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PUBLIC SUMMARY REPORT
ANNUAL SURVEILLANCE ASSESSMENT (ASA2)

SIME DARBY PLANTATION Sdn Bhd
Management Unit SOU20
Batu Pahat, Johor, Malaysia

Report Author

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SUMMARY

BSi Group Singapore Pte Ltd (BSi) has conducted the Annual Surveillance Assessment (ASA2) of Sime Darby Plantation Sdn Bhd Strategic Operating Unit SOU20 (SOU20) comprising Chaah Mill, supply base, support services and infrastructure. BSi concludes that SOU20 operations comply with the requirements of RSPO Principles & Criteria: 2007 ; MY-NI Indicators and Guidance : 2010; and RSPO Supply Chain Certification Standard : November 2011 for Palm Oil Mills – Module D: Segregation Mechanism.

BSi recommends the continuation of the approval of SOU20 as a producer of RSPO Certified Sustainable Palm Oil.

ABBREVIATIONS

AMESU	All Malayan Estates Staff Union
BOD	Biological Oxygen Demand
CDA	Controlled Droplet Application
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
FFB	Fresh Fruit Bunch
HCV	High Conservation Value
HIRAC	Hazard Identification Risk Assessment Control
MAPA	Malayan Agricultural Producers Association
MPOB	Malaysian Palm Oil Board
MY-NI	Malaysian National Interpretation
NUPW	National Union of Plantation Workers
OSHAS	Occupational Safety & Health Assurance System
OSH	Occupational Safety & Health
PK	Palm Kernel
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
R&D	Research and Development
SIA	Social Impact Assessment
SOP	Standard Operating Procedure

1.0 SCOPE OF SURVEILLANCE ASSESSMENT

1.1 Identity of Certification Unit

The SOU20 Chaah Mill and Estates are located at Batu Pahat, Johor (Figure 1). Additional maps showing details of Chaah, North Labis and Sungai Simpang Kiri Estates are also included (Figures 2, 3 and 4). The GPS location of the Mill is shown in Table 1.

Table 1: Mill GPS Location

MILL	LONGITUDE	LATITUDE
Chaah (30t/hr capacity)	102°59' 47.6772"	2°10' 40.8468"

1.2 Production Volume

The production tonnages for CPO and PK for the period from the start of the Certificate (18/11/2010), for the 12

months previous to ASA2 (01 July 2011 – 30 June 2012) and projected for the next twelve months are listed in Table 2.

Table 2: Production Tonnages

Chaah Palm Oil Mill	CPO	PK
Estimate at Certification	22,378**	7,362**
ASA1 Actual 18/11/11 – 17/11/12	27,996**	6,598**
ASA2 Actual 01/07/11 – 30/06/12	22,993* 22,942**	5,197* 5,186**
ASA2 Projected 01/07/12 – 30/06/13	22,854**	5,128**

* Includes Outside Suppliers tonnages

** = Certified Production

1.3 Certification Details

Sime Darby RSPO Membership No: 035-04(O)
BSi RSPO Certificate No: SPO 548299
Initial Certification Assessment: 26, 27 & 29 June 2009
Date of Certification: 18 November 2010

1.4 Description of Supply Base

The Chaah Mill supply base is FFB from the three company owned Estates, Chaah, North Labis and Sungai Simpang Kiri. The FFB production from Company owned Estates for the Initial Certificate and actual production for the 12 months previous to ASA2 are listed in Table 3, together with the projection for the next year. In December 2011, a small tonnage of crop from an FFB Trader was diverted from Yong Peng Mill to Chaah Mill. This has been excluded from the 2011/12 Certified production and in future Chaah Mill will process only FFB from Sime Darby Estates.

Table 3: FFB Tonnages Processed

Source	Estimate at Initial Certification	Actual 01/07/11 – 30/06/12	Projected 01/07/12 – 30/06/13
SOU20 Estates			
Chaah	63,938	64,690	7,417
North Labis	37,101	9,569	0
Sg Simpang Kiri	-	31,075	30,880
Sub total	101,039	105,334	106,297
Adjacent Sime Darby Estates			
Welch	-	1,767	-
Yong Peng	-	399	-
Sub total	-	2,166	-
FFB Trader*			
Yong Peng River	-	235	-
TOTAL	101,039	107,735	106,297

* The production from the FFB Trader is excluded from the SOU20 Certificate

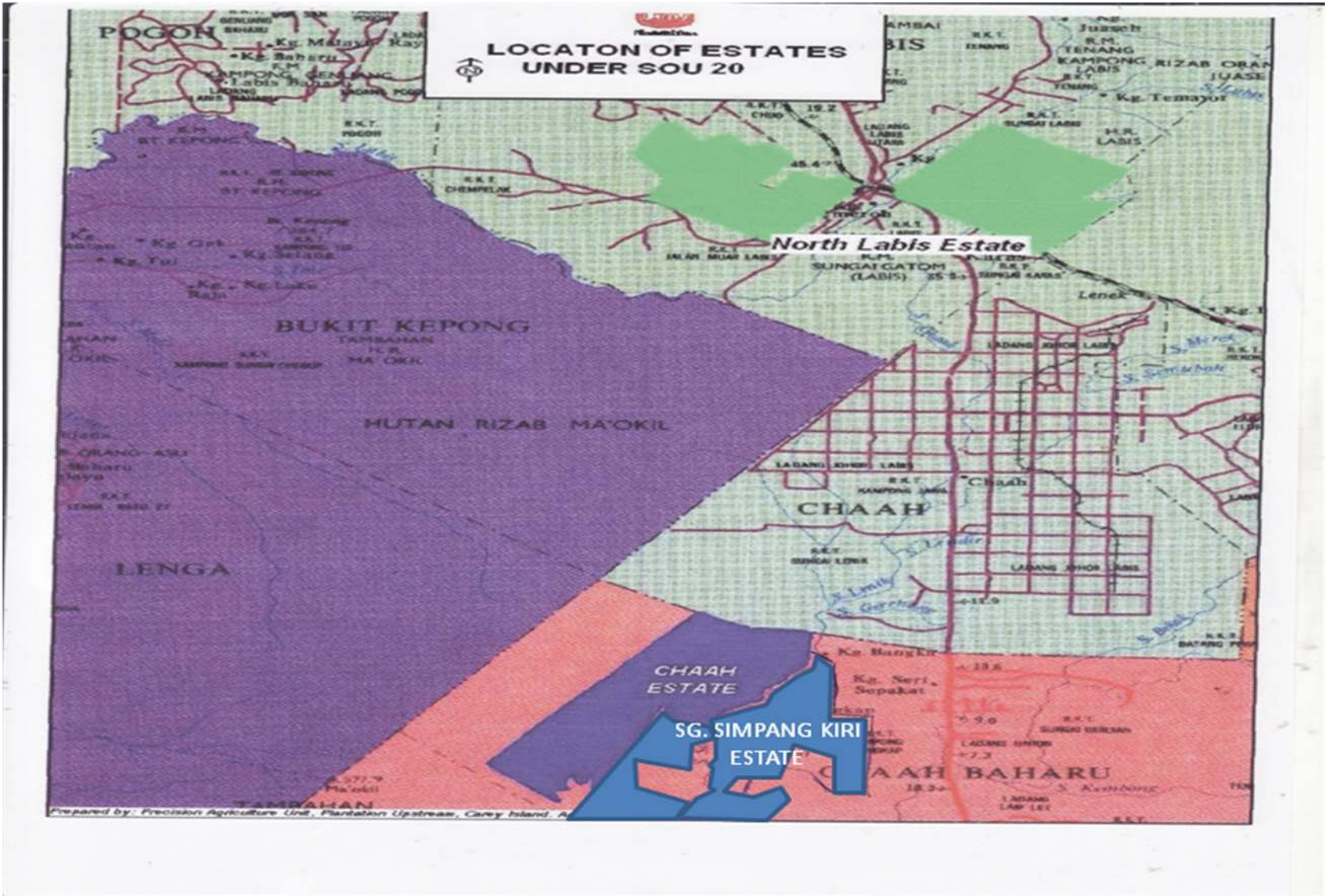


Figure 1: SOU20 Location Map

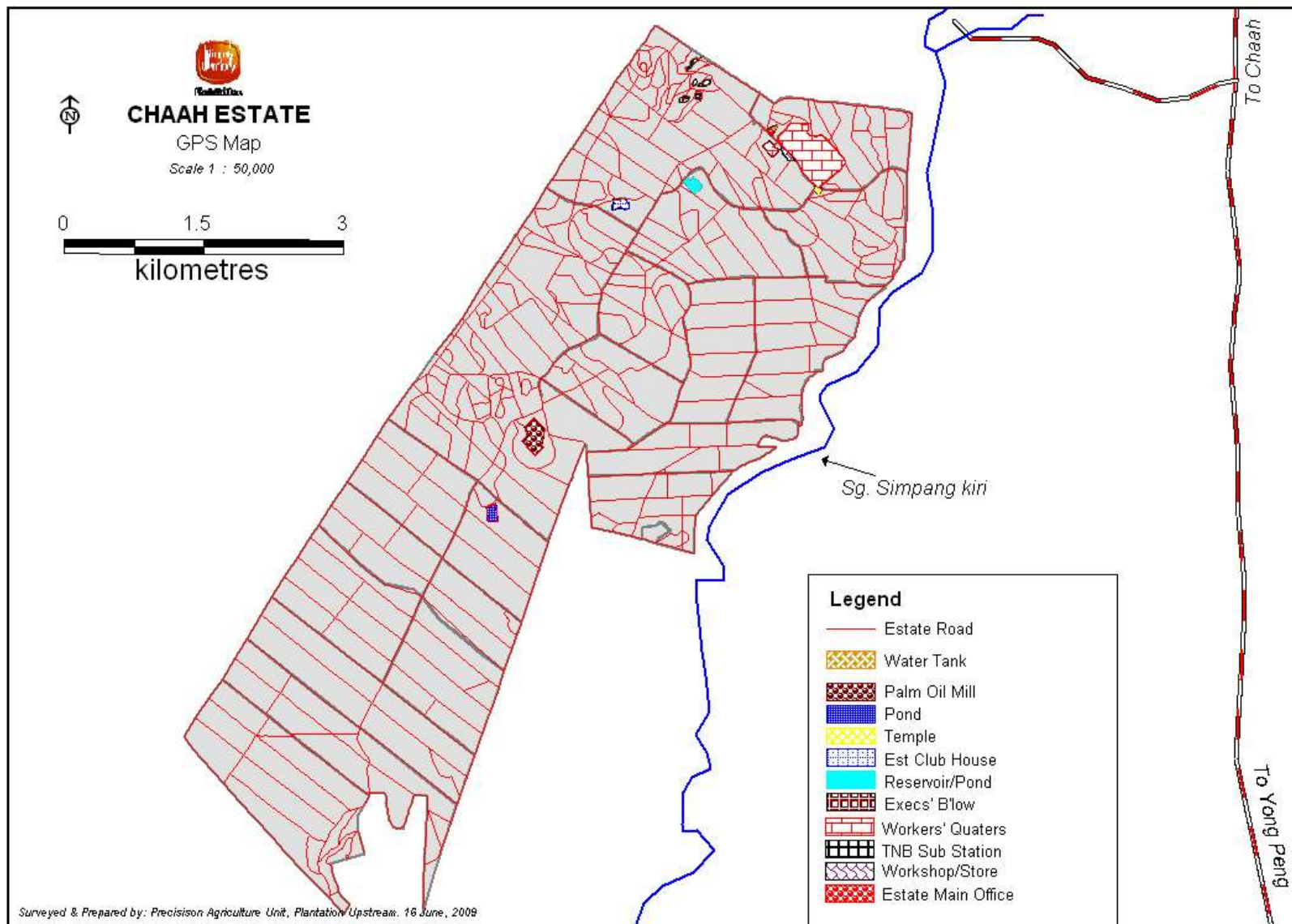


Figure 2: Chaah Estate Layout

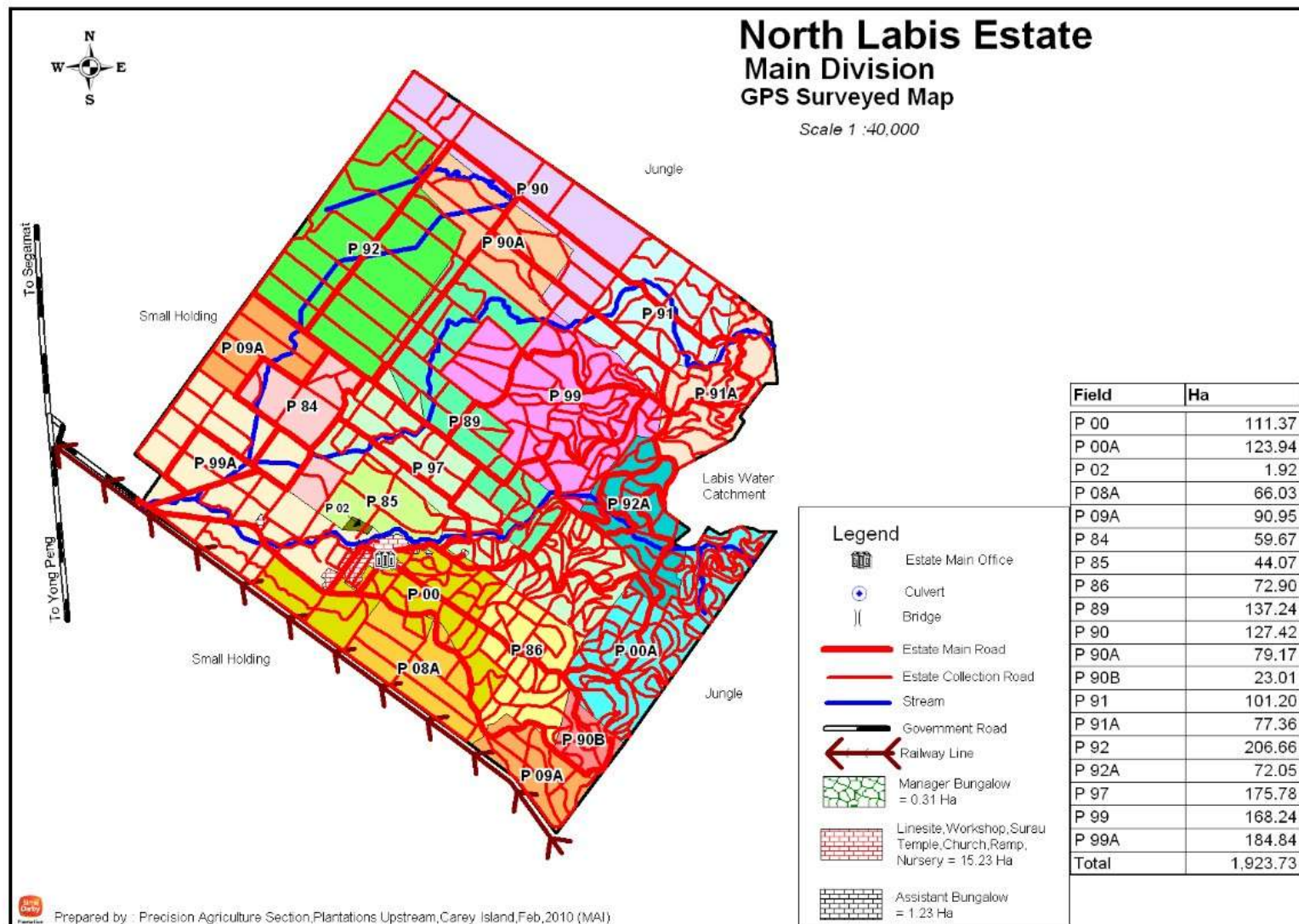


Figure 3: North Labis Estate Layout

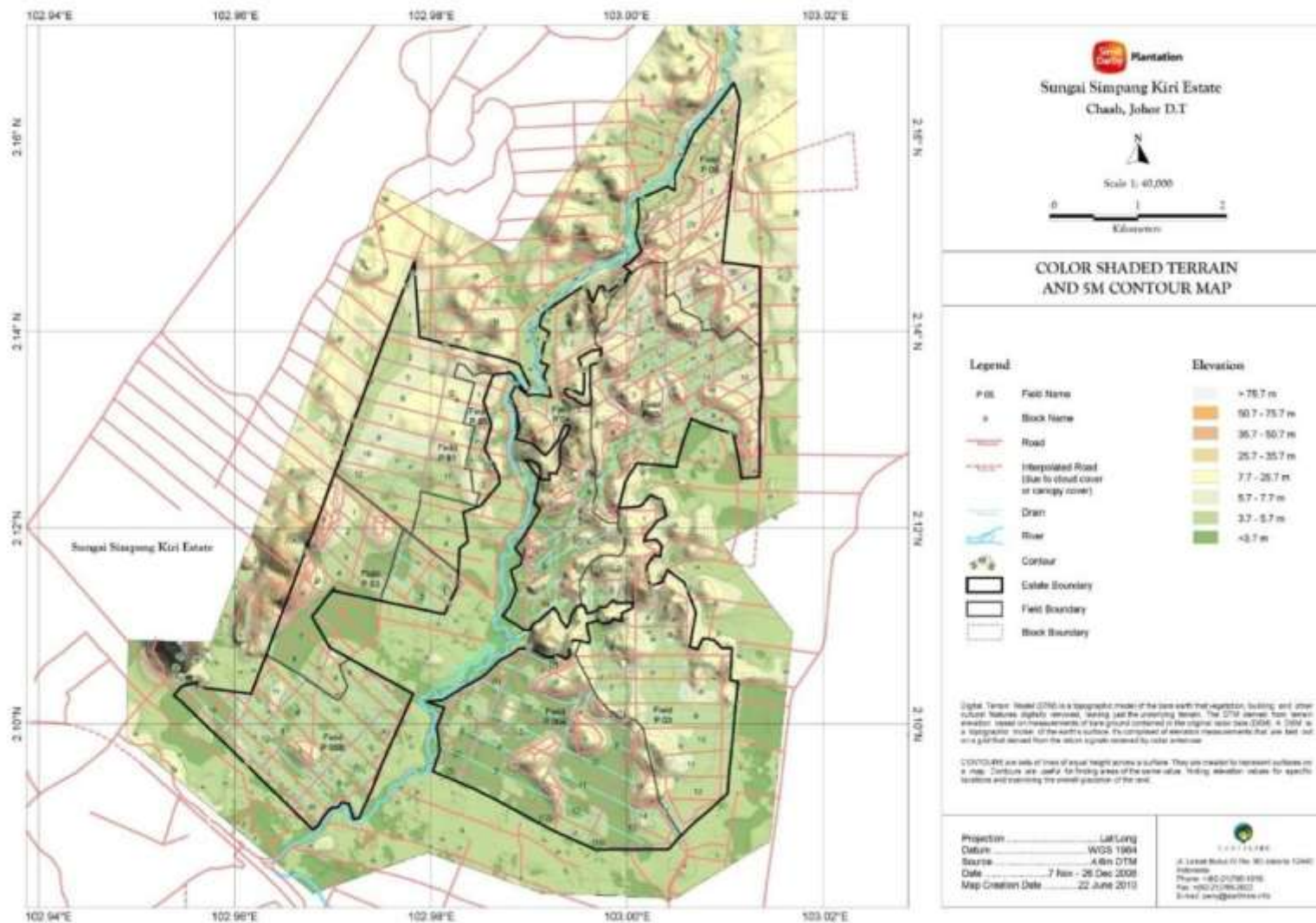


Figure 4: Sungai Simpang Kiri Estate Layout

The SOU20 Estates were developed in 1974 (Chaah) and 1911 (North Labis). Oil palms were first planted in the 1960s at North Labis and are in their third cycle and at Chaah palms are in their second cycle. The age profile of the palms is shown in Table 4a. North Labis Estate is being replanted and 20% of the palms are less than 5 years old and have not yet reached peak production. At Sungai Simpang Kiri Estate almost half of the palms have just reached maturity.

Table 4a: Age Profile of SOU20 Palms

ESTATE	AGE (years)	% PLANTED AREA
Chaah	21 – 30	0.2
	11 – 20	36.4
	4 – 10	62
	0 – 3	1.4
North Labis	21 – 30	14
	11 – 20	51
	4 – 10	24
	0 – 3	11
Sungai Simpang Kiri	21 – 30	11
	11 – 20	29
	4 – 10	48
	0 – 3	12

The areas planted are shown in Table 4b.

Table 4b: SOU20 Estates and Areas Planted

Estate	Mature (ha)	Immature (ha)	TOTAL
Chaah	2,648	37	2,685
North Labis	2,975	381	3,356
Sungai Simpang Kiri	1,742	236	1,978
OVERALL TOTAL	7,365	654	8,019

Supply Chain

SOU20 has used the mass balance mechanism for the supply chain since Initial Certification. However, SOU20 has processed only certified FFB since Initial Certification, except for one small consignment of 235 tonnes from an FFB Trader in December 2011. Sime Darby has decided SOU20 will process only certified FFB sourced from company owned estates and will now use the segregation mechanism for the supply chain. All deliveries of FFB to the Mill are issued with a weighbridge docket that records the details of the supplier, truck registration number, driver's name and the tonnage. Sime Darby Commodities Trading Marketing Department, located at Head Office, manages all of the purchases of crop and sales of product. The system is computerised and when the Mill inputs the code for a Buyer, the RSPO Supply Chain information is

generated automatically for the despatch note and the sales invoice. During the previous 12 months there was no sale of either Certified Sustainable Palm Oil (CSPO) or Certified Sustainable Palm Kernel (CSPK) from Chaah Mill. Inspection of documents confirmed that SOU20 maintains all of the applicable documentation required for verification of implementation of the RSPO Supply Chain Certification Standard : November 2011, Palm Oil Mills - Module D: Segregation Mechanism – Refer to Appendix A for details.

1.5 Progress against Time Bound Plan

Sime Darby Time Bound Plan (updated July 2012) is included as Appendix B. Sime Darby has achieved RSPO Certification of all 39 of the Strategic Operating Units (SOU) in Malaysia, and 16 of the 23 in Indonesia. Sime Darby has completed the Initial Certification Assessments for the remaining 7 SOUs in Indonesia and the assessment reports are pending review by the RSPO. Upon certification of the remaining 7 SOUs, Sime Darby will have achieved the Time Bound Plan. Effective from July 2012, Sime Darby has closed Jeleta Bumi and Mostyn Mills and converted Sepang Mill to third party operation, which reduces the number of SOUs in Malaysia to 36.

BSi has continued involvement with assessments of 13 of the Sime Darby SOUs during the 2011/12 period. During this time, Sime Darby has kept BSi informed of issues and claims made against them. The issues raised previously by Serikat Petani Kelapa Sawit (SPKS) in Sanggau District Indonesia in relation to plasma smallholders' claims against PTMAS were followed up between 07 and 09 August 2012. Information indicated the status quo has been maintained and PTMAS has continued to address the issues applicable to its operations.

At the time of preparation of this Report, BSi is not aware of:

- (1) any unresolved significant land disputes that are not in a process of resolution;
- (2) any replacement of primary forest or loss of HCVs;
- (3) any labour disputes that are not being resolved through an agreed process;
- (4) any evidence of noncompliance with any law at any of the landholdings.

BSi considers that Sime Darby meets the RSPO requirements for Partial Certification.

1.6 Progress of Associated Smallholders/ Outgrowers towards RSPO Compliance

Chaah Palm Oil Mill does not plan to process any crop from Smallholders or Outgrowers.

1.7 Organisational Information / Contact Person

Sime Darby Plantation Sdn Bhd
Management Unit SOU20
Batu Pahat Johor
MALAYSIA

Contact Person: Mr Azhanizan Bin R Deni
Senior Assistant In Charge
Chaah Palm Oil Mill
Phone: +60 07-934 2454
Fax: +60 07-934 1455
Email: chaah.mill@simedarby.com

2.0 ASSESSMENT PROCESS

2.1 Assessment Team Members

Charlie Ross – Lead Assessor RSPO

B.App.Sc. M.Sc (Env.Studies)

Lead Auditor EMS RABQSA Cert N^o14370

Topics assessed: Legal, Environment, Agricultural Practices, Social, Sustainability

Iman Nawireja – Assessor RSPO

B.Ag.Sc. M.Sc. (Comm)

Topics assessed: Legal, Environment, Agricultural Practices, Social, Sustainability

Robyn Ross – Social Assessor RSPO

Topics assessed: Legal, Social, Women and Families, Sustainability

Noryati Hambali – Facilitator (Women and Families)

2.2 Assessment Programme

The ASA2 was carried out 11–12 July 2012. The Assessment Programme is included as Appendix C.

The Programme included assessments of Chaah Palm Oil Mill, Chaah and North Labis Estates against all of the RSPO P&C and applicable RPSO indicators, and Supply Chain Standard : 2011 for Segregation Mechanism. The Estates were selected for assessment on alternate years.

The Nonconformities that were assigned (CR01 – CR04) during previous assessments and the Observations that were identified during ASA1 were followed up to check the effectiveness of corrective actions – refer Section 3.3 Page 16.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interview of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Checklists and questionnaires were used to guide the collection of information.

This report is structured to provide a summary for each Principle, together with details for selected indicators. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

Mr Aryo Gustomo, BSi RSPO Scheme Manager, has reviewed this report for conformance with BSi Procedures and the RSPO Certification System requirements.

2.3 Stakeholder Consultation

Internal and external stakeholders were consulted to obtain their views on SOU20 environmental and social performance and any issues of concern that they may have. External stakeholders were interviewed at their premises where practical or they were invited to the Mill or the Estate. Internal stakeholders were interviewed in groups in the workplace or at their housing. Company officers were not present at any of the meetings. A list of stakeholders contacted is included at Appendix D.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Findings

Nonconformities were assigned against Major Compliance Indicator 5.2.2 (CR05) and Minor Compliance Indicators 5.2.3 (CR06) and 6.1.3 (CR07). Eight (8) Observations/Opportunities for improvement were identified. SOU20 prepared a Corrective Action Plan for addressing the identified Nonconformities, which BSi reviewed and accepted. Refer Section 3.2 Page 14 for details of Nonconformities and Corrective Actions.

Review of the Nonconformities assigned during previous Assessments (CR01 – CR04) found the corrective actions were being effectively and consistently implemented and the nonconformities remain closed. The eleven (11) Observations/Opportunities for Improvement identified during ASA1 were followed up to check the effectiveness of corrective actions. Refer Section 3.3 Page 16 for details.

BSi recommends continuation of Certification for SOU20 as a producer of RSPO Certified Sustainable Palm Oil.

PRINCIPLE 1: Commitment to Transparency

SOU20 has maintained the filing system for documentation and has kept policies and other information available on request. Requests for information, for example, from the MPOB have been responded to and records were available for inspection during the site visit.

Criterion 1.1: Oil palm growers and millers provide adequate information to other stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages & forms to allow for effective participation in decision making.

The Mill and Estates maintain a filing system for requests for information received from Government and other stakeholders. Review of the files showed that the requests for information are mainly from MPOB, such as

a “Cost Survey” received 06 April 2012 and replied by the Mill on 21 May 2012.

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.

The Mill and Estates have maintained copies of all of the documents listed under Criterion 1.2 and these are publicly available upon request, in accordance with Sime Darby policy.

PRINCIPLE 2: Compliance with Applicable Laws and Regulations

Inspection of records and documents confirmed all of the SOU20 licences were current. Compliance with legal requirements was confirmed by review of records and examination of reports on internal audits of the SOU20 Mill and Estates, such as Environmental, Factories and Machinery and Labour Laws. The BOD of treated mill effluent and the smoke density of gaseous emissions from the mill boiler were consistently within the licence limits, as confirmed by laboratory tests and those done independently by consultants. Checks of a sample of pay records and interviews of staff and workers showed compliance with Labour Laws. The Estates are on Government leased land and there were no disputes over land ownership.

Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.

Legal compliance was assessed by examining a sample of records, documents and reports and inspection of facilities and processes. Examples of documents are listed below.

Laboratory analyses of monthly samples of treated Mill effluent confirmed the BOD content meets licence requirements for land application for the previous twelve months (Figure 5).

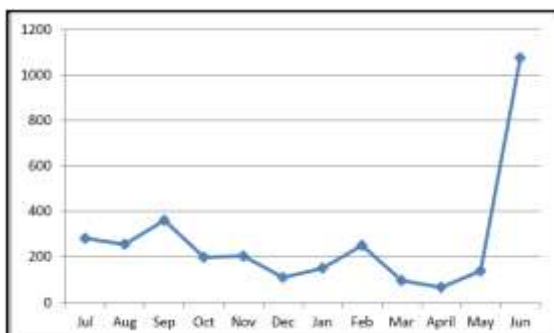


Figure 5: BOD (mg/L) of Treated Mill Effluent July 2011 – June 2012

The maximum BOD during the previous year was 1,025 mg/L recorded in June 2012, which is significantly less than the limit for land application of 5,000 mg/L. Mill boiler emissions were tested by PAC Testing &

Consulting Sdn Bhd 21 February 2012 (Report PAC-AE-120217) and the level of dust particulate was within compliance with Regulation 25 of the Malaysian Environmental Quality (Clean Air) Regulations, 1978. The Mill is linked to the DOE via the continuous emissions monitoring system. Review of data indicated compliance with the smoke emission limits. The smoke density meter was calibrated by ST Tech Engineering Sdn Bhd on 11 June 2011, (Service Report No 8757).

The Mill and Estates hold copies of licences for plant and equipment, for example, Boiler Number 1 Certificate expiry 25 December 2012. Copies of licences for drivers, boiler attendants and engineers are held on personnel files.

The Mill has an approval letter from Labour Department dated 22 November 2010 for extension of overtime hours current to 30 November 2013. Inspection of a sample of Mill and Estates pay records confirmed overtime hours were within the approved limit. Pay records also confirmed pay and conditions complied with employment terms and conditions current at the time of the Assessment visit.

The Mill collected samples of raw water from the reservoir in January 2012 and of treated drinking water from the housing and the report by Nalco Analytical Resources (Report No 536388) confirmed the results for physico-chemical quality were in compliance with the Malaysian Drinking Water Quality Standard. The treated water supply was sampled for microbiological testing on 10 April 2012 and the results (Test Report No ML122/12) confirm compliance with the Malaysian Drinking Water Quality Standard.

The Mill and Estates hold a legal register that lists the legislation and Permit requirements and conditions for OSHAS, Environment and Labour. In addition, the Mill and Estates hold copies of the applicable legislation.

The most recent DOSH visit to the Mill was on 28 March 2013 for inspection of Boiler #3 and noted “all safety devices were in good condition and well serviced”. The DOE visit on 19 December 2011 did not identify any significant issues requiring corrective action. The DOE Licence No 002153 is current to 30 June 2012 and includes desludging of an effluent pond.

Criterion 2.2: The right to use the land can be demonstrated and is not legitimately contested by local communities with demonstrable rights.

The Estates are on Government Leased land and the SOU20 operations are consistent with the terms of the land titles, which is for oil palm.

Inspection of a sample of boundary stones at Labis (for example Block 92A Stone No 3502) and Chaah Estates confirmed that these have been marked clearly with a red and white post and were being maintained.

Inspection of records and interview of local kampung representatives indicated that there are no current or recent land disputes.

Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users without their free, prior and informed consent.

All of the Estates operations are on Government Leased land. The Estates do not restrict access by smallholders or the public to the land, except for the transport of FFB. SOU20 allows smallholders to graze their cattle within the oil palms of the Estates near their smallholdings.

PRINCIPLE 3: Commitment to Long Term Economic and Financial Viability

SOU20 has continued to improve the palm yields through the rehabilitation programme at Sg Simpang Kiri and implementation of better field practices at Chaah Estate. The Mill has achieved OER of 21.3% over the 2011/12 year by means of improved FFB quality and better operational control in processing.

Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.

The Estates and Mill have Annual Operational and Capex Budgets that are projected for the next four years – 2011/12 though to 2014/15. The budgets include performance objectives and targets related to production, efficiency and quality.

The average annual FFB yield (Figure 6) is very low for Sungai Simpang Kiri Estate that was explained as due to the low density of palms following flood damage that occurred in 2007. SOU20 is rehabilitating the areas to improve yield. In contrast, the average yield at Chaah Estate was 25.7 t/ha/year in 2011/12, while at North Labis yield declined slightly due to soil moisture deficit on the hilly areas. The Plantation Advisor has recommended the implementation of additional water conservation practices for these areas.

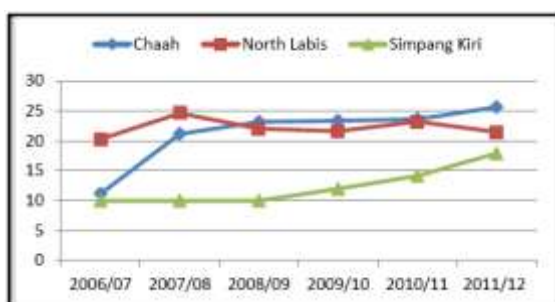


Figure 6: Average Annual FFB Yield (t/ha/yr) 2006 – 2012

The Mill OER (Figure 7) shows a sharp rise in efficiency in 2008/09 when Sime Darby took over the management of SOU20 and changed the FFB ripeness standard and provided high emphasis on FFB quality, timely evacuation of the crop and loose fruit collection. The mill achieved an OER of 21.31% over the 2011/12 year, against a target of 21.6%.

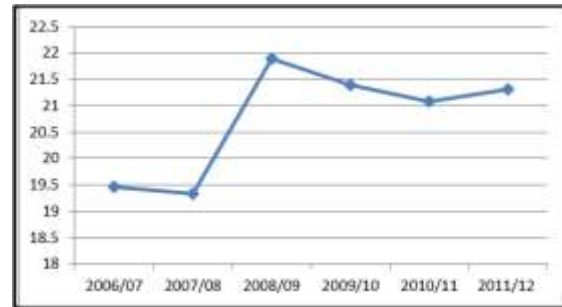


Figure 7: Average Annual OER (%) 2006-2012

PRINCIPLE 4: Use of Appropriate Best Practices by Growers and Millers

The Mill and Estates have continued to work towards consistent implementation of the Sime Darby Policies and SOPs for best practices. The Mill Advisor and the Estate Advisor programmed visits provide review of environmental and production performance and recommendations for improvement.

Overall, field practices were well implemented and FFB yields have increased at Sungai Simpang Kiri and Chaah Estates. The replanting programme at North Labis appeared to have appropriate practices implemented consistently for terracing, groundcover establishment and riparian buffer zone set-asides. Worker health and safety continued to be given appropriate priority and resources for training and implementation.

Criterion 4.1: Operating procedures are appropriately documented and consistently implemented and monitored.

The Mill has maintained and holds a copy of SOPs issued 1 November 2008 covering all work stations. In addition, the Mill has prepared Work Instructions in Bahasa Malaysia, which are displayed at each work station.

The Estates holds copies of the Sime Darby SOPs issued 2008 and have translated selected SOPs, such as harvesting and field upkeep, into Bahasa Malaysia.

The Mill Advisor visits approximately quarterly, with the most recent visit 18-20 June 2012. The issue raised in 2011 for the need to de-sludge two of the effluent ponds has been carried out. The Estate Plantation Advisor's most recent visit to SOU20 Estates was in May 2012. The Estate Managers have responded to issues raised in the Advisor's reports.

Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.

Sime Darby Agronomy Section of R&D Department carried out annual inspection of the palms and leaf sampling at the SOU20 Estates in July 2011 to monitor nutrient status and to recommend the annual fertiliser program for 2011/12. The Agronomists are due to visit over the next month to formulate the 2012/13 fertiliser programme.

Criterion 4.3: Practices minimise and control erosion and degradation of soils.

Erosion control practices are documented in the Sime Darby Agricultural Reference Manual. At Chaah Estate, all of the land is flat except for 4% of the area, which is hilly. North Labis Estate has terracing on approximately 30% of the area. Inspection confirmed erosion control practices were implemented, including U-shaped stacking of pruned fronds, silt pits and terracing of slopes.

Groundcover vegetation generally was adequate at the Estates. Inspection of field conditions and spraying at North Labis Blocks 2000A and 97A indicated the incorrect technique was being used when operating CDA sprayers. The Plantation Advisor has recommended cessation of using CDA spray equipment at some locations. **Observation 01** – *Inspection of field conditions and spraying at North Labis Block 2000A indicated the incorrect technique was being used when operating CDA sprayers, which may negatively affect groundcover – refer Section 3.2 Page 15.*

Criterion 4.4: Practices maintain the quality and availability of surface and groundwater

Inspection of North Labis Block 1990A showed the buffer zone that will be set aside at replanting in 2015, was appropriately demarcated and groundcover vegetation was well established. The Mill collects water samples quarterly upstream and downstream of the Mill. The most recent samples were collected 05 April 2012 and the results (Report No IE 315/2012) indicated no significant difference in water quality parameters between upstream and downstream sites.

The Mill average annual water usage (Figure 8) remained high at 1.6 t/t FFB in 2011/12. The mill identified the cause of high usage was due to excessive use of water for daily cleaning floors. Despite efforts and awareness to workers, there was significant response to stop using water for cleaning. In June 2012, a new Manager was appointed to the mill and has advised workers they will be subject to disciplinary action if they do not reduce water usage. This had an immediate effect and usage for the month decreased by approximately 20%.

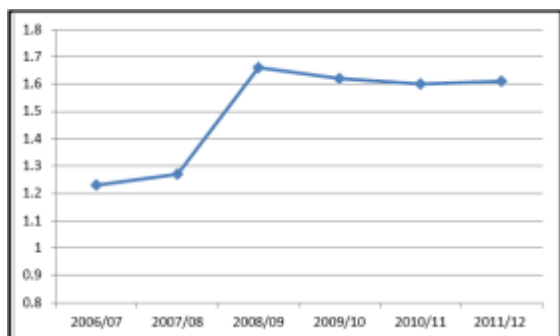


Figure 8: Annual Mill Water Usage (t/t FFB) 2006-2012

Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

SOU20 has continued expanding the plantings of beneficial plants along roadsides with *Turnera subulata*, *Cassia cobanensis* and *Antigonon leptopus* well established. The Estates also have installed Barn Owl boxes and the twice-yearly census at North Labis, for example, showed 56% occupancy.

Criterion 4.6: Agrochemicals are used in a way that does not endanger health or the environment. There is no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. Where agrochemicals are used that are categorised as World Health Organisation Type 1A or 1B, or are listed by the Stockholm or Rotterdam Conventions, growers are actively seeking to identify alternatives and this is documented.

The quantity of pesticide and treatment required is documented in Section 16-5 of the Sime Darby Agricultural Reference Manual. The Estates have displayed at the pesticide mixing area the quantity of pesticide to be measured for each spray application.

Inspection of the Pesticides Stores and records confirmed only pesticides are used that are registered by the Pesticides Board.

Inspection of the Pesticide Stores confirmed the storage meets regulatory requirements, for example, security, ventilation, signage, lighting, spill containment, separation and labeling of chemicals.

Labelling of all chemicals and Work Instructions is in Bahasa Malaysia. Work Instructions are displayed at the pesticide storage and use areas.

The sprayers undergo monthly medical checks at the Estates clinic. CHRA annual medical surveillance was carried out by a DOSH registered doctor, for example, North Labis 11/02/12 for 12 pesticide operators at Klinik Segamat Johor (Dr Ling Kay Kwong). Inspection of records confirmed all operators were fit to work with pesticides.

Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented.

The Health and Safety Policy signed by Top Management 1 April 2008 was displayed in Mill and Estates Offices.

The HIRAC that was previously prepared in 2008 was reviewed for the Fruit Handling, Steriliser and Threshing Stations Section tasks in November 2011. The review did not identify any changes to the risks. The Estates also have reviewed the HIRAC, for example North Labis in July 2011, with two additional tasks risk-assessed.

The Mill Safety Training Programme is documented to show the schedule of training topics, such as fire fighting, fire drill and first aid. The Estates have a

programme for scheduling of training awareness topics each month for the 2012/13 year.

The Mill maintains records of Safety Training, for example 5 Mill staff attended Fire Drill Training on 19 March 2012 at Sungai Simpang Kiri. Records of Mill training and interview of workers indicated understanding of safety. The Estates holds records of training including the topic, attendees and signatures, for example, training for 7 sprayers conducted on 27 June 2011 at North Labis Field Block 98A for demonstration of correct wearing of PPE and safe spray technique in the field.

Inspection of herbicide spraying confirmed sprayers were working safely and in accordance with product precautions.

The Mill standard PPE issue is safety shoes, helmet and hearing protection, with station specific issue of gloves, dust mask, eye protection and high visibility vest. Records are maintained of PPE issued to individuals including signature of recipient. The Estates issue to sprayers an apron, eye protection, respirator, gloves and rubber boots

Inspection of operational areas at the Mill and spraying and harvesting tasks in the field confirmed appropriate PPE was supplied and being worn correctly. **Observation 02** – *North Labis workshop oxy-acetylene safety goggles were damaged and unsuitable for use. When this was pointed out by the assessor, a replacement set was purchased immediately from the local hardware store – refer Section 3.2 Page 15.*

Observation 03 – *The following minor safety improvements were noted for the Mill: The Emergency Response Plan had not been updated to include recent (June 2012) management changes and revised list of Emergency Contacts; The oxy-acetylene pressure regulators were not fitted with “flash-back arrestors” – refer Section 3.2 Page 15.*

The Mill Supervisor is designated OSH coordinator. The Estates Field Supervisor is OSH Coordinator.

Records confirmed the Mill and Estates hold quarterly OSH meetings, for example, the Mill recently held an OSH meeting on 28 June 2012 with 19 attendees. Topics of discussion included safety inspection and issues related to various work stations. The Estates hold safety meetings quarterly with the most recent for North Labis Estate on 05 July 2012, attended by 21 persons including staff, workers and contractor representatives. Information from Safety Committee Meetings is communicated to workers at muster briefings.

The Mill and the Estates' Emergency Response Plans (2011/12) were reviewed 05 July 2011 and are based on the originals prepared in 2008 and include all of the required elements. An emergency evacuation fire drill was carried out at the mill in April 2012.

First Aid Training was carried out 22 June 2009 for 15 Mill Staff and Workers and 21 Chaah Estate staff and workers; and on 22 July 2011 by the Medical Assistant for 11 staff and mandores.

Inspection confirmed First Aid Kits were located at work stations, the supervisor's office and the maintenance workshop in the Mill and were appropriately stocked. The Estates have distributed First Aid Kits to Mandores and Supervisors.

Malaysian staff and workers are covered by SOCSO Insurance. Mill foreign workers are covered by RHB Insurance Berhad under a Master Policy current to 30 June 2013.

Criterion 4.8: All staff, workers, smallholders and contractors are appropriately trained.

The majority of training at the Mill and Estates is carried out informally by on-the-job instruction and briefing. The Mill and Estates Annual Training Plans have been revised for the coming year 2012/13 that lists the schedule of training. Records of all Mill and Estates training are maintained on file for individuals including topic and signature of attendees. For example, on 10 June 2012 training of harvesters, mandores, staff and executives was held at North Labis Estate to identify problems and implement corrective actions in harvesting operations.

PRINCIPLE 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity

SOU20 has revised the environmental aspects and impacts register with the main improvements targeting the reduction of water usage and non-renewable energy reduction. However there was inadequate revision of the HCV Management Plan and additional training is needed for the protection of fauna.

Waste management generally was well implemented with consistent recycling of palm by-products to the field. The small sanitary landfill at each Estate was appropriately managed and scheduled wastes were stored securely and sold to a licensed recycler.

The zero burning policy was consistently implemented at the North Labis replanting area and point sources of pollutants were well controlled.

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 continuous improvement.

The Mill and Estates have reviewed the environmental aspects and impacts register. Following the installation and operation of the new boiler, the decommissioning of the two small boilers has been recommended. The key issue at present is to reduce the usage of raw water in the mill and the Action Plan has been revised to address this. The Action Plan now focuses on the reduction of water usage for cleaning.

Criterion 5.2: The status of rare, threatened or endangered species and 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 their conservation taken into account in management plans and operations.

Field inspections confirmed that SOU20 has continued to maintain the HCV4 at riparian areas at both North Labis and Chaah Estates and the reinstated riparian corridor linking the adjacent Ma'okil Forest reserve and the Simpang Kiri River.

CR05 – Chaah Estate Conservation Action plan for 2010/2011 had been revised by including information from the HCV Management Plan. However, the subsequent Action Plan for 2011/2012 was inadequately prepared for the following reasons: it did not include update of the 2010/11 Actions; the person with responsibility was not assigned; and there was no target completion date. At North Labis, the Action Plan had been updated in June 2012, but there was inadequate description of the work carried out as evidence of implementation – refer Section 3.2 Pages 14/15.

Signs are posted at the entrance to the Estates warning of protection of HCVs and prohibiting hunting. **CR06** – Inspection of Chaah Estate housing found several cages of spotted dove, which were likely to have been captured in the field – refer Section 3.2 Page 15.

Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.

The Mill and Estates have implemented a Waste Management Action Plan, which details the action to be taken in relation to each type of waste generated and the person responsible. Inspection of the mill indicated solid wastes were well controlled, with appropriate facilities for temporary storage of processing by-products such as EFB, fibre and boiler ash. A scheduled waste store is appropriately designed for secure storage of spent lubricating oil, lead acid batteries and used chemical containers.

The Mill has engaged Kualiti Alam (DOE Licence Nos: 000211 – 000215) for collection and disposal of scheduled wastes. The Mill and Estates maintain records of scheduled waste consignments, for example, scheduled waste was sent to Kualiti Alam on 22 July 2011, Serial#090914-006, vehicle registration#JEN5169 refers.

Medical wastes from the North Labis Clinic is transferred to the Labis government clinic and records were available confirming receipt. **Observation 04** – At Chaah Clinic a quotation has been accepted for Pantai Medivest (18/07/2011) to collect Clinic wastes, but no collection has occurred to date. Used “sharps” continue to be stored in appropriate containers. The Estate has arranged with the Visiting Medical Officer to collect and transfer the clinic wastes to his registered Clinic for disposal to a registered Scheduled Waste Facility – refer Section 3.2 Page 15.

The Mill and Estates maintain records of monthly scheduled waste stocktakes and copies are held of the manifests for collection of scheduled wastes. Materials

that are not suitable for recycling or re-use are disposed in a small, purpose-built landfill at each Estate. **Observation 05** - At North Labis Estate, the landfill was appropriately located at a disused quarry, but could be improved by installing an earthen bund to prevent rainfall runoff from entering the trench – refer Section 3.2 Page 15.

Inspection confirmed the landfills were appropriately located and well maintained, consistent with municipal landfill requirements, with a cover of soil placed on recently disposed waste. **Observation 06** – Chaah housing area was very neat and tidy but rubbish has been discarded in a small area in the adjacent palms by the roadside. When this was pointed out the Estate cleared the area immediately – refer Section 3.2 Page 15.

The Mill keeps records of the quantities of crop residues transferred to the Estates (EFB, Boiler Ash and POME) and applied to the palms. **Observation 07** – The small drain adjacent to Boiler #3 had evidence of ash entering the drain with rainfall runoff. Protection of water quality could be improved by preventing runoff from entering the drain and/or installing a sediment trap on the drain – refer Section 3.2 Page 15.

The Estates maintain a programme for EFB application and records on a map the areas receiving material. POME is recycled to the field at Chaah Estate using a system of furrows for land application.

Observation 08 – At North Labis Estate workshop, the drain in front of the workshop has inadequate capacity for collection of runoff and transfer to the pollution control device – refer Section 3.2 Page 15.

Criterion 5.4: Efficiency of energy use and use of renewable energy is maximised.

The mill continued to report renewable and non-renewable energy usage to Head Office on a monthly basis (Figure 9). The mill installed a new large capacity (1.2MW) steam turbine in January 2012. The use of non-renewable energy remained elevated due to the low utilisation of the mill. This is expected to change when FFB supply from North Labis is reinstated to the Mill.

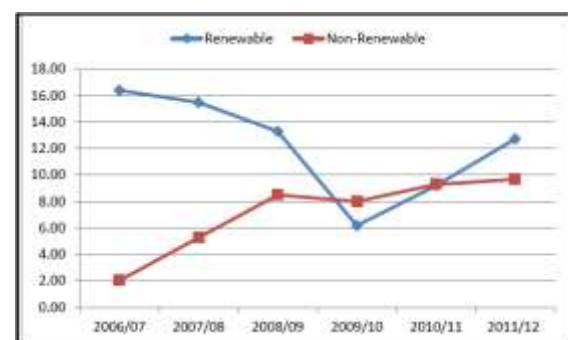


Figure 9: Mill Energy Use (kWh/t CPO) 2006 – 2012

Criterion 5.5: Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situation, as identified in the ASEAN guidelines or other regional best practice.

SOU20 has adopted the Sime Darby Policy on zero burning. Inspection of the replanting area at North Labis confirmed that the felled palms and boles had been chipped for mulch. Inspections of workplaces at the Mill and Estates and housing areas did not find any evidence of fire being used for waste disposal.

Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.

The mill has continued to operate with boiler smoke emissions within the Malaysian environmental quality limits. The mill has targeted the reduction of water usage, which in turn will reduce the quantity of wastewater requiring treatment and disposal.

The Estates Pollution Prevention Plan continues to focus on control of point sources of pollution to ensure the control systems are maintained. Prevention of soil erosion and discharge of sediment in rainfall runoff also is a priority.

PRINCIPLE 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers

SOU20 has maintained the system of open communications with its employees and the local community representatives. The company has continued to operate the Joint Consultative Committee for meetings with worker representatives. The system for addressing complaints and grievances appeared to be effective and requests for housing repairs continued to dominate the register.

The company' pay and conditions for staff and workers were consistent with Labour Laws. Interviews of staff and workers did not identify any incident relating to discrimination or minimum age of workers. The company has a good relationship with contractors and the local community.

Criterion 6.1: Aspects of plantation and mill management, including replanting, that have social impacts 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 continuous improvement.

The SIA document was reviewed, but no amendments were made as the operations have remained largely unchanged.

CR07 – The Social Action Plans had not been reviewed or updated at either the Mill or the two Estates visited. Meetings had been held with some stakeholders, but not specifically for the purpose of receiving input on social issues and these were not documented – refer Section 3.2 Page 15.

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.

Interviews of stakeholders indicated they had open communications with the Mill and Estates. Records were maintained of communications via letters and e-mails.

Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all parties.

SOU20 has maintained the system for recording complaints and grievances. The majority of complaints relate to requests for repairs to the housing and these were being addressed.

Criterion 6.4: Any negotiations concerning compensation for loss of legal or customary 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.

All of the land is freehold title held by Sime Darby and there has not been any claim made in relation to land.

Criterion 6.5: Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.

Pay and conditions are documented in MAPA/AMESU Agreement and MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement. Interview of workers (local and foreign) confirmed their understanding of pay and conditions of employment.

Children travel by private bus to local schools (primary Taman Desa Temu Jodoh approximately 7 km) and (secondary Chaah approximately 18 km) and the company subsidises 50% of transport costs. Staff, Workers and their families receive free medical treatment at the company clinics. Sime Darby provides a Crèche free for staff and worker children. Electricity is from the Government supply and provided to all houses. Water is provided and treated by the company and supplied to all houses at no cost.

Criterion 6.6: The employer respects the right 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.

SOU20 recognises the rights of workers to be members of a union. The Mill has a Joint Consultative Committee where workers representatives are members. Minutes of meetings are available and include the attendance list and topics discussed.

Criterion 6.7: Children are not employed or exploited. Work by children is acceptable on family farms, under adult supervision, and when not interfering with education programmes. Children are not exposed to hazardous working conditions.

The minimum working age is 18 under the Labour Ordinance. Inspections and checks during the ASA2 did not find any under-age worker or children at workplaces in the Mill and the Estates.

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.

The Social Policy that was approved by Top Management in April 2008 includes a statement on anti-discrimination and is displayed at Mill and Estates Offices and on notice boards at muster areas. Interviews of Staff and Workers and inspection of a sample of pay records during ASA2 did not find any evidence of discrimination.

Criterion 6.9: A Policy to prevent sexual harassment and all other forms of violence against women and to protect their reproductive rights is developed and applied.

A Policy on the Prevention of Sexual Harassment is documented in the Social Policy approved by Top Management April 2008. Interview of female staff and workers during ASA2 confirmed Gender Committees continue to operate and there are no outstanding issues.

Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.

SOU20 does not purchase crop from smallholders or any outside suppliers.

Several of the contractors interviewed had worked with SOU20 for more than 10 years. They confirmed they understood the contracts terms and conditions of employment and they did not have any issues. The company pays invoices on time.

Criterion 6.11: Growers and millers contribute to local sustainable development wherever appropriate.

SOU20 makes donations to local schools and supports places of worship for religious ceremonies.

PRINCIPLE 7: Responsible Development of New Plantings

SOU20 has not carried out any new oil palm developments and there are no plans for expansion of plantings. Principle 7 is not applicable to this Assessment.

PRINCIPLE 8: Commitment to Continuous Improvement in Key Areas of Activity

SOU20 has continued to make progress with improving the efficiency of production which is important for overall sustainability. The Mill OER has remained above 21% and FFB yields have improved at Chaah and Sungai Simpang Kiri estates, while North Labis is undergoing replanting.

Environmental and social issues are being addressed appropriately and internal audits provide feedback on performance against company policies and standards. The company has maintained open dialogue with internal and external stakeholders and there are no unresolved issues with local communities.

Criterion 8.1: Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.

SOU20 has continued to expand the Integrated Pest Management such as beneficial plants and it has not been necessary to use Class 1A chemicals for several years.

The Environmental Improvement Plans continue to focus on the reduction of water usage at the Mill and soil conservation continues to be a priority at North Labis at the replanting areas. The new large steam turbine at the Mill will help reduce the consumption of non-renewable fuel.

Significant improvement in air quality has been achieved following the commissioning of the new boiler.

The Social Action Plan continues to focus on improvements for resident workers and their families. Houses are being upgraded.

3.2 Identified Nonconformities and Noteworthy Positive and Negative Observations (ASA2)

Nonconformities were assigned to Major Compliance Indicator 5.2.2 and Minor Compliance Indicators 5.2.3 and 6.1.3. Eight (8) Observations/Opportunities for Improvement were identified. SOU20 has prepared a Corrective Action Plan for addressing the identified Nonconformities, which BSI has reviewed and accepted.

CRO5: Major Compliance Indicator 5.2.2 – Management Plan for HCV habitats (including ERTs) and their conservation

A Nonconformity was assigned because the Chaah Estate Conservation Action plan for 2010/2011 had been revised by including information from the HCV Management Plan. However, the subsequent Action Plan for 2011/2012 was inadequately prepared for the following reasons: it did not include update of the 2010/11 Actions; the person with responsibility was not assigned; and there was no target completion date. At North Labis, the Action Plan had been updated in June

2012, but there was inadequate description of the work carried out as evidence of implementation.

Corrective Actions:

North Labis Estate and Chaah Estate are to review and update the Biodiversity Action Plan with appropriate evidences of photographs and description of any training or awareness given to the workers and staff.

SOU20 provided the following Objective Evidence:

- *Sime Darby Plantation Sustainability Department revised the 2011/12 HCV Action Plan to include an update of work completed, the name of the person responsible and the target date for completion. Appendix E (1).*
- *North Labis revised and updated the Biodiversity Action Plan by including additional detail on the work carried out. Appendix E (2).*
- *HCV Awareness Signboard. Appendix E (3).*
- *Revised mapping of steep areas previously planted to oil palm that will be set-aside at future replanting. Appendix E (4)*

BSi Assessors considered the corrective actions and the objective evidence provided were satisfactory and appropriate.

The Nonconformity was closed 10/09/2012

CR06: Minor Compliance Indicator 5.2.3 – Evidence of a commitment to discourage any illegal or inappropriate hunting fishing or collecting activities, and developing responsible measures to resolve human wildlife conflicts.

A nonconformity was assigned because Inspection of Chaah Estate housing found several cages of spotted dove, which were likely to have been captured in the Estate.

Corrective Actions:

The birds were set free immediately and the linesite residents and workers were briefed on this matter.

BSi Assessors considered the corrective actions satisfactory and appropriate and progress toward resolution of the issue will be followed up during the next Annual Surveillance Assessment (ASA3).

CR07: Minor Compliance Indicator 6.1.3 – A timetable with responsibilities for mitigation and monitoring is reviewed and updated as necessary.

A Nonconformity was assigned because the Social Action Plans had not been reviewed or updated at either the Mill or the two Estates visited. Meetings had been held with some stakeholders, but not specifically for the purpose of receiving input on social issues and these were not documented.

Corrective Actions:

The Action Plan was discussed, reviewed and documented immediately with all issues raised by stakeholders internally and externally for further action by Estate and Mill Management.

BSi Assessors considered the corrective actions satisfactory and appropriate and progress toward resolution of the issue will be followed up during the next Annual Surveillance Assessment (ASA3).

Observations/Opportunities for Improvement (ASA2)

- 01 (4.3.2)** Inspection of field conditions and spraying at North Labis Block 2000A indicated the incorrect technique was being used when operating CDA sprayers, which may negatively affect groundcover.
- 02 (4.7.1)** North Labis workshop oxy-acetylene safety goggles were damaged and unsuitable for use. When this was pointed out by the assessor, a replacement set was purchased immediately from the local hardware store.
- 03 (4.7.1)** The following minor safety improvements were noted for the Mill:
The Emergency Response Plan had not been updated to include recent (June 2012) management changes and revised list of Emergency Contacts;
The oxy-acetylene pressure regulators were not fitted with “flash-back arrestors”.
- 04 (5.3.2)** At Chaah Clinic a quotation has been accepted for Pantai Medivest (18/07/2011) to collect Clinic wastes, but no collection has occurred to date. Used “sharps” continue to be stored in appropriate containers. The Estate has arranged with the Visiting Medical Officer to collect and transfer the clinic wastes to his registered Clinic for disposal to a registered Scheduled Waste Facility.
- 05 (5.3.2)** At North Labis Estate, the landfill was appropriately located at a disused quarry, but could be improved by installing an earthen bund to prevent rainfall runoff from entering the trench.
- 06 (5.3.2)** Chaah housing area was very neat and tidy but rubbish has been discarded in a small area in the adjacent palms by the roadside. When this was pointed out the Estate cleared the area immediately.
- 07 (5.3.2)** The small drain adjacent to Boiler #3 had evidence of ash entering the drain with rainfall runoff. Protection of water quality could be improved by preventing runoff from entering the drain and/or installing a sediment trap on the drain.
- 08 (5.3.2)** At North Labis Estate workshop the drain in front of the workshop has inadequate capacity for collection of runoff and transfer to the pollution control device.

Noteworthy Positive Components

- Mill OER has remained above 21%.
- FFB yields have increased at Chaah and Sungai Simpang Kiri Estates and North Labis is undergoing replanting.
- SOU20 provided assistance to local communities during the flood earlier in the year.

3.3 Status of Nonconformities (Major and Minor) Identified during Previous Assessments

The Nonconformities that were identified and “closed” during previous assessments (CR01 – CR04) were followed up to check and confirm the implementation of corrective actions had been maintained and all Nonconformities remain closed.

Observations/Opportunities for Improvement

01 (4.4.1) Signs have been installed along small streams however, the riparian buffer zone has not been marked with an “X” on the palms that will not be replanted.

ASA2 Findings: Riparian buffer zones that are due for replanting were appropriately marked.

02 (4.4.5) Water conservation is an important issue but water leaks such as those observed at the Mill Water Treatment Plant need to be repaired as first priority.

ASA2 Findings: The leaks identified during ASA1 had been repaired and no additional leak was identified during ASA2.

03 (4.6.1) The accuracy of measuring pesticide concentrate for preparation of pre-mix spray solution could be improved by using “laboratory grade” plastic measuring cylinders.

ASA2 Findings: Plastic measuring cylinders have been purchased for preparation of pre-mix spray solution.

04 (4.7.1) Mill safety needs improvement because of the following:

- A drain cover at the FFB Loading area had moved and presented a fall hazard.
- A contractor’s oxy-acetylene bottles at the steriliser cage repair area were not restrained and the pressure regulators were damaged. This was corrected immediately.
- An operator at the Kernel Station was not wearing hearing protection.
- Safety training, such as for First Aid Refresher Course is scheduled 6-monthly but has not been carried out for more than 2 years.

The Mill took action prior to the Closing Meeting to address and rectify the above issues.

ASA2 Findings: The issues identified during ASA1 had all been actioned.

05 (4.7.1) Sungai Simpang Kiri Estate was affected by a major flood in January/February 2011, which provided an opportunity to test the implementation

of the Emergency Response Plan, but the Estate has not prepared a report on the review of the effectiveness of the Response.

ASA2 Findings: The Estate prepared a Report to the General Manager on the response to the flood. An improvement has been the purchase of a new motor boat to enable more effective response in the future.

06 (5.1.1) The feedback loop between the identification of environmental impacts, implementation of improvement programs and the Aspects and Impacts Register is not well established, because a number of the impacts that have been mitigated have not been included in the Register.

ASA2 Findings: The Mill Aspect and Impact Register had been revised and updated to include the improvement of, for example, the installation of new boiler #3.

07 (5.2.2) The most recent Chaah HCV Action Plan had not been updated with the information from the latest HCV Management Plan.

ASA2 Findings: The Chaah HCV Action Plan had not been updated adequately and the North Labis Action Plan also needs additional information. **The Observation was upgraded to a Nonconformity (CR05).**

08 (5.3.2) The Mill and Estates maintain monthly stock takes of scheduled waste, but at Sungai Simpang Kiri it was noted that there was no record of the empty 20 litre containers returned to Scheduled Waste Store from previous use for pre-mix.

ASA2 Findings: Sg Simpang Kiri Estate maintains daily records of transfers in and out of the Schedule Waste Store and the stocktake is updated monthly.

09 (5.3.2) The Mill monsoon drain sediment trap had been cleaned but part of the oily solids had been discarded on the bank beside the trap instead of collecting the waste for safe disposal.

ASA2 Findings: The monsoon drain sediment trap had been maintained and there was no evidence of incorrect disposal of oily solids.

10 (6.1.3) The Mill and Chaah Social Action Plan had not been updated to include issues that had been completed. Although local communities were consulted records were not kept of discussions and the results were not used for updating the Action Plans.

ASA2 Findings: The Social Action Plans had not been updated and stakeholder meetings had not been held and documented for the purpose of providing input to the Action Plans. **The Observation was upgraded to a Nonconformity (CR06).**

11 (6.2.3) The Mill and Estates List of Stakeholders could be improved by including relevant local Government contacts, Worker Union and NGOs.

ASA2 Findings: The stakeholder lists had been updated and included appropriate stakeholders.

3.4 Issues Raised by Stakeholders

The issues raised by stakeholders during ASA1 were followed up during this ASA2 and found to have been actioned appropriately by the company.

Issues Identified during ASA2

The majority of stakeholders had positive comments about SOU20. For the situations where stakeholders raised issues, the company's response is stated below.

North Labis Estate Gender Committee Meeting was held 20 March 2012 but issues raised, such as "why female General Workers are not offered overtime"; and "female field workers with small children are unable to work overtime because the crèche closes at 230pm", do not appear to have been addressed.

Company Response: Presently, overtime is worked for spraying and fertilising, which are male tasks. During replanting, females have worked overtime planting LCC and the crèche operated for extended hours.

The BSi Audit Team considered the SOU20 response to the issue raised to be appropriate. The issue will be followed up during ASA3 to check on progress and satisfactory resolution.

North Labis Medical Assistant stated she operates two clinics and sometimes needs additional supplies and a clinic assistant.

Company Response: The Medical Assistant will be made aware that additional purchases of medicines can be made as necessary. A full-time Assistant will be provided.

The BSi Audit Team considered the SOU20 response to the issue raised to be appropriate. The issue will be followed up during ASA3 to check on progress and satisfactory resolution.

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1 Date of Next Surveillance Visit

The next Surveillance Assessment (ASA3) will be scheduled within twelve months of RSPO approval of continuation of Certification.

4.2 Date of Closing Nonconformities (Major and Minor)

Table 5: Status of Nonconformities

CAR	CLASS	ISSUED	STATUS
CR01 2.1.1	Major	29/06/2009	Closed 06/07/2010
CR02 4.4.1	Major	29/06/2009	Closed 06/07/2010
CR03 5.2.2	Major	29/06/2009	Closed 06/07/2010
CR04 4.3.2	Minor	29/06/2009	Closed 19/12/2011
CR05 5.2.2	Major	12/07/2012	Closed 10/09/2012
CR06 5.2.3	Minor	12/07/2012	"Open"
CR07 6.1.3	Minor	12/07/2012	"Open"

4.3 Sign-off of Surveillance Assessment Findings

Please sign below to acknowledge receipt of the assessment visit described in this report and confirm the acceptance of the assessment report contents including assessment findings.

Signed for on behalf of
Sime Darby Plantation Sdn Bhd (SOU20)



.....
Mr Azhanizan Bin R Deni
Senior Assistant in Charge
Chaah Palm Oil Mill
Date: 19/9/2012

Signed for on behalf of
BSi Group Singapore Pte Ltd



.....
Mr Charlie Ross
Lead Auditor

Date: 19/09/2012

Appendix “A”

Supply Chain Assessment

APPENDIX A – SUPPLY CHAIN ASSESSMENT REPORT – SOU20 – SEGREGATION**CHAAH OIL MILL****Certified Mill Production – 01 July 2011 – 30 June 2012**

MILL	CAPACITY	CPO	PK
Chaah	30 t/hr	22,942	5,186

Sales of Certified Mill Products – 01 July 2011 – 30 June 2012

MILL	CPO	PK
Chaah	NIL	NIL

Certified FFB Received Monthly - 01 July 2011 – 30 June 2012

Month	Chaah Estate	North Labis Estate	Sungai Simpang Kiri Estate	Welch Estate	Yong Peng Estate	TOTAL FFB/Month
July '11	5,874.16	3,440.19	2,396.39	-	-	11,710.74
August	7,515.31	1,626.89	2,356.63	-	-	11,498.83
Sept	8,732.25	1,482.36	3,529.42	-	-	13,744.03
Oct	8,234.59	966.45	4128	-	-	13,329.04
Nov	7,210.96	85.09	2,963.52	257.73	-	10,517.30
Dec	5,317.37	-	1,954.31	842.11	-	8,113.79
Jan '12	4,033.59	--	2,382.89	667.43	-	7,083.91
Feb	2,845.33	-	1,641.89	-	398.60	4,885.82
March	2,057.35	1,967.86	1,387.36	-	-	5,412.57
April	4,037.86	-	2,729	-	-	6,766.86
May	4,523.63	-	2,899.1	-	-	7,422.73
June	4,307.86	-	2,706.16	-	-	7,014.02
TOTAL	64,690.26	9,568.84	31,074.67	1767.27	398.6	107,499.64

Certified Company Details

Sime Darby Plantation Sdn Bhd
Management Unit SOU20
Batu Pahat Johor
Muar Johor Darul Takzim
MALAYSIA

Contact Person: Mr Azhanizan Bin R Deni
Senior Assistant in Charge
Chaah Palm Oil Mill

Phone: +60 07-934 2454
Fax: +60 07-934 1455
Email: chaah.mill@simedarby.com

RSPO Membership No: 035-04(O)

RSPO Supply Chain Certification System for Sime Darby Plantation (SDP)

No	Business Unit	RSPO SCCS Certification Y/N	Date of SCCS Certification Process	Certification Body	Certification Date
1	Unimills B.V.	Yes	Jan – March 2009	Control Union	Certified on 28 June 2011
3	SD Biodiesel	Yes	Jan – March 2010	SIRIM	Certified on 25 March 2011
4	SD Jomalina	Yes	Oct – Dec 2010	SIRIM	Certified on 10 March 2011
5	SD Kempas	Yes	Jul- Sept 2011	SIRIM	Certified on 19 Aug 2011.
6	SD Austral	Yes	Jan – March 2012	SIRIM	Certified on 13 April 2012.
7	NURI – SD Jomalina	Yes	Jan – March 2012	SIRIM	Certified on 13 April 2012.
8	Kernel Crushing Plant – Carey Island (KCP)	Yes	Jan – March 2012	SIRIM	Certified on 13 April 2012.

Certification Body Details

BSi Group Singapore Pte Ltd
(Co. Reg. 1995 02096-N)
3 Lim Teck Kim Road #10-02
Genting Centre
SINGAPORE 088934

Contact Person: Mr Aryo Gustomo
BSi RSPO Scheme Manager
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Summary

The scope of this supply chain assessment is the Chaah Mill that is owned and operated by Sime Darby and uses the segregation mechanism. The assessment included site visits to Chaah Oil Mill and Chaah and North Labis Estates, review of records and interviews of staff. SOU20 had Nil sales of Certified CPO and PK for the period 01 July 2011 – 30 June 2012. The assessor concluded SOU20 has implemented an appropriate management system for controlling the purchase of certified FFB, processing of same and sales. SOU20 maintains adequate records for confirming compliance with the RSPO supply Chain requirements and staff were able to demonstrate an appropriate knowledge of the requirements applicable to the Mill for Segregation mechanism.

Conclusion

The SOU20 management system and records meet the requirements of the RSPO supply chain requirements, November 2011 for the Segregation Mechanism.

Sime Darby Commodities Trading Marketing Department manages all sales of CPO and PK on behalf of the Sime Darby Mills. The system is computerised and when the Mill inputs the code for a Buyer, the RSPO Supply Chain information is generated automatically for the despatch note and the sales invoice. Inspection of documents confirmed that SOU20 maintains all applicable documentation required for verification of implementation of the RSPO Supply Chain Certification Standard : November 2011, for Palm Oil Mills - Module D: Segregation Mechanism.

Certificate Details

Background to the Report

(a) Report authors

Assessor

Mr Charlie Ross, BSi RSPO Lead Auditor

CB Management Representative

Mr Aryo Gustomo, BSi RSPO Scheme Manager

(b) Previous assessments *Not Applicable*

(c) On-Site Visits

Visit Itinerary

Wednesday 11 July 2012 – Chaah Mill – Opening Meeting held at Mill Meeting Room; Weighbridge Station; examined weighbridge records; daily records of FFB deliveries, CPO and PK production; CPO Bulk Tank and PK Silo records; shipments of CPO and PK. Closing Meeting Thursday 12 July.

People consulted: Azhanizan Bin R Deni (Mill Senior Assistant in Charge); Mohd Pahmie (Assistant Engineer); Weighbridge Operator.

Scope

The scope of the assessment is the Chaah Palm Oil Mill and the supply base of Sime Darby owned Chaah and North Labis Estates. The Supply Chain mechanism used is Segregation. The SOU20 operations were assessed against the RSPO Supply Chain Standard : November 2011 requirements for Oil Mills and Module D – CPO Mills: Segregation.

Description of Operation's Management System

SOU20 uses the segregation mechanism for the supply chain. All consignments of FFB despatched from the Estate to the Mill are accompanied by a Consignment Note with a unique consecutive number and includes details of: Field Number Harvested; block Number; No of Bunches; Date Harvested; Estimated Tonnage; Vehicle Registration Number; Driver's Name and Bin Number.

All deliveries of FFB received at the Mill are issued with a Weighbridge Docket that records the Name of the supplier, Truck Registration No, Driver's Name and the Tonnage. The weighbridge system is computerised and delivery records are used as the basis for payment for FFB deliveries. A sample of weighbridge dockets was checked at the Mill against the summaries of FFB deliveries from North Labis Estate. This confirmed the details of the source and quantity of FFB were recorded accurately and could be verified by tracking. The source of the FFB can be traced back to the Estate and the oil palm block from which it was harvested.

The Mill sends a Daily Production Report to Sime Darby Head Office that records the quantity of FFB received from the Estate; the tonnage of FFB processed; the tonnages of CPO and PK produced; shipment tonnages; and the quantities of materials held in storage. The Mill and Estates also report the above quantities monthly to Sime Darby Head Office in the Monthly Production Report.

Checks of records confirmed there were no sales of RSPO Certified CPO and PK produced by Chaah Mill during the preceding 12 months (01 July 2011 – 30 June 2012). Inspection of documents confirmed that SOU20 maintains the documentation required for supply chain verification (RSPO Supply Chain Standard November 2011).

Certified Volume Purchased and Claimed

The following certified FFB material was received from SOU20 Estates and adjacent Certified Sime Darby Estates during the 01 July 2011 – 30 June 2012 year and processed at Chaah Mill: 107,499.64 t/FFB

Main Report Details

1. Documented procedures

- 1.1 The facility 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:
- Complete and up to date procedures covering the implementation of all the elements in these requirements. *Complies – Procedures are current and include all elements of the Supply Chain for controlling the receipt, sale and dispatch of palm products. For example, SPMS: 2012 Draft/ Appendix 15 - Standard Operating Procedure for Traceability and RSPO Supply Chain Certification System.*
 - The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the facilities procedures for the implementation of this standard. *Complies – The Mill Manager has responsibility for the Supply Chain aspects of FFB receipts, processing and shipping of palm products. Interview confirmed his knowledge of the RSPO Supply Chain requirements for the respective areas of the mill operations.*
- 1.2 The facility shall have documented procedures for receiving and processing certified and non-certified FFB. *Complies – the Mills Weighbridge SOP covers the receiving of FFB and recording details of the Supplier and Transporter. All deliveries of FFB are subject to verification of documentation and quality checks. For example, MQMS/V1:2008/Level 3/Standard Operating Procedure/Station No. 1/Reception Station/1.3.1:Weighbridge MQMS/V1:2008/Level 3/Standard Operating Procedure/Section V:Introduction/Crop Quality Standards.*

2. Purchasing and goods in

- 2.1 The facility shall verify and document the volumes of certified and non-certified FFBs received. *Complies – the Mill records tonnages received at the weighbridge and these are reported daily to Head Office on the Production Report.*
- 2.2 The facility shall inform the CB immediately if there is a projected overproduction. *Complies – the company has a mechanism for advising the CB of production variations, which are monitored internally.*

3 Record keeping

- 3.1 The facility shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these requirements. *Complies – Inspection of records at the Mill confirmed these were updated daily.*
- 3.2 Retention times for all records and reports shall be at least five (5) years. *Complies – Records are archived and stored for > 5 years.*
- 3.3
- The facility shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO, PKO and palm kernel meal on a three-monthly basis. *Complies – these are updated monthly and reported to Head Office on the Monthly Production Report.*
 - All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. *Complies, but Nil sales of Certified products.*
 - The facility can only deliver Segregation sales from a positive stock. However, a facility is allowed to sell short. *Complies – The company had NIL sales of certified products and therefore did not exceed the Certified CPO or PK volumes during the 2011/12 year. Company policy is to only make sales of stocks of palm product held in storage.*
- 3.4 The following trade names should be used and specified in relevant documents, e.g. purchase and sales contracts, e.g. *product name*/SG or Segregated. The supply chain model used should be clearly indicated. *Complies – The company uses the prefix SG on the Product Code.*

4. Sales and good out

- 4.1 The facility shall ensure that all sales invoices issued for RSPO certified products delivered include the following information:
- The name and address of the buyer;
 - The date on which the invoice was issued;
 - A description of the product, including the applicable supply chain model (Segregated or Mass Balance)
 - The quantity of the products delivered;
 - Reference to related transport documentation.
- Complies – although SOU20 had NIL sales of certified palm products, all of these items (a-e) are included in the company's standard sales invoicing.*

5 Training

- 5.1 The facility shall provide the training for all staff as required to implement the requirements of the Supply Chain Certification Systems. *Complies – The company maintains records of training. Interviews of Mill Staff confirmed general knowledge of the Supply Chain requirements.*

6 Claims

- 6.1 The facility shall only make claims regarding the use of, or support of RSPO certified oil palm products that are in compliance with the RSPO Rules for Communications and Claims. *Complies – To the best of the Assessor's knowledge, the company has not made claims outside of the RSPO rules for Communications and Claims.*

Appendix “B”

Sime Darby Time Bound Plan

RSPO Certification Timebound Plan for Sime Darby Plantation (SDP)

Financial year (July – June)	Targeted	Achieved
June 2008	5 SOUs	Sime Darby Plantation has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment.
2008/2009	20 SOUs (from Malaysia and Indonesia)	
2009/2010	20 SOUs (from Malaysia and Indonesia)	
2010/2011	17 SOUs (from Malaysia and Indonesia)	

Status	Malaysia	Indonesia	Total	Remarks
Certified	39*	16	55**	*Effectively only 36 SOUs (starting July 2012) : Jeleta Bumi POM and Mostyn POM have been closed down. Sepang POM has been converted to third party oil mill and not included in the RSPO Certification timebound plan. **Total SOUs certified 52 SOUs.
RSPO Review	0	7***	7***	<ul style="list-style-type: none"> Pending review by RSPO EB. *** Effectively only 6 SOUs as Tamiang POM had ceased operation & combined with Blang Simpo POM.
Total SOUs	39*	23	62****	**** Revised number of SOUs for SDP is 58 beginning FY 2012/2013.

Appendix “C”

ASA2 Programme

ASA2 PROGRAMME – 11–12 JULY 2012

TEAM: CR: Charlie Ross; RR: Robyn Ross; IN: Iman Nawireja; NH: Noryati Hambali

DATE	TIME	ACTIVITY	CR	IN	RR	NH
SOU20 Wednesday July 11 TEAM 1 CHAAH PALM OIL MILL TEAM 2 CHAAH ESTATE	AM	Opening Meeting	√	√	√	√
		Inspect Mill, Effluent Ponds, Land Application, Stores, Workshop, Compost Site and Landfill	√			
		Interview Mill Workers	√			√
		Interviews (Contractors/Suppliers)	√			√
		Review Pay Documentation			√	√
	PM	Interview Female Staff/Workers			√	√
		Document Review including Supply Chain	√			
		Visit Clinic Interview Staff			√	√
		Inspect Housing (Mill and Estate) Interview Residents			√	√
		Closing Briefing	√		√	√
AM	Inspect Estate, including Buffer Zones/Interview Male Fieldworkers		√			
	Inspect Stores, Landfill		√			
	Interviews (Contractors/External Stakeholders)		√			
	Contact Government Departments, NGOs etc		√			
	PM	Visit any Local Communities		√		
	Document Review		√			
	Closing Briefing		√			
Thursday July 12 NORTH LABIS ESTATE	AM	Opening Briefing	√	√	√	√
		Inspect Estate, including Buffer Zones	√			
		Interview Male Fieldworkers		√		
		Inspect Stores, Landfill	√			
		Interviews (Contractors/External Stakeholders)		√		
		Visit any Local Communities		√		
		Interview Female Fieldworkers			√	√
		Interview Female Office Staff/Workers			√	√
		Visit Clinic Interview Staff/Workers			√	√
		Inspect Housing and Interview Residents			√	√
Review Pay Documentation			√	√		
PM	Document Review	√	√			
	Prepare Visit Report and Closing Presentation			√		
	Closing Meeting	√	√	√	√	

Appendix “D”

List of Stakeholders Contacted

LIST OF STAKEHOLDERS CONTACTED

<p><i>Staff and Workers</i> NUPW Worker Representative 5 Harvesters Chaah Estate 9 Female Mill Staff/Workers 6 Male Mill Staff/Workers Group Residents Chaah Mill/Estate Housing Shop Contractor Hospital Assistant Chaah Mill/Estate Clinic</p>	<p><i>Staff and Workers</i> 5 Female Staff/Workers North Labis Estate 1 Female & 2 Male North Labis Field Workers Medical Assistant North Labis Estate Clinic Group Residents North Labis Estate 2 Crèche Workers North Labis Estate 6 Foreign Harvesters North Labis Estate</p>
<p><i>Contractors & Suppliers</i> Mill Equipment Supplier Mill Engineering Contractor 2 FFB Transporters Harvesting Contractor Spare Parts Supplier</p>	<p><i>Local Communities</i> Kampung Hj Khamisan Head and Residents</p>
<p><i>Government Departments</i> Department of Labour Department of Occupational, Safety and Health Department of Lands and Survey</p>	<p><i>NGOs and Others</i> AMESU, Subang Jaya NUPW, Kluang Branch Secretary</p>

Appendix “E”

Evidence for Closing Nonconformity CR05

Appendix E (1) Revised and updated HCV Action Plan

Biodiversity Action Plan for FY 2011/12
Estate : Chaah

Action Steps	Description	Action Plan	Person in-charge	Date		Tracking Date	
				Commencement	Propose for completion	Budget	Completion todate %
1. Set Aside Nature Conservation Area	Any area of Biodiversity area, unplantable area, river buffer zone, slope >25°, new area planted with forest tree species under SDP Tree Planting Project or any potential area for Biodiversity enhancement must be set aside as Nature Conservation Area by the management and to be listed under Sime Darby Plantation Nature Conservation Area	- An assessment by PS-RSPO Unit, TQEM Department has identified HCV area in May 2009.	<u>TQEM Team</u> - Norazam Abdul Hammed - Nurulashida Mohd Saad <u>Estate Management</u> - Ali Anuar b Husin Saadi 1. Worship area - Mohd Sabri Abd Rahim - R. Sugumaran 2. Water catchment - Ahmad Marzuk Shuib - Rajandran	May 2009	June 2012.	Nil	100%
2. Inspection of the Conservation Area	a) Develop schedule for inspection b) To make recommendation and conclusion c) To work with related agencies	- Annual inspection schedule by TQEM Department has been developed. - Cooperation with related agencies.	<u>TQEM Team</u> - Norazam Abdul Hammed - Nurulashida Mohd Saad <u>Estate Management</u> -Ali Anuar b Husin Saadi	July 2010	On going	Nil	-
3. Rehabilitation and Habitat Enhancement	Enrichment planting by introducing specific tree species to attract wildlife and improve biodiversity of the above area.	- 840 trees of ERT species has been planted around the estate area. - Maintaining the planted forest tree species and monitoring the survival rate.	<u>TQEM Team</u> - Nafiz Zainal Abidin - Norazam Abdul Hameed <u>Estate Management</u> - Ali Anuar b Husin Saadi - Mohd Sabri Abd Rahim	November 2010	December 2010	Nil	100%

Biodiversity Action Plan for FY 2011/12
Estate : Chaah

4. Managing Bordering Forest Reserves.	Appropriate measure must be instituted to protect bordering Maokil Forest Reserves.	1. To maintain: i. Existing trenches ii. Boundary markers iii. Bund area and tide gate. iv. Security drop gate where applicable.	<u>TOEM Team</u> - Nurulashida Mohd Saad <u>Estate Management</u> - Ali Anuar b Husin Saadi - Mohd Sabri Abd Rahim	July 2010	June 2011	Nil	100%
		2. Report to related agencies such as Forestry Department on any illegal logging and encroachment to the forest reserves.		July 2010	On going	Nil	-
		3. Create awareness among the workforce on the protection of surrounding biodiversity.		July 2010	On going	Nil	-
5. Education and Awareness	a) An education and awareness programme shall be carrying out to train the SOU on biodiversity, flora/fauna and about biodiversity management. b) Communication through Sime Darby webpage c) Establishing fact sheet for internal and external (to increase the nature conservation awareness) d) Encourage further research on specific biodiversity. e) Training by relevant agencies – Forestry/Wildlife Department, WWF etc.	1) To maintain any Signage available such as:- i - Biodiversity area ii - No Fishing iii - No Hunting iv - Buffer Zone	<u>TOEM Team</u> - Norazam Abdul Hameed - Nurulashida Mohd Saad <u>Estate Management</u> - Ali Anuar b Husin Saadi - Mohd Sabri Abd Rahim - Ahmad Marzuk Shuib	July 2010	On-going – to ensure all signage are in good order and visible at all time.	Nil	100%
		2) 6 monthly training for all workers and staff on biodiversity conservation and management.		July 2010	On-going process,	Nil	100%

Biodiversity Action Plan for FY 2011/12
Estate : Chaah

6. Interface with animals	<p>a) Company will raise the awareness of HCV and ERT of flora and wildlife to the employees. b) Employees are taught not to disturb or not to hunt any wildlife. c) Any case interface with wildlife or signs of wildlife entering the estates shall be reported to Wildlife Department immediately. d) If animal potential cause danger to human life, necessary action shall be taken to ensure safety.</p>	<p>- 6 monthly training to all workers and staff on the Biodiversity conservation and management awareness. - Putting up signages as a clear message on wildlife protection such as 'No Hunting' and 'No Fishing'. - Giving cooperation with the Wildlife Department or any related agencies on interface with wildlife.</p>	<p><u>TOEM Team</u> - Norazam Abdul Hameed - Nurulashida Mohd Saad <u>Estate Management</u> - Ali Anuar b Husin Saadi - Mohd Sabri Abd Rahim - Ahmad Marzuk Shuib</p>	July 2010	On-going process to educate all workers and staff.	Nil	100%
				July 2010	June 2011	Nil	100%
				July 2010	On going	Nil	-
7. Compliance to the SDP policy on river Buffer Zone and Slope Protection	The area contain special features – steep slope, river buffer zone, etc as per Sime Darby Policy shall be set aside and introduced as new conservation area.	- On-going compliance to the company's Policies.	<p><u>TOEM Team</u> - Norazam Abdul Hameed <u>Estate Management</u> - Ali Anuar b Husin Saadi</p>	July 2010	On going	Nil	-

Prepared by,


 (Mohd. Sabri B. Abdul Rahim)
 Senior Assistant, Manager

25/06/2012

SIME DARBY PLANTATION SDN. BHD.
 Verified by
 (647768-V)
 LADANG CHA'AH



(Ali Anuar B. Hussin Saadi)
 Estate Manager

25/06/2012



Action Plan Biodiversity of Sime Plantations North Labis Estate

**Towards RSPO in Sime Darby
Plantations**

**A report prepare by Mohd Nor Yusri bin Jawahil
For North Labis Estate
Date: JULY 2011**

No	Issue & Strategies	Action By	Time Frame	Status
1	<p>Set Aside Nature Conservation Area</p> <p>Any area of biodiversity area, unplanted area, river buffer zone, slope >25°, new area planted with forest tree species under SDP Tree Planting Project or any potential area of biodiversity enhancement must be set aside as Nature Conservation Area by the management and to be listed under Sime Darby Plantation Nature Conservation Area including their hectareage.</p>	Chandra Bhos A/L Mani	Aug '11	Completed
2	<p>Inspection of the conservation area</p> <p>a) Develop schedule for inspection b) To make recommendation and conclusion c) To work with related agencies</p>	Zainal Abidin Hassan	Sept '11	Completed
	<p>Rehabilitation and Habitat Enhancement</p> <p>Enrichment planting by introducing specific tree species to attract wildlife to improve biodiversity of the above area.</p>	Muhamad Adam Mokhtar	Oct '11	Completed
3	<p>Education and Awareness</p> <p>An education and awareness programme shall be carrying out to train the SOU on biodiversity, flora / fauna and about biodiversity management.</p> <p>a) Communication trough Sime Darby webpage b) Establishing fact sheet for internal and external (to increase the nature conservation awareness).</p>	Muhd Nor Yusri Bin Jawahil	Dec '11	In Progress

	<p>c) Encourage further on research on specific biodiversity</p> <p>d) Training by relevant agencies – Forestry Department / Wildlife Department, WWF etc.</p>			
4	<p>Compliance for the SDP policy on river Buffer Zone and Slope Protection.</p> <p>The area contain special features – steep slope, river buffer zone, etc as per Sime Darby Policy shall be set aside and introduced as new conservation area.</p>	Siti Hajar Samsuri	Feb '12	Completed
5	<p>Interface with animal</p> <p>a) Company will raise the awareness of HCV and ERT of flora and wildlife to the employee.</p> <p>b) Employees are taught not to disturb or not to hunt any wildlife.</p> <p>c) Any case of interface with wild face or signs wildlife entering the estate shall be reported to Wildlife Department immediately.</p> <p>d) If animal potentially cause danger to human life, necessary action shall be taken to ensure safety.</p>	Mohd Nor Yusri bin Jawahil	May '12	Completed


 NIME DARBY PLANTATION SDN. BHD.
 NORTH LABIS ESTATE
 Company No. 017706-D
 25/6/12

Appendix E (3) Example of HCV Awareness Signboard posted at the Estates



Appendix E (4) Example of revised mapping of steep areas previously planted to oil palm that will be set-aside at future replanting.

