation Eutrophication of aquatic environments and vegetation Over growth due to fertilizer applications. Interruption on aquatic biological health.	Education/awareness for workers Monitoring of water sampling results Ensure no agrochemicals activities at bordering water bodies Cover any bare soil with planting of <i>vertivar</i> grasses,	Complied
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Criterion / Indicator		Assessment Findings		Compliance																
			Degradation of catchment areas	groundcovers, etc. to reduce soil erosion.																
5.2.3	<p>There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance -</p>	<p>There were programs held by the estates /mill to all employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing made during the ad hoc session and morning muster. This is also emphasized during the training held by SQM programs. Employees are aware of the following measures;</p> <ul style="list-style-type: none"> a) An offence to capture, harm, kills any wildlife. b) Disciplinary measures shall be taken if found violating company rules. c) Riparian buffer zone to be free from any chemicals application/pollution <p>Training in relation to the HC management are provided to the employees as follows;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>18/1/18</td> <td>Environment, scheduled waste</td> <td>3</td> </tr> <tr> <td>2</td> <td>9/7/18</td> <td>Briefing on company policies</td> <td>entire</td> </tr> <tr> <td>3</td> <td>8/12/18</td> <td>MSPP/RSPO basic requirements</td> <td>Entire</td> </tr> </tbody> </table>		No	Date	Subject	Attendees	1	18/1/18	Environment, scheduled waste	3	2	9/7/18	Briefing on company policies	entire	3	8/12/18	MSPP/RSPO basic requirements	Entire	Complied
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<p>5.2.4</p>	<p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. <p>- Minor compliance -</p>	<p>The CU members established a standard monitoring document. Details provided include the following information;</p> <ol style="list-style-type: none"> Area Field no and GPS coordinate Observation <ul style="list-style-type: none"> - Encroachment /sign of trespassing - Wildlife issues/conflicts/sighting - Pollution /erosion issues Maintenance of signage / fence <p>The monitoring being made by the AP during the security rounds in the estate complex. The field staff/Assistant also played a role in providing information during their daily rounds in the fields. Records furnished by the APs were sighted and verified.</p> <table border="1" data-bbox="981 815 1836 1331"> <thead> <tr> <th>No</th> <th>Action steps</th> <th>Action Plan</th> <th>Date</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Inspection of HCV</td> <td>Continuous inspection and recommendation To liase with related agency</td> <td>Jan 19</td> <td>Estate mgmt</td> </tr> <tr> <td>2</td> <td>Protection or conservation & monitoring of biodiversity area.</td> <td>To continuously collaborate with R& D to monitor the status & health of trees</td> <td>Jan 19</td> <td>Estate mgmt</td> </tr> <tr> <td>3</td> <td>Protection & conservation of mangrove forests area.</td> <td>To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.</td> <td>Jan 19</td> <td>Estate mgmt</td> </tr> </tbody> </table>	No	Action steps	Action Plan	Date	PIC	1	Inspection of HCV	Continuous inspection and recommendation To liase with related agency	Jan 19	Estate mgmt	2	Protection or conservation & monitoring of biodiversity area.	To continuously collaborate with R& D to monitor the status & health of trees	Jan 19	Estate mgmt	3	Protection & conservation of mangrove forests area.	To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.	Jan 19	Estate mgmt	<p>Complied</p>
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Criterion / Indicator		Assessment Findings					Compliance
		5	Rehabilitation & habitat enhancement	To participate in tree planting divers tree species to enhance the surrounding biodiversity.	Jan 19	Estate mgmt	
		6	Interface with animals	Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with <i>Jabatan Perhilitan</i> on wildlife encounter/discovery	Jan 19	Estate mgmt	
		7	Education and awareness	Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming	Jan 19	Estate mgmt	
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	No HCV set asides with existing rights of local communities have been identified					Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.							

<p>5.3.1</p>	<p>All waste products and sources of pollution shall be identified and documented. - Major compliance -</p>	<p>West Mill and Estate has identified all wastes and sources of pollution. The Waste Management Action Plan FY 2019 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="981 555 1854 853"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping – biogas emission)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table> <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2019. The waste generated from the mill operations as shown below;</p> <table border="1" data-bbox="981 1013 1854 1284"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fibre, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>The pollution identified from the mill activities</p>		Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping – biogas emission)- GHG	2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.		Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill complex and employees' quarters	3	Industrial waste	Fibre, palm kernel shell, boiler ash, scrap iron	4	Sewage	Sewage from housing/office complex	<p>Complied</p>
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3 Leakage of lubricant	Storage & vehicle maintenance											
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to <i>Kualiti Alam Sdn Bhd</i> a licensed contractor with DOE.		Complied								

<p>5.3.3</p>	<p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>The waste management and disposal plan to avoid or reduce pollution had been documented and implemented as discussed in Indicator 5.1.3 above. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution on the routine operation. Mill wastes had been disposed as follows:</p> <ul style="list-style-type: none"> a) Crop residue/biomass i.e. fiber and shell were used as fuel in the boiler. b) The monitoring of water and effluent discharge, a monthly and quarterly report for final discharge were submitted to DOE in a timely manner, as required by the written approval. c) Scheduled waste management, a procedure "Handling of Scheduled Waste" established. The wastes were disposed through DOE's licensed contractor <i>Kualiti Alam Sdn Bhd</i>. The estate had services of SDI collecting all the vehicles/machine scheduled waste on completion of servicing. d) Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing was continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal. 5th schedule inventory was evident. The storage and disposal of the following scheduled waste were reviewed, noted to be satisfactory. <p>The pollution identified from the mill activities and the action plan to reduce the pollutions are as follows:</p> <table border="1" data-bbox="981 1201 1834 1364"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>To monitor the condition of dust cyclone every 3 months To carry out boiler furnace cleaning every week</td> </tr> </tbody> </table>		Type of waste	Action Plan	1	Black smoke	To monitor the condition of dust cyclone every 3 months To carry out boiler furnace cleaning every week	<p>Minor non-conformance</p>
	Type of waste	Action Plan							
1	Black smoke	To monitor the condition of dust cyclone every 3 months To carry out boiler furnace cleaning every week							

Criterion / Indicator		Assessment Findings		Compliance	
		2	Odour & gases	To maintain proper feeding into digestion process of effluent to prevent severe and unpleasant odour Maintain 1:1 ratio of acidification process	
		3	Leakage of lubricant	Ensure SOP to be strictly followed To place all lubricant oil drum on metal trays	
		The mill has not established the EFB monthly disposal distribution for 2018 Hence <i>an NCR AB 03- 19 is raised</i>			
Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.					

<p>5.4.1</p>	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -</p>	<p>The mill records the usage of diesoline and concerted ratio over the FFB processed.</p> <table border="1" data-bbox="1032 459 1809 898"> <thead> <tr> <th>Month</th> <th>Diesel used</th> <th>FFB Processed</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr><td>Jan 18</td><td>5563</td><td>21914</td><td>0.25</td></tr> <tr><td>Feb 18</td><td>3172</td><td>13191</td><td>0.24</td></tr> <tr><td>Mac 18</td><td>3450</td><td>16351</td><td>0.21</td></tr> <tr><td>April 18</td><td>3423</td><td>16880</td><td>0.20</td></tr> <tr><td>May 18</td><td>3734</td><td>18107</td><td>0.21</td></tr> <tr><td>June 18</td><td>3817</td><td>17378</td><td>0.22</td></tr> <tr><td>July 18</td><td>3616</td><td>15800</td><td>0.23</td></tr> <tr><td>Aug 18</td><td>3379</td><td>15426</td><td>0.22</td></tr> <tr><td>Sept 18</td><td>4342</td><td>16845</td><td>0.26</td></tr> <tr><td>Oct 18</td><td>4188</td><td>18784</td><td>0.22</td></tr> <tr><td>Nov 18</td><td>3393</td><td>15707</td><td>0.22</td></tr> <tr><td>Dec 18</td><td>3219</td><td>15118</td><td>0.21</td></tr> </tbody> </table> <p>West Palm Oil Mill consistently monitors the following and tabulate the data monthly.</p> <p>a) The consumption of non-renewable energy (diesel) Direct usage of diesel for the mill operations is recorded. The quantity in mt is divided over the mt FFB processed (ratio) during the month. The performance is measured by this ratio to indicate the level of performance. The data is compiled for comparison and control for future improvement with aim of gradual reduction of diesel. There were measures as shown in the energy management plan to reduce and eliminate wastages among others as follows;</p> <ul style="list-style-type: none"> - To ensure optimum FFB ramp balance to commence processing - Timely servicing of vehicles to ensure efficient use of diesel & avoid leakages 	Month	Diesel used	FFB Processed	Diesel/FFB	Jan 18	5563	21914	0.25	Feb 18	3172	13191	0.24	Mac 18	3450	16351	0.21	April 18	3423	16880	0.20	May 18	3734	18107	0.21	June 18	3817	17378	0.22	July 18	3616	15800	0.23	Aug 18	3379	15426	0.22	Sept 18	4342	16845	0.26	Oct 18	4188	18784	0.22	Nov 18	3393	15707	0.22	Dec 18	3219	15118	0.21	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Regular servicing of turbine for a better efficiency and to minimise running of gen-set - Educate employees on fuel saving practices. <p>The mill recorded a mean ratio of 0.22 for the entire 12 months.</p> <p>b) power production and allocation to the mill machinery and complex generated by steam turbine tabulated for the financial year 2019. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt FFB.</p>	
Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	There was no land preparation in West CU by burning ever since SDB practiced zero burning as per the policy in: <ul style="list-style-type: none"> a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation b) Carbon Policy <p>SDP has a policy of no open burning. As advocated, both estates practiced Zero burning. In the 2016 replants visited during the audit in both Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose</p>	Complied
5.5.2	Where fire has been used for preparing land for replanting, 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 -	There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.	Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			

Criterion / Indicator		Assessment Findings	Compliance												
5.6.1	<p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).</p> <p>- Major compliance -</p>	<p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. 'Pollution Identification Environmental improvement action plan' – is used to identify the waste products and sources of pollution – is in place and is being reviewed accordingly. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1"> <thead> <tr> <th></th> <th>Environment receptor</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Source from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping – GHG emission</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydrocyclone/claybath /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, domestic waste and industrial/process waste</td> </tr> </tbody> </table> <p>Under "Jadual Pematuhan , license no 003180, air emission from boiler stack was monitored with results as follows.</p> <ul style="list-style-type: none"> a) 1st stack sampling was conducted 09/2/218 (0.183 g/Nm3) b) 2nd stack sampling was done on 3/5/18 (0.198 g/Nm3) c) 3rd stack sampling made on 19/9/18 (0.181 g/NM3) <p>The result for 2 stack sampling report shown that the measured levels of gaseous emission emitted and stack leading from 2 boiler chimney monitored were found to be within the limit. The assessment was done by <i>Alam Hijau Integrasi (M) Sdn Bhd.</i></p>		Environment receptor	Details	1	Air	Source from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping – GHG emission	2	Water	Cleaning water/run-off/process station waters (hydrocyclone/claybath /sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	Land	Scheduled waste, domestic waste and industrial/process waste	Complied
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Criterion / Indicator		Assessment Findings	Compliance															
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Pollution Identification Environmental improvement action plan' – is used to identify the waste products and sources of pollution and actions taken to mitigate and reduce them are in place and are being reviewed accordingly. a) Green House Gaseous – Potential sources are being identified using 'Carbon Inventory Calculation Methodology. b) Emission Sources have been identified from Land Conservation, Fertilizer (mineral), Manufacture & Transport, NO from fertilizer, c) Fuel Consumption, Peat Oxidation, POME and reported in the PalmGHG Summary Report.	Complied															
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	The GHG emissions due to the operations is identified and recorded in the palm GHG version 3.01. The GHG calculations were made as per certification unit basics. Summary emissions as given below <table border="1" data-bbox="981 849 1816 983"> <thead> <tr> <th></th> <th>Crop</th> <th>tCO2 e</th> <th>tCO2 e/ ha</th> <th>tCO2 e/mt FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Own</td> <td>11175.75</td> <td>2.23</td> <td>0.08</td> </tr> <tr> <td>2</td> <td>Group</td> <td>6722.79</td> <td>2.96</td> <td>0.12</td> </tr> </tbody> </table> <p>The period of the report was from Jan 18 – Dec 18.</p>		Crop	tCO2 e	tCO2 e/ ha	tCO2 e/mt FFB	1	Own	11175.75	2.23	0.08	2	Group	6722.79	2.96	0.12	Complied
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Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.																		
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.																		
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Social Impact Assessment (SIA) was conducted on 27-28/3/2014 by Social & Environment Projects Unit, PSQM Department. The methodologies of the assessment were interview with the workers and external stakeholders such as local communities, site observations and documentation review. Attendant list of the interviewed stakeholder was sighted in the report.	Complied															

Criterion / Indicator		Assessment Findings	Compliance
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	For SIA, the assessment was conducted with the participation of relevant stakeholders such as neighbouring villagers, government authority, contractors and suppliers, internal workers and etc. Attendance list of the stakeholders was sighted. Annually, estate will conduct the stakeholder meeting to obtain the feedback on the current issues. The latest meeting was conducted on 27.12.2018 (West POM) attended by school management, contractor and suppliers for both. In West Estate, the stakeholders meeting were conducted separately based on issue. Examples are Meeting with AP and Cattle Owner (24.12.2018), Kg Orang Asli Sg Kurau (08.08.2018) and contractor (16.11.2018).	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	The mill and estate's management have developed an action plan for social assessment based on the issues raised during SIA. The plan has incorporated timetable with responsibilities for mitigation and monitoring of the social impacts were developed and reviewed as necessary.	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The social management plan has been reviewed annually and the latest plan is reviewed on 14.01.2019 for West POM and 08.07.2018 for West Estate. The issues captured in the stakeholder meeting for West POM were not included in SIA management plan for West POM. Example were list for paint from Jega, using ash for levelling the school field and requesting the resource for school tuition class.	Minor non-conformance

Criterion / Indicator		Assessment Findings	Compliance
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder scheme was involved in the certification units.	Not applicable
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	SDPB has developed a documented procedure in Sustainable Plantation Management System on handling social issues, Appendix 5, Version 1, and Issue No.1, dated 01/4/2008. The procedure has detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	Senior/Assistant Manager of the mill/estate have been appointed as Social officer to handle all issues related to social (internal and external). Sighted the appointment letter of Mr. Izran Tugiran and Senior Assistant Manager (Ahmarul Asuwad) dated 25/01/2019 and 02/10/2017 respectively.	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Stakeholder's meeting was conducted on 27.12.2018 with the participation from the external stakeholders in West POM. In West Estate, estate will conduct the stakeholder meeting annually to obtain the feedback on the current issues. The latest meeting was conducted on 27.12.2018 (West POM) attended by school management, contractor and suppliers for both. In West Estate, the stakeholders meeting were conducted separately based on issue. Examples are Meeting with AP and Cattle Owner (24.12.2018), Kg Orang Asli Sg Kurau (08.08.2018) and contractor (16.11.2018). Meeting minutes was sighted and the issues raised during the meeting having the timeline and person in charge to complete. No further issue was sighted.	Complied
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			

Criterion / Indicator		Assessment Findings	Compliance
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	A documented dispute resolution procedure is available in Mill and Estate Quality Management System Manual which is effective, timely, appropriate and open to any affected parties. The complaint and grievances is open to effected parties including internal and external stakeholders.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	The mill management has implemented Internal and External Complaint logbook. Most of the complaints were regarding house repair such as pipe leaking (main pipe), broken wall and etc. The management has taken action to rectify the problem. The estate’s management has implemented Workers’ quarters/office/building repairs complaint record for internal workers. Most of the complaints were regarding house repair such as pipe leaking (main pipe), broken wall and etc.	Complied
Criterion 6.4:			
Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	SOP to identify legal and customary rights as well as people entitled to compensation has been established with titled “Handling Land Disputes” dated 1/11/2008. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.4.2	<p>A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land.</p> <p>- Minor compliance -</p>	<p>SOP as per Clause 6.4.1.</p>	<p>Complied</p>
6.4.3	<p>The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available.</p> <p>- Major compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.</p>	<p>Complied</p>
<p>Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.</p>			

Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.1 Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>The mill and estates have recruited local workers and foreign workers. The management has included basic pay, net pay, gross pay, deduction of salary, phone allowance, holiday pay and etc. on the pay slip.</p> <p>Payslip of month Dec'18, Oct'18 and Aug'18 for workers have been sampled as below: West POM: a) Employee No.: 143982 b) Employee No.: 114899 c) Employee No.: 124031 d) Employee No.: 64055 e) Employee No.: 115951 f) Employee No.: 6982 g) Employee id: 7029 h) Employee id: 106380 i) Contractor worker: Adil Hossain (Passport no: BL0296313) j) Contractor worker: Md Alim (Passport no: BK0979582) – A&M manpower Sdn Bhd</p> <p>West Estate: a) Employee No.: 96415 b) Employee No.: 103990 (cooking oil) c) Employee No.: 106039 (cooking oil) d) Employee No.:97571 e) Contractor worker: Sobhan Talukder (YGNT Enterprise) f) Contractor worker: (ATT Trading).</p> <p>All the sampled workers below were achieved Minimum Wage Order 2016 of RM 1000/month or RM 38.46/ day. Minimum wage order 2018 will be implemented in January 2019 pay slip.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
6.5.2	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p> <p>Employment contract are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, medical assistance, holiday and annual leave, termination of services and etc. The contract was signed by the workers and sampled contracts as below:</p> <p>West POM:</p> <ul style="list-style-type: none"> a) Employee No.: 143982 b) Employee No.: 114899 c) Employee No.: 124031 d) Employee No.: 64055 e) Employee No.: 115951 f) Employee No.: 6982 g) Employee id: 7029 h) Employee id: 106380 i) Contractor worker: Adil Hossain (Passport no: BL0296313) j) Contractor worker: Md Alim (Passport no: BK0979582) <p>West Estate:</p> <ul style="list-style-type: none"> a) Employee No.: 96415 b) Employee No.: 103990 (cooking oil) c) Employee No.: 106039 (cooking oil) d) Employee No.:97571 e) Contractor worker: Sobhan Talukder (YGNT Enterprise) f) Contractor worker: (ATT Trading). 	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –	The management has provided water and electricity supply to the workers through government supply. Besides, the management has a medical facility in the compound where the employees are allowed to access the facility throughout the serving period without any charges. Employees are staying in the line-site provided by the management without any rental incurred. There is line site inspection conducted on weekly basis by Mohd Nazari (Medical Assistant) to both West Oil Mill and West Estate.	Complied
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance –	Foods and goods for employees were provided through sundry shop at the vicinity of the operating units. Most of the sundry shops are operated by the former estates workers or family members. Besides, the mill and estate were nearby the town or village where the workers are easily access to the shop to purchase goods and foods. Interviewed with the workers found that they were understood and satisfied with the foods and goods price selling in the operating unit's compound.	Complied
Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	SDPB has implemented Social Policy dated January 2015 where the management is committed and respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively. It was published in both language, Bahasa Melayu and English in the office notice boards and housing area.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	NUPW meeting was conducted on 12/09/2018 with total 30 participants (West POM) and 26/07/2018 (West Estate) with a total participant of 11 attendants. Meeting minute is sighted and no issue has been reported in the meeting. AMESU meeting was conducted on 2/2/2017 and among the issue discussed are newly member’s join, insurance subscription, salary rate as at Sept 2018. Interview with the Union representatives confirmed that no issue. There is also Union Day Celebration on 28.01.2019.	Complied
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	The company has developed Child Protection policy dated January 2015. Operating units are complied with the minimum age requirement. No employees below the age of 18 were sighted through the master list of active employee list and interview with worker.	Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	SDPB has implemented Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Mill has recruited local communities, women, and foreign workers to work in the mill. All of them are given equal opportunity and treat fairly on the housing provided, job that has been offered, salary and etc. Salary of local workers and foreign workers were based on MAPA/NUPW and Minimum Wage Order 2016 and no discrimination happened.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	There is no any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	SDPB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. Briefing of policies were given to the workers during the latest muster Briefing on 19.01.2019 in West POM to all 51 workers. In West Estate, the SDP Policies and COBC Training were conducted on 09.07.2019 at Muster Ground West Division.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	SDPB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of policies were given to the workers during the latest muster Briefing on 19.01.2019 in West POM to all 51 workers. In West Estate, the SDP Policies and COBC Training were conducted on 09.07.2019 at Muster Ground West Division.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
6.9.3	<p>A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The mill and estate management have established a Gender Committee to discuss and resolve issues related to women. The managements had implemented procedure for sexual harassment grievance and complaint form to any incidences of sexual harassment is implemented.</p> <p>Gender Committee Meeting was conducted on 25/8/2018, 11/08/2018, 27/7/2018, 15/03/2018 and 18/01/2019 in West POM. Meeting minutes were sighted and no sexual harassment or violence cases reported to date. Activities have been conducted such as Merdeka Celebration on 25.08.2018 and bowling training on 03.08.2018. Meeting was conducted on 11/10/2018, 23/08/2018, 15/3/2018 and 10/1/2018 in West Estate. Other than that, the committee has organized activities such Cake baking class, aerobic and etc.</p>	Complied
<p>Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>			
6.10.1	<p>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p>- Minor compliance -</p>	West POM process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	Complied
6.10.2	<p>Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation).</p> <p>- Major compliance -</p>	West POM process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	Complied
6.10.3	<p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>- Minor compliance -</p>	West POM process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	Complied
6.10.4	<p>Agreed payments shall be made in a timely manner.</p> <p>- Minor compliance -</p>	West POM process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.11:			
Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	The mill and estate’s management have made contribution to the local communities, school and the internal stakeholders such as accommodating various visitors request from Jabatan Industri & Komoditi (12.12.18), Sime Darby School Childrens (28.11.18), current supply at temple for Hindu [prayer on 13.09.2018 and etc. In West Estate, sighted the records for appreciation from SMK Pulau Carey for Kejohanan Catur (M) Peringkat MSSD Kuala Langat 2018 on 06-08 March 2018, Interviewed with the local community and school representatives confirmed that the management was very supportive to provide contributions to them upon request.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	There were no scheme smallholders under the certification unit.	Not applicable
Criterion 6.12:			
No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	All employees are legal with local identification card for local employees and foreign employees are with valid passports and working permits. No evident of trafficked workers were found during the audit.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	No contract substitution was noted in the document as well as based on the worker’s interview during line site visit.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Equal opportunity and non-discriminatory policy is implemented. No temporary workers. Migrant workers are treated equally as per the locals.	Complied
Criterion 6.13: Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	The Social and Humanity management policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations. Briefing of policies were given to the workers during the latest muster Briefing on 19.01.2019 in West POM to all 51 workers. In West Estate, the SDP Policies and COBC Training were conducted on 09.07.2019 at Muster Ground West Division.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	This site is located at Peninsular Malaysia, hence this requirement is not applicable.	Not applicable
Principle 7: Responsible development of new plantings			
West Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this surveillance assessment. The immature areas are replanted area.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <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"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>Continual improvement plan was established at WPOM and West Estate using Kaizen Charter, e.g.:</p> <ul style="list-style-type: none"> • To reduce sand carry over to clarification station • To reduce CPO penalty charged by buyers • To eliminate number of bunches falling into the drain • To reduce cost of chemical and mixing 	<p>Complied</p>

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Appendix B: Approved Time Bound Plan

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	11-Aug-20	RSPO 550179	N.A
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	N.A
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	N.A
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	N.A
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	N.A
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	N.A
5a	Sg Samak		3 Mar '11	NA	NA	Mill was closed down.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	N.A
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	N.A
8	East	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543543	N.A
9	West	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543594	N.A
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Mill was closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020, MUTU – RSPO/091	N.A
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019, MUTU-RSPO/094	N.A
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049, MUTU-RSPO/092	N.A
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-855480	N.A
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	RSPO 541905	

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15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-19	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051, MUTU-RSPO/093	N.A
17	Kempas	Jasin, Melaka	19 May '10	18-May-20	RSPO 005	N.A
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	N.A
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-19	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	RSPO 550182	Mill was closed down.
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	N.A
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	N.A
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	N.A
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042, BV-RSPO-20170705-01	N.A
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BV-RSPO-20170623-01	N.A
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	RSPO 547123	Mill was closed down.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-18	RSPO 537872	N.A
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	N.A
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	N.A
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	Mill was closed down.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Mill was closed down.
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	N.A
32	Rajawali	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819167, RSPO 0020	N.A
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	N.A

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34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO- 815150, MUTU- RSPO/054	N.A
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Legends

Certification Withdrawal

NA - NOT APPLICABLE

Note: There are 2 certificate numbers for some SOUs due to transfer of CB.

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	SGS-RSPO/PC17-00005	N.A
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	3-Jul-18	MUTU-RSPO/027	N.A
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	N.A
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	N.A
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	N.A
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	N.A
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	MUTU-RSPO/002	N.A
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	N.A
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	N.A
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	N.A
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	30-Dec-16	MUTU-RSPO/009	N.A
13		BETUNG		1-April-14	1-April-19	MUTU-RSPO/035	

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14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU- RSPO/001	N.A
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	15-Mar-17	MUTU- RSPO/015	Cert. discontinued – supply bases extended to Rantau POM
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU- RSPO/020	N.A
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU- RSPO/004	N.A
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Iilir, Riau	01-Dec-16	30-Nov-21	MUTU- RSPO/008	N.A
19		MANDAH		1 April 2014	1 April 2019	MUTU- RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU- RSPO/007	N.A
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU- RSPO/018	N.A
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU- RSPO/088	N.A
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	3-May-18	MUTU- RSPO/026	N.A
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-19	MUTU- RSPO/044	N.A
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	N.A

Legends

Pending Certification by RSPO EB	Mill down	closed
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NA - NOT APPLICABLE

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2018 for West 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 West POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.1
PK	1.1

Extraction	%
OER	19.96
KER	4.67

Production	t/yr
FFB Process	222,788.9
CPO Produced	44,464.18
PKO Produced	10,396.7

Land Use	Ha
OP Planted Area	19,096
OP Planted on peat	140.6624
Conservation (forested)	0
Conservation (non-forested)	0
Total	19,236.6624

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	49612.77	0.35	31042.03	0.38	0	0	80654.8	0.73
CO ₂ Emission from fertilizer	3247.54	0.02	2401.73	0.04	0	0	5649.27	0.06
NO ₂ Emmision	4503.68	0.03	2146.29	0.03	0	0	6649.97	0.06
Fuel Consumption	698.27	0	438.56	0	0	0	1136.83	0
Peat Oxidation	0	0	114.64	0.02	0	0	114.64	0.02
Sink								
Crop Sequestration	-46886.51	-0.33	-29420.46	-0.36	0	0	-76306.9	-0.69
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	11175.75	0.08	6722.79	0.12	0	0	17898.54	0.18

**Note: Includes both estates*

Summary of Mill Emission and Credit

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	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	40413.42	0.18
Fuel Consumption	160.67	0
Grid Electricity Utilisation	1812.94	0.01
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	42387.03	0.19

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	11424.74
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

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

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

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

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	West POM takes the legal ownership and physically handles RSPO certified FFB from the estates and produce CPO and PK. The SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4 has been revised with the new standard June 2017.	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.	West POM is not receiving the FFB from traders or distributor and itself not at trader or distributor, therefore no license required	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.	The Palmtrace ID for West POM: RSPO_PO1000000103.	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	This is not refinery, therefore no processing aids is included.	N/A
5.2 Supply chain model			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	West POM is using the IP supply chain model since it received the FFB from own estates. The reclassification procedure from IP to MB is available as per SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4, since Mill has also sell the CSPK as SG product.	Yes

		For buyer who doesn't require RSPO certified CPO or PK, downgrading can be done from certified material to non-certified material.	
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	West POM is using IP supply chain model since it receive the FFB from own estates.	Yes
5.3. Documented Procedures			
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4 has been revised with the new standard June 2017 covering all the supply chain elements.	Yes
	<ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	The SCC training has been conducted on 12.02.2018 on the SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4, attended by 12 attendants from various position such as weighbridge clerk, auxiliary police, assistant engineer, QA and others. Further records verified as per 5.4.1 and 5.6.1.	Yes
	<ul style="list-style-type: none"> • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard. 	The person having overall responsibility for and authority over the implementation is Head of Operating Unit as per the SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4 and for assisted by Assistant Manager, Mr Izran bin Tugiran as person in charge for Sustainable Management System for FY 2017/2018 for 2 years as per appointment letter dated 16.10.2017.	Yes
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; <ul style="list-style-type: none"> i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. 	The SOP for Internal Audit, namely Internal Audit Procedure, SD/SDP/PSQM/IAP Revision 2 dated 01.11.2017 where the SCCS audit shall be conducted annually + as and when required for Independent External Assurance Audit.	Yes

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	<p>ii) effectively implements and maintains the standard requirements within its organization</p>	<p>Sustainability Unit, GSQM Department & SQM Central has conducted MSPO & RSPO Internal audit Report for SOU 9: West POM on 14-16/01/2019. There is 11 Major, 6 Minor and 4 OFI has been raised. 2 Major NCs are related to RSPO SCC and all issues has been closed.</p>	<p>Yes</p>
<p>5.4. Purchasing and goods in</p>			
<p>5.4.1</p>	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p> <p>West POM have a Mill Weigh System to verify at the weighbridge However, for incoming document, the information is not include the minimum traceability requirement as below:</p> <p>West Estate, Carey Island Code : E-152, Consignment note# 162451, Field no: 09B, Div. Bangkok Mill tonnage: 9020 kg Transport: BDM5241W20 Product: FFB Date: 26.01.2019 RSPO Cert: Nil</p> <p>East Estate, Carey Island (Crop Diversion) Code : E-167, Consignment note# 039361, Field no: 05, Div. C Mill tonnage: 8980 kg Transport: PAG5878E54 Product: FFB</p>	<p>Major non-conformance</p>

		Date: 26.01.2019 RSPO Cert: SPO 543543	
	<ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>As the supplier of FFB is coming from own estate and some other crop diversion from own group, the document received only FFB consignment note and mill weighbridge ticket.</p> <p>Sampled document as above.</p>	Yes
	<ul style="list-style-type: none"> The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. 	<p>As the supplier of FFB is coming from own estate and some other crop diversion from own group, the document received only FFB consignment note and mill weighbridge ticket.</p> <p>These estate didn't need the making the shipping announcement.</p>	Yes
	<ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rsपो.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	West POM only receive the FFB from own estate, therefore this requirement is not applicable.	Yes
	<ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	West POM only receive the FFB from own estate, therefore this requirement is not applicable.	Yes
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	<p>There is procedure for handling non-conforming products and/or documents as per SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4.</p> <p>Where there is contamination of RSPO/MSPO certified material during receiving, processing, storage and dispatch, the mill/estate shall downgrade the materials following the downgrade order: RSPO: IP -> MB -> Non certified</p>	Yes

5.5. Outsourcing activities			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>The list of outsourced contractor was sighted, "list of stakeholder" as at 25 January 2019 include the transport contractor for CPO and PK. eg: Jasa Bumi Logistics Sdn Bhd for CPO transporter dated 19 December 2017 valid for 3 years.</p>	Yes
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	<p>As per contract agreement between West POM and Jasa Bumi Logistics Sdn Bhd, there is Annexure 5, RSPO Supply Chain Certification Standard for contractor's agreement mentioned the site has legal ownership of all input material to be included in outsourced processes.</p>	Yes
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>Agreement on the transportation of CPO for Jasa Bumi Logistics Sdn Bhd dated 19 December 2017 with validity of 3 years contract is available during the audit.</p>	Yes
	<p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	<p>The mill ensure that outsourced activities (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced processes within West Palm Oil Mill, hence this requirement is not applicable.</p>	N/A

	d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	The mill ensure that outsourced activities (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced processes within Bukit West Palm Oil Mill, hence this requirement is not applicable.	N/A
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 mill ensure that outsourced activities (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced processes within West Palm Oil Mill, hence this requirement is not applicable.	N/A
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.	So far, no new contractor used for the processing or physical handling of RSPO certified oil palm products. The contractor used only for CPO transportation.	N/A
5.6. Sales and goods out			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	<p>West Palm Oil Mill has established SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4.</p> <p>West POM have a Mill Weigh System to verify at the weighbridge However, for outgoing document, the information in the sales contract and invoices is having insufficient information as below:</p> <p><u>CSPO</u> Despatch Ticket: 017695 Buyer: SDP Joma Ref – Sime Darby Plantation Sdn Bhd Address: Teluk Panglima Garang Industrial EAS Contract No: S/C-PSD/1812/CPO0719H Shipment date: 02/01/2019 Quantity: 38,170 KG Product: PQ RSPO CPO IP</p>	Major non-conformance

		<p>Transport: Jasa Bumi Logistics Sdn Bhd Supply chain cert no: SPO 543594 (SC MODEL IP)</p> <p><u>CSPK</u> Despatch Ticket: 017521 Buyer: SDP KCP – Sime Darby Plantation Berhad Address: KCP-Pulau Carey Contract No: S/C-PSD/1811/PK0651B Shipment date: 19/11/2018 Quantity: 28,420 KG Product: Palm Kernel RSPO IP Transport: STB Maju – STB Maju (M) Sdn Bhd Supply chain cert no: SPO 543594 (SC MODEL IP)</p>	
	<ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>The information been verified in the despatch note, SOP and shipping announcement.</p>	Yes
	<ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	<p>Sampled the shipping announcement as below: Buyer: Sime Darby KCP Carey Island Transaction ID: TR-9a362f9c-2438 Quantity: 400 MT Product: CSPK (IP) Shipping/BL Date: 16/10/2018</p>	Yes
5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified 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 	<p>The registration of PalmTrace will be carried out by the Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Company has registered their mill in the PalmTrace with Members ID – West Oil Mill: RSPO_PO1000000103 License valid until 18-05-2019. Member category : Oil Mill</p>	Yes

	their transaction in the RSPO IT platform and confirm upon receipt where applicable.		
5.7.2	The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:	West Palm Oil Mill has the Procedure for Handling of Certified CPO and PK despatch where it was mentioned that Global Trade Marketing shall make the necessary transaction of RSPO certified CPO and PK in the RSPO IT Platform. Sampled the shipping announcement 5.6.1	Yes
	<ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. 		
	<ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. 	Every shipping announcement made by Global Trade Marketing, HQ in RSPO IT platform per shipment or group of shipments or the book and claim system (RSPO credits). The declaration time to do shipping announcement is at least within 3 month period after the shipment or within the duration agreed by Mill's respective customers/buyers.	Yes
	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	There were no volume sold for other scheme (refer to Table 11 & 12; Supply Chain declaration of Table D & E; Summary Template).	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Sampled of shipping announcement documents and found that the management done the shipping announcement accordingly.	Yes
5.8. Training			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	The training plan for the whole year 2019 was available and includes RSPO/MSPO/SCCS training P&C which tentatively scheduled in December 2019.	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.	The SCC training has been conducted on 12.02.2018 on the SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4, attended by 12 attendants from various position such as weighbridge clerk, auxiliary police, assistant engineer, QA and others. The training has been conducted by Sustainability Team, Puan Sharifah.	Yes
5.9. Record Keeping			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	West POM has keep the records such as SOP, training, Palmtrace transactions, sales contracts, internal audit and management review as per RSPO SCC Standard 2017 requirement. Sampled seen as per 5.4.1, 5.6.1.	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	The records are kept for minimum 2 years as per SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4. All records kept in the weighbridge office. Randomly sampled the last 2 years FFB Receive Detail Report by Supplier/Division/Product and weighbridge ticket dated 1.4.2017. Both are available and well kept.	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.	West POM has using the continuous accounting system where monthly balance monitored in Sime Weigh System. Sighted the data for 1 year cycle from July 17-Jun 18 (previous financial year) and July 18 – Dec 19 (current financial year).	Yes
5.10. Conversion factors			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO	This is Palm Oil Mill, so no conversion rate is used. The CPO and PK was extracted based on past actual rate.	Yes

	website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.		
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	This is Palm Oil Mill, so no conversion rate is used. The CPO and PK was extracted based on past actual rate.	N/A
5.11. Claims			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	No claims been made under RSPO by West POM and it is confirm during site visit. This is also stated in the SOP that any claims regarding the use of or support of certified oil palm products shall comply with the rules on market communication and claims (2016).	N/A
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	West POM has not using any corporate communication on its product (CPO and PK).	N/A
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org ' where the link must lead to the member's profile page.	West POM has not using any corporate communication on its product (CPO and PK)	N/A

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.	West POM has not using any corporate communication on its product (CPO and PK)	N/A
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.	West POM has not using any corporate communication on its product (CPO and PK)	N/A
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.	West POM has not using any corporate communication on its product (CPO and PK)	N/A
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	West POM has not using any business to business communication on its product (CPO and PK).	N/A
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.	West POM has not using any business to business communication on its product (CPO and PK).	N/A
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.	West POM has not using any business to business communication on its product (CPO and PK).	N/A

	b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
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>	West POM has not using any business to business communication on its product (CPO and PK).	N/A
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	West POM has not using any business to consumer communication on its product (CPO and PK).	N/A
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	West POM has not using any business to consumer communication on its product (CPO and PK).	N/A
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	West POM has not using any business to consumer communication on its product (CPO and PK).	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	West POM has not using any business to consumer communication on its product (CPO and PK).	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	West POM has not using any business to consumer communication on its product (CPO and PK).	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.	West POM has not using any business to consumer communication on its product (CPO and PK).	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.	West POM has not using any business to consumer communication on its product (CPO and PK).	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 www.rspo.org .	West POM has not using any business to consumer communication on its product (CPO and PK).	N/A
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	West POM has apply 100% IP for its product (CPO & PK).	Yes
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	West POM has apply 100% IP for its product (CPO & PK).	N/A

	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>		<p>N/A</p>
<p>Labelling and trademark (IP)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	<p>West POM didn't use any RSPO label and trademark for its product (CPO & PK).</p>	<p>N/A</p>
<p>Messaging (IP)</p>			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org 	<p>West POM didn't use any RSPO label and trademark for its product (CPO & PK).</p>	<p>N/A</p>

	<ul style="list-style-type: none"> • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content (MB)			
	95% or above of the oil palm content must be RSPO MB-certified.	Not applicable as only IP module is used.	N/A
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Not applicable as only IP module is used.	N/A
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the 	Not applicable as only IP module is used.	N/A

	<p>trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</p> <ul style="list-style-type: none"> • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. • In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed. 	Not applicable as only IP module is used.	N/A
	<p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <p>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p>	Not applicable as only IP module is used.	N/A
MODULE C – PARTIAL PRODUCT CLAIMS			
	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p>	Not applicable as only IP module is used.	N/A

	<ul style="list-style-type: none"> • The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. • At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. • The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. • The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. • The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim. 		
MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES			
	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made</p>	Not applicable as only IP module is used.	N/A
	<p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p> <p>95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made</p>	Not applicable as only IP module is used.	N/A
5.12. Complaints			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	The SOP has mentioned that where there are any stakeholder complaints received by mill, mill shall handle the complaints in accordance to Procedure for External Communication in	Yes

		PQMS SOM Sub-section 5.5 Appendix 5.5.3.2. Sighted the complaint book for both internal and external however no complaint regarding RSPO product received so far.	
5.13. Management Review			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	In SOP of management review, the management review will be hold annually at planned intervals.	Yes
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	The input for management review is as below: <ol style="list-style-type: none"> 1. There is 2 major NC raised in internal audit by Puan Atikah from SQM. 2. Customer feedback: No complaint received so far. 3. Changes that could affect the management system: no changes. 4. Follow up actions: Will continue to provide relevant SCC training. 5. Recommendations for improvement: Refresher training for RSPO SCC to all workers including transporter. 	Yes
5.13.3	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	The output from management review: <ol style="list-style-type: none"> 1. Improvement of the effectiveness of the management system 2. Resource needs: no additional resource required so far. 	Yes

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

D.1 Definition			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
D.1.1	A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.	West POM has the complete procedure and method to verify the volumes and sources of certified, the implementation of any processing controls, and volume sales of RSPO certified products. No uncertified FFB received in West POM.	Yes
D.2 Explanation			
D.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The projection for certified FFB and production of certified CPO and PK in West POM has been recorded in BSI's public summary report and registered in RSPO IT Platform.	Yes

D.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	IT Platform (PalmTrace) with ID RSPO_PO1000000103	Yes
D.3 Documented procedures			
D.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a. Complete and up to date procedures covering the implementation of all the elements in these requirements;	SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4 has been revised with the new standard June 2017 covering all the supply chain elements.	Yes
	b. The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site’s procedures for the implementation of this standard.	The person having overall responsibility for and authority over the implementation is Head of Operating Unit as per the SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4 and for assisted by Assistant Manager, Mr Izran bin Tugiran as person in charge for Sustainable Management System for FY 2017/2018 for 2 years as per appointment letter dated 16.10.2017.	Yes
D.3.2	The site shall have documented procedures for receiving and processing certified FFBS.	West POM has SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4 where if there is contamination of RSPO/MSPO certified material during receiving, processing, storage and despatch, the mill/estate shall downgrade the materials following the downgrade order: RSPO: IP->MB->Non-certified and the volume of downgraded material shall be recorded accordingly. So far, there is no non-conforming FFB or document received.	Yes
D.4 Purchasing and goods in			

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D.4.1	The site shall verify and document the tonnage and sources of certified FFBs received.	West POM has the real time basis report through the monthly record in using Sime Weigh system adapted in mill. Sighted the record from Jul 2017-Jun 2018 (previous financial year), a total of 43,654.619 MT for CSPO and 10,269.390 MT for CSPK and OER: 23.25% & KER 4.74%, Jul'18 – Dec'18 CSPO: 20,599.779 MT and CSPK: 4,957.066 Mt.	Yes
D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	As per SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4, the oil mills shall inform PSQM complete with justification immediately if there is a projected overproduction of certified tonnage. PSQM shall upon verification notify the respective CB accordingly for any updates in the RSPO-IT (PalmTrace) system.	Yes
D.5 Record keeping			
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. <i>IP Mill must report on real time basis.</i>	West POM has the real time basis report through the monthly record in using Sime Weigh system adapted in mill. Sighted the record from Jul 2017-Jun 2018 (previous financial year), a total of 43,654.619 MT for CSPO and 10,269.390 MT for CSPK and OER: 23.25% & KER 4.74%, Jul'18 – Dec'18 CSPO: 20,599.779 MT and CSPK: 4,957.066 Mt.	Yes
D.6 Processing			
D.6.1	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.	All FFB received and processed are from certified sources, which are from own estates. If the demand is for conventional CPO and PK, the 1:1 downgrade is used.	Yes

Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
Period: Jan 2018 – Dec 2018				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Feb 2018	13,173.49	-	13,173.49
2	Mar 2018	16,354.86	-	16,354.86
3	Apr 2018	16,866.65	-	16,866.65
4	May 2018	18,120.76	-	18,120.76
5	Jun 2018	17,380.89	-	17,380.89
6	Jul 2018	15,791.32	-	15,791.32
7	Aug 2018	15,431.13	-	15,431.13
8	Sep 2018	16,830.36	-	16,830.36
9	Oct 2018	18,719.53	-	18,719.53
10	Nov 2018	15,701.66	-	15,701.66
11	Dec 2018	15,516.75	-	15,516.75
Total		179,887.40	-	179,887.40

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B. Monthly Records of Certified CPO & PK since the last audit. Period: Feb 2018 – Dec 2018			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Feb 2018	2,688.41	601.70
2	Mar 2018	3,381.96	796.13
3	Apr 2018	3,562.72	788.10
4	May 2018	3,818.66	883.25
5	Jun 2018	3,516.16	874.31
6	Jul 2018	3,277.25	785.50
7	Aug 2018	3,417.54	882.40
8	Sep 2018	3,491.78	900.35
9	Oct 2018	3,953.18	908.14
10	Nov 2018	3,330.64	764.84
11	Dec 2018	3,129.39	715.77
Total		37,567.69	8,900.49

A. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) Period: Feb 2018 – Dec 2018				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	ABC Refinery	TR-204cc7d6-12c1, TR-10b91be0-3b6f, TR-40e75928-1e25, TR-25be315eb618, TR-10420bc4-98a5, TR-cbef39d6-d4df, TR-64737538-893d, TR-5dc232ff-93bf, TR-1bbc4389-cbee, TR-9f10d6f5-40d0, TRc9e3a0acfb82, TR-51fe09c0-6b93, TR-06eb5e4a-2ef9, TR-f29730dc-2257, TRe6314a6bc337, TR-939120f9-f51a, TR-20457727-cb5e, TR-780ea4c7-8544, TRRead62e6afbd3, TR-70573f93-27a1, TR-29d13dd8-4cd3, TR-54e44b6d-6232, TR-922649d4-5cf4, TRa9c61673-9f24, TR-660f0cddaa61, TR-fb171029-af91, TR-096b3ec6-279d, TR-eb3f700cf787, TR-74cb6d48-5f99, TR-87c474a5-b853, TR-14b875d1-d512, TR-3aced2c3-9030, TRd928cbd8-7d40, TRc8e30368-1815, TR-3c425592-9d0c, TR-89785f46-c862, TR-5119a3b2-6018, TRd3a4bba7-ae6b, TR-3121005ec432, TR-d4260f33-7819, TR-684bfdd9-33e8, TR-0de42bad-7ef8, TRda808cb8-a6f9, TR-60943acc-8ac8, TR-76926e54-40f0, TR-914b276b-1e20, TR-4177b6ef-5992, TR-e8fe3cd1-44e3	34,488.46 mt (CPO IP)	-

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	<p>TR-ffbe0f29-bf40, TR-f13802af-38b6, TR-105483af-3206, TR-7b4d6941-f250, TR-4e26f442-3f1f, TR-d6f7abff-32a5, TR-f38c68fe-83be, TR-73e47002-c4f8, TR-947e953f-4109, TR-e5dfc738-5ebf, TR-0930e16f-6914, TR-a852a7f7-77cf, TR-8a69e1f1-bbd3, TR-af55b9dc-351a, TR-036dceb0-c1bf, TR-2ea30f3e-22c4, TR-fbeb6f81-7514, TR-1864eb35-28c3, TRe63b5a4e-0f05, TR-669b1b32-b57d, TR-94c139c6-b01e, TR-90108e49-b2f9, TR-194e4d21-a7fb, TR-6729f9a8-66ec, TR-29ec673af5d7, TRe23cae1ec5e3, TR-76bb13a2-6167, TRadd58b55-8eaa, TR-8539dcee-2d55, TR-5b5f3e89-d3b0, TR-9e0852d5-d591, TR-954b25ca-184a, TR-8b51970dd0f8, TRa753b6eaa761, TR-46b373c7-c79a, TR-24914b92-6f64, TR-f8bed40c-1458, TR-6ce40810-9164, TR-8d62e663-1f8a, TR-ed73ff99-f94d, TR-08e73a25-7092, TRc094875e-159c, TR-92969d0fa969, TR-9e249844-8c3a, TR-2ece3d1cf739, TR-6231643a-907a, TR-72db219e-3a89, TRde4868be-0ed2, TRb19414b5-5dbd, TR-d7e9af8ddab4, TRee89aed4-e005, TRe83e7587-7171, TR-e52afd62-5c01, TRb1399399-8759, TR-c5f07851-6f69, TR-57618cf-410c, TRd074d718-eb33, TRab64950a-147f, TR-e68b11dfae29, TRe92733e0-c8f6, TR-4f9ec6f2-64b8, TR-9a057e5ddf5f, TR-72ce889ef3d5, TR-7f9761a3-41dd, TRb33aae44-e18d,</p>		
2	<p>TR-0c970fd9-0fbb, TR-f59c498f-7066,</p>	-	1,350 (PK SG)
3	<p>TR-c9cbeafebecc, TR-1aad7883-6c55, TR-63ae7e13-df17, TR-731e8718-43a2, TR-3aecbc13-04ad, TR-95defb84-1001, TR-51f74fc4-4a4c, TR-9a362f9c-2438, TR-6d4127f4-a64c</p>	-	6,344.39 (PK IP)
TOTAL		34,488.46	7,694.39

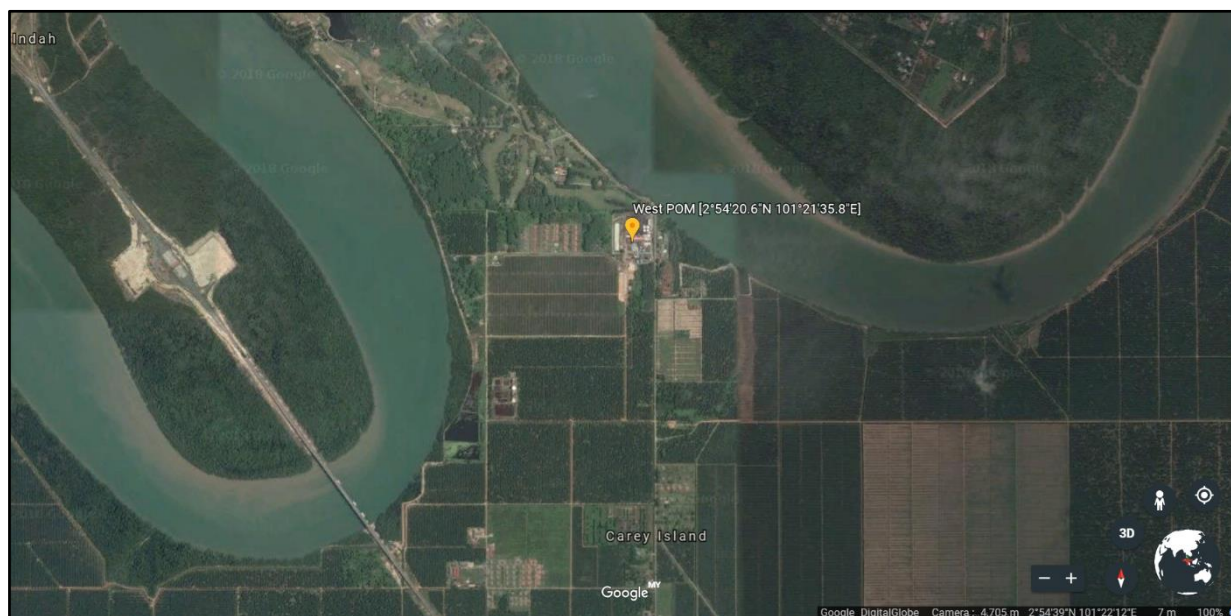
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C. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)				
Period: Feb 2018 – Dec 2018				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
N/A				

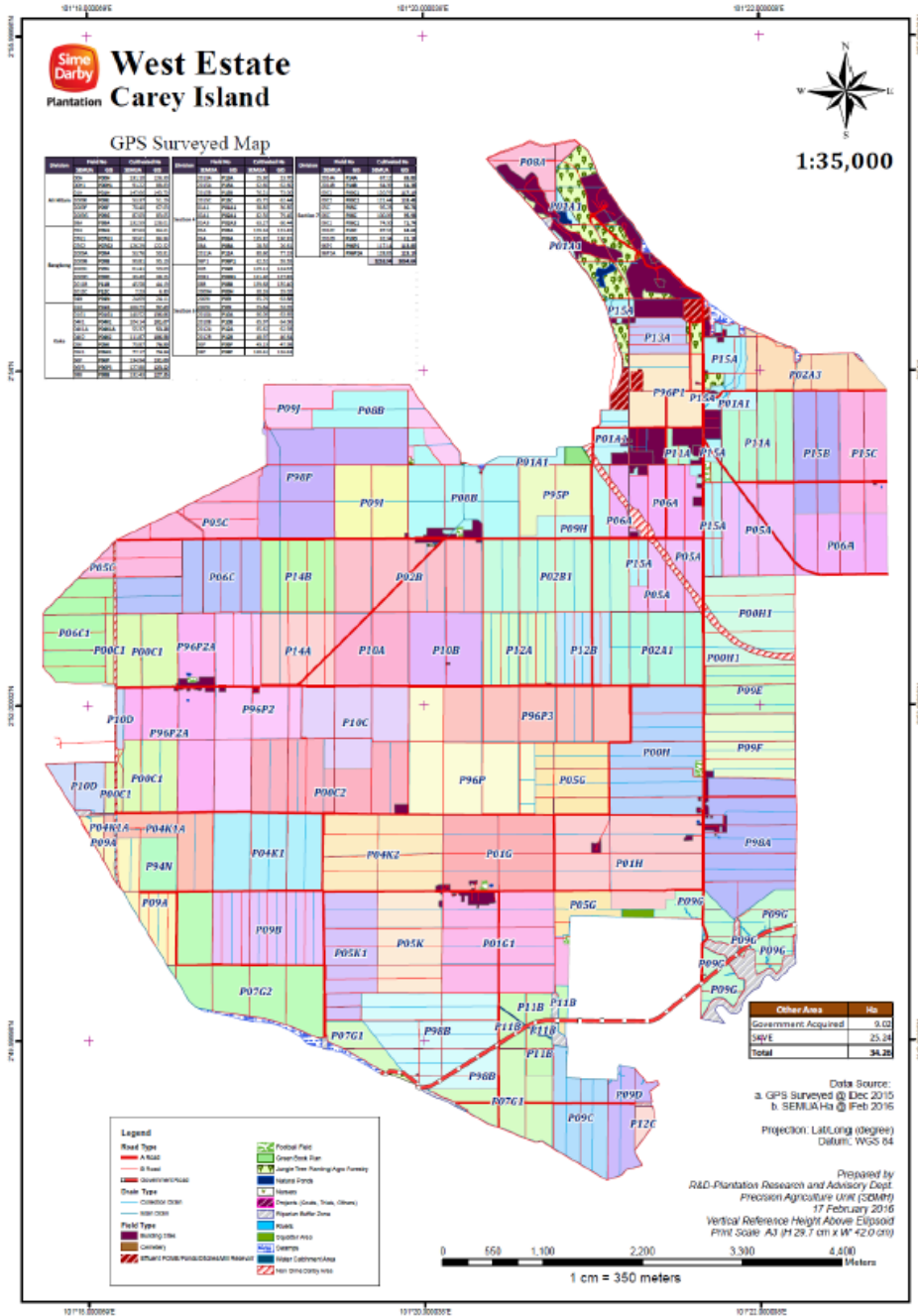
E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)			
Period: Feb 2018 – Dec 2018			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	HUP LEE	-	748.36
2	LEE OIL MILLS	-	199.14
3	SIN HUAT HIN	-	159.30
4	SANG KEE	-	99.30
5	SDP NURI	2,297.65	
6	BMD	257.39	-
7	MEWAH OILS	205.17	-
8	NCH O&F SEMYIH	252.37	-
Total		3,012.58	1,206.10

F. Records of Certified CPO & PK Sold under RSPO Credits to Buyers since the last audit (if any). Period: Feb 2018 – Dec 2018			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO or PK Sold (mt)
N/A			

Appendix F: Location Map West Palm Oil Mill Certification Unit and Supply bases



Appendix G: West Estate Field Map



Appendix H: List of Smallholder Sampled

Not applicable

Appendix I: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
BCE	Bukit Cheraka Estate
BKE	Bukit Kerayong Estate
BKPOM	Bukit Kerayong Palm Oil Mill
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
SOU	Strategic Operating Unit