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**PUBLIC SUMMARY REPORT**  
**RECERTIFICATION ASSESSMENT**

**Kulim (Malaysia) Berhad**

**Palong Mill and Supply Base**

**Johor Malaysia**

*Report Author*

**Charlie Ross – Prepared February 2014**

emandm@bigpond.net.au

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## SUMMARY

Kulim (Malaysia) Berhad (Kulim) owns and operates four (4) Mills and twenty (20) oil palm Estates. BSi Group Singapore Pte Ltd (BSi) has conducted the Recertification Assessment of Palong Mill and supply base of 6 company owned Estates, support services and infrastructure. BSi concludes that Palong Mill and Supply Base meet compliance with the requirements of RSPO Principles & Criteria: 2007; MY-NI Indicators and Guidance : 2010; and RSPO Supply Chain Certification Standard : 2011, Module E – CPO Mills : Mass Balance.

BSi recommends the continuation of the approval of Kulim's Palong Mill and Supply Base as a producer of RSPO Certified Sustainable Palm Oil.

## ABBREVIATIONS USED

AMESU	All Malayan Estates Staff Union
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CDM	Clean Development Mechanism
CPO	Crude Palm Oil
CSPK	Certified Sustainable Palm Kernel
CSPO	Certified Sustainable Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
FFB	Fresh Fruit Bunch
HIRAC	Hazard Identification Risk Assessment Control
HCV	High Conservation Value
IPM	Integrated Pest Management
JCC	Joint Consultative Committee
LTA	Lost Time Accident
MPOB	Malaysian Palm Oil Board
MSDS	Material Safety Data Sheet
NUPW	National Union of Plantation Workers
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PCD	Pollution Control Device
PK	Palm Kernel
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
QMS	Quality Management System
RSPO	Roundtable on Sustainable Palm Oil
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
WHO	World Health Organisation

## 1.0 SCOPE OF RECERTIFICATION ASSESSMENT

### 1.1 Identity of Certification Unit

Kulim (Malaysia) Berhad operations consist of four (4) Palm Oil Mills and twenty (20) company owned Estates. The Kulim Mills and 19 of the Estates are located in Johor State and the other Estate is located in Pahang State, Malaysia (Figure 1). The Certification Unit of this Recertification Assessment is the Palong Mill and Supply Base of six (6) company owned Estates. The GPS locations of the Mill and Estates are shown in Table 1.

**Table 1: GPS Locations Mill and Estates**

LOCATION	LONGITUDE	LATITUDE
Palong Mill	102° 47' 6.0432"	2° 42' 23.094"
<b>Estates</b>		
Palong	102° 44' 55.5288"	2° 44' 55.896"
Mungka	102° 47' 8.3544"	2° 41' 15.4392"
Kemedak	102° 46' 7.284"	2° 42' 47.0268"
Sepang Loi	102° 49' 4.0764"	2° 41' 32.0928"
UMAC	102° 48' 23.9364"	2° 53' 3.3144"
Labis Bahru	102° 52' 27.9228"	2° 25' 49.2888"

## 1.2 Production Volume

The production tonnages for CPO and PK for the 12 months prior to the Recertification Assessment (01/11/2012 – 31/10/2013) and projections for the next twelve months are listed in Table 2. CPO and PK production increased due to the receipt of more crop from outside suppliers. The projected production will decrease in 2014 due to replanting at Labis Bahru and UMAC Estates and purchase of less crop from outside suppliers.

**Table 2: Production Tonnages**

Palong Palm Oil Mill	CPO	PK
Estimate at Certification (Under JCorp)	30,581**	9,194**
ASA1 Actual 01/01/2011–31/12/2011 (Under JCorp)	32,037* 19,116**	8,423* 5,027**
ASA4 Actual 01/11/2011 –31/10/2012 (Under Kulim)	34,971* 22,030**	9,091* 5,724**
Recertification Actual 01/11/12–31/10/13	42,132* 24,855**	11,140* 6,572**
Projected 01/11/13 – 31/10/2014	37,516* 23,817**	9,712* 6,166**

\* Includes all Outside Suppliers tonnages

\*\* = Certified Production (Kulim Estates)

## 1.3 Certification Details

Since the Initial Certification, the Kulim Mills and Estates have been registered with RSPO under a single Certificate, the details of which are shown below:

Kulim RSPO Membership No: 1-0006-04-000-00  
BSi RSPO Current Certificate No: 537873  
Initial Certification Assessment: 14–24 July 2008  
Date of Certification: 23/01/2009

ASA1: 12 – 21/01/ 2010 Certificate re-issued 31/03/2010  
ASA2: 10 – 17/01/ 2011 Certificate re-issued 28/03/2011  
ASA3: 31/10 – 05/11/2011 Certificate re-issued 14/02/2012  
ASA4: 05 – 12/11/ 2012 Certificate re-issued 31/01/2013

BSi, on advice from the RSPO Secretariat, will issue a separate new Certificate for each Kulim Mill and Supply Base. Please refer to Appendix A for Recertification Certificate details.

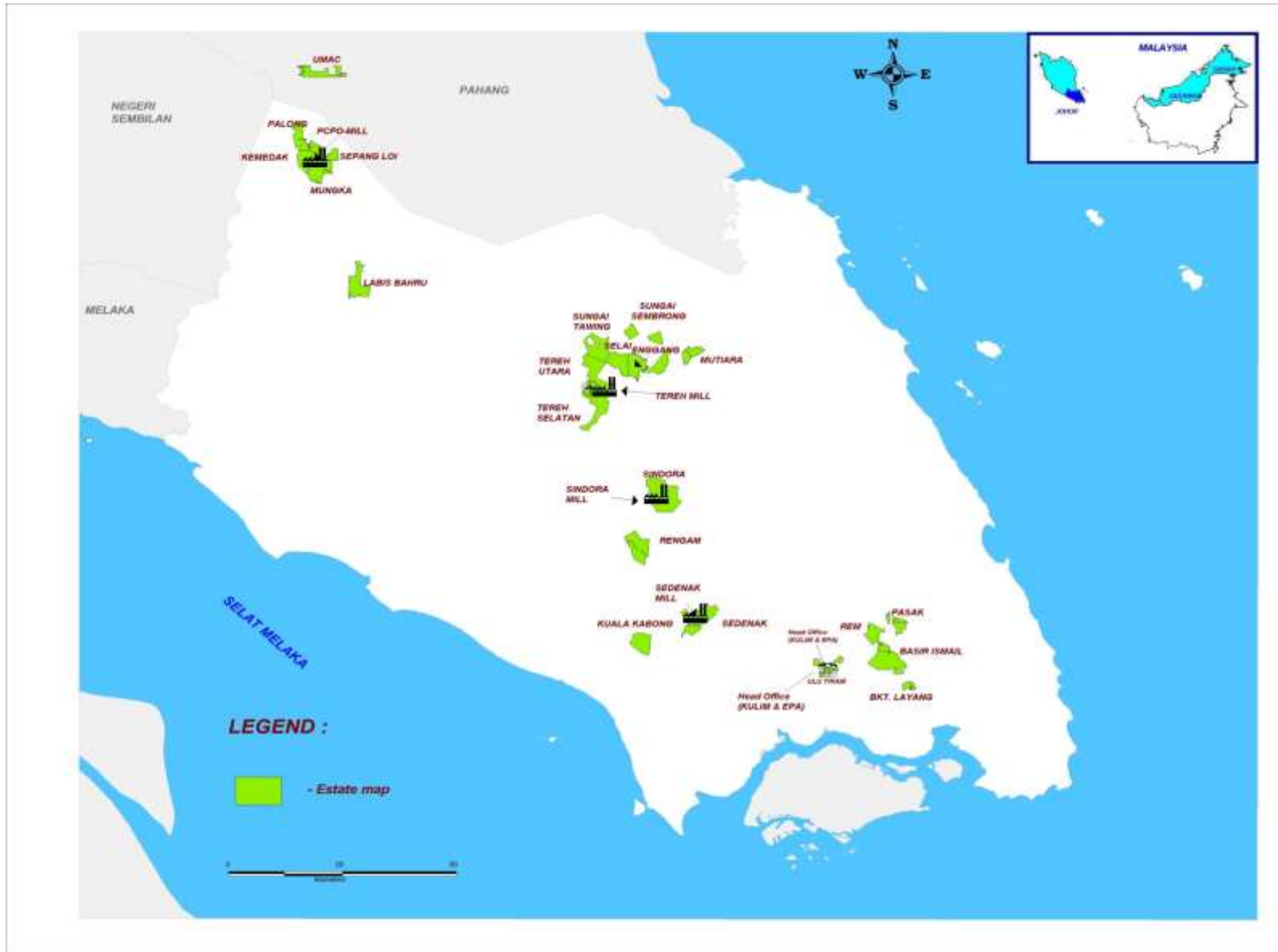


Figure 1: Kulim Mills and Estates Location Map

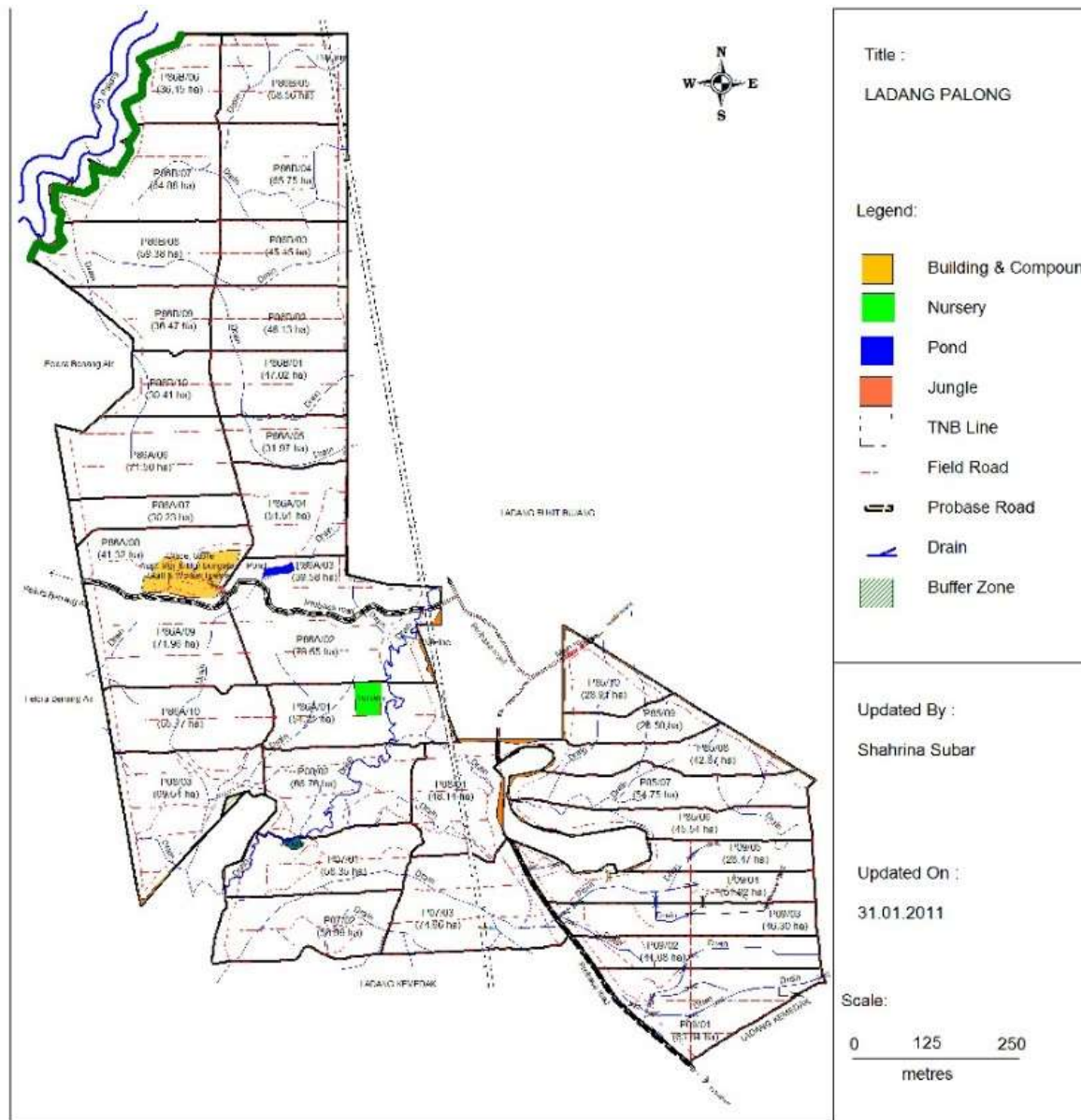


Figure 2: Palong Estate Layout

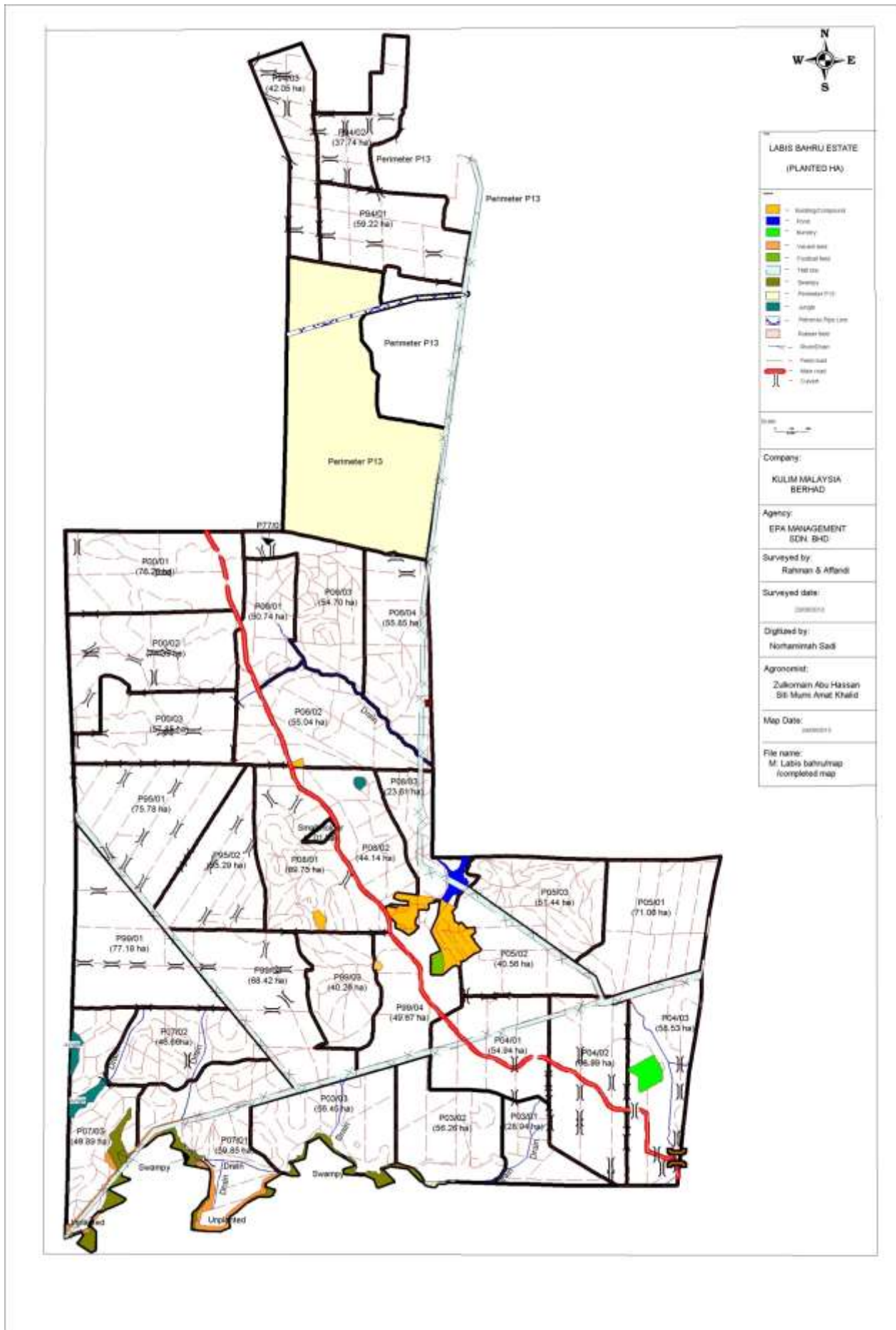


Figure 3: Labis Bahru Estate Layout

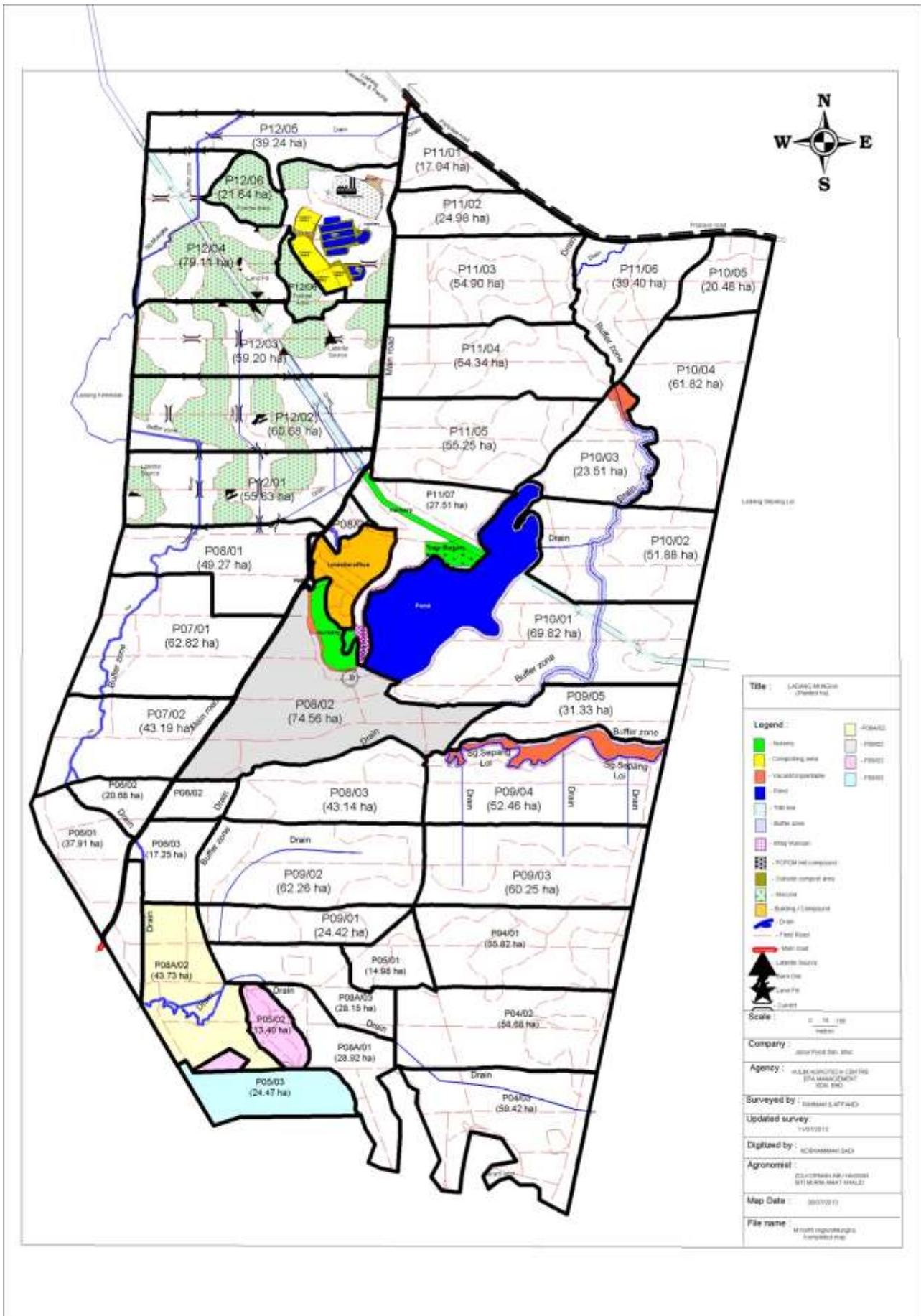


Figure 4: Mungka Estate Layout





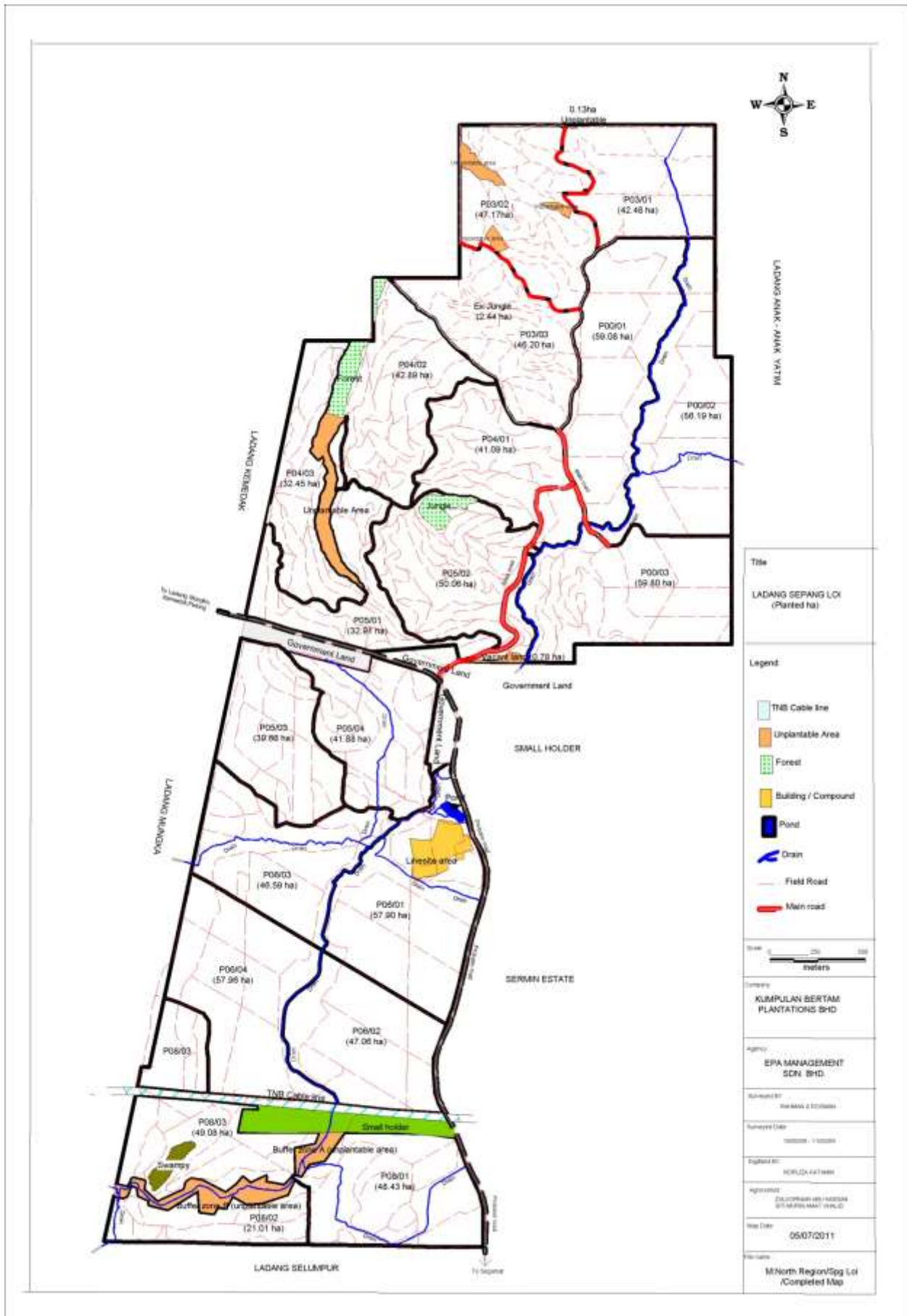


Figure 6: Sepang Loi Estate Layout

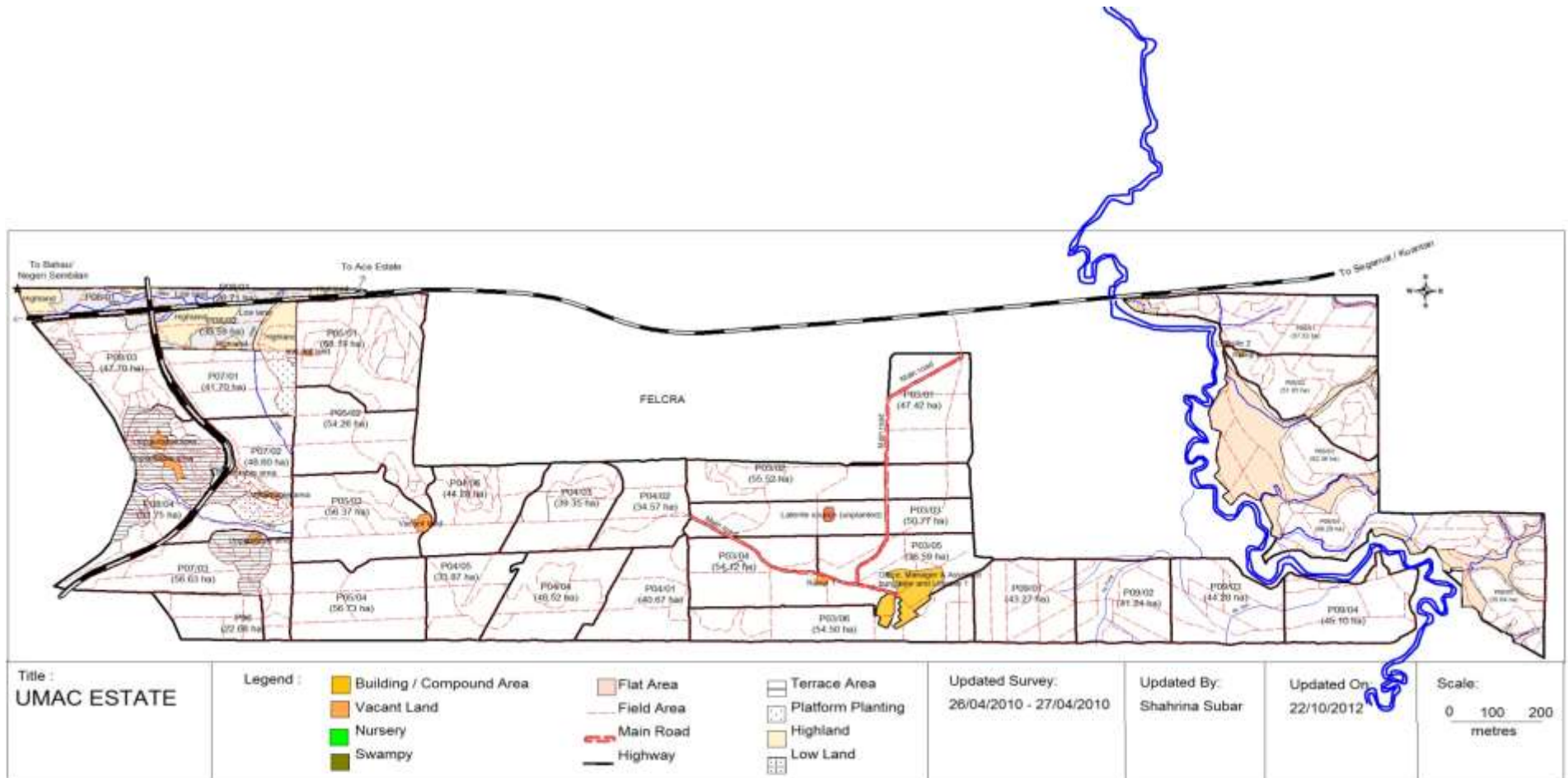


Figure 7: UMAC Estate Layout

#### 1.4 Description of Supply Base

The supply base is six (6) company owned Estates; one (1) "Outside" Estate and seven (7) FFB Traders with their FFB production listed in Table 3. Production from the "Outside" Estate and FFB Traders is not included in the Certificate.

**Table 3: FFB Production (Palong Mill Supply Base)**

Source	Estimate at Certification 9/02/2011	Actual 01/11/2012– 31/10/2013	Projected 01/11/2013– 31/10/2014
<b>Kulim Estates</b>			
Palong	26,364	11,104	9,526
Mungka	20,901	13,002	15,123
Kemedak	20,191	13,432	14,285
Sepang Loi	10,923	19,246	19,056
UMAC	16,443	31,279	27,506
Labis Bahru	26,025	35,978	30,336
<b>Total Kulim Estates</b>	<b>120,847*</b>	<b>124,041*</b>	<b>115,832*</b>
<b>"Outside" Estate</b>			
Unilease Plantation	0	572	
<b>FFB Traders</b>			
Sri Mahtai		2,336	
Eng Huat		38,217	
Kin Ma	38,576	32,381	66,623
Hong Bee		9,323	
Mewah Mega		563	
Guan Leng		2,828	
	<b>38,576</b>	<b>85,648</b>	<b>66,623</b>
<b>Total Outside Suppliers</b>	<b>38,576</b>	<b>86,220**</b>	<b>66,623**</b>
<b>OVERALL TOTAL</b>	<b>159,423</b>	<b>210,261</b>	<b>182,455</b>

\* = Certified Production Kulim Estates

\*\* Production from the "Outside" Estate and FFB Traders is not included in the Certificate

#### Supply Chain

Kulim uses the Mass Balance mechanism for the Palong Mill supply chain. All deliveries of FFB to the Mill are issued with a weighbridge docket that records the name of the supplier, truck registration number, driver's name and the tonnage. The weighbridge system is computerised and the delivery records are used as the basis for payment for FFB deliveries. A sample of weighbridge dockets was checked at the Mill against the Daily Transaction Summary of FFB deliveries from each supply source. This confirmed the details of the source and quantity of FFB were recorded accurately and could be verified by tracking. Kulim made sales of CSPO certificates on the GreenPalm trading platform and physical sales through eTrace. Inspection of documents confirmed that Kulim maintains all of the documentation required for supply chain verification (Refer Appendix B).

At Palong Mill, production from company Estates is expected to decrease due to replanting at Labis Bahru and UMAC. The Mill also plans to purchase less crop from outside suppliers.

The development of oil palm at the company owned Estates commenced in 1947 and the palms are in their second and

third cycles. The age profile of the palms is shown in Table 4a.

**Table 4a: Age Profile of Palms**

AGE (years)	% Planted Area	AGE (years)	% Planted Area
<b>Palong</b>		<b>Sepang Loi</b>	
21 +	2	21 +	0
11 – 20	0	11 – 20	34
4 – 10	45	4 – 10	66
0 – 3	53	0 – 3	0
<b>Mungka</b>		<b>UMAC</b>	
21 +	0	21 +	0
11 – 20	0	11 – 20	21
4 – 10	65	4 – 10	79
0 – 3	35	0 – 3	0
<b>Kemedak</b>		<b>Labis Bahru</b>	
21 +	0	21 +	0
11 – 20	0	11 – 20	44
4 – 10	59	4 – 10	43
0 – 3	41	0 – 3	13

The areas of mature and immature palms are detailed in Table 4b for each of the Estates. Areas provided during ASA4 differ for some Estates as follows: Palong increase by 1.83 ha due to new GPS Survey at replanting; Mungka Estate decrease by 23.83 due to new GPS Survey; Sepang Loi decrease by .27 ha due to new GPS Survey; Labis Bahru increase by 92.37 ha due to planting of oil palm at land previously planted to rubber.

**Table 4b: Areas Planted**

Estate	Recertification Mature (ha)	Recertification Immature (ha)	Recertification Total
Palong	852.45	979.40	1,831.85
Mungka	1,125.83	597.94	1,723.77
Kemedak	1,001.98	690.34	1,692.32
Sepang Loi	919.89	0.00	919.89
UMAC	1,549.81	0.00	1,549.81
Labis Bahru	1,711.51	261.14	1,972.65
<b>TOTAL</b>	<b>7,161.47</b>	<b>2,528.82</b>	<b>9,690.29</b>

#### 1.5 Progress against Time Bound Plan

Kulim holds an interest in New Britain Palm Oil Ltd that is RSPO Certified and managed as a separate autonomous entity. Kulim previously managed the Tunjuk Laut Mill and Supply Base but since October 2013 this has been leased to third party operator (Awan Timur Resources) and Kulim no longer manages the operations. BSi concludes that Kulim has completed all the commitments of its Time Bound Plan that relate to company owned and managed Mills and Estates.

Kulim has recently purchased a property in Indonesia and plans to develop the land for oil palm. No work has commenced, however Kulim is in the process of initiating the assessment of HCV of the land.

### 1.6 Progress of Associated Smallholders/ Outgrowers towards RSPO Compliance

Kulim has consulted FFB suppliers and advised them it aims to achieve RSPO Certification for all the Palong Mill supply base. Interview of a sample of the FFB suppliers, comprising Outside Estates and FFB Traders, found that they were aware of RSPO but still did not have detailed knowledge of the RSPO requirements. Kulim will continue to work with the FFB suppliers, comprising Outside Estates and FFB Traders to assist them to implement the RSPO P&C.

### 1.7 Other Certifications Held

Palong Mill operates a Quality Management System to the ISO 9001:2008 standard (Certificate No AR1816), current to 10 November 2014.

### 1.8 Organisational Information / Contact Person

Kulim (Malaysia) Berhad	Contact Person:
Ulu Tiram Estate	Mr Sallehuddin Mohd Noh
KB 705	Senior Manager
Johor Bahru	Phone: +6078611611
Johor 80990	Fax: +6078631084
MALAYSIA	Email: <a href="mailto:sallehuddin@kulim.com.my">sallehuddin@kulim.com.my</a>

## 2.0 ASSESSMENT PROCESS

### 2.1 Assessment Team Members

**Charlie Ross** – Lead Assessor RSPO  
B.App.Sc. M.Sc (Env.Studies)  
Topics assessed: Legal, Environment, Agricultural Practices, Occupational Health & Safety, Social, Supply Chain

**Isman Yusoff** – Assessor RSPO  
BSc.Electrical Engineering; Exec.M Business Admin.  
Topics assessed: Legal, Environment, Agricultural Practices, Occupational Health & Safety

**Nabila Seth Niven** – Social Assessor RSPO  
BBA (Hons) Business Studies  
Topics assessed: Social, Occupational Health & Safety

**Robyn Ross** – Social Assessor RSPO  
SA8000  
Topics assessed: Legal, Social, Women and Families

**Dian Ekowati** – Facilitator  
Graduate Degree (Master Level), Rural Sociology and Gender; Bachelor Degree, Community Empowerment.

CVs for Mr Yusoff, Ms Seth Niven and Ms Ekowati, new team members, are included at Appendix C.

### 2.2 Assessment Programme

The Recertification Assessment was carried out 06, 07 and 10 December 2013. The Assessment Programme is included as Appendix D.

The Programme included assessments of the Mill, Palong and Labis Bahru Estates against all of the RSPO Principles & Criteria: 2007; MY-NI Indicators and Guidance : 2010, and the RSPO Supply Chain Certification Standard : November 2011, Module E – CPO Mills : Mass Balance. The Estates were selected for assessment on the basis of environmental aspects and time since previous site visit.

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. 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 each indicator. 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 Kulim's environmental and social performance and any issues of concern that they may have. Notification of the Recertification Assessment was posted on the RSPO, BSi and Kulim websites. External stakeholders were contacted by email and telephone to arrange meetings where practical and to seek their views on the environmental and social performance of the Palong Mill and Supply Base. 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 E.

## 3.0 ASSESSMENT FINDINGS

### 3.1 Summary of Findings

During this Recertification Assessment a Nonconformity was assigned to Major Compliance Indicator 2.2.2. Eight (8) Observations/Opportunities for improvement were identified. Refer Section 3.2 Page 20 for details. Kulim prepared a Corrective Action Plan for addressing the identified Nonconformity, which BSi reviewed and accepted.

Review of the nonconformities assigned at Palong during previous assessments (JCorp) found corrective actions were being effectively and consistently implemented and the nonconformities remain closed. The four (4) Observations/Opportunities for Improvement identified during Kulim ASA4 also were followed up to check the effectiveness of corrective actions. Refer Section 3.3 Page 21 for details.

**PRINCIPLE 1: Commitment to Transparency**

Kulim has maintained up to date policies, procedures and management plans for provision of information to the public on request. The requests for information are received at Head Office and are then forwarded to the Estates and Mills for provision of site specific information. A number of requests for information were received from MPOB and NUPW which were handled locally in a timely manner.

**Criterion 1.1: Growers and Millers provide adequate information to other stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.**

Kulim has issued “Communication and Consultation Management Guidelines” that define the responsibilities and actions required for receiving, recording and responding to enquiries and requests from internal and external stakeholders.

The Mill and Estates have implemented the “Communication and Consultation Management guidelines” as evidenced by the maintenance of filing systems for recording written requests for assistance and information. Inspection of a sample of records found that requests for information were received only from Government Departments, NUPW and the MPOB. The sample of records indicated requests for the Estates and Mills to provide information, such as for MPOB surveys, were replied to in a timely manner. (1.1.1)

**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.**

Kulim holds copies of each of the 7 management documents that are required to be publicly available. Kulim policy is to make these available upon request.

In addition, Kulim has continued to use as a point of reference the “Sustainability Handbook” June 2007 that details the company’s environmental and social policies and grievance procedure. Copies of the handbook are available on request.

Kulim policy is to make documents and copies of the Sustainability Handbook publicly available on request, except those relating to commercial confidentiality.

Details of Land Titles are held in file “Grant Title” on SPO Server. Hard copy is held by EPA Property Department. (1.2.1)

The Health and Safety Plan is documented in the “Improvement Plan for 2013” issued January 2013. (1.2.2)

Environmental and Social Aspects and Impacts are recorded on a Register for the Palong Operating unit that is revised annually and was updated 13 May 2013. Copies are held at the Mill and each Estate. (1.2.3)

Pollution Prevention Plans are included in the Environment Improvement Plan, which was updated in January 2013 and included performance targets. (1.2.4)

Kulim’s Sustainability Handbook details the dispute resolution process to be followed and the recording of information. (1.2.5)

Kulim follows the Land Acquisition Act 1960 (ACT 486), which details the acquisition, the assessment of compensation to be made on account of the acquisition and any other matters incidental thereto. (1.2.6)

Kulim maintains an Improvement Plan that is reviewed by top management and updated in January each year. (1.2.7)

**PRINCIPLE 2: There is compliance with all applicable laws and regulations**

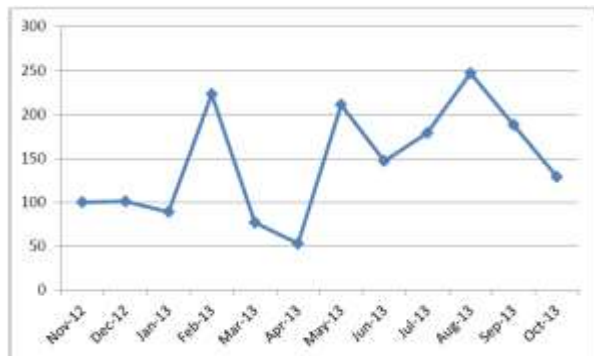
Kulim has maintained the systems for documentation, checking and assessment of legal compliance with applicable laws and regulations such as the Factories & Machinery Act 1967, the OSH Act 1994, the Environmental Quality (Clean Air Regulation) 1978 and the Employment Act 1955. Inspection of records showed that the Palong Mill and the Estates visited have maintained legal compliance with statutory requirements, except at the Estates for permits relating to air compressors, for which a Nonconformity was assigned. Each of the Estates visited has maintained boundary stones so that they are clearly marked and visible. Interview of local community representatives indicated there were no land tenure disputes with the Kulim estates.

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

The Mill Visiting Engineer makes checks for legal compliance. During the visit to Palong Mill on 13 and 14 June 2013 he reported that all statutory requirements were being met, except for the SPAN license for the water treatment plant, which had expired. The Mill had written to Kulim head office requesting renewal of the license on 21 January 2013, but there was no follow-up. A sample of statutory licenses was checked and found to be current, for example, at Palong Mill the MPOB licence No 578392004000 was current to 30 November 2014; the air compressor (JH PMT# 3617) was current to 02 September 2014.

Review of internal and external audit and consultant reports showed that the Mill and the Estates visited had maintained legal compliance with applicable laws and regulations, except for the Nonconformity assigned at Palong Estate relating to the compressor license. Palong Mill boiler emissions were tested on 13 June 2013 by PAC Testing & Consulting Sdn Bhd and confirmed the level of dust particulate was in compliance with Regulation 25 of the Malaysian Environmental Quality (Clean Air) Regulations, 1978. Ambient air quality at areas within and surrounding the Mill were tested by PAC Testing & Consulting Sdn Bhd on 25 and 26 September 2013 and the Total Suspended Particulates were within the Malaysian recommended Environmental Air Quality Guideline limits of 260 ug/m<sup>3</sup>. ST TECH Engineering Sdn Bhd calibrated the boiler smoke density meter on 26 March 2013 (Service Report SR 9172). Review of monthly reports to DOE of boiler smoke opacity indicated compliance with the Malaysian recommended Environmental Air Quality Guideline. A DOE Officer visited Palong Mill on 25 April 2013 and collected effluent samples, but did not identify any issue requiring corrective action.

Mill effluent is treated in effluent ponds and approximately 50% is used for composting with EFB and the balance is recycled to the palms by land application in furrows. The BOD of treated mill effluent complied with licence limits of 5,000 mg/L throughout the year (Figure 8) and the maximum BOD was 250 mg/L in August 2013.



**Figure 8: BOD (mg/L) of Treated Mill Effluent**

Water supplied to housing from the Kulim operated water treatment plants showed compliance with the Malaysian Drinking Water Quality Standard. The Mill and Estates carry out daily checks of pH and residual free chlorine. In addition, samples are sent to the Wacco Industrial Services Sdn Bhd Laboratory monthly for analysis.

The Mill has approval from Department of Labour dated 9 November 2011 for extension of overtime hours to 150 per month current 01-11-2011 to 31-10-2014. Inspection of a sample of pay records including peak crop month August 2013 showed overtime hours were in compliance. No discrepancies were observed between local and foreign worker payments.

A DOSH officer visited Palong Mill on 31 October 2013 to observe hydrostatic pressure testing of three of the vertical sterilisers and confirmed the results were satisfactory. The Mill has completed the rectification and the DOSH inspection is scheduled for 05 December 2013. (2.1.1)

**CR15 – A Nonconformity was assigned at Palong Estate, because it did not hold a Certificate of Fitness for the workshop air compressor. At Palong Mill, application had been made for renewal of the SPAN license for the water treatment plant, but at the time of the site visit, the license renewal had not been received, despite follow-up by Kulim Property Department – refer Section 3.2 Page 20.**

Kulim maintains a Register of Legal Requirements for the Mills and Estates that was updated in 2013 to include the Wildlife conservation Act 2010. In addition, each operation has a List of Licenses showing the expiry dates. Kulim Legal Department has provided the Mill and Estates with copies of the applicable acts and regulations that are supplemented with a summary of requirements. (2.1.2)

Kulim has implemented monthly reporting against performance targets and the system of regular visits by the Mill Visiting Engineer and the Plantation Inspector, respectively who audit legal compliance during site visits, as noted for Indicator 2.1.1 above. (2.1.3)

Kulim Legal Counsel carries out annual reviews of the legal requirements and updates these when necessary and communicates the changes to the mills and estates. (2.1.4)

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

Kulim operations are on either “Freehold Land” or “State Leases”. Details of Land Titles and summary of lease history are held in file “Grant Title” on the SPO Server. Kulim Property Department holds a hard copy of land titles. (2.2.1)

Only oil palm is grown on the land, which is consistent with the land titles and lease conditions. (2.2.2)

Kulim has completed the program of surveying the boundaries of all of its properties and installing boundary stones. Each of the Estates visited held a copy of a map showing the locations of boundary stones. Inspections of a sample of boundary stones at each of the Estates visited, for example, Stone Numbers 068 and 069 at Labis Bahru P06 Block 03, confirmed boundary stones are clearly marked with poles painted red and white and maintained. The maintenance program consists of quarterly weeding and annual painting of the boundary marker poles. (2.2.3)

There are currently no Land disputes at any of the Kulim Estates. (2.2.4)

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

The Palong Mill and Estates operations are on either “Freehold Land” or “State Leases”. The land is not encumbered by Customary Rights. (2.3.1)

The right to use the land is not disputed. Where previous disputes have occurred, Kulim Head Office holds detailed maps prepared by an independent surveyor. (2.3.2)

There is no customary land or negotiated agreements for any of the Kulim land. (2.3.3)

**PRINCIPLE 3: Commitment to Long Term Economic and Financial Viability**

Kulim has implemented a management system for monitoring and reporting of performance against production targets for achieving long-term economic and financial viability. Reports were available showing the details of production and costs. Kulim has continued its commitment to sustainability by funding capital expenditure for improvements at the Mill, such as replacement of the vertical sterilisers and at Estates, such as replanting and construction of new housing.

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

The Palong Mill and the Estates have an annual operating budget for the calendar year 2014 and five-year projections (2014 – 2019) for production. The budgets include performance targets for production and quality and each of

the operating units reports monthly results to senior management. The average annual FFB yield for the Estates (Figure 9) has increased between 2012 and 2013, with the exception of Palong and Mungka which decreased slightly. Labis Bahru Estate yield increased because of improved crop recovery and the replanted palms are starting to reach maturity. (3.1.1)

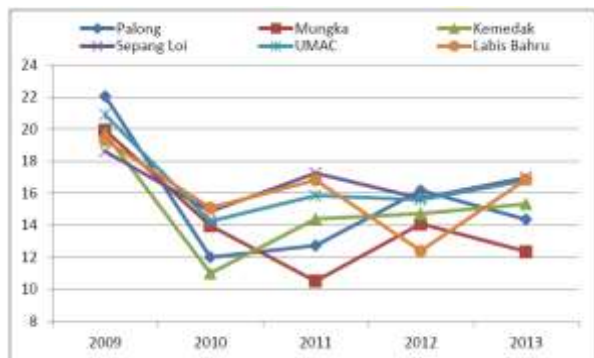


Figure 9: Average Annual FFB Yield 2009 – 2013

The average annual OER (Figure 10) has decreased slightly from 20.4% in 2012 to 20.15% in 2013. This was explained as being due to reduction in the quantity of loose fruit delivered to the Mill from 12% of FFB in 2012 to 10% of FFB in 2013.

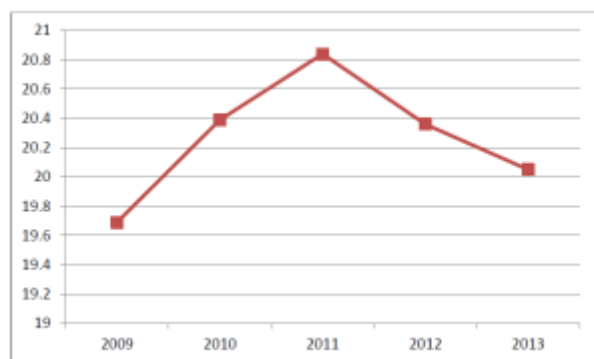


Figure 10: Average Annual Mill OER (%) 2009-2013

Each of the Estates has a ten-year replanting plan that details the schedule and areas to be replanted. (3.1.2)

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

Kulim has well established management systems for monitoring and control of best practice implementation at its Mills and Estates. This includes the programme of regular internal audits by Mill Visiting Engineer, Plantation Inspectors and Agronomists for maintaining and improving production.

The boundaries of stream buffer zones that will be reinstated at future replanting were maintained and inspection showed that herbicides had not been applied to these areas. Inspection of recently replanted areas confirmed the buffer zones were set aside in accordance with Kulim Policy. The use of pesticides is closely controlled and field inspection confirmed sprayers were using correct

application techniques and were observing safe work practices. Kulim has continued to give high priority to safety of employees and contractors which has resulted in low LTA index at the Mill and Estates.

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

Palong Mill SOPs are controlled documents under the ISO 9001:2008 Quality Management System. The Mill reviewed the SOPs in July 2010. Copies of Work Instructions have been extracted from the SOPs and illustrated with photographs for each workstation in the Mill. In 2013, Kulim reviewed the SOPs for the Mill and Estates operations and has uploaded these to the Kulim Portal.

Palong Mill has maintained certification of their Quality Management System to the ISO 9001:2008 standard (Certificate No AR1816, current to 10 November 2014). Implementation of SOPs at the Mill was checked by internal audits and the external ISO9001 audit. Interview of a sample of mill operators indicated understanding of the SOP applicable to the workstation.

The Estates SOPs are documented in the Kulim agriculture manual (2007) and a copy was held at each estate visited. The implementation of SOPs is monitored by the Estate Manager, the Plantation Inspector and the Agronomist. (4.1.1) **Observation 01** – Palong Estate held a copy of the Agricultural Manual dated 27 Sept 2007, but it had not been updated with the new issue of Part “K” revised in 2012 – refer Section 3.2 Page 21.

The Mill and Estates maintain records of the monitoring carried out internally by the Mill Visiting Engineer and the Plantation Inspector. The Visiting Engineer made three visits to Palong Mill in 2013. Inspection of a sample of records indicated the Mill has responded to issues raised by the visiting Engineer. The Plantation Inspector visited the Estates twice in 2013 with the most recent to Labis Bahru on 28 August 2013. (4.1.2)

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

The Kulim Agronomists maintained the programme of foliar and soil sampling for assessment of palm nutrition and making recommendations for the annual fertiliser plan, specific to each Estate. For example, the Agronomist visited Labis Bahru Estate in March 2013 and carried out inspection of the palms and foliar sampling. (4.2.1)

The Agronomy team carried out soil sampling at Palong and Labis Bahru Estates out in March 2013 and samples were analysed by UTCL Laboratory, with the results received by the Estates in April 2013. (4.2.2)

Kulim has implemented composting of EFB at a plant near the Palong Mill and the bio-compost is applied to the palms to replace part of the inorganic nitrogenous fertiliser requirement. Approximately 50% of the POME is applied to the palms in a furrow system, and the Kulim Agronomist monitors the yield and nutrition of palms at this location. (4.2.3)

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

Kulim has overlain a topographic map on the soil map to identify areas of potential erosion risk at each Estate. (4.3.1)

There are no steep areas that have been identified for setting aside as conservation areas when replanting is due. Inspection of field conditions at each of the Estates visited showed well established and maintained groundcover vegetation. Kulim has implemented roto-slashing of harvesting paths at flat and gently sloping areas, in preference to use of herbicide. On sloping areas and terraces, stacking of pruned fronds along the contour for protection against soil erosion was relatively consistent. (4.3.2)

Each of the Kulim Estates has an annual budget and a programme for road maintenance. Inspection of each of the Estates visited showed the roads to be accessible indicating that road maintenance was being carried out in accordance with the annual programme for roadside pruning, road repair, drain upkeep, culvert maintenance, road gravelling and grading. Labis Bahru Estate has a ready source of laterite and the roads were in good condition. (4.3.3)

There are no peat soils at any of the Palong Mill supply base Estates. (4.3.4)

There are no sandy, low organic matter or acid sulphate soils at any of the Palong Mill supply base Estates. (4.3.5)

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

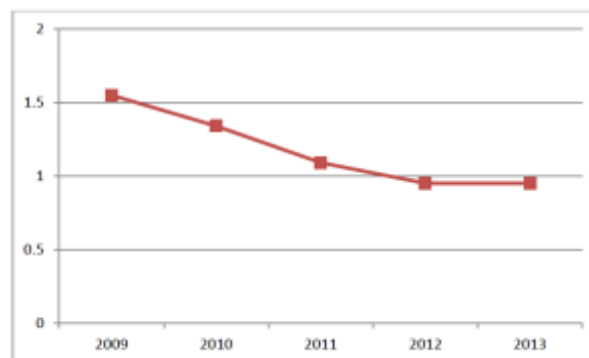
The programme of demarcating buffer zones for reinstatement at future replanting had been completed by painting “blue and white” rings around the trunks of palms to show clearly the boundaries. At Labis Bahru inspection of the replanting confirmed an appropriate width buffer zone had been set aside at replanting for the size of the streams and in accordance with Kulim Policy. (4.4.1)

Inspection of the Estates visited and information provided by Kulim indicated there was no construction of bunds or dams across waterways. (4.4.2)

Inspections of Palong Mill and the Estates visited showed that point source pollutants were well controlled through maintenance of pollution control devices. Records were available to show that the PCDs had been inspected and cleaned weekly. The Mill and Estates carry out monthly monitoring of water quality upstream and downstream of the operations. Review of records for water samples taken by Palong Mill indicated higher TSS downstream than upstream when sampled in November 2013. (4.4.3)

The Mill and the Estates measure daily rainfall and the information is used for assessment of crop projections and for management of the composting site. (4.4.4)

The Mill monitors and reports water usage monthly to Kulim head office. The water usage remained static at 0.94 t/t FFB during 2013 (Figure 11). (4.4.5)



**Figure 11: Annual Mill Water Usage (t/tFFB) 2009-2013**

Inspection of the Estates visited showed that Kulim has demarcated the boundaries of river reserves and that these were being protected from disturbance. (4.4.6)

The water management plan for Palong Mill describes the actions to reduce water usage. The Estates have implemented rainwater harvesting to provide water for general use, such as washing vehicles and equipment. (4.4.7)

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

Kulim’s Agriculture Manual – Section J provides detailed information on Integrated Pest Management including the IPM strategies for a range of palm pests. The IPM Program consists of monitoring of pest numbers and use of biological controls wherever possible. When additional treatment using chemicals is necessary, then this is carried out in a controlled manner. For example, field conditions are inspected for weeds prior to spraying in order to identify the appropriate chemical and spray technique. (4.5.1)

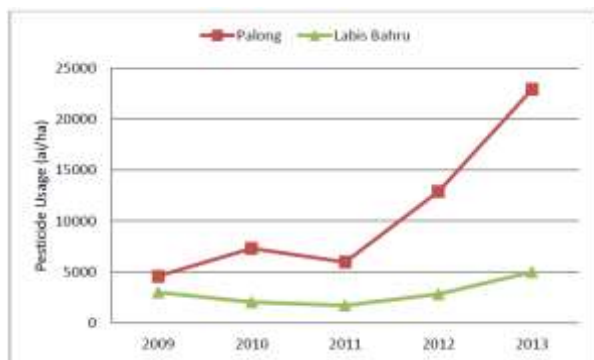
The main palm pest is rats and damage is monitored in the field as well as for the FFB delivered to the Mill. The occurrence of fresh rat damage is used as a trigger for assessment of the need for treatment. Census data are available on a block basis in the form of a map on the “Treatment and Census File”.

Kulim continued the programme for establishment of beneficial plants (*Turnera subulata* and *Cassia cobanensis*) along roadsides through the Estates for control of leaf eating insects. Barn owls have been introduced at each Estate for control of rats and annual census carried out in August 2013 recorded 49% occupancy. (4.5.2)

The daily issues of pesticides are recorded on the Bin Card for each pesticide. At the end of each month, these quantities are transferred onto a monthly summary including active ingredient and records of monthly usage are available since 2007. (4.5.3)

Kulim monitors pesticide usage at each of the Estates and information on pesticide toxicity units for the estates visited is shown in Figure 12. The usage of pesticides is specific to the field conditions at each Estate, which often vary considerably due to environmental factors, such as





**Figure 12: Annual Pesticide Usage 2009-2013**

replanting, the age of palms and outbreak of pests. Labis Bahru Estate has undergone a major replanting program and pesticide usage increased in 2012 due to the application of Ally for control of broadleaf weeds. At Palong Estate, there was an outbreak leaf-eating pests and the marked increase in usage in 2012 and 2013 is due to the high toxicity of the active ingredient in Monochrotophos. (4.5.4)

**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 Kulim Agricultural Manual – Section H – provides justification of the use of chemicals in relation to particular field conditions, such as for controlling individual species of weeds. Table H01 of the Manual provides guidance on pesticide application rates. Copies of the Manual were available at the estates visited. (4.6.1)

Inspection of the pesticide stores and stock inventories showed that only pesticides registered under the Pesticides Act 1974 were held. The CHRA (refer Indicator 4.6.5) was appropriate for the types of pesticides being used, including paraquat. Palong Estate held approval from the Department of Agriculture for the use of Monochrotophos for treatment of an outbreak of leaf-eating insects. A small quantity of paraquat was held at each of the estates visited and this was secured in a separate locked store. (4.6.2)

Inspection of the pesticide stores at Palong and Labis Bahru Estates confirmed pesticides were stored safely in accordance with the manufacturer's instructions. All pesticide storage areas had spill containment, adequate convective ventilation, clear labelling, physical separation by type of chemical, and safety instructions. (4.6.3)

MSDS in Bahasa Malaysia were held at the pesticide stores. Information on the safe handling of pesticides is displayed at the pesticides store and mixing area, in the form of pictorial work instructions. (4.6.4)

Each of the Estates visited held a copy of the results of the medical surveillance carried out in accordance with CHRA requirements. (4.6.5) **Observation 02 – Annual Medical Surveillance was carried out for Labis Bahru pesticide operators and inspection of the Report found 6 workers were recommended to be removed from spraying duties and sent**

**for re-testing. Clarification with management found the workers had been transferred to harvesting duties but at the time of the site visit had not yet been sent for re-testing – refer Section 3.2 Page 21.**

**Observation 03 – At Palong Estate inspection of the CHRA Medical Surveillance found 3 workers (one of whom has returned to Indonesia) were detected with reduction in serum cholinesterase level due to over exposure to the pesticides. The workers were transferred to other duties but it was also recommended in the Report that the workers need to be re-tested. However, at the time of the site visit re-testing of the two workers had not been carried out – refer Section 3.2 Page 21.**

Palong and Labis Bahru Estates employ only male sprayers. (4.6.6)

Kulim uses WHO Type 1A and Type 1B chemicals only on the basis of pest census data when a threshold level is exceeded. Palong Estate had an outbreak of bagworm requiring treatment in 2012 and 2013. Kulim uses paraquat dichloride for control of volunteer oil palms and for weeds in immature palms. Since 2009, paraquat usage at Palong and Labis Bahru, has decreased by 87% and 63%, respectively. Kulim Plantation Department advised that they have kept up to date with research and investigations, but to date there is no suitable economic alternative to the contact herbicide paraquat dichloride. (4.6.7)

Kulim has not carried out aerial application of pesticides at any of its Estates. (4.6.8)

Palong Mill CPO has not been tested for pesticide residues. (4.6.9)

The daily issues of pesticides are recorded on the Bin Card for each pesticide. At the end of each month, these quantities are transferred onto a monthly summary including active ingredient and records of monthly usage are available since 2007. (4.6.10)

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

Kulim has implemented an OSH Management Plan for improvement of safety of employees that was updated in January 2013 for the calendar year. (4.7.1 a)

The Mill and Estates have reviewed and updated the Safety Risk Assessment (HIRAC) for 2013, for example the Mill update June 2013. Review found all areas of operations had been risk assessed. (4.7.1 b)

An Awareness and Training Programme has been prepared for 2013 and cross check with training records indicated, for example, training for sprayers was conducted at Labis Bahru Estate on 20 February 2013 for 18 sprayers and at Palong Estate on 21 March 2013. (4.7.1 c i)

MSDS for chemicals and fertilisers are available in both Bahasa Malaysia and English language. (4.7.1 c ii)

Inspections of the Mill and the Estates visited indicated that safe work practices were being implemented. Workers were observed to be wearing appropriate PPE for the specific task being carried out and the PPE was worn correctly and consistently across most of the sites visited. For example at Labis Bahru, sprayers were wearing a waterproof apron,

respirator, helmet, gloves and boots. At each work location visited safety signs were clearly posted to warn of potential hazards. Records were available of PPE issued to individual workers and contractors, including signatures to confirm receipt. (4.7.1 d)

At the Mill and each Estate there is a designated OSH Coordinator who is responsible for organising safety training, meetings and investigation and reporting of accidents and incidents. (4.7.1 e)

Records were available confirming that quarterly OSH meetings had been held at the Mill and the Estates. For example, the most recent meeting for the Mill was 25 October 2013 with 14 Management/Supervisor/Mandore/Foreman and 8 worker representatives; Labis Bahru Estate 3 September 2013 with 14 participants including 2 Management, 3 Mandores and 9 worker representatives; and Palong Estate 20 September 2013. Palong and Labis Bahru advised their next meetings are scheduled in December 2013. The meeting minutes included details of discussion on safety for each work task, review of safety performance and discussion of workplace health and safety issues. (4.7.1 f)

The Emergency Response Plans at the Mill and each Estate had been reviewed and updated where necessary, such as for changed phone numbers, and workers had been trained in emergency evacuation. The Mill and Estates have site specific Plans including maps showing assembly areas and lists of emergency contacts. For example, the Mill Emergency Exit Plan and up-to-date contacts are displayed beside the main office door. Interviews of Mills and Estates staff and workers confirmed understanding of emergency response. (4.7.1 g)

The Health Assistant has carried out first aid training for Mill workers on 22 May 2013 with 40 participants. At Palong Estate, Jabatan Perkhidmatan Awam Segamat (JPAM) carried out first aid training. First Aid Training was carried out at Labis Bahru Estate by the Health Assistant on 9 September 2013 for 17 workers. (4.7.1 h)

First Aid Kits are installed at various work stations at the Mill and Estates and inspection confirmed these had been inspected and were appropriately stocked. (4.7.1 i)

**Observation 04** – During interview of Labis Bahru Estate harvesters it was found that the Mandore had not brought the first-aid kit to the field – refer Section 3.2 Page 21.

All accidents are investigated and reported to Head Office. The LTA Index (number of lost days per 200,000 man hours worked) is updated monthly for each Mill and Estate. Accident statistics are reported monthly to head office and yearly to DOSH, with the report for 2012 calendar year issued on 08 January 2013. The long term trend of the LTA index (Figure 13) shows consistently low value for Palong Mill and improvement at the Estates. (4.7.2) **Observation 05** – At Labis Bahru Estate, the OSH Meetings could be improved by including “Discussion of Reportable Accident” in the meeting agenda – refer Section 3.2 Page 21.

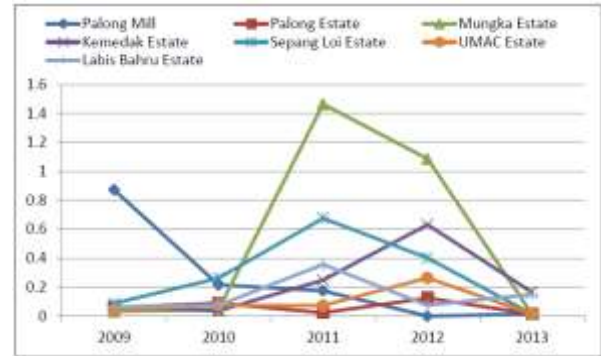


Figure 13: LTA Index 2009-2013

Mill and Estates Staff and local workers are covered by Social Security Organisation Insurance (SOCSO) with relevant amounts deducted from their monthly salary. Foreign workers have Worker Compensation Cover by Berjaya Sampo Insurance Berhad current 01/01/2013 to 31/12/2013. For example, review of records confirmed 17 foreign Mill workers are covered under Policy Number 13DJB/WWSCZ14392, at Palong Estate 131 Foreign workers are covered under Policy No 13DJB/WWCZ14445 and at Labis Bahru 106 Foreign workers are covered under Policy No 13DJB/WWSCZ143374. (4.7.3)

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

Kulim has prepared an Annual Training Plan 2013 that lists the internal and external training courses scheduled for the Mills and Estates during the year. In addition each Mill and Estate has a schedule of “on-the-job” training for the main tasks. Inspection of training records showed that training was carried out during 2013 in accordance with the Training Plan. The Mill and each of the Estates visited maintained records for individual staff and workers of training, including induction of new workers. (4.8.1)

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

The Mills and Estates reviewed and updated the Environmental Improvement Plans that continued to focus on reducing the impact of point source pollutants. The Estates Improvement Plans included expansion of biological controls, such as barn owls and beneficial plants in the IPM Programme. Kulim has continued to engage with the Wildlife Conservation Society, Johor Branch, for awareness training in preventing human-wildlife conflicts.

Inspections confirmed that conservation set-asides and riparian buffer strips that were re-established during replanting, were being protected from disturbance.

Solid wastes are separated at source and recyclables are stored for sale to a recycler. Kulim has established a contract with a DOE licensed contractor for the removal and safe disposal of scheduled waste. Non-recyclables are disposed in small landfills in accordance with Local Government sanitary landfill regulations.

**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.**

Kulim Sustainability Team worked with representatives from each Mill and Estate at the Training Centre in August 2013 to review the Environmental Aspects and Impacts Register. This involved conducting a re-assessment for each of the significant risks. Palong Mill revised down the risk of organic matter from shredded fibre entering the monsoon drain due to improved operation controls. (5.1.1)

Palong Mill prepared the environmental improvement plan for the 2014 year in October 2013. Significant improvements completed in 2013 were the replacement of the steam ring in all vertical sterilisers to avoid leakage and the installation of condensate recycle in November to reduce oil losses. Each of the Estates visited has prepared an improvement plan that was based on the impact risk assessment results. A significant improvement at Labis Bahru Estate is better control of spraying for maintenance of good groundcover vegetation. For example, spraying of harvesting paths has been discontinued by switching to roto-slashing. (5.1.2)

**Criterion 5.2: The status of rare, threatened or endangered species (ERTs) and high conservation value habitats, if any, that exists 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.**

In 2007 Kulim engaged a consultant to undertake a Biodiversity Survey of the Estates and adjacent areas to make an assessment of the occurrence of any HCV within or adjacent to the Estates. (5.2.1)

The HCV Management Plan developed following the 2007 biodiversity assessment has been implemented, and field inspection confirmed the continued protection of areas set aside for conservation. Labis Bahru has maintained protection of a small area of remnant swamp forest within the Estate and there were waterhen and kingfishers present when inspected. (5.2.2)

A Kulim representative contributed to a meeting with Wildlife Conservation Society and the Pahang State Perhilitan Department on the sharing of experiences in managing human/elephant conflict.

Kulim continued to support the Kulim Wildlife Defenders Program through a range of activities involving school children around Kulim Estates as well as the Estate communities and Estate workers on awareness for the prevention of human-wildlife conflict. At Labis Bahru Estate, the signs warning of the protection of conservation set-asides have been maintained. (5.2.3)

**Criterion 5.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.**

The Palong Mill and Estates have identified all sources of wastes and pollutants and documented these in the Environmental Aspects and Impacts Register, which is reviewed annually and updated as necessary. (5.3.1)

Inspections confirmed the Mill solid wastes were consistently controlled in accordance with the Waste Management Plan. EFB was shredded in a hammer Mill then composted with treated Mill effluent. Boiler ash and fly ash were stored in bunkers protected by roofs to prevent material from entering the stormwater drain system. Recyclables, such as scrap metal, were stored in a designated area for sale to a recycler. Non-recyclables and domestic refuse were disposed in a small landfill located within the Estates. **Observation 06** – *At the time of the site visit, only one section of the Palong Mill furrow system for land application had been adequately weeded to enable effective pre-start inspections for assessment of furrow bund condition, while the others were overgrown with grass and weeds – refer Section 3.2 Page 21.*

Scheduled wastes, such as spent lubricating oil and used chemical containers, are stored in secure purpose-built stores. Inspection of the scheduled waste stores and associated records confirmed the monthly stocktakes were kept up to date and the scheduled wastes were well controlled and were collected by DOE Licensed contractors.

Kulim has arranged an annual contract (expiry October 2014) with Kualiti Alam Sdn Bhd for collection and disposal of scheduled waste. Records are maintained of scheduled waste consignments and stocktake of stored materials, in accordance with DOE requirements, for example Consignment Notes 0048515 – 0048517 for waste that was collected on 28 November 2013. Kualiti Alam collected scheduled wastes from Labis Bahru Estate on 02 December 2013, Consignment Notes 0000727-0000729.

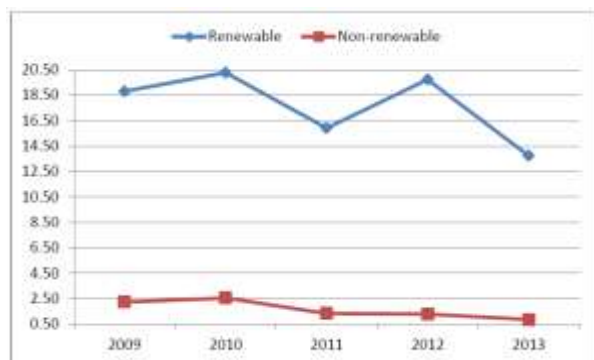
Medical wastes are stored securely at each Clinic prior to transfer to Sindora Clinic for collection by Pantai Medivest. Records were available for management of medical wastes from each Mill and Estate clinic visited. (5.3.2) **Observation 07** – *Review of documentation at Palong Estate Clinic, it was found that Clinic waste was not being disposed of as per EQA 1974 (Scheduled Wastes) regulations, 2005 as there were only two transactions recorded for 2013, ie 10/01/2013 and 05/12/2013. It should be ensured that disposal of clinic waste does not exceed 180 days, as per the regulation – refer Section 3.2 Page 21.*

Inspection of the replanted area at Labis Bahru Estate showed the felled palms had been chipped and the waste retained in windrows for organic matter. EFB was shredded in a hammer Mill then composted with treated Mill effluent. Boiler ash and fly ash were stored in bunkers to prevent material from entering the stormwater drain system. (5.3.3)

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

Palong Mill maintains records of renewable energy usage (Figure 15), which is reported monthly to head office. The use of the steam turbine for electricity generation has been optimised in order to reduce the dependence on diesel fossil fuel. During the 2013 year, there was a decrease in the rate of usage of electricity generated by the steam turbine, due to the larger quantity of FFB processed. (5.4.1)

Palong Mill also maintains records of non-renewable energy usage. Figure 14 shows a decrease in use of diesel for generating electricity in 2013 due to the extended processing hours when the steam turbine provided power.



**Figure 14: Mills Energy Usage (kWh/tFFB) 2009-2013**

**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.**

Inspections of replanting areas at Labis Bahru Estate showed that the old stands of palms had been felled, chipped and retained in windrows as mulch and there was no evidence of open burning. (5.5.1 and 5.5.2)

The use of fire for waste disposal was not found at the Mill or either Estate location inspected. (5.5.3)

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

Palong Mill and the Estates have documented the improvements to reduce pollution from all of the company's activities in the Environmental Aspects and Impacts Register. (5.6.1)

The Environmental Aspects and Impacts Register is reviewed annually and improvements identified to reduce the risks to the environment. For example during 2013, Palong Mill constructed a roof over the ash bunkers and the fibre storage areas to prevent material from being discharged to the monsoon drain. Kulim has implemented significant improvements to reduce pollution from point sources through, for example, more consistent operational control.

Kulim presently does not have a plan to implement methane capture from the Palong mill effluent ponds, however it is presently constructing a project at Sedenak Mill for biogas capture, with the aim of reducing greenhouse emissions and co-generation of electricity. (5.6.2)

There is no peat soil at Palong Mill supply base Estates. (5.6.3)

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

Kulim has reviewed and updated the SIA and Social Action Plan for the 2013 year.

Local community representatives stated there was good communication with the company and the good relationship was maintained. The JCC continued to operate with meetings at the Mill and Estates.

Interviews of workers and their families indicated they are treated fairly and there were no issues related to discrimination.

The Gender Committees continued to operate successfully for the communication of issues among female staff and workers.

Kulim continued to maintain a good relationship with contractors and outgrowers who confirmed that dealings were fair and transparent.

**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 Kulim Sustainability Team visited the Mill and Estates in May 2013 and met with stakeholders, including workers and their families, local community representatives, contractors and suppliers, for review of the social issues. Following the review, the Mill and Estates prepared site-specific Social Improvement plans consistent with the local situation for the 2013 year. (6.1.1)

Interviews of internal and external stakeholders during the Recertification Assessment confirmed that they had been consulted during the annual review of social issues. (6.1.2)

Inspection of records at locations visited found, for example, the Mill Plan was updated 13 May 2013 with only one issue raised by the Union Representative "not clear on payslips". The planned follow up is to give explanation on pay slips based on the guidelines from MAPA and to record the explanation given to workers. Review of the previous plan showed all issues have been addressed and closed. Inspection of records indicated no issues had been raised at either Palong or Labis Bahru Estates during the SIA review. (6.1.3)

**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.**

Kulim "Communication and Consultation Management Guidelines" that were prepared in 2008 continue to be used by the Managers of the Mill and the Estates. The Guidelines provide local managers with flexibility to use the form of communication that is appropriate for a range of situations that includes workers, community leaders, civil society and government. (6.2.1)

The Estates and Mill Managers are the main point of contact for internal and external stakeholders. Interviews of stakeholders confirmed that Kulim has an open approach to communication with staff, workers and local communities. (6.2.2)

Inspection of records showed that the Mill and Estates maintained their lists of stakeholders up to date with Palong Mill List updated 16 November 2013; Palong Estate 24 October 2013 and Labis Bahru Estate 30 July 2013. Inspection of records at all locations indicated that written communications were replied to promptly with the correspondence kept on file. (6.2.3)

**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.**

The Mill responds to customer complaints by means of the ISO 9001 QMS procedures, while the Estates follow the Kulim communications guidelines. (6.3.1)

The Mill and Estates maintain “Inquiry Registers” for receiving and responding to requests and complaints from employees and external stakeholders. Review of the registers found there was no unresolved grievance. (6.3.2 and 6.3.3)

**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 Kulim operations are on land that is either freehold or on state leases and customary rights are not applicable. (6.4.1, 6.4.2 and 6.4.3)

**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.**

There is a collective Labour Agreement for both workers (NUPW) and staff (AMESU) and pay and conditions are documented and are above the industry minimum standard. (6.5.1)

Interviews of staff and workers confirmed that they had been provided with a copy of their employment contract and they understood their pay rates and deductions and received all entitlements outlined therein. (6.5.2)

The majority of the workforce is made up of single male foreign workers recruited from Indonesia. Interviews of local and foreign workers indicated satisfaction with the standard of housing and facilities. At Labis Bahru Estate houses are in the process of being repainted with 20 units completed during 2013 and the remaining 20 during 2014. Interview of residents at all locations visited found requested repairs were being carried out in a timely manner. Each location visited held a “Housing Repairs Register”. For example, inspection of Labis Bahru Estate Register showed repairs are carried out in a timely manner with no outstanding entries. At the more remote locations, Kulim provides water and electricity. Review of water quality test results for water supplied to housing confirmed compliance with the Malaysian Drinking Water Quality Standard. In addition, samples are sent to the Wacco Industrial Services Sdn Bhd Laboratory monthly for analysis. Residents at all company housing have access to facilities established by the company, such as health clinic, sports field, community hall, crèche, and places of worship. Kulim provides free bus transport and uniforms for Primary school children of staff and local workers. (6.5.3) **Observation 08 – At Palong Mill, treated water for the domestic supply is tested regularly for physico-chemical properties and daily for residual free chlorine. An improvement would be to carry out bacterial testing periodically to assess the effectiveness of chlorine**

*disinfection of the treated water supply – refer Section 3.2 Page 21.*

**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.**

Interviews of staff and workers and Officials from the NUPW Kluang Office confirmed Kulim supports freedom of association. At the Mill and Estates there is a local committee made up of union representatives elected by members. Records are kept of meetings between company representatives and the local union committee members, for example, at Labis Bahru Estate a meeting was conducted on 18 April 2013 attended by the Estate management, field workers, and field supervisors. Topics of discussion included Housing, FFB harvesting, worker’s payments and amenities. Palong Estate held a meeting with workers on 19 September 2013. (6.6.1 and 6.6.2)

**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.**

Inspection of a sample of personnel files at the Mill and Estates confirmed recruits’ ages were checked against their Malaysian Identity Card, or in the case of foreign workers, their passport. Under-age persons were not observed at any of the work locations inspected during the Recertification Assessment. (6.7.1)

**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 Kulim Sustainability Handbook includes a Policy on Equal Opportunities. The Kulim Handbook and Policies are publicly available and the policies are displayed prominently on notice boards at the Mill and the Estates. (6.8.1)

Inspection of a sample of pay records and interviews of staff and workers at the Mill and Estates did not identify any issues related to discrimination. The NUPW Union Officials stated they had never received any complaint related to discrimination in Kulim’s treatment of employees. (6.8.2)

**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 Sexual Harassment and Prevention of Violence against Women is displayed prominently on notice boards at the Mill and Estate Offices. Interviews of internal and external stakeholders confirmed awareness and understanding of the Policy. (6.9.1)

Gender Committees continue to operate at each of the locations visited. Interviews and inspection of Meeting Minutes indicated grievances were rare and the gatherings continued to be used for arranging social activities and events. (6.9.2)

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

Kulim Finance Department arranges contracts for the purchase of goods and services, including those with FFB suppliers. Kulim pays in accordance with the MBOB formula plus a premium for FFB quality. The Mill displays the current FFB price on a notice at the Weighbridge and records are available of past prices paid for FFB. Interviews of FFB Traders confirmed Kulim deals fairly with them and they do not experience any delays in receiving payment. Kulim makes two (2) progress payments during the month for FFB deliveries and the final payment during the first week of the new month. Interviews of contractors and suppliers indicated that contracts are legal and binding and they understand the Terms and Conditions therein and they have a good relationship with the company. (6.10.1 – 6.10.4)

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

The public infrastructure is well developed near the Mill and Estates visited and government services are readily accessible. Kulim has continued to make appropriate contributions to local communities in the form of donations and assistance to schools and local communities.

**PRINCIPLE 7 is not applicable as there has been no new development at any Kulim Estate.**

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

Kulim Estates have continued the programme of establishing beneficial plants and the deployment of barn owls, with the aim of reducing the use of pesticides. The use of WHO Type 1A and Type 1B pesticides has been kept to a minimum and such pesticides are used only when pest census numbers exceed a pre-determined threshold. Kulim has continued to use paraquat dichloride for two (2) specific applications, but at the same time has kept usage to a minimum as there is still no economically viable replacement. (8.1.1)

Kulim Sustainability Team has worked with the Mill and the Estates to review and update the environmental aspects and impacts risk registers and to develop improvement plans. The company is continuing with the replanting program to reduce the age profile of the palms. The Mill has been working with the Estates and outside suppliers to improve FFB quality and the OER which is an important indicator of processing efficiency. (8.1.2)

The Mill has optimised the use of steam turbines for generating electricity, which has reduced the dependence on the use of non-renewable diesel fuel. Water usage was within the 2013 target set for Palong Mill, and the engineering team is investigating additional methods for reducing consumption. The Mill recycles all the empty bunches and mill effluent to the oil palm estates either via composting or direct field application. (8.1.3)

Although there is no biogas project yet planned for Palong Mill, Kulim continues to invest in capital improvements such as the biogas capture project at Sedenak Mill for reducing Green House Gas emissions from effluent treatment. (8.1.4)

The Mill and Estates made significant progress on improvements at housing areas, involving the construction of new houses at Palong Mill and Estate. The company continued to support local schools and places of worship with donations which are considered appropriate for the socio-economic setting. (8.1.5 and 8.1.6)

**3.2 Identified Nonconformities and Noteworthy Positive and Negative Observations (ASA4)**

During this Recertification Assessment a Nonconformity was assigned to Major Compliance Indicator 2.1.1. The Assessment Team also identified eight (8) Observations/Opportunities for Improvement. The progress with these will be checked at the next Assessment Visit.

**CR15 – Major Compliance Indicator 2.1.1 – Evidence of compliance with legal requirements.**

*A Nonconformity was assigned at Palong Estate, because it did not hold a Certificate of Fitness for the workshop air compressor. At Palong Mill, application had been made for renewal of the SPAN license for the water treatment plant, but at the time of the site visit, the license renewal had not been received, despite follow-up by Kulim Property Department.*

**Corrective Actions**

KSTS\* has been instructed to obtain the Certificate of Fitness for all air compressor for Kulim's Estates and Mills, which include Palong Estate, by 31/01/2014. In taking immediate action, KSTS has already liaised with DOSH Inspector Negeri Johor to undertake the inspection of air compressors at all Kulim Estates and Mills once a year for the issuance of the Certificate of Fitness.

KSTS has to submit an annual inspection schedule program and monthly progress report on the inspection conducted by DOSH Inspector to the respective estate and Estate Operation Department as well as Sustainability Department for review and record purposes.

Property Department will continue to follow up with SPAN for the license renewal for water treatment plant and to ensure that the licenses are issued out to the respective Estates and Mills, including Palong Mill.

\* KSTS - Kulim Safety Training & Services Sdn Bhd is a wholly owned subsidiary of Kulim (Malaysia) Berhad

**Objective Evidence Provided:**

*An acknowledgement signed by En Hairozie bin Asri, Statutory Section Head of Jabatan Kesihatan dan Keselamatan Pekerjaan (DOSH) Negeri Johor dated 5/02/2014 and payment voucher ref JH/BIL/14/91 from the same agency dated 5/02/2014 were provided as objective evidence that Kulim has made application through KSTS to obtain renewal of the "Certificate of Fitness" for the air compressor at Palong Estate. Refer Appendix F Document 1a*

*A letter from SPAN signed by Annie Chua Soh Ping, the Director for Tariff and Licenses, Social and Economic Monitoring Department, Suruhanjaya Perkhidmatan Air Negara (SPAN) Malaysia dated 30/01/2014 was provided as objective evidence, acknowledging Kulim's application for*

*Water Treatment Plant license for Palong Mill. Refer Appendix F Document 1b*

BSi considers the Objective Evidence provided is appropriate and the Nonconformity was closed 06/02/2014. Implementation of corrective actions will be checked during the Surveillance Assessment visit 2014.

#### **Observations/Opportunities for Improvement**

- 01 (4.1.1)** Palong Estate held a copy of the Agricultural Manual dated 27 Sept 2007, but it had not been updated with the new issue of Part K revised in 2012.
- 02 (4.6.5)** Annual Medical Surveillance was carried out for Labis Bahru Estate pesticide operators however inspection of Report found 6 workers were recommended to be removed from spraying duties and sent for re-testing. Clarification with management found the workers had been transferred to harvesting duties but at the time of the site visit had not yet been sent for re-testing.
- 03 (4.6.5)** At Palong Estate inspection of the CHRA Medical Surveillance found 3 workers (one of whom has returned to Indonesia) were detected with reduction in serum cholinesterase level due to over exposure to the pesticides. The workers were transferred to other duties but it was also recommended in the Report that the workers need to be re-tested within 1 month. However, at the time of the site visit re-testing of the two workers had not been carried out.
- 04 (4.7.1)** During interview of Labis Bahru Estate harvesters it was found that the Mandore had not brought the first-aid kit to the field.
- 05 (4.7.2)** At Labis Bahru Estate, the OSH Meetings could be improved by including "Discussion of Reportable Accident" in the meeting agenda.
- 06 (5.3.2)** At the time of the site visit, only one section of the Palong Mill furrow system for land application had been adequately weeded to enable effective pre-start inspections for assessment of furrow bund condition, while the others were overgrown with grass and weeds.
- 07 (5.3.2)** Review of documentation at Palong Estate Clinic, found that Clinic waste was not being disposed of as per EQA 1974 (Scheduled Wastes) regulations, 2005 as there were only two transactions recorded for 2013, ie 10/01/2013 and 05/12/2013. It should be ensured that disposal of clinic waste does not exceed 180 days, as per the regulation.
- 08 (6.5.3)** At Palong Mill, treated water for the domestic supply is tested regularly for physico-chemical properties and daily for residual free chlorine. An improvement would be to carry out bacterial testing periodically to assess the effectiveness of chlorine disinfection of the treated water supply.

Progress with the eight (8) Observations/Opportunities for Improvement will be followed up during the 2014 Surveillance Assessment visit.

#### **Noteworthy Positive Observations**

- The Company has continued to invest capital for improving Mill performance and throughput, such as the replacement of vertical sterilisers.
- The Company has continued with the replanting programme to reduce the overall age profile.
- The Mills and Estates continue to maintain a good safety record with regard to work related LTAs.
- Kulim continues to maintain a very good relationship with both internal and external stakeholders.
- The Mill and Estates have continued to make improvements in utilisation of natural resources with reductions in consumption of diesel fuel.
- Gender Committees continued to be active at all locations visited, with a good level of support from Management. This has resulted in creating a social network for female staff and worker engagement.
- Kulim has continued to engage with the Wildlife Conservation Society, Johor Branch.

#### **3.3 Status of Nonconformities (Major and Minor) Previously Identified**

Corrective Actions implemented for the Nonconformities identified at the Mill and Estates during previous Assessments (JCorp and Kulim) remain in place and the nonconformities remain closed.

#### **Review of Progress with Observations/ Opportunities for Improvement Identified at Palong Mill and Supply Base during Kulim ASA4**

- 02 (2.1.1)** Inspection of pay records at Sindora, Tereh and Palong Mills showed a small number of workers exceeded the approved overtime hours during the peak crop period.

**Recertification Findings:** *Inspection of a sample of pay records found overtime hours were in compliance.*

- 03 (4.3.2)** At the Sindora and Palong Mill compost sites, control of soil erosion needs improving to prevent sediment from entering the monsoon drain and depositing in the stormwater pond.

**Recertification Findings:** *Inspection showed improved groundcover vegetation and the Mill had installed a weir in the collection drain to prevent sediment entering the stormwater pond.*

- 05 (4.4.1)** Inspection of replanted areas confirmed buffer zones correctly marked and set aside along small rivers,

but found several palms were planted inside the designated buffer zone beside man-made drains (UMAC P09 Block 2, Mungka P10 Block 2, Ulu Tiram P12).

**Recertification Findings:** *The incorrectly planted palms were removed and the Estate Managers provided photographs of each location to confirm this.*

**08 (4.7.1)** The identification of safety hazards could be improved by consistent implementation of workplace inspections using a standard checklist.

**Recertification Findings:** *Locations visited during the Recertification Assessment found consistent implementation.*

**10 (6.6.1)** There is no Workers Union at Mungka Estate, however the Mosque Committee Meeting is used to gather workers' input in regard to the Estate operations. However, minutes of meetings were not consistently prepared for every meeting conducted.

**Recertification Findings:** *Enquiry confirmed quarterly meetings are held and Minutes are recorded.*

The Assessment Team concluded Kulim had implemented appropriate and effective improvements for the Observation identified during ASA4.

### 3.4 Issues Raised by Stakeholders and Findings with Respect to each issue

The one issue raised by stakeholders during ASA4 was followed up during this Recertification Assessment and found to have been actioned appropriately by the company.

#### Issues Raised by Stakeholders during Recertification

Stakeholders contacted had only positive comments about Kulim and no issues were raised by either Internal or External stakeholders during the Recertification Assessment.

## 4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

### 4.1 Date of Next Surveillance Visit

The next Assessment will be scheduled within 12 months of Kulim's Certificate being re-issued.

### 4.2 Date of Closing Nonconformities (Major and Minor)

Table 5: Status of Nonconformities

CAR	CLASS	ISSUED	CLOSED
CR01 Sindora Mill 4.4.6	Minor	24/07/2008	21/01/2010
CR02 Kuala Kabong Estate 5.6.3	Minor	24/07/2008	21/01/2010
CR03 Sedenak & Sindora Mills 6.5.2	Minor	27/07/2008	21/01/2010
CR04 Tereh Mill 5.3.2	Minor	21/01/2010	10/01/2011

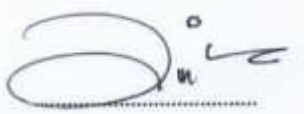
Table 5 Cont'd: Status of Nonconformities

CAR	CLASS	ISSUED	CLOSED
CR05 Sindora Estate 5.3.3	Minor	21/01/2010	13/01/2011
CR06 Sindora Mill 5.3.2	Minor	13/01/2011	05/11/2011
CR07 Sindora Mill 4.4.6	Minor	12/11/2012	"closed" 03/12/2013
CR08 4.3.2	SEDENAK MILL AND SUPPLY BASE		
CR09 4.7.1	SEDENAK MILL AND SUPPLY BASE		
CR10 2.1.1	SINDORA MILL AND SUPPLY BASE		
CR11 5.3.2	SINDORA MILL AND SUPPLY BASE		
CR12 2.1.1	TEREH MILL AND SUPPLY BASE		
CR13 4.7.1	TEREH MILL AND SUPPLY BASE		
CR14 5.3.2	TEREH MILL AND SUPPLY BASE		
CR15 Palong Mill & Estate 2.1.1	Major	12/11/2012	"closed" 06/02/2014

### 4.3 Sign-off of Recertification Assessment Findings

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

Signed for on behalf of  
**Kulim (Malaysia) Berhad**  
Zulkifly Bin Zakariah  
Vice President - Plantation Operations



Date: 25/02/2014

Signed for on behalf of  
**Bsi Group Singapore Pte Ltd**  
Charlie Ross  
Lead Auditor



.....

Date: 25/02/2014



# ***Appendix “A”***

## ***RSPO/BSI Certificate Details***

Kulim (Malaysia) Berhad  
 Ulu Tiram Estate  
 KB 705  
 Johor Bahru  
 Johor 80990 Malaysia

Current Certificate Number : SPO 537873  
 Certificate Issue Date: 23/01/2009  
 Recertification Certificate Number: (will be assigned upon RSPO Approval)  
 Certificate Re-issue Date: (will be issued upon RSPO Approval)

Website: [www.kulim.com.my](http://www.kulim.com.my)

Standards: RSPO Principles & Criteria : 2007; Malaysia National Interpretation & Guidance : 2010; RSPO SCCS 2011  
 Module E – CPO Mills : Mass Balance

PALONG PALM OIL MILL AND SUPPLY BASE	
Location	Johor, MALAYSIA
Address	KB 504 85009 Segamat Johor MALAYSIA
GPS Location	2° 42' 23.094" N 102° 47' 6.0432" E
CPO Tonnage Total Production (mt)	37,516
PK Tonnage Total Production (mt)	9,712
Company owned Estates FFB Tonnages (mt)	Palong (9,526); Mungka (15,123); Kemedak (14,285); Sepang Loi (19,056); UMAC (27,506); Labis Bahru (30,336)
“Outside” Estate and FFB Traders Tonnages* (mt)	66,623
CPO Tonnage Claimed ** (mt)	23,817
PK Tonnage Claimed ** (mt)	6,166

\* Production from the “Outside” Estate and FFB Traders is excluded from the Certificate.

\*\* The tonnage claimed is the proportion of the total FFB production sourced from Company owned Estates.

# ***Appendix “B”***

## ***Supply Chain Assessment***

**APPENDIX B – SUPPLY CHAIN ASSESSMENT REPORT – RSPO SCCS 2011 Module E – CPO Mills : Mass Balance****KULIM (MALAYSIA) BERHAD – PALONG MILL AND SUPPLY BASE****Certified Mill Production – 01 November 2012 – 31 October 2013**

MILL	CAPACITY	CSPO	CSPK
Sedenak	75 t/hr	35,915	10,016
Sindora	45 t/hr	29,590	9,113
Tereh	60 t/hr	63,1245	17,280
Palong	40 t/hr	24,855	6,572
<b>TOTAL</b>		<b>153,484</b>	<b>42,981</b>

**Total Sales\* of Kulim Certified Mill Products – 01 November 2012 – 31 October 2013**

CSPO	CSPK
136,942	19,529

\* Since the Initial RSPO Certification, Kulim has operated under a single RSPO Certificate and the sales of Certified Mill Products were not recorded against individual mills.

**Total Sales\* of Kulim Certified Mill Products – 01 November 2012 – 31 October 2013**

Months	GreenPalm Trade Certificates		RSPO (eTrace)		ISCC Certificates	
	CSPO	CSPK	CSPO	CSPK	CSPO	CSPK
Nov - 12	18,996	-	70	-	-	-
Dec - 12	13,120	7,529	70	-	-	-
Jan - 13	-	-	-	-	-	-
Feb - 13	-	1,000	1,060	-	-	-
Mar - 13	-	-	80	-	5,400	-
Apr - 13	4,011	-	-	-	1,580	-
May - 13	40,000	-	130	-	6,300	-
Jun - 13	10,000	2,000	-	-	6,460	-
July - 13	-	-	100	-	210	-
Aug - 13	-	-	600	-	-	-
Sep - 13	-	600	845	-	800	-
Oct - 13	27,000	8,400	110	-	-	-
Nov - 13	-	-	-	-	-	-
Dec - 13	-	-	-	-	-	-
<b>TOTAL</b>	<b>113,127</b>	<b>19,529</b>	<b>3,065</b>	<b>0</b>	<b>20,750</b>	<b>0</b>

\* Since the Initial RSPO Certification, Kulim has operated under a single RSPO Certificate and the sales of Certified Mill Products were not recorded against individual mills.

**PALONG MILL SUPPLY BASE****Certified FFB Received Monthly - 01 November 2012 – 31 October 2013**

Month	Palong	Mungka	Kemedak	Sepang Loi	UMAC	Labis Bahru	Total FFB/Month
Nov-12	979.91	1,104.67	992.56	1,868.28	3,034.95	3,581.22	11,561.59
Dec	808.26	791.82	849.4	1,764.75	2,218.41	3,554.08	9,986.72
Jan-13	748.14	684.51	815.32	1,378.9	1,681.84	2,958.44	8,267.15
Feb	703.09	612.42	615.78	1,084.29	1,180.18	2,261.2	6,456.96
Mar	617.61	525.54	603.54	965.03	1,314.86	2,314.84	6,341.42
Apr	892.33	909.65	878.97	1,166.44	1,702.94	2,129.37	7,679.70
May	859.58	1,037.64	1,039.63	1,355.83	1,683.13	2,299.24	8,275.05
Jun	852.76	1,079.11	1,131.41	1,341.49	1,781.82	2,291.47	8,478.06
Jul	1,201.12	1,276.42	1,649.55	1,951.53	3,185.72	2,728.17	11,992.51
Aug	1,242.39	1,522.44	1,555.93	1,943.78	4,340.81	3,817.22	14,422.57
Sep	1,095.55	1,672.12	1,549.52	2,094.22	5,300.59	4,270.19	15,982.19
Oct	1,103.38	1,785.62	1,750.55	2,331.57	3,853.67	3,772.15	14,596.94
<b>TOTAL</b>	<b>11,104.12</b>	<b>13,001.96</b>	<b>13,432.16</b>	<b>19,246.11</b>	<b>31,278.92</b>	<b>35,977.59</b>	<b>124,040.86</b>

**Certified Company Details**

Kulim (Malaysia) Berhad  
 Ulu Tiram Estate  
 KB 705  
 Johor Bahru  
 Johor 80990  
 MALAYSIA

Contact Person: Mr Sallehuddin Mohd Noh  
 Senior Manager  
 Phone: +6078611611  
 Fax: +6078631084  
 Email: [sallehuddin@kulim.com.my](mailto:sallehuddin@kulim.com.my)

RSPO Membership No: 1-0006-04-000-00

**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  
 Phone: +65 6270 0777  
 Fax: +65 6270 2777  
 Email: [Aryo.Gustomo@bsigroup.com](mailto:Aryo.Gustomo@bsigroup.com)

**Summary**

Supply Chain assessment was made for the production from Palong Mill that is owned and operated by Kulim (Malaysia) Berhad. The assessment included site visits to the Mill and Palong and Labis Bahru Estates, Kulim Marketing Department, review of records and interviews of staff. Since Initial RSPO Certification, Kulim has operated under a single RSPO Certificate for the four (4) Mills: Sedenak, Sindora, Tereh and Palong. Kulim sold: 113,127 Green Palm Certificates equivalent to 113,127 tonnes of CSPO; 19,529 Green Palm Certificates equivalent to 19,529 tonnes of CSPK; and 23,815 tonnes of CSPO through the eTrace sales system during the period 01 November 2012 – 31 October 2013. Kulim's sales of CSPO and CSPK were within the quantities stated on the RSPO Certificate. The assessor concluded Kulim has implemented an appropriate management system for controlling the purchase of certified FFB, processing of same and for tracking sales. Kulim maintains adequate records for confirming compliance with the RSPO supply Chain traceability requirements as applicable to all Kulim Mills.

**Conclusion**

The Kulim management system and records meet the requirements of the RSPO Supply Chain Certification Standard : November 2011, Module E – CPO Mills : Mass Balance. Kulim Marketing Department manages all sales of CPO and PK on behalf of the Kulim Mills. The system is computerised and Kulim Marketing Department transfers information electronically to the Mills for including the RSPO Supply Chain information for the despatch note and the sales invoice. Inspection of documents confirmed that Kulim maintains all of the applicable documentation required for verification of implementation of the RSPO Supply Chain Certification Standard : November 2011, Module E – CPO Mills : Mass Balance.

## 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 (ASA4)

#### (c) On-Site Visits

### Visit Itinerary

Friday 06 December 2013 – Palong Mill – Opening Meeting held at Mill Meeting Room; Weighbridge Station; examined weighbridge records; daily Transaction Report of FFB deliveries, CPO Despatch Book; Kernel Despatch Book; Despatch Advice Book; CPO Bulk Tank and PK Silo records; Copy of CPO Contracts; Copy of Kernel Contracts; Weighbridge Dockets. Closing Meeting Tuesday 12 November.

People consulted: Mohd Khairudin Bin Idris (Manager); Amir Muslimin Bin Mohamed (Asst Engineer); Mohammed Razif Bin Sulaiman (Asst Engineer); Mohd Radzi Bin Muhamad Dul (Asst Engineer); Weighbridge Operator.

Tuesday 10 December 2013 – EPA Head Office (Marketing Department): Examined sales recorded in the eTrace system and related supply chain documents.

People consulted: Mohd Radzi Mohamed (Marketing Manager)

### Scope

The scope of the assessment covered Palong Palm Oil Mill and the supply base of Kulim owned and operated Estates, with visits to Palong and Labis Bahru Estates. The Supply Chain mechanism used is Mass Balance. The Kulim operations were assessed against the RSPO Supply Chain Certification Standard : November 2011, Module E – CPO Mills : Mass Balance.

### Description of Operation's Management System

Kulim uses the mass balance mechanism for Palong Mill supply chain because it processed non-certified crop from “outside suppliers” during the period 01/11/2012 – 31/10/2013. All consignments of FFB despatched from the Estates 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 Palong and Labis Bahru Estates. 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 Kulim Head Office that records the quantity of FFB received from the Estates and outside suppliers; the tonnage of FFB processed; the tonnages of CPO and PK produced; despatch tonnages; and the quantities of materials held in stock at CPO Tanks, PK Silos and unprocessed FFB at the Ramp. The Mill and Estates also report the above quantities monthly to Kulim Head Office.

Kulim Marketing Department notifies the Mill and Kulim's Contract Transporter of individual contracts from customers and provides a copy of the contract. When the Contract Tanker arrives at the Mill the driver provides a copy of the Collection Order, which the Mill then checks this for match with Marketing Department Contract details. The Mill then inspects the tanker for cleanliness and safety before weighing at the weighbridge. The mill starts filling the tanker and samples the product and tests the quality immediately before continuing to fill the tanker. The tanker is then filled with the Collection Order quantity, weighed then Kulim Security attach seals to each tanker manhole and valve and records the seal numbers on the Weighbridge Ticket and the CPO Despatch Book. The weighbridge Operator fills in details of the despatch in the MPOB Despatch Book and gives the tanker driver a copy of the weighbridge ticket and the MPOB Despatch ticket. The weighbridge Operator then informs Marketing Department of the tanker despatch and quantity.

Checks of a sample of records at the Mill confirmed the sales of CPO and PK matched the despatch quantities during the preceding 12 months (01 November 2012 – 31 October 2013). Inspection of documents confirmed that Kulim maintains the documentation required for supply chain verification (RSPO Supply Chain Certification Standard : November 2011, Module E – CPO Mills : Mass Balance).

### Certified Volume Purchased and Claimed

The following certified FFB material was received from Kulim Estates during the 01/11/2012 – 31/10/2013 year and processed at Palong Mill: 124,040.86 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 controlled documents under the Mill ISO 9001 Quality Management System, are current and include all elements of the Supply Chain for controlling the receipt, sale and dispatch of palm products.*
  - 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 Marketing Manager has overall responsibility for the Supply Chain traceability activities – planning and executing sales of CSPO & CSPK. aspects of FFB receipts, processing and shipping of palm products. Interview of the Marketing Manager confirmed his knowledge of the RSPO Supply Chain requirements and he was able to demonstrate use of eTrace to track sales and shipments of products.*
- 1.2 The facility shall have documented procedures for receiving and processing certified and non-certified FFB. *Complies – the Mill Weighbridge SOPs cover 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, Document No: PCM/SOP/5.2/ REV No: 0; Issue No:2 /Procedure 6.1 Reception of FFB/ 01 July 2010 Document No: PCM/SOP/5.2/ REV No: 0; Issue No:2 /Procedure 6.2 Despatch of CPO/ 01 July 2010 Document No: PCM/SOP/5.2/ REV No: 0; Issue No:2 /Procedure 6.3 Despatch of PK/ 01 July 2010 Document No: PCM/SOP/5.2/ REV No: 0; Issue No:2 /Procedure 7.0 Process Monitoring/ 01 July 2010 Document No: PCM/SOP/5.2/ REV No: 0; Issue No:2 /Procedure 8.0 Weighbridge Maintenance/ 01 July 2010*

### 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 Mill Production Report.*
- 2.2 The facility shall inform the CB immediately if there is a projected overproduction. *Complies – the Marketing Department has a mechanism for advising the CB of production variations, which are monitored internally, using information from the Monthly Reports.*

### 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 3 years, in accordance with ISO 9001 QMS, but 5 years relating to RSPO.*
- 3.3 a) 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 – the Mill prepares a “Monthly Progress Report” for Head Office on the quantities of crop received by source, processed, dispatch of CPO & PK and held in stock.*
- b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. *Complies, the volumes held in stock are updated and reported to Head Office daily and monthly.*
- c) The facility can only deliver Mass Balance sales from a positive stock. However, a facility is allowed to sell short. *Complies –The Company policy is to only make sales of stocks of palm product held in storage. The company did not make any physical deliveries of CSPO or CSPK outside of stock holdings.*
- 3.4 The following trade names should be used and specified in relevant documents, e.g. purchase and sales contracts, e.g. \*product name\*/MB or Mass Balance. The supply chain model used should be clearly indicated. *Complies – Kulim uses the prefix “CSPO Mass Balance” on the Product Code.*
- 3.5 In cases where a Mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the Mills and does not need to be separately certified. The Mills have to ensure that the crush is covered through a signed and enforceable agreement. *Complies – The company does not out-source activities to Kernel Crushing Mills.*

### 4. Sales and goods 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; *Complies – included on invoice.*
  - The date on which the invoice was issued; *Complies*
  - A description of the product, including the applicable supply chain model (Segregated or Mass Balance); *Complies (MB)*
  - The quantity of the products delivered; *Complies*
  - Reference to related transport documentation. *Complies – dispatches include details of the transport vehicle/vessel and shipper and the serial numbers of seals attached to the container for product security.*

### 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 – Inspection of a sample of records at the Mill and Marketing Department confirmed Kulim maintains records of training. Interviews of Marketing Manager and Mill Staff confirmed knowledge of the Supply Chain requirements. For example, the Mill holds records for RSPO Supply Chain training held at Kulim Head Office and attended by Assistant Engineers on 31 January 2013.*

### 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 “C”***

### ***New Team Members CV***

*Isman Yusoff, Nabila Seth Niven and Dian Ekowati*



**CURRICULUM VITAE FOR ISMAN YUSOFF****1. PERSONAL PARTICULARS**

**Name** : Isman Bin Yusoff  
**Gender** : Male  
**Nationality** : Malaysian  
**D.O.B.** : 7 April 1962  
**Language Proficiency** : Written: English and Bahasa Malaysia  
 Spoken: English, Malay and Indonesian  
**HPhone/Contact No.** : +6012 3159639  
**E mail address** : ismanyusoff@yahoo.com

**2. ACADEMIC AND PROFESSIONAL ATTAINMENT**

<b><i>Name of institution/ organization</i></b>	<b><i>Period of Study</i></b>	<b><i>Degree or Diploma Obtained / Name of course</i></b>
Universiti Teknologi Mara-Shah Alam, Malaysia-Faculty of Business Management	Aug 1999- Aug 2001	Executive Master in Business Administration
University of Missouri at Rolla, Missouri, USA	June 1980- Dec.1984	Bachelor of Science in Electrical Engineering
Lead Auditor(Quality) with Institute Registered of Certified Auditor(IRCA), U.K	19- 23, Feb. 199 0	Lead Auditor Certificate/5 days LA/A course
Lead Assessor/Assessor of Quality Management System IRCA	Register since 1995	Certificate in IRCA registered Lead auditor-Registered No. (A006056)
Standard And Industrial Research Institute of Malaysia, Shah Alam	15 Jan 1996	Certificate –ISO 14001 Awareness Course on EMS
Det Norske Veritas UK, DNV Singapore	8-9 Jan. 1996	Certificate of Training-Introduction to Environmental Management System
Det Norske Veritas BV Netherland, Kuala Lumpur	16-18 April 1996	Certificate of Attendance-Developing a Certifiable ISO 14001 EMS
Det Norske Veritas UK , DNV Hong Kong,	17-21, June 1996	Certificate Of Training-EARA Advanced Environmental Management System Auditing (EARA Approve)
Det Norske Veritas, Kuala Lumpur	9-13, March 1998	Modern Safety Management
Det Norske Veritas, Loss Control	20-24, July	Accredited Safety Auditor

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Management, Kuala Lumpur	1998	
Det Norske Veritas, Singapore	1-3 Nov. 2000	Certificate of Achievement-OHSAS 18001
Det Norske Veritas Norway, Holmen Fjordhotel Norway	12-16 Febuary 2001	Diploma-Journey Port 1(Managment course)
Alan A. Griffin UK Ltd/Malacca	10-11 Jan. 2002	Certificate of Qualification ISO 9001:2000 Transistion
Qualified Lead auditor for ISO 14001 and OHSAS 18001 by DNV.		Lead Auditor Training Course on EMS/OHSAS 18001
Det Norske Veritas, Kuala Lumpur	13 May 2003	OHS & Environmental Legislation of Malaysia.
MDEC & TUV Rhenland-MDEC, Cyber jaya	25-27 July 2011	Assessor Training for Qualification for MSC Malaysian product and Rating
British Standard Industry(BSI), Hong Kong	15 & 16 Feb 2012	Sustainability Reporting Assurance & Standard Training
BSI , HCM Vietnam	26 & 27 March 2012	ISO 14064 Greenhouse Gas
BSI, HCM Vietnam	28 March 2012	PAS 2060 Carbon Neutrality
BSI Malaysia, Kuala Lumpur	6 Sept 2012	Introduction to RSPO P & C

### 3. PROFESSIONAL QUALIFICATION

- (i) Registered Lead Auditor QMS with IRCA, UK
- (ii) Registered Approved Lead Auditor/Auditor for QMS/EMS/OHSAS with Det Norske Veritas/British Standard Institute
- (iii) Resource person (trainer) for QMS/EMS/OHSAS training
- (iv) BSI Sustainable Palm Oil EMS/OHS Auditor for RSPO

### 4. DETAILED PROFESSIONAL EXPERIENCE

<i>Period of Employment and Name of Employer</i>	<i>Description of Work</i>
<b>BSI Services Malaysia</b>	<b>Operation Director/Senior Lead Auditor</b>
<b>April 2011 to May 2013</b>	<ul style="list-style-type: none"> <li>• Responsible to help formulate the company's overall strategic plan.</li> <li>• Develop and implement operations and delivery strategy aligning with company strategic plan.</li> <li>• Performed capacity and capability planning periodically to ensure optimal delivery</li> <li>• Technical/Certification review on reports form BSI ASEAN before issue of certificate.</li> <li>• Qualification review of all BSI ASEAN LA/Auditor and Nace code</li> </ul>

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<b><i>Period of Employment and Name of Employer</i></b>	<b><i>Description of Work</i></b>
	<ul style="list-style-type: none"> <li>• He is to ensure compliance to all accreditation rules and BSI group rules</li> <li>• Certification audit, training and , assisting in ISO 9001(Quality Management System),ISO 14001 (environmental management system), OHSAS 18001 (occupational health and safety management system) , integrated quality and RSPO – EMS/OHS Audit,</li> </ul>
<b>Det Norske Veritas AS</b>	<b>Managing Director/Head Of Certification / Senior Lead Auditor</b>
<b>December 1993 to March 2011</b>	<ul style="list-style-type: none"> <li>(i) Setting up the DNV as Certification Bodies (1993) in Malaysia with the supervision of the Regional Director and managing the welfare of the employees</li> <li>(ii) Overseeing business growth,budgeting and annual operating plan. Laise and monthly Reporting to Corporate Head office. Monitoring of monthly P &amp; L.</li> <li>(iii) Planning, design, preparing and implementing and the quality management system(local certification procedure)</li> <li>(iv) Coordinating and scheduling the other Lead auditors/Auditors.</li> <li>(v) Marketing of Accredited Quality Management system,environmental, health and safety management systems certification</li> <li>(vi) Qualified Auditor/Lead Auditor</li> <li>(vii) Certification audit, training and , assisting in ISO 9001(Quality Management System),ISO 14001 (environmental management system), OHSAS 18001 (occupational health and safety management system) and integrated quality, environmental, health and safety management systems that includes pre assessment and implementation audit of the management systems for SMEs, MNCs of various industries in Malaysia,Indonesia,Singapore,Vietnam,Philipines,Thailand and China.</li> <li>(viii) Review and revise training materials from DNV to suit local context</li> </ul>
<b>Standard and Industrial Research Institute of Malaysia (SIRIM)</b>	<b>Senior Quality Assessment Officer</b>
<b>Dec. 1990 – Nov 1993</b>	<ul style="list-style-type: none"> <li>(i) Certification audit in ISO 9001 (Quality management system), Conducting assessment for certification to ISO 9001/9002 standards for Standard and Industrial Research Institute Of Malaysia (SIRIM), British Standard Institute QA Of U.K.</li> <li>(ii) Consultancy and Baseline audit to QMS that includes development and implementation of the management systems for SMEs, MNCs of various industries</li> <li>(iii) Design training materials for quality management system internal audit courses, developing and implementing QMS,</li> </ul>

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<b>Period of Employment and Name of Employer</b>	<b>Description of Work</b>
	<p>interpretation of ISO 9001</p> <p>(iv) Conduct training in QMS Internal Audit, Awareness QMS, Developing ISO 9001/9002.</p> <p>(v) Setting up the internal audit procedure and conduct the audit for SIRIM</p> <p>(vi) Planning, design, preparing and implementing and the quality management system(certification procedure) for SIRIM certification scheme with British Standard Institute (BSI QA. UK)</p>
<p><b>Standard and Industrial Research Institute of Malaysia (SIRIM)</b></p> <p><b>April 1985 – Dec. 1990</b></p>	<p><b>Quality Assurance Officer/Quality Inspectorate</b></p> <ul style="list-style-type: none"> <li>• Testing of Electrical Component/Cable in support of SIRIM Product Certification Scheme Activities.</li> <li>• Consignment Certification for Control products (Electrical) coming into Malaysia.</li> <li>• Co-ordinate and supervise inspector team as inspecting agent for VDE of Germany and KEMA of Netherlands</li> <li>• Involves as Field Representative to conduct Initial/Factory Inspection for Canadian Standard Association</li> </ul>

**5. SAMPLES LIST OF ORGANISATIONS FOR WHOM QUALITY ,ENVIRONMENTAL, HEALTH AND SAFETY AUDITS/TRAINING/CONSULTANCY HAS BEEN CARRIED OUT IN Malaysia and Indonesia.**

<b>S/n</b>	<b>Name of the organization</b>	<b>Brief detail of the nature of audit/Training / consultancy</b>

<b>S/n</b>	<b>Name of the organization</b>	<b>Brief detail of the nature of audit/Training / consultancy</b>
1.	PT Pertamina LOBP, Cilacap, Jawa Tengah, Indonesia	Certification Audit on the company's Quality management system to ISO 9001 and Pertamina requirement
2.	Pertamina DPPU, Seakarno Hatta, Jakarta	Certification Audit on the company's Quality management system to ISO 9001 and Pertamina requirement
3.	PT Pertamina UPMS III Depot Padalarang Bandung	Certification Audit on the company's Intergrated Quality environmental, health and safety management system to ISO 14001/OHSAS 18001 ISO 14001:1996 / ISO 9001:2000 / OHSAS 18001:1999(Incuding the Federal/Province Environmantal and Safety Act and Pertamina Requirement)
4.	PT Pertamina Depot, Tg Grem Merak Indonesia	Certification Audit on the company's Intergrated Quality environmental, health and safety management system to ISO 14001/OHSAS 18001 / ISO 9001:2000 / OHSAS 18001:1999(Incuding the Federal/Province Environmantal and Safety Act and Pertamina Requirement)
5.	PT PUNJ LLOYD Indonesia	Certification Audit on the company relevant to the South Sumatra West Java Gas Pipeline Intergrated Management System(ISO 14001:1996 / ISO 9001:2000 / OHSAS 18001:1999) (Incuding the ederal/Province Environmantal and Safety Act and PT Perushaan Gas NegaraRequirement)
6.	Pertronas Carigali-HSEMS	As Lead consulatant and Auditor to develop thePetronas Carigali HSEMS audit protocol. Development of the element of Policy, Organization, Risk Management,Implementation and Monitoring. Based on the protocol which includes the HSE Plan was audited for PMO, Vitnem Operation, the Head quarter, Sabah and the Sarawak operation.
7.	Pertronas Carigali	Training, Consulate and develop the Quality Management system for the company base on their existing procedure. This inckude gap analysis/audit and interview the staff.
8.	PT Dover Chemi,Merak,Java	Certification Audit on the company's Quality management system to ISO 9001.
9.	PT Wartsila Indonesia	Certification Audit on the company Intergrated Management system relevant to the Generator, Transformer manufacturing .Intergrated Management System(ISO 14001:1996/ISO 9001:2000/OHSAS 18001:1999) (Incuding the Federal/Province Environmantal and Safety Act )
10.	Intelchem Sdn Bhd, Pasir Gudong,Johor	Certification Audit on the company's Intergrated Quality environmental, health and safety management system to ISO 14001/OHSAS 18001 ISO 14001:1996 / ISO 9001:2000 / OHSAS 18001:1999(Incuding the Environmantal Quality Act, Safety Act, Factory Machinery Act )

<b>S/n</b>	<b>Name of the organization</b>	<b>Brief detail of the nature of audit/Training / consultancy</b>
11.	PT Mulya Adhi Paramita, Tangerang, Jakarta	Certification Audit on the company's scope on Chemical Storage and Trading Quality management system to ISO 9001.
12.	Sumatec Corp. Sdn Bhd, Selangor	Perform Training on Internal Audit and Awareness to ISO 9001. Certification Audit on the company's scope on Project management and Fabrication of Structure/Tanks/Facilities Quality management system to ISO 9001
13.	KISWIRE (M) SDN BHD, JOHOR	Perform Training on Internal Audit and Awareness to ISO 9001. Certification Audit on the company's scope on Manufacture of wire rope for Oil gas/shipping industry Quality management system to ISO 9001
14.	Mechmar Keppel Engr. .Shah Alam, Malaysia	Perform Training on Internal Audit and Awareness to ISO 9001. Certification Audit on the company's scope on Project management and Fabrication of Structure/Tanks/Facilities Quality management system to ISO 9001
15.	Tepat Teknik Sdn Bhd, Shah Alam	Perform Training on Internal Audit and Awareness to ISO 9001. Certification Audit on the company's scope on Project management and Fabrication of Structure/Tanks/Facilities Quality management system to ISO 9001
16.	Kvaener Process AP Sdn Bhd, Malaysia	Certification Audit on the company's scope on Project management and Fabrication of Structure/Tanks/Facilities Quality management system to ISO 9001
17.	Orbtech Sdn Bhd, Kuala Lumpur	Perform Training on Internal Audit and Awareness to ISO 9001. Certification Audit on the company's scope on Project management in Oil & Gas Quality management system to ISO 9001
18.	Petro Pipe Industry Sdn Bhd , Prai	Certification Audit on the company's scope on Project management and Fabrication of pipe.
19.	PT Humpuss Trading, Jakarta & Semarang, Central Java	Certification Audit on the company's scope on Chemical Trading and petrol station operation to ISO 9001.
20.	Project Lebuhraya Utara Selatan	Certification Audit on the company's Quality environmental, health and safety management system to ISO 9001/ ISO 14001/OHSAS 18001 (included compliance assessment to the local legislation of Malaysia). Training on EMS/OHSAS/QMS awareness and internal audit.
21.	Balfour Beatty Ralls Sdn Bhd -	Certification Audit on the company's Intergrated Quality environmental, health and safety management system to

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S/n	Name of the organization	Brief detail of the nature of audit/Training / consultancy
	Kuala Lumpur	ISO 14001/OHSAS 18001 ISO 14001:1996 / ISO 9001:2000 / OHSAS 18001:1999(Including the Environmental Quality Act, Safety Act, Factory Machinery Act )
22.	GAC Cargo System Malaysia	Certification Audit on the company's scope on Freight Forwarding and Logistics operation to ISO 9001
23.	PT EKA NURI Tg Periok, Jakarta	Certification Audit on the company's scope Cargo Handling, Warehousing and Fuel Handling Transportation Services for Oil and Gas Operation for ISO 9001, OHSAS and ISO 14001.
24.	Sime Darby - SOU 4 (Flemington)	Roundtable Sustainable Palm Oil(RSPO) Principle & Criteria(P&C) Audit
25.	Sime Darby - SOU 2 (Chersonese)	Roundtable Sustainable Palm Oil(RSPO) Principle & Criteria(P&C) Audit
26.	Sime darby - SOU 18 (Diamond Jubilee)	Roundtable Sustainable Palm Oil(RSPO) Principle & Criteria(P&C) Audit
27.	TDM Kemaman	Roundtable Sustainable Palm Oil(RSPO) Principle & Criteria(P&C) Audit
28.	Felda Palm Oil Mill(Leper Hilir)	Roundtable Sustainable Palm Oil(RSPO) Principle & Criteria(P&C) Audit
29.	Sime Darby - SOU 22 (Bkt Benut)	Roundtable Sustainable Palm Oil(RSPO) Principle & Criteria(P&C) Audit
30.	Sime Darby - <b>SOU 1 (Sg. Dingin)</b> , Kedah	Roundtable Sustainable Palm Oil(RSPO) Principle & Criteria(P&C) Audit
31.	TDM - Sg. Tong (K. Terengganu)	Roundtable Sustainable Palm Oil(RSPO) Principle & Criteria(P&C) Audit
32.	Sime Darby - <b>SOU 7 (Bkt. Kerayong)</b>	Roundtable Sustainable Palm Oil(RSPO) Principle & Criteria(P&C) Audit
33.	Sime Darby - <b>SOU 3 (Elphil)</b>	Roundtable Sustainable Palm Oil(RSPO) Principle & Criteria(P&C) Audit
34.	Sime Darby-Pagoh	Roundtable Sustainable Palm Oil(RSPO) Principle & Criteria(P&C) Audit
35.	Felda Palm Oil Mill(Bkt Sagu)	Roundtable Sustainable Palm Oil(RSPO) Principle & Criteria(P&C) Audit

**The above is the samples of Certification audit/training done. Basically Isman had audited more than 800 companies to ISO 9001, ISO 14001, OHSAS 18001 and RSPO in Region South East Asia. The List of Audit Log 1990 to current will be provided upon request.**

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## Nabila Seth Mohd Niven

Client Manager, **BSI Services (M) Sdn. Bhd.**



B-08-01(East), Level 8, Block B, PJ8, No.23,  
Jalan Barat, Seksyen 8,  
46050 Petaling Jaya, Selangor, Malaysia.  
T: +603-79607801 | M: +6012-2488905  
[Nabila.Seth@bsigroup.com](mailto:Nabila.Seth@bsigroup.com) | [bsigroup.com.my](http://bsigroup.com.my)

### Professional Qualification (Current)

---

- Registered Auditor QMS -**IRCA, UK** | Certificate No MY09097-04092
- RSPO-SA – SPO Social Auditor  
**BSI Services (M) Sdn. Bhd**
- Senior Planner since Year 2009

### Academic Qualification (Latest)

---

- BBA (Hons) in Business Studies | Graduated 2006)  
**University Technology Mara, Malaysia**
- Diploma in Business Studies | Graduated 2003)  
**University Technology Mara, Malaysia**

### Working Experience (Latest)

---

- RSPO SA Auditor | January 2012 - Present  
**BSI Services (M) Sdn. Bhd**
- Senior Audit Planner/ISO 9001 Auditor | October 2009 - Present  
**BSI Services (M) Sdn. Bhd**
- Commercial Accounts Desk Senior Officer | August 2007 – August 2009  
**Netstar Advanced Systems Sdn. Bhd.**
- Customer Service Officer | August 2006 - August 2007  
**Netstar Advanced Systems Sdn. Bhd.**
- HR Assistant | March 2006 – August 2006  
**Nestle Products Sdn. Bhd.**





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## Audit Capabilities

- ISO 9001 | Auditor
- RSPO | Social Auditor

## RSPO Audit Experience

From/To: (MM/YY)	Organisation audited:	Standard:	Role in Audit (Trainee, Auditor, Lead Auditor, etc):
Oct 2012	Sime Darby Plantation Sdn Bhd (SOU Flemington & Supply Base)	RSPO P&C, MYNI (Surveillance Assessment)	PRSP0-SA - SPO Social Auditor
Dec 2012	FELDA Palm Oil Mill (Bukit Sagu & Supply Base)	RSPO P&C, MYNI (Stage 2 Assessment)	PRSP0-SA - SPO Social Auditor
May 2013	TDM Plantation Sdn Bhd - Kemaman	RSPO P&C, MYNI (Stage 2 Assessment)	PRSP0-SA - SPO Social Auditor
June 2013	FELDA Palm Oil Mill (Lepar Utara 4 & Supply Base)	RSPO P&C, MYNI (Surveillance Assessment)	PRSP0-SA - SPO Social Auditor
July 2013	Sime Darby Plantation Sdn Bhd (SOU 26)	RSPO P&C, MYNI (Re-certification Assessment)	PRSP0-SA - SPO Social Auditor
Sept 2013	Sime Darby Plantation Sdn Bhd (PT SIA)	RSPO P&C, MYNI (Surveillance Assessment)	PRSP0-SA - SPO Social Auditor
Oct 2013	FELDA Palm Oil Mill (Jengka 21 & Supply Base)	RSPO P&C, MYNI (Surveillance Assessment)	PRSP0-SA - SPO Social Auditor
Oct 2013	FELDA Palm Oil Mill (Jengka 18 & Supply Base)	RSPO P&C, MYNI (Surveillance Assessment)	PRSP0-SA - SPO Social Auditor
Nov 2013	Sime Darby Plantation Sdn Bhd (Melalap)	RSPO P&C, MYNI (Surveillance Assessment)	PRSP0-SA - SPO Social Auditor

## DIAN EKOWATI

Address : Ciomas Cluster Residence, Jalan Gabus 5, Blok A No. 3A  
 Rt. 6/10, Kelurahan Padasuka. Kecamatan Ciomas, Kabupaten Bogor, 16610  
 Provinsi Jawa Barat  
 Phone : +62 812 2219 162  
 Email : [dee.ekowati@gmail.com](mailto:dee.ekowati@gmail.com)

### EDUCATION BACKGROUND

- 2012 Graduate Degree: Bogor Agricultural Institute Graduate School (Master Level), Faculty of Human Ecology, Rural Sociology Study Program, Majoring in Gender and Social Demography. Thesis: Fertility and Gender Relation in Neglasari Village, Jasinga, Bogor, West Java.
- 2006 Bachelor Degree: Bogor Agricultural Institute, Communication and Community Development Study Program. Thesis: Community Empowerment in Ecotourism Development; Pesisir Krui, West Lampung.

### PROFESSIONAL HISTORY

- 2013 Consultant for Participatory MRV Project: Center for International Forestry Research (CIFOR).
- 2009-2013 Facilitator for British Standard Institution Auditors in Conducting RSPO Audits in Indonesia and Malaysia.
- 2011-2012 Research on Landless Farmers Livelihood in West Java rural areas, Neglasari Village, Jasinga Sub-District, Bogor, West-Java, Sajogyo Institute (SAINS).
- 2011-2012 Research on Gender Relation and Women's Decision on the Number of Children, Neglasari Village, Jasinga Sub-District, Bogor, West-Java. Rural Sociology, IPB Graduate School.
- 2011 Co-researcher on research; Farmers Movement to Defend their Land, Atenco, Mexico. SEPHIS.
- 2010-2011 Desk Study on Indonesian Land Reform Initiative – SAINS, Asian NGO Coalition (2010) and International Land Coalition (2011).
- 2010 Study on Women Participation in Government Program aimed for Women Empowerment (Program Pemberdayaan Wanita Keluarga Sehat Sejahtera), Research Institution of IPB, Bogor District, West Java.
- 2010 Impact Study of Government Assistance on Farmers: Superior Rice and Corn Seedlings, Chemical and Organic Fertilizer, Pasuruan and Situbondo Districts, East Java, Indonesia. IPB Research Center.
- 2010 Agrarian Systematic Research;"HGU and its Implications: Tajau Pecah Village, Batu Ampar Sub District, Tanah Laut District and Hayup Village, Haruai Sub District, Tabalong District, South Kalimantan Province. Sajogyo Institute and National Land Academy.
- 2009-2010 Research on Community Satisfaction on PT Antam Tbk's Community Development Program. Bogor. West Java. IPB Research Center.

- 2009 Agrarian Systematic Research; "Agricultural Institution of Production and Distribution in Rural Households Post Land Reform in Gender Perspective: a Case Study in Banjaranyar and Pasawahan Village, Clamls, West Java." SAINS and National Land Academy.
- 2008 Study on Adaptation and Ecological Conflict in Community Surrounds Forest Area: Kasepuhan Sinar Resmi (Abah Asep), Sirna Resmi Village, Cisolok Sub District, Sukabumi District, West Java. Rural Sociology Study Program, IPB Graduate School.
- 2008 PT. Aqua Transportation Impact in Social Economic Aspect of the Community, Part of PT. Aqua CSR Research, Sukabumi, West Java.
- 2007 Facilitating community to manage program from the government in PPK-IPM project (West Java Provincial Government Program to Increase the People's Human Development Index).
- 2005 Research on the Potency to Develop Community Based Ecotourism as an Effort in Empowering Rural-Agro forest Community, Lembaga Alam Tropika Indonesia (LATIN), West Lampung.
- 2005 Research on Local Participative Technology, Petungkriyono Sub District, Pekalongan District, Central Java, LATIN.
- 2004 Facilitating community to establish and manage their own Community Radio, LATIN NGO (Lembaga Alam Tropika Indonesia), West Lampung.
- 2003 Research on Rural Community's Social Economic Potency, Pamijahan Sub District, Bogor, IPB.

#### **TRAINING AND FELLOWSHIP**

- 2011 Tailor Made Short Course Agrarian Transition For Rural Development in Institute of Social Studies (ISS), Erasmus University The Netherland - a cooperation of ISS and Sajogyo Institute.
- 2010 International Workshop on Agrarian Transition in Indonesia, Department of Anthropology, Faculty of Cultural Science, Gadjah Mada University, Jogjakarta.
- 2009 Workshop on Methodology and Public Lecturer with Tania Muray Li and Ben White - SAINS - Agrarian Research Center of IPB and National Land Academy
- 2008 Training on Analyzing Village Potency Data, Sajogyo Institute.
- 2007 Workshop on Character Building - Teacher Institute, Sampoerna Foundation, Jakarta
- 2004 Facilitator Techniques Training, LATIN NGO, WALHI (Wahana Lingkungan Hidup Indonesia) and West Lampung Government.

**PAPER PRESENTED IN CONFERENCES**

- 2010 "Negotiating Space of Critical Collaboration" Presented in Yale International Forum: Interdisciplinary Conference, Social Justice and Rule of Law: Addressing the Growth of a Pluralist Indonesian Democracy, Diponegoro University and Yale University, Semarang, Indonesia.
- 2010 "Gender and Fertility in Plantation". Presented in the International Workshop on Agrarian Transition in Indonesia, Department of Anthropology, Faculty of Cultural Science, Gadjah Mada University, Yogyakarta.
- 2009 "Return to Local Knowledge to Achieve Resilient Agriculture to Climate Change". Presented in the International Seminar on Achieving resilient-agriculture to climate change through the development of Climate-Based Risk Management Scheme, on November 2009, held by Indonesian Association of Agricultural Meteorology.
- 2009 "Poverty and Disparity between Upland and Lowland; Indonesian Case". Presented in the 2nd IRSA (Indonesian Regional Science Association) International Institute (July 2009), held By IRSA and IPB.
- 2005 "The Potency to Develop Community Based Ecotourism; Pekon Pahlungan, Krui, West Lampung" Presented in the Meeting of Petani Repong Damar (P2RD), West Lampung Government.

**BOOK CHAPTERS IN BAHASA INDONESIA**

- 2010 "Membaca Ulang Keberadaan Hak Guna Usaha dan Kesejahteraan Rakyat". (Second Author) in Pengembangan Kebijakan Agraria Untuk Keadilan Sosial, Kesejahteraan Masyarakat dan Keberlanjutan Ekologis. Yogyakarta, Indonesia: SAINS dan National Land Academy Press.
- 2009 "Kelembagaan Produksi-Distribusi Pasca Okupasi dalam Perspektif Gender, Studi Kasus Dua Desa di Kabupaten Ciamis". (First Author) in Memahami dan Menemukan Jalan Keluar dari Problem Agraria & Krisis Sosial Ekologi. Yogyakarta, Indonesia: SAINS dan National Land Academy Press.

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- 2009 "Poverty and Disparity between Upland and Lowland Communities". (First Author) in Economic Journal of Emerging Markets. Special Edition on Regional Economics. Yogyakarta: Faculty of Economics, Universitas Islam Indonesia.

# ***Appendix “D”***

## ***Recertification Programme***

**KULIM (MALAYSIA) BERHAD INITIAL RECERTIFICATION PROGRAMME****PALONG MILL AND SUPPLY BASE 06, 07 and 10 DECEMBER 2013**

**TEAM: CR: CHARLIE ROSS (LEAD AUDITOR); IY: ISMAN YUSOFF; NS: NABILA SETH;  
RR: ROBYN ROSS; DE: DIAN EKOWATI**

DATE	TIME	DETAILS	CR	IY	NS	RR	DE
<b>Friday 6 December PALONG</b>	AM	Opening Meeting (Mill, Palong & Labis Bahru Estates)	√	√	√	√	√
		Inspect Mill/Effluent Ponds/Stores/Workshop/Landfill /Land Application	√				
		Interview Male Staff/Workers	√				
		Joint Interview Contractors/Suppliers (Mill Office)				√	√
		Joint Interview Local Community Representatives (Mill Office)	√				√
	PM	Interview Female Office Staff/Workers	√				√
		Review Pay Documentation				√	√
		Visit Clinic Interview Staff				√	√
		Inspect Housing Interview Residents				√	√
		Document Review including Supply Chain	√			√	√
		Closing Briefing	√			√	√
<b>TEAM 2 Palong Estate</b>	AM	Inspect Estate including any hilly/conservation/HCV areas/buffer zones		√			
		Interview Harvesters/Male Fieldworkers		√			
		Interview Female Fieldworkers/Sprayers (if any)			√		
		Inspect Stores, Workshop, Landfill		√			
		Interview Office Staff/Workers			√		
		Review Pay Documentation			√		
	PM	Joint Interview Contractors/Suppliers (Estate Office)			√		
		Joint Interview Local Communities Representatives (Estate Office)			√		
		Contact Government Offices, NGOs and any other relevant Stakeholders			√		
		Visit Clinic interview Staff			√		
		Inspect Housing interview Residents			√		
		Document Review		√	√		
		Closing Briefing		√			
<b>Saturday 7 December PALONG</b>	AM	Opening Briefing	√	√	√	√	√
		Inspect Estate including any hilly/conservation/HCV areas/buffer zones	√	√			
		Interview Harvesters/Male Fieldworkers/Sprayers	√	√			
		Interview Female Fieldworkers/Sprayers			√	√	√
		Inspect Stores, Workshop, Landfill	√	√			
		Joint Interview Contractors/Suppliers (Estate Office)		√	√		
	PM	Joint Interview Local Communities Representatives (Estate Office)		√	√		
		Interview Office Staff/Workers				√	√
		Review Pay Documentation				√	√
		Visit Clinic Interview Staff				√	√
		Inspect Housing Interview Residents			√	√	
		Document Review	√	√	√	√	
		Closing Briefing	√	√	√	√	
<b>Tuesday 10 December</b>	AM	Interviews EPA Management, Human Resources, Plantation, Engineering and Marketing Departments	√				√
	PM	Prepare Visit Report and Closing Presentation				√	
		Closing Meeting	√			√	√

## ***Appendix “E”***

### ***List of Stakeholders Contacted***

**Stakeholders Contacted – Kulim (Malaysia) Berhad  
PALONG MILL AND SUPPLY BASE**

**INTERNAL STAKEHOLDERS**

<p><b>Mill</b> 3 Male Mill Workers (Foreign) 3 Male Mill Workers (Local) 5 Female Staff/Workers 18 Residents at Housing Clinic Staff</p>	<p><b>Palong Estate</b> 2 Harvesters (Foreign) 8 Sprayers (Foreign) 2 Female Staff/Workers Clinic Staff</p>	<p><b>Labis Bahru Estate</b> 5 Harvesters (Foreign) 5 Sprayers (Foreign) 2 Female Staff/Workers 4 Male Staff Residents at Housing Clinic Staff</p> <p><b>EPA (Head Office)</b> Marketing Department Human Resources Department Property Department Plantation Department Engineering Department</p>
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**EXTERNAL STAKEHOLDERS**

<p><b>Mill</b> HLE Trading Sdn Bhd (Safety Product Supplier) Eng Huat Trading Co (FFB Supplier)</p>	<p><b>Labis Bahru Estate</b> Fadzli Cater Farm Sdn Bhd (Neighbour) Syarikat Hong Leong Huat (Supplier) Wong Foo Chong Trading Company (Contractor) Tong Woon Trading Company (Contractor)</p>
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<p><b><u>GOVERNMENT DEPARTMENTS/STATUTORY AUTHORITIES</u></b> Department of Environment (Kluang) Department of Occupational Safety and Health (Kluang) Department of Labour (Segamat)</p>	<p><b><u>NGOs and OTHERS</u></b> Wildlife Conservation Society, Johor NUPW Selangor and Kluang AMESU Selangor Tenaganita</p>
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## ***Appendix “F”***

### ***Objective Evidence for Closing Nonconformity CR15***

**CR15 – Major Compliance Indicator 2.1.1 – Evidence of compliance with legal requirements.**

A Nonconformity was assigned at Palong Estate, because it did not hold a Certificate of Fitness for the workshop air compressor. At Palong Mill, application had been made for renewal of the SPAN license for the water treatment plant, but at the time of the site visit, the license renewal had not been received, despite follow-up by Kulim Property Department.

**Corrective Actions**

KSTS\* has been instructed to obtain the Certificate of Fitness for all air compressor for Kulim's estates and mills which include Palong Estate by 31/01/2014. In taking immediate action, KSTS has already liaised with DOSH Inspector Negeri Johor to undertake the inspection of air compressor at all Kulim Estates and Mills once a year for the issuance of the Certificate of Fitness.

KSTS has to submit an annual inspection schedule program and monthly progress report on the inspection conducted by DOSH Inspector to the respective estate and Estate Operation Department (EOD) as well as Sustainability Department (SD) for review and record purposes.

Property Department (PD) will continue to follow up with SPAN for the license renewal for water treatment plant and to ensure that the licenses are issued out to the respective estate and mills including Palong Mill.

\* KSTS - Kulim Safety Training & Services Sdn Bhd is a wholly owned subsidiary of Kulim (Malaysia) Berhad

**Objective Evidence Provided:**

An acknowledgement signed by En Hairozie bin Asri, Statutory Section Head of Jabatan Kesihatan dan Keselamatan Pekerjaan (DOSM) Negeri Johor dated 5/02/2014 and payment voucher ref JH/BIL/14/91 from the same agency dated 5/02/2014 was provided as objective evidence that Kulim has made application through KSTS to obtain renewal of the "Certificate of Fitness" for the air compressor at Palong Estate. Refer Appendix F Document 1a

A letter from SPAN signed by Annie Chua Soh Ping, the Director for Tariff and Licenses, Social and Economic Monitoring Department, Suruhanjaya Perkhidmatan Air Negara (SPAN) Malaysia dated 30/01/2014 was provided as objective evidence, acknowledging Kulim's application for Water Treatment Plant license for Palong Mill. Refer Appendix F Document 1b

BSi considers the Objective Evidence provided is appropriate and the Nonconformity was closed 06/02/2014. Implementation of corrective actions will be checked during the Surveillance Assessment visit 2014.

## Appendix F Document 1a – Evidence regarding Certificate of Fitness for Air Compressor



**KERAJAAN MALAYSIA**  
**Resit Rasmi**  
**ASAL**

**(Kew.38E)**  
No Resit : 04102114000703  
Tarikh : 05/02/2014

Diterima daripada : LADANG PALONG

No. Kad Pengenalan/No Daftar Pemiagaan :  
Alamat :

Bil	Perihal Terimaan	Cara bayaran	No rujukan	Kod OSOL/ Amanah	Amaun (RM)
1	PEMERIKSAAN DAN PERKHIDMATAN KILANG DAN JENTERA	TUNAI		71902	40.00
<b>Jumlah</b>					<b>40.00</b>

Ringgit Malaysia: Empat Puluh Sahaja

Catatan : 14/91(5.1.14)

Jabatan: KEMENTERIAN SUMBER MANUSIA  
PTJ: JAB KESELAMATAN DAN KSN PEKERJAAN JOHOR  
Pusat Terimaan: JABATAN KESELAMATAN & KESIHATAN PEKERJAAN JOHOR

(SITI NOR HAFIZZA BTE MD TUGIMAN)

(05/02/2014 11:38:13 AM)

*Ini adalah cetakan komputer dan tidak perlu ditandatangani*

No Kebenaran : BNPK(B.15)248-10(SK.6)JD29(52)



mk 1/1

**Salinan Asal**

Rujukan Kementerian Kewangan:



**KERAJAAN MALAYSIA**  
**JABATAN KESELAMATAN DAN KESIHATAN PEKERJAAN MALAYSIA (Johor)**  
 (KEMENTERIAN SUMBER MANUSIA)

Jabatan Keselamatan dan Kesihatan Pekerjaan  
 Johor  
 Tingkat 9, Menara TJB,  
 Jalan Dato Syed Mohd Mufti,  
 80534 Johor Bahru  
 Johor  
 07-2243076

**KENYATAAN BIL TUNTUTAN**

no daftar tempat bfga : JH/06/04/2450

Kepada	<b>Ladang Palong</b>
Alamat	Ladang Palong, K.B. 530, 85009 Segamat, Johor.
Untuk Perhatian	<b>Pengurus</b>
Nombor Bil	<b>JH/BIL/14/91</b>
Tarikh Bil	06/01/2014
Pengeluar Bil	Mohamad Fauzi Bin Che Yusoff
Tarikh Cetak	06/01/2014

Sila sempurnakan bayaran dalam masa **tiga puluh (30)** hari dari tarikh bil. Jika pembayaran dibuat dalam bentuk Cek, Kiriman Wang atau Wang Pos hendaklah dipalang (Tidak boleh berniaga) dan dibayar kepada **Jabatan Keselamatan dan Kesihatan Pekerjaan Johor**. Semua bayaran hendaklah disertakan dengan bil ini.

Bil	Tarikh	Rujukan Kami	Perkara	Butir-butir Ringkas	Jumlah
1	14/11/2013	JH PMT 21524	TANK	0.16 m3	40.00
<b>Jumlah (RM)</b>					<b>40.00</b>

*Ini adalah cetakan komputer, dan tidak perlu ditandatangani*



**Appendix F Document 1b – Evidence regarding renewal of SPAN license**

**SURUHANJAYA PERKHIDMATAN AIR NEGARA**  
 (NATIONAL WATER SERVICES COMMISSION)  
 Aras Bawah & Aras Satu  
 Prima Avenue, Blok 3510  
 Jalan Teknokrat 6,  
 63000 Cyberjaya  
 Selangor Darul Ehsan, Malaysia

Telefon : (603) 8317 9333/4/5  
 Faks : (603) 8317 9336/9  
 Laman Web : [www.span.gov.my](http://www.span.gov.my)

Ruj. Kami: SPAN/EKS/(PT) 800 – G (bil.19)

Tarikh : 30 Januari 2014

**Pengurus Besar**  
 EPA Management Sdn Bhd  
 Ulu Tiram Estate,  
 K.B. 705,  
**80990 JOHOR BAHRU**

(u.p: Encik Azimin bin Abdullah)

Tuan,

**PERMOHONAN PENDAFTARAN LESEN KELAS KEMUDAHAN DAN PERKHIDMATAN SISTEM BEKALAN AIR PERSENDIRIAN**

- Ladang Tereh Selatan
- Ladang Enggang
- Kilang Kelapa Sawit Palong

Dengan segala hormatnya surat Tuan bertarikh 23 Disember 2012 rujukan PROP/SPAN (CYB)/SL(206)/12-2013(001) serta perkara di atas adalah dirujuk.

2. Dimaklumkan pihak SPAN telah menerima permohonan tuan untuk memperbaharui lesen kelas bagi EPA Management Sdn Bhd dan subsidiari. Pihak kami telah meneliti maklumat yang dikemukakan dan telah disemak untuk tujuan kelulusan pembaharuan tersebut.

3. Sebagaimana yang dimaklumkan oleh Tuan, kelulusan ini diperlukan bagi tujuan pensijilan RSPO bagi subsidiari milik EPA Management Sdn Bhd dan kelulusan segera SPAN mengenai permohonan Tuan amat diperlukan. Untuk itu, pihak kami akan mengambil tindakan segera mengenainya dan maklum balas rasmi akan dikeluarkan dalam tempoh terdekat.

4. Sekiranya pihak tuan mempunyai sebarang pertanyaan dan menghadapi masalah boleh menghubungi Puan Haslina binti Hassan, Bahagian Pelesenan & Tarif

di talian 03-8317 9392 atau email [haslina@span.gov.my](mailto:haslina@span.gov.my). Pihak kami memohon maaf atas kesulitan yang dihadapi.

Sekian, terima kasih.

Yang benar,



.....  
**(Annie Chua Soh Ping)**  
Pengarah  
Bahagian Pelesenan & Tarif  
Jabatan Kawalselia Ekonomi & Sosial  
b/p Suruhanjaya Perkhidmatan Air Negara

ACSP/HH  
AC 