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PUBLIC SUMMARY REPORT

RSPO ANNUAL ASSESSMENT (ASA 3)

**Sime Darby Plantation Sdn Bhd
Management Unit SOU 7 – Bukit Kerayong Palm Oil Mill
Selangor, Malaysia**

Report Author:

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SUMMARY

BSi has conducted the Third Annual Assessment (ASA 3) of Sime Darby Plantation Sdn Bhd, Bukit Kerayong Certification Unit (SOU7) located in Jeram, Selangor, Malaysia comprising one mill, three company owned estates, support services and infrastructure. BSi concludes that Bukit Kerayong Palm Oil Mill and three supply base estates comply with the RSPO requirements [RSPO P&C MYNI 2010; RSPO Certification System June 2007 (revised March 2011) including Annex 4: Procedures for Annual Surveillance Assessment; and Supply Chain Certification Standard: November 2011, Module D – CPO Mills: Segregation]

BSi recommends the approval of Bukit Kerayong Certification unit's operations as a producer of RSPO Certified Sustainable Palm Oil.

ABBREVIATIONS USED

ASA	Annual Initial Assessment
BOD	Biological Oxygen Demand
CAR	Corrective Action Request (for nonconformity)
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
HCV	High Conservation Value
IAV	Initial Assessment Visit
IPM	Integrated Pest Management
MSDS	Material Safety Data Sheet
MY-NI	Malaysian National Interpretation
NUPW	National Union of Plantation Workers
PK	Palm Kernel
PPE	Personal Protective Equipment
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure

1.0 SCOPE OF CERTIFICATION ASSESSMENT

1.1 IDENTITY OF CERTIFICATION UNIT

The Bukit Kerayong Palm Oil Mill and estates are located at Jeram, Selangor, Malaysia. Figure 1 show Bukit Kerayong Estate map and mill. Figure 2 and 3 shows the Bukit Cheraka and Elmina estate field map. These are the two sampled estates assessed during the second annual surveillance assessment. The GPS location and processing capacity of the mill is shown in Table 1 below.

Table 1: Mills GPS Locations

MILL	EASTING	NORTHING
Bukit Kerayong Capacity: 30mt/hour	101° 22'36.66" E	3° 11' 24.58"N

1.2 PRODUCTION VOLUME

The production tonnages for CPO and PK for the period covering the previous assessment and projected tonnage for the next 12 months for the period covering 2014 are listed in Table 2 below.

For the records, Bukit Kerayong Palm Oil Mill achieved highest year to-date OER of 20.21 since commissioning of the mill. Month to-date OER for the month of February 2014 was 21.34.

TABLE 2: PRODUCTION TONNAGES

Bukit Kerayong Mill	CPO	OER	PK	KER
Projected at ASA2	30,256	20.00	8,320	5.50
Actual for ASA2	28,452	19.73	7,745	5.37
Projected for 2014	32,605	20.50	8,747	5.50

1.3 CERTIFICATION DETAILS

Sime Darby RSPO Membership No: 1-0008-04-000-00
BSI RSPO Certificate No: SPO 550181
Initial Certification Assessment Date: 28 - 31 July 2009
Date of Certification: 15 April 2011
Date of ASA 1: 13 -14 April 2012
Date of ASA 2: 19 – 22 February 2013
Date of ASA 3: 18 – 21 February 2014

1.4 DESCRIPTION OF SUPPLY BASE

The supply base consists of FFB from three company owned estates (Bukit Kerayong, Bukit Cheraka and Elmina estates). The history of the establishment of these plantations was described in the last assessment report. These estates were developed to oil palm in 1916 and the palms are in their third cycle. The projected FFB production from the Bukit Kerayong Certification Unit's supply base estates for the period covering the ASA 3 is listed in Table 3 below. The actual FFB for 2013 period covering the ASA2 reduce about 4.6% compare to the estimate. This is due to replanting activities. The projected FFB productions for 2014 increased due to anticipate the immature palms coming into maturity and prime mature. There is no FFB received from Sime Darby's certified adjacent estates. Segregated supply chain model is applicable to the palm oil mill and incoming documents were verified.

Table 3: Estate FFB Tonnages Processed

Source	Estimate for ASA2 (2013)	Actual for ASA 3 (2013)	Projected ASA3 (2014)
1. Bukit Kerayong	36,824	45,149	49,168
2. Bukit Cheraka	81,478	69,092	74,940
3. Elmina	32,980	29,945	32,985
TOTAL	151,282	144,186	159,048

Note: No out-grower, smallholder or non-certified source.

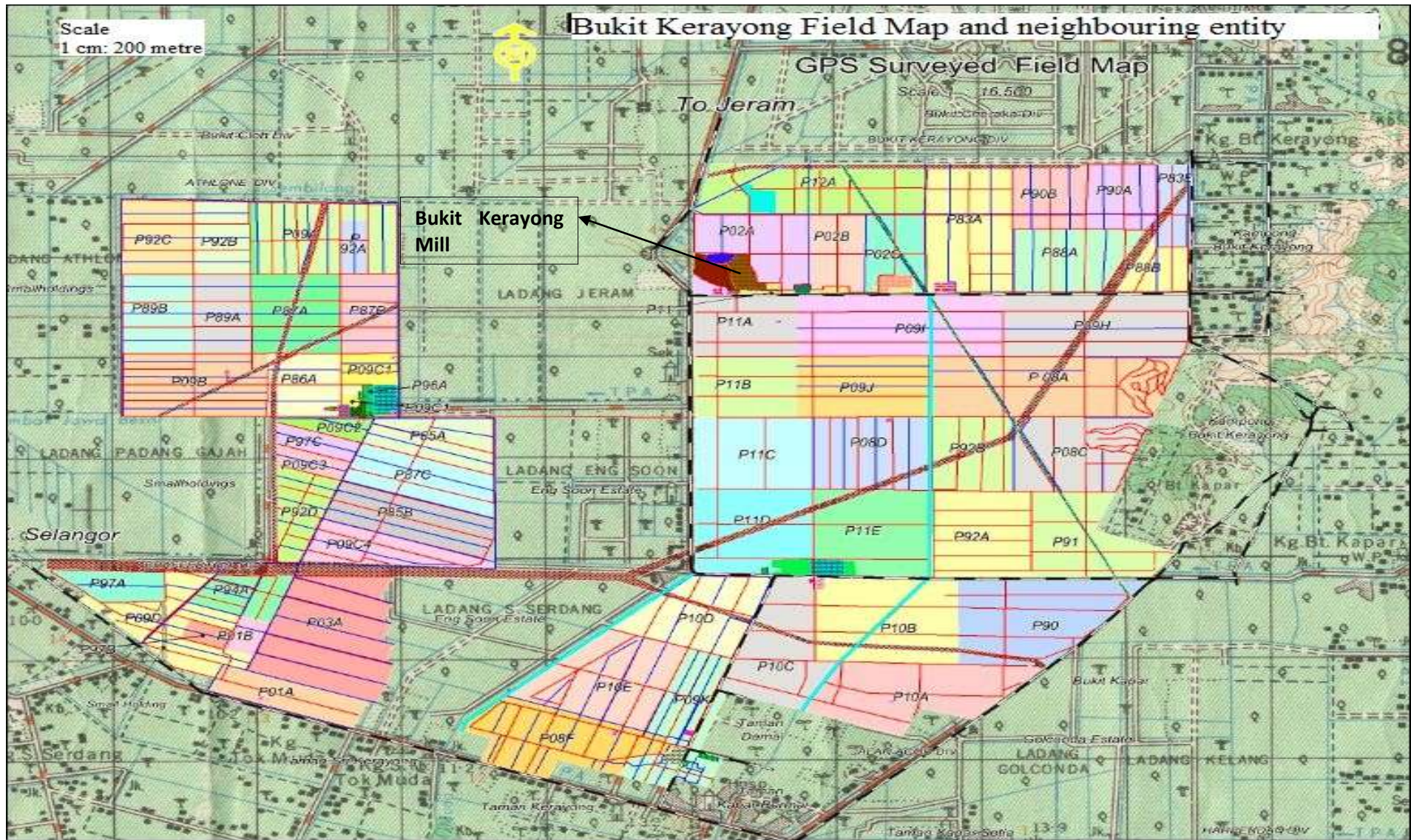


Figure 1: Bukit Kerayong Estate field map and location of the mill

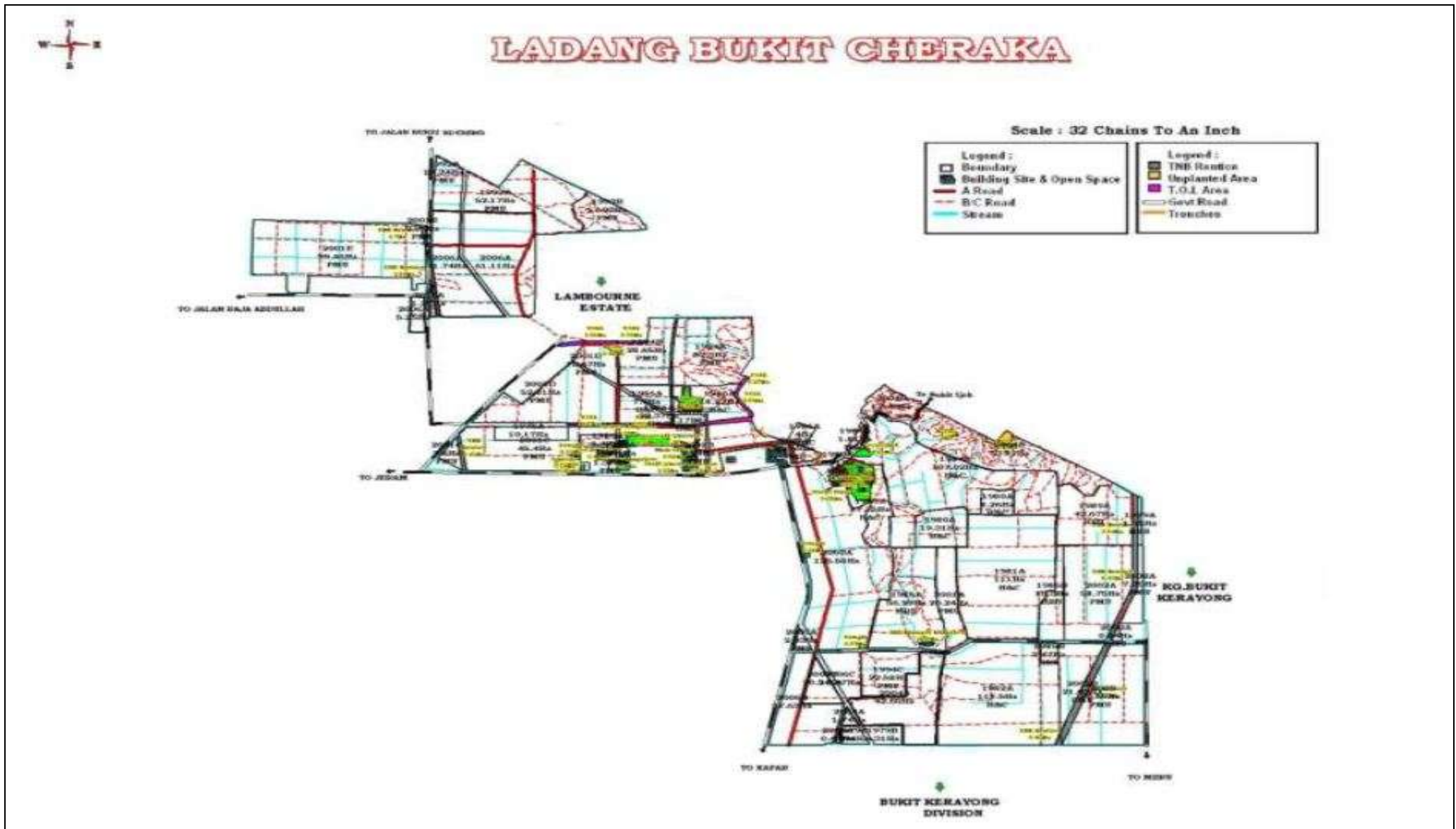


Figure 2: Bukit Cheraka Estate field map.

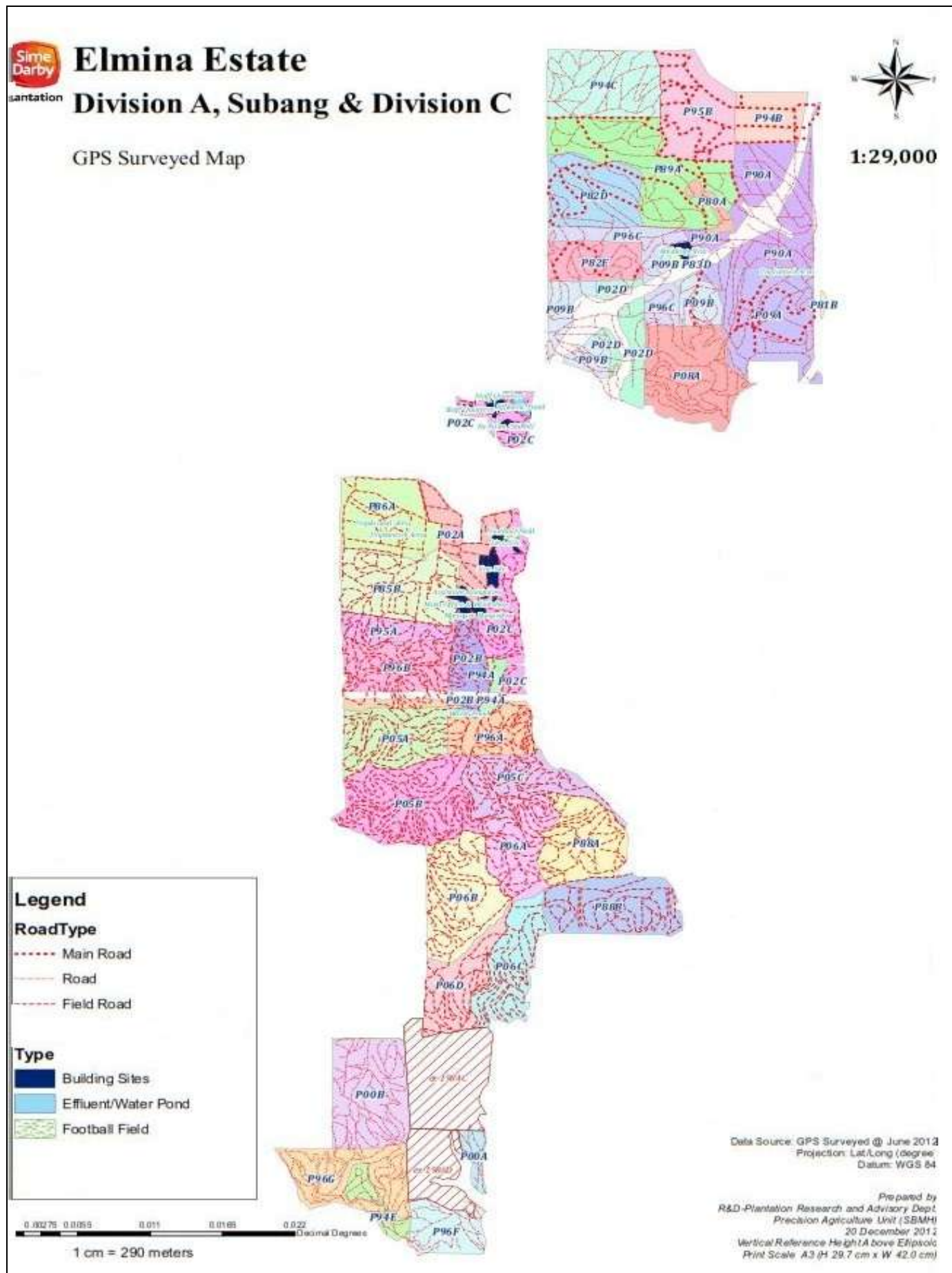


Figure 3: Elmina Estate field map.

The age profile of the palms is shown in Table 4a. All the estates has immature palm below 3 years old due to the replanting activities. Planting after 2005 was replanted.

Table 4a: Age Profile of Palms

Planting Year	Age (years)	Estate and % of Planted Area		
		Bukit Kerayong	Bukit Cheraka	Elmina
2011 – 2013	0 – 3	22	15	6
2010 – 2006	4 – 8	30	22	17
2005 – 2000	9 – 14	6	36	14
1999 – 1996	15 – 18	1	12	7
1995 – 1989	19 – 25	20	12	21
1988 & Above	Above 25	21	3	35
	TOTAL	100	100	100

The areas of mature and immature palms are detailed in Table 4b for each of the estates.

Table 4b: Estates and Areas Planted

Estate	Total Land Area	Planted Mature (ha)	Planted Immature (ha)	Total Planted Area (ha)
Bukit Kerayong	4255	2,946	858	3,804
Elmina	2910	2,361	138	2,499
Bukit Cheraka	3665	2,950	536	3,486
TOTAL	10,830	8,257	1,532	9,789

Note: Total land area covers planted area, infrastructure (986ha) and biodiversity area (55ha).

1.5 Supply Chain

Similar to ASA2, Bukit Kerayong palm oil mill uses the segregated supply chain model for the entire certified palm products (CPO and PK). All deliveries of FFB to the Mill are issued with a weighbridge ticket which records the details of the supplier, truck registration number, driver's name, the tonnage and verified the source whether from certified source by referring to the certified supply base details. Similarly all the outgoing certified palm products are indicated as certified and Segregation is written on the weighbridge ticket as well. The weighbridge system is computerized and the FFB delivery and product dispatch records are used as the basis for payment for deliveries and invoicing for shipments, respectively. Inspection of documents confirmed that Bukit Kerayong mill maintains all the documentation required for verification of implementation of the RSPO Supply Chain Certification standard: November 2011 CPO Mills – Module D: Segregation. Refer to Appendix E for details of assessment.

1.5 Other Certification Held

Bukit Cheraka Estate have SS Certificate (Certificate Number: AC 3985) issued by Malaysian Productivity Corporation on 23/12/2013 valid until 22/12/2014.

1.6 Progress against Time Bound Plan

Sime Darby Time Bound Plan is included as Appendix A. Sime Darby has achieved RSPO Certification for 34 of the Management Units in Malaysia and 19 in Indonesia. There are two management units in Malaysia undergone RSPO initial Certification due to newly commissioned mills. Pagoh Palm Oil Mill was certified in January 2014. Sua Betong certification unit was certified in February 2014. There are 6 certification units in Indonesia was audited and summary report is being RSPO peer reviewed. Upon certification of the remaining Management Units, Sime Darby will have achieved the Time Bound Plan.

As per the time bound plan, Pagoh palm oil mill which was commissioned end of 2012 was certified on 28 January 2014.

BSi has continued involvement with assessments of Sime Darby Management Units during the 2013/14 period. During this time, Sime Darby has kept BSi informed of any issues and claims made against it. At the time of preparation of this Report, BSi is not aware of:

- Any unresolved significant land disputes;
- Any replacement of primary forest or loss of HCVs;
- Any labour disputes that are not being resolved through an agreed process;
- Any evidence of noncompliance with any law at any of the landholdings.

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

1.7 Organizational Information / Contact Person

Sime Darby Plantation Sdn. Bhd.,
Bukit Kerayong Palm Oil Mill,
Management Unit SOU 7,
Ladang Bukit Cheraka,
45800 Jeram, Selangor, Malaysia.

Contact Person: Mr. Anuar bin Zakaria
Title: Manager, Bukit Kerayong Palm Oil Mill
Phone: 03-32647144
Fax: 03-32647666
Email: anuar.zakaria@simedarby.com

1.8 Progress of Associated Smallholders/Out growers towards RSPO Compliance

There is no any associated smallholder or out-growers within the Bukit Kerayong Certification Unit's supply base.

2.0 ASSESSMENT PROCESS

2.1 Certification Body

BSI Group Singapore Pte Ltd
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BSi is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSi Standards is the UK's National Standards Body. BSi provides independent, third-party certification of management systems. BSi has a Regional Office in Singapore, and an Office in Kuala Lumpur, Jakarta and Bangkok.

2.2 Qualifications of the Lead Assessor and Assessment Team

Senniah Appalasamy - Lead Assessor

He holds degree in Resource Economics from Agriculture University, Malaysia. He has vast experience in Plantation crop management covering oil palm plantation, rubber, cocoa and pepper for more than 10 years. He is also experience in manufacturing sector as a quality controller and production management. He is involved in RSPO implementation and assessment since 2008 as a team member and subsequently as a lead auditor with RSPO approved certification body covering assessment with RSPO P&C, RSPO SCCS, RSPO NPP and RSPO Group Certification in Malaysia, Indonesia and Thailand. He has completed ISO 9001:2008 Lead Auditor Training, ISO 14001 Lead Auditor Training, RSPO SCCS awareness training, RSPO Lead Auditor Training Course, RSPO SCCS Lead Auditor Training Course, RSPO – RED Lead Auditor Training Course, International Sustainable Carbon Certification (ISCC) Lead Auditor training, Sustainability Report Assurance (SRA) Assessor Training, ISO 14001 Lead Auditor Training Course and OHSAS 18001 Lead Auditor Training Course. Besides RSPO, he is also qualified as ISCC lead auditor and SRA Lead Assessor. He have experience in other standards i.e. Global Gap Option 1 and 2 (Fruit, vegetable and aquaculture) and GMP B+ as team member.

Nabila Seth Nivan – Team member

Nabila Seth Bt Mohd Niven is a fulltime employee with BSI Services Malaysia. She graduated in Business Administration from University Technology Mara, Malaysia. She attended internal RSPO training in September 2012. Currently she is an ISO 9001:2008 auditor with BSi. She has audited more than 17 companies against the ISO 9001 standard for the past 2 years and recently involved as Social Auditor during the RSPO Assessment to assess the social aspects and gender issues.

Muhammad Haris B. Abdullah – Team member

He graduated from the Open University Malaysia with a Bachelor of Business Administration (Hons) Majored in Human Resource Development and completed his Master's Degree in Business Administration from the

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University Utara Malaysia in January 2014. He has more than 3 years working experience in oil palm plantation and conducting social impact assessments of agriculture, agriculture best practices, and environmental impact assessment and workers welfare. He attending the RSPO Lead Auditor Training in April 2013 and passed the course. He is also passed the ISO 14001 Lead Auditor Training and qualified as EICC auditor. He had assisted with conducting audits of oil palm plantation for more than 7 companies against the RSPO P&C in Indonesia and in Malaysia for the past 4 years. During this assessment, he assessed on the aspect of Legal, Social and community engagements, Stakeholders consultation, and workers welfare.

2.3 Assessment Programme

The ASA3 was carried out on 18 - 21 February 2014. The Assessment Programme is included as Appendix C. The Programme included assessments of Bukit Kerayong Palm Oil Mill, Bukit Cheraka Estates and Elmina Estate against RSPO P&C, Supply Chain Standard: November 2011 CPO Mills-Module D: Segregation and applicable indicators.

The Nonconformities that were assigned and the Observations that were identified during the 2nd Annual Assessment were followed up to check the effectiveness of corrective actions and found that it is remain closed. Details are explained in section 3.3.

The methodology for collecting objective evidence includes physical site inspections, observation of operational work and processes, interview with executives, staff, workers and their families. Meeting and interview with external stakeholders without the present of company management members was conducted to gather feedback from stakeholders. Review and document audit was conducted through inspection of records and data. This report is structured to provide a summary for each Principle, together with details for selected indicators. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

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

2.4 Stakeholder Consultation

Internal and external stakeholders were consulted to obtain their views on SOU7: Bukit Kerayong Palm Oil Mill and Supply Base's environmental and social performance and any issues or concern that they might have. External stakeholders were interviewed in private

and they were invited to the Mill and estate for a private meeting. Those unable to attend were met at their premises. Internal stakeholders such as workers, their families, contractors, suppliers and staff were interviewed in groups in the workplace and at the housing site. A list of stakeholders contacted is included at Appendix D.

3.0 ASSESSMENT FINDINGS

3.1 SUMMARY OF FINDINGS

During the ASA3, nonconformity was assigned against Minor Compliance indicators of RSPO P&C. Along with this there were three observations for improvement were identified - Refer Section 3.2 for details. SOU7 prepared a Corrective Action Plan for addressing the identified Nonconformities, which BSi reviewed and accepted.

The Nonconformities that were assigned during the Second Annual Assessment and the Observations/Opportunities for Improvement identified were followed up to check the effectiveness of corrective actions. The nonconformities were closed and previous nonconformities are remains closed. Refer Section 3.3 for details.

BSi recommends continuation of Certification for Bukit Kerayong Palm Oil Mill and supply base as a producer of RSPO Certified Sustainable Palm Oil.

PRINCIPLE 1: Commitment to Transparency

Similar to previous assessment, Bukit Kerayong Palm Oil Mill and supply base has continued to document communications with stakeholders and has provided information in a timely manner when requested.

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

Bukit Kerayong mill and supply base continue to maintain records on individual files for information requests received. At the mill, request for information from DOE was received on 13/2/2014 and attended on 15/2/2014. DOSH visited on 27/1/2014 to check the safety aspect implementation. All the required information on Safety and Health Plan was provided.

Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.

The mill and supply base estates have maintained up to date copies of documents that are required to be publicly available. The file contains copies of land title,

safety and health plan, aspect impact report on environment and social, pollution prevention plan, negotiation procedure, continuous improvement plan details of complaints received which are comply to RSPO requirement.

PRINCIPLE 2: Compliance with Applicable Laws and Regulations

Compliance found against applicable regulation relevant to mill and estate operation. This was confirmed through inspection of internal RSPO audit reports, head office compliance audit report, internal OSH department audit report, regulatory departments visit records (DOSH visit reports and DOE visit report), licenses and permit at the palm oil mill and supply base estates. Bukit Kerayong palm oil mill comply with the licenses and permit requirements, such as the Factories & Machinery Act 1967, the OSH Act 1994, the Environmental Quality (Clean Air Regulation) 1978 and the Employment Act 1955 etc. The palm oil mill and supply base estates are on free hold land. No any land disputes was identified and interview with stakeholders confirm no any disputes. Boundary markers were clearly marked and maintained. This was inspected and confirmed during the field inspection.

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

The palm oil mill and estates maintains copies of all required permits and licences. It was noted the permits are valid and current, for example, Mill MPOB Licence No 562906004000 valid till 31 July 2014, Elmina Estate: 518324002000 valid until 28/2/2015. The most recent DOSH visit at mill for machinery inspection was done on the 27/1/14 which indicated compliance to safety regulation. DOE license number 00509 expiring on 30 June 2014. Permits are displayed on the wall. Compressor permits are displayed at the workshop as well # PMT-SL 115421 valid until 1/10/2014.

The noise mapping and person exposure monitoring was done as per Reg. 9 (1).(2) of the Factory and machinery (Noise Exposure) regulation 1989. Audiometric was done in January 2014. Medical surveillance as per CHRA is conducted on 29/9/2013.

Mill boiler emissions were tested 29/1/2014 by external consultant [Report Number: L-KI-BC 140 (BK-0486)] and the results indicated particulate dust concentrations were found to be 0.3144g/m³N well within the limit of 0.4 g/m³N stipulated in the Malaysian Environmental Quality (Clean Air) Regulations, 1978. At the time of inspection the smoke density meter was operational and had been calibrated on 29/1/2014 by Environmental Science Malaysia Sdn Bhd.

The palm oil mill and estates continue to hold copies of licenses for plant and equipment operators and drivers and examination of a sample confirmed these were

current and valid. Inspection of pay records found that payments were made in accordance with Minimum Wage Order and NUPW – MAPA Collective Agreement. Overtime paid as per labour law and was within the monthly Labour Department limit.

The Mill Advisor and the Plantation Advisor carry out site visits annually and assess legal compliance with statutory requirements beside operational performance. Interview with the managers and on-site administrative executive reveal that MAPA, MPOA, AMESU, NUPW and Sime Darby Regional Office provide legal updates on changes to labour laws and worker pay and conditions. Interview with representative from the head office confirm that Sime Darby Standards and Compliance Unit provide legal updates on all applicable legislation throughout Sime Darby. Based on this information the Legal and Other Regulation Register was updated on 16/08/2013 and evaluation is carried out. Compliance was achieved.

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

Bukit Kerayong mill and supply base estates were developed on freehold land titles and a copy of each is held on site. There is no change in the land ownership. Bukit Cheraka Estate holds 28 titles i.e., Grant No. 49446 for lot 1144, Elmina Estate consist of 36 land titles i.e. 46096 lot 2132, 27405 lot 1505, 50016 lot 1000 etc. The terms stated in the land title is for agriculture and the operations are consistent with the permit conditions.

Inspection of field at Elmina and Bukit Cheraka estate confirmed the boundary stones and markers are continuously maintained and marked with red and white paint. There was no land dispute at Bukit Kerayong Certification unit. Sample checked at block 2005B and 2006B.

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.

All the estates are on Freehold land. The estates do not restrict access of stakeholders through the plantation area. Access is given by giving permission prior to the entry through written permissions. The permission process is part of internal security control. There are Government roads running through the estates which provide unrestricted public access.

PRINCIPLE 3: Commitment to Long Term Economic and Financial Viability

The mill and estates are continuously committed to improving the economic performance of the mill and estates. One of the major improvements was the OER achievement whereby OER was increased from 19.40 in 2007 to 20.21 in February 2014, the highest ever to-date

OER achieved by the mill. FFB yield per hectare records shows that the yield is on increasing trend as well in Bukit Kerayong Estate.

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

The palm oil mill and all estates have an Annual budget for the financial year 2013/2014. The palm oil mill budget includes the projected FFB processed, CPO and PK production which projected for five years. There are targets set for OER of 20.50 for the financial year 2013/14 year. The Mill is confident of achieving the targeted OER and is working with the estates to improve the FFB quality delivered to the mill and to reduce oil losses. The OER for the month of February 2014 was 21.34 and year to-date was 20.21.

The estates have separate annual budget which includes projected yield, maintenance cost and allocation for the continuous implementation of RSPO requirements.

Estates have replanting programme which included in the budget as well and extended until financial year 2019/20. The replanting programme includes the schedule and hectareage for each field. At Bukit Cheraka Estate a total of 116.09ha programmed for replanting in 2012/13 financial year was replanted. The replanting programme affects the overall average FFB yields. There is also plans to delay the replanting at Elmina estate due to the land might be handed over for property development.

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

Bukit Kerayong mill and supply base estates continued to implement the Sime Darby Group's SOPs and management system dated 1 November 2008 that is based on best practices. Mill and estates have separate SOPs to cover all the related operation. SOPs at the mill are posted on the work station as reference for employees. Similarly estates posted work instructions at the office, store and workshop. No changes in SOP were noted.

Replanting programme continue to incorporate reinstatement of riparian buffer zones as part of replanting best practise. Handling and application of agrochemical was carried out safely. Safety continued to be a high priority for the mill and estates.

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

The Mill has continued to use the Mill Quality Management System SOPs issued 1 November 2008. Copies of the Mill SOPs are posted at each workstation in Bahasa Malaysia so that local workers understand the work instructions.

Similar to the mill, estate Quality Management System SOPs issued 1 November 2008 covering all operations from nursery through to mature palms. Estates continue to have prepared pictorial work instructions for each of the tasks so that the foreign workers understand the work procedures. The estates display SOPs on the notice board at the Muster areas.

Periodic monitoring conducted by Mill and Plantation Advisors, Central Zone General Manager, Plantation Sustainability Team, Group Compliance Assurance Department and through external audits. The Sime Darby Agronomists from the Research and Development Department responsible for monitoring the palm nutrients and development of a fertiliser programme for optimisation of soil fertility and palm yields. This is carried out through leaf sampling to analyse the palm nutrient level. The Plantation Advisor visited Bukit Cheraka Estate in June 2013 and issues raised have been addressed by the manager. Records are kept for more than 12 months.

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

Sime Darby's Agronomy Section of Research and Development (R&D) Department carries out annual leaf sampling to monitor nutrient status on the palms. Soil analysis is carried out on 5 years interval. Latest fertilizer recommendation was made on 27/12/2013 for the year 2014. Agronomist visited the estates On 21-22 October 2013 prior to the fertilizer recommendation.

The information from the nutrient status assessment through leaf analysis and FFB yield trend are used to develop the fertilizer programme for the year 2014. Fertilizers were applied as per agronomist recommendation. For example, Elmina estate has applied Ammonium Chloride 1.25kg/palm in the field 08A covering an area of 60.67ha on 14/10/2013.

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

Field inspection showed groundcover with soft grass and soft weeds. Recently replanted area is established with cover crops and vegetation is well established. There is no significant erosion risk was noted during the field visit. There are no peat soils or soil categorised as problematic or fragile soil at all estates.

Estate has implemented annual road maintenance programme. During audit, ongoing road maintenance was carried out with road grader. Road inspected are generally in a good condition and well maintained.

Soil analysis report shows that there is no peat soil. Soil analysis conducted every 5 years. Soil mainly lateritic mixed and due to this the roads are in good condition as

well. During field visit noted that there is no fragile or sandy area.

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

The Bukit Kerayong Certification Unit's supply base estates already re-instate buffer zones to ensure no sediments goes into the water course. Recent replanting area further enhanced the riparian with avoiding any machinery work along the riparian.

Sampling of discharged water from housing site was done on 14/2/2014 (Report Number: IE 153/2014) showed the BOD is <1mg/L indicating no polluting activities. During the field visit it was noted that stream water is very clear without any sediments. The waters entering and outgoing from the estate are clean. Daily rainfall is recorded and the information is used for water table management at low-lying areas and crop forecasting. The Estates maintain approximately 10 years of rainfall records and earlier records are held by R&D Department. Bukit Kerayong mill monitor water usage which recorded every day and summarised on monthly basis. Water consumption varies from 1.30M³ to 1.45 M³ per tonne FFB processed.

The Mill monsoon drain is fitted with an oil trap and a sediment trap and records are kept of the weekly drain inspections. Bukit Cheraka and Elmina Estates have installed oil traps and sediment traps at the workshop and vehicle washing bays. Inspection confirmed that oil traps are well maintained. Inspection to the effluent pond at the mill confirmed that the ponds are well managed with consistent achievement of BOD the permitted level. The quarterly reporting dated 30/1/2014 for the period covering October – December 2013 shows the BOD level was within specification (320ppm, 324ppm and 295ppm), Report number: EP 293/2013.

Rainfall data is used for water management. This includes water shortage contingency plan which was reviewed on 3 February 2014 due to the long drought faced by the state of Selangor. The revised plan includes minimising water usage for cleaning and ensures there is no wastage through any leakages and to purchase water from the water supply department for the domestic consumption.

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

The major palm pest is remains as Bagworm and the estates have a designated team to carry out census fortnightly to monitor the leaf eating pest condition. IPM practice becomes very critical to control leaf eating pest. All estates planted beneficial plants such as *Cassia cobanensis*, *Turnera subulata* and *Antigonon leptopus* as

a preventive measure to control leaf eating pest and as part of IPM practise. Barn owl boxes are erected at 1 box/20 ha density. Occupancy rate of barn owl is monitored through census. The latest census in 16/1/2014 shows the occupancy rate is dropped to 45% due to the extensive township developments surrounding the estates.

The estates have continued to record agrochemical usage through the stores issuance records. Field costing book shows details of quantity applied, date of application, block number, type of agrochemical applied (a.i. and brand name), application round, applicator details and usage unit/ha. These records are also assessed through chemical management audit by the PSQM department on 24/10/2013.

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.

Sime Darby Central Purchasing Department controls the purchase of all agrochemical. Inspection of the agrochemical stores at Bukit Cheraka and Elmina Estates confirmed only pesticides registered by the Pesticides Board are used and comply to requirement. During the inspection of the estate's agrochemical stores, it was confirmed that storage area was in accordance with regulations with adequate security, ventilation, separation of chemicals, spill containment and labelling. All chemicals were labelled in Bahasa Malaysia complete with MSDS in English and Bahasa Malaysia. There is no class 1 agrochemical.

There is a programme to conduct medical surveillance for agrochemical applicators and those handling agrochemicals. Medical surveillance conducted as per CHRA requirement done by OHD doctor (Registration number: HQ/08/DOC/00/636) dated 24/9/2013 Report number: FE9405304). CHRA conducted by DOSH approved assessors with permit number JKKP IH 127/171-2(124) and assessor with permit number JKKP IH 127/171-2(257) dated July 2010.

There was no female pesticide operator. However although there is no female applicators, practice is in place to transfer confirmed pregnant female operators who wishes to continue working to other duties and is not allowed to return to work as a pesticide operator until she has ceased breast-feeding. Paraquat is not used since 2004. No aerial spraying. Chemical residue testing not carried out because there was no any request from buyers. Information on pesticide usage is available for the past five years.

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

The Sime Darby Occupational Health and Safety Policy signed by top management provide guidance and were communicated to staff and workers during morning musters. The annual review of the Mill HIRAC was carried out for each work station for the financial year 2013/2014 in July 2013. Safety is prioritised.

An area for improvement was identified during the visit to the eater catchment area at Elmina estate as per below:

Observation 1: 4.7.1 Elmina Estate: The water treatment area is fenced, but the fencing is too low and easily can be trespass.

The palm oil mill and estates have prepared Safety Training Matrix and a schedule that lists the safety training to be carried out for each workstation during the 2013/14 year. The mill and estates carries out safety awareness briefing in the morning muster and maintains records of specific safety training courses, including topic, trainer and attendee details.

The mill supplies workers with PPE that includes safety shoes, helmet, hearing protection, high visibility vest plus additional PPE specific to work stations. The estates supply workers with safety shoes, helmet, high visibility vest plus additional PPE specific to tasks. During the mill and estate field visit it was noted that PPE implementation is comply to the safety requirements.

The Assistant Managers are the person responsible for OSH coordination at the Mill and Estates. OSH Meetings are held quarterly and minutes are kept of meetings, including a list of attendees and their signatures. Quarterly OSH meeting held at the mill and estate and minute of the meeting is recorded. OSH meeting was conducted on 13 February 2014 attended by 17 representatives from the workers and management. Palm Oil Mill and estates have documented Emergency Response Plan that was reviewed and updated in July 2013 and amended as per changes of staff and contact details. Emergency contacts are displayed on notice boards and on the "Visitors Card".

Bukit Kerayong mill and supply base estates investigate and report all accidents to DOSH through JKKP 6 and JKKP 8 forms. No fatal accidents reported. Minor injuries include common thorn prick and slip and fell cases. Summary of the accident are reviewed during the quarterly OSH meeting.

Local staff and workers are covered by Social Security Organization (SOCSO) Insurance. Foreign workers are covered through compensation scheme insurance. Latest policy was from RHB Insurance, Policy number: FW 054431 valid until 15/6/2014 and FW052292 valid till 19/7/2014.

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

The Mill and Estates have prepared an annual training plan for the financial year 2013/14 that details the training to be carried out for each work station. In addition, the mill carries out informal on-the-job instruction to improve skill levels. The mill and estates maintain records of training for workers and staff.

Records of the training include:

Preventive Maintenance Training at mill dated 24/10/2013. Crèche Ayah Training dated 7-8/2/2014 at Seri Intan Estate conducted by qualified personnel from Sime Medical Centre. Skill Enhancement training attended by Hospital Assistant from Elmina estate on March – September 2013 at Sime Darby Nursing and health College. ERP training conducted on 25/10/2013 attended by 38 employees. Chemical Handling Training on 18/12/2013 attended by agrochemical applicators. Tractor Driver Training: 2 February 2013.

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

The original Environmental Aspect Impact was developed in June 2009. Subsequently, review is conducted on annual basis to identify new impact. Recent review was conducted on July 2013 for the Financial Year 2013/2014. Improving environmental impacts continue to be main issue and utmost attentions was given to reduction of waste and enhancement of riparian to increase the biodiversity impact. Efficient use of natural resources such as water is another area that operating units looking into for improvement through minimising wastage. The water management plan has been revised on the July 2013 as well. Practically all of the natural vegetation was cleared during the initial development of the land many decades ago and reinstatement of riparian buffer strips is being carried out progressively during replanting.

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.

As per details under criteria 5 above, Bukit Kerayong palm oil mill and supply base estates have reviewed the Environmental Improvement Plans for the significant aspects and impacts. Recent review was conducted on 10 June 2013 for the Financial Year 2013/2014.

During the visit to the housing site, improvement on the waste management noted with signboards to create recycling awareness and zero burning. The landfill at the mill was improved through proper signages and no plastics, aluminium or glass items inside the landfill. During replanting, zero burn technique is continued to

be practiced through chipping and mulching of felled palms.

Criterion 5.2: The status of rare, threatened or endangered species and high conservation value habitats if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and their conservation taken into account in management plans and operations.

Initial HCV assessment was conducted in June 2009. Bukit Kerayong supply base estates have maintained the boundaries of conservation areas, such as riparian buffer zones and the Forest Reserve adjoining Elmina Estate. At Bukit Cheraka Estate, jungle trees were planted near the field 94A, 04B and 86A such as *Aguilera Malaccensis*, *Barringtonia* are continue to be preserved, monitored and maintained based on the HCV management plan prepared by Plantation Sustainability team from head office.

Awareness and HCV protection signboards at the entrances to the estates prohibiting illegal hunting and fishing are continuously maintained to ensure awareness among internal and external stakeholders and employees. Interview with stakeholders and employees confirm that they are aware of the need to protect fauna and flora.

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

Mill and estate have prepared waste management plans that list the waste generated and method of disposal/treatment such as recycling of FFB, POME, shell and fibre. It was noted that the states are located near urban area. Due to this reason they have access to engage contractors to collect household waste twice weekly for disposal at the Local Municipal Council landfill.

The mill and estates dispose the clinical waste through VMO and subsequently to Sharps and Bins Sdn Bhd. Bukit Cheraka Estate disposed medical waste on the 12 December 2013, consignment note P 496514. Elmina estate carry out similar disposal through the VMO who have collected the medical was during his visit on 21 January 2014.

The Mill and Estates continue to engaged Tex cycle Sdn Bhd (Contractor permit: 50013902048) for disposal of used empty containers. The storekeeper has maintained monthly stock-takes of scheduled wastes and copies were available of manifests for waste collection.

EFB is continued to be recycled to the field with the majority applied to immature palms through mulching around the palms. Records inspected shows that an average of 40-45mt/ha of EFB has been applied in the field at Bukit Cheraka Estate and Elmina Estate. Palm

Oil Mill Effluent (POME) is applied to palms in furrows at Bukit Kerayong estate. Previous inspection of the area confirmed a well managed system with two full-time operators in attendance continue to be employed.

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

Total energy use is recorded and reported monthly to Sime Darby Head Office and mill adviser. Separate records for the renewable energy consumed and fossil fuel used are available. The total average usage was slightly increased from 18.98kWh in 2012 to 20.61kWh in 2013. Renewable energy mainly generated from shell and fibre produced by the mill.

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.

Bukit Kerayong certification unit and supply base estates continue to implement the zero burning policy. Inspection of replanting areas at the estates confirmed consistent implementation of the zero burning policy through felling and chipping, and apply back to the field as mulch. Inspection of the housing area at Bukit Kerayong and Bukit Cheraka Estates and mill found no evidence of fire being used for waste disposal. Interview with employees confirm that they are aware about zero burning policy.

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

Bukit Cheraka and Elmina Estate have sealed the road leading to the entrance of the Estate, which has eliminated the dust emissions from vehicle traffic. Pollution prevention plan for 2013/14 has been revised and prepared in July 2013 for the new financial year. This was implemented to mitigate all the pollution creating activities. At the mill reduction of particulate smoke emission is continue to be given attention because of the mill location at the urban area. The new boiler installed continue to function efficiently to minimise the particulate emission due to the built in pollution control technology. There is no peat soil.

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

SIA is reviewed annually following the financial year. Review is conducted through interview with staff, workers and local communities. Interview with the stakeholders confirm that they have participated during the SIA review through stakeholder meeting. It was noted that all the operating units maintain good relationship with internal and external stakeholders including local communities and

contractors. The company has made progress on the construction of new housing with new units. Social policies have been consistently implemented and no complaints or grievances have been received that require addressing through a formal process. Although all the operating units are located adjacent to urban areas, it continues to provide donations to assist local schools and places of worship that are appropriate for the socio-economic condition.

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.

Bukit Kerayong mill and supply base estates have reviewed the SIA and revised the Social Action Plans for the year 2014. The assessment includes appropriate stakeholder consultation and clearly defines the actions to be taken including the responsible person and target completion date. Interview with the stakeholders confirm that they have participated during the SIA review through stakeholder meeting held on 7 February 2014. A timetable with responsibilities for mitigation and monitoring of social issues was reviewed and updated as necessary during the review of the SIA.

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.

Supply base estates have maintained dialogue with local communities and stakeholders. Consultation and communication procedure is similar to the procedure reported during the previous assessments. The manager and assistant manager are responsible for handling any social issues. The mill and estates have maintained lists of Stakeholders that includes local village heads, government departments, school, suppliers, and contractors, local worship places representatives, NUPW, AMESUA, MPOA and other interested parties. Records of communications are held on file together with company response. However it was noted that the palm oil mill did not conduct stakeholder meeting. At Bukit Cheraka estate the stakeholder list found to be incomplete. A minor nonconformity was raised as per below.

CAR Reference: 1021303N3

6.2.3 Maintenance of a list of stakeholders, records of all communication and records of actions taken in response to input from stakeholders.

At Bukit Kerayong Mill the stakeholder consultation yet to be conducted. At Bukit Cheraka Estate the stakeholder list was not updated to reflect the current existing stakeholders. Document audit at Bukit Kerayong POM revealed that the stakeholder meeting involving the affected parties such contractors, local communities,

government agencies is yet to be conducted for the Year 2014. The stakeholder list in Bukit Cheraka Estate updated on 18/02/2014 however did not include two parties, Smart Road System Sdn Bhd and AJK Taman Permai who was invited for the consultation on 19/02/2014.

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.

Sime Darby Grievance Procedure is used as guidance for resolving any disputes. It is common that complaints from workers were raised verbally and recorded in the request book and handled by the Assistant Managers. The records of previous issues are maintained for more than three years and this was confirmed during inspection of the grievances records book. Inspection of records and interview with staff, workers, contractors and external stakeholders did not identify any pending unresolved issues.

However as an area for improvement, an observation was raised based on the comment from internal stakeholders. The issue was discussed in the union meeting as well as the employees agreed that the items are given as promised.

Observation 2: 6.3.2 Bukit Kerayong Mill & Bukit Cheraka Estate – Free cooking oil and rice provided by company as an extra benefit. There is a delay in providing the oil and rice to workers as per normal schedule of two months interval.

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.

As stated under criteria 2.2 above, all the land in Bukit Kerayong Certification Unit are on freehold title and there was no any land dispute or claim for compensation that need any settlement Sime Darby has group procedure for identifying legal and customary rights and procedure for identifying people entitle to any compensation.

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

Pay and conditions are documented through MAPA/AMESU Agreement and MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement and complies to Minimum Wage Order.

Similar to the last surveillance assessment, interview with mill and estate staff and workers confirmed that they understand Terms and Conditions of their

employment contracts and receive correct entitlements. Interview with employees reveal that they understand details and deductions outlined on their pay slips. Payroll checks confirm that correct remuneration was paid for standard hours as well as for any overtime hours worked. Employee's payslip for the month of January 2014 was checked and verified shows the basic pay, allowances and incentives were paid and deduction for EPF, SOCSO, NUPW and personal insurance are clearly stated. The minimum wages of RM 900 set by the government has been implemented as well.

All the housing meets the government standard and interview of staff and workers raised no issues related to housing and facilities provide by the company. Schools are within close proximity such as the Primary Tamil School (SJKT Ladang Braustein) is located at Bukit Cheraka Estate, and Secondary Schools are located at Kapar Town approximately 7km distance. A Crèche is available for children of staff and workers. The children at the crèche are provided with milk and biscuits by the operating units at no cost. Water to all housing is from the Government supply. Electricity to Bukit Kerayong mill houses was supplied by the mill and estates housing's electricity is from the Government supply. Medical treatment at the company clinics to staff, workers and their families are provided free and any cost any referral to government clinics for further treatments are covered by the operating units as well.

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 confirmed they were allowed to join a union of their choice such as NUPW and AMESU. Further interview with the state NUPW secretary confirmed this practice. Policy on Freedom of Association is continuously implemented. Regular meeting were conducted and this was confirmed during the interview with the union representative. Union meeting was conducted on 12/09/2013 attended by representatives of NUPW operating unit's Auxiliary Police, mill representatives, foreign workers representatives and manager. Issue related to the free cooking oil and rice was discussed and explanation from the management was recorded as accepted by the members of the meeting.

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

The minimum working age in Malaysia is 18 years old as per the Labour law requirement is complied. During

recruitment, applicant's age was checked based on the identification card details for local applicants. Foreign workers are verified based on passport details. Children and under-age workers were not seen employed at the mill or estate operational areas during the field visit. Interview with stakeholders further confirm that there are no children employed.

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.

Interview with internal and external stakeholders reveal that there is no any form of discrimination practiced at all the operating units audited. Inspection of pay records of staff and workers at the mill and estates did not identify any issues related to discrimination. Interview with female employee confirm that there is no gender discrimination as well.

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 statement to prevent sexual harassment and violence is documented in the Sime Darby Social Policy approved by since the initial assessment. Similar to the ASA2, interview with the female staff and workers confirmed that they are aware of the Policy. Interview with the Gender Committee representative confirm that there were no any sexual harassment issues. Latest Gender committee meeting was held on the 12/1/2014 for mill and estates. No any issues related to sexual harassment reported. However, an observation was raised as an area for improvement as per below.

Observation 3: Bukit Kerayong Mill: Awareness of gender policy and complaint procedure can be part of gender committee's meeting agenda.

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

Bukit Kerayong Palm Oil Mill does not purchase FFB from outside source (smallholder/out-grower). Pricing mechanism for other contract works such as housing and general repair work is available. Interviews with contractors confirmed that they understood terms and conditions. Some of the contractors had worked for the operating units for more than 10 years and did not have any complaints or disputes. Interview with the electrical contractor and road maintenance contractor confirmed that the payments are made in timely manner as per contract and no any disputes.

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

Infrastructure in the area is well developed and government services are readily available. Bukit Kerayong mill and estates were always continued to make donations to local schools, temples and mosques, and other community activities such as sports activities organised by local authorities. These are considered as an appropriate form of assistance. Some of the contributions are based on the consultation with the local communities.

Principle 7: Responsible Development of New Plantings

All the supply base estates under Bukit Kerayong Certification Unit did not carry out any new oil palm developments and there are no plans for any expansion of plantings. Principle 7 is therefore not applicable to this assessment.

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

Bukit Kerayong palm oil mill, supply base estate and Sime Darby Central Management has continued to demonstrate commitment to the principle of continuous improvement of environmental and social performance. Similarly Bukit Kerayong Certification Unit and its supply base estates are committed to continuous improvement. Beside improving the productivity and efficiency of the operations, the company has also paid attention to environmental protection measures and improvements to worker housing involving substantial capital investment.

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

Improvements in the IPM implementation program and elimination of the paraquat usage are continuously practiced to ensure objective to minimise agrochemical and pesticide is implemented. Paraquat is not used at any of the estates. Environment improvements continue to be focus on the reinstatement of riparian buffer strips along streams during replanting and the establishment of adequate groundcover vegetation as part of effective erosion control practice. The efficient use of natural resources such as water and energy are continuously monitored at mill and estates. Recycling of mill waste product such as EFB, shell and fibre has been maximised. Waste reduction such as oil losses at the Mill, which has seen improvement in OER has increased the OER to 20.21 in February 2014, the achievement in the history of the palm oil mill. The company has demonstrated its commitment to social improvements by continuously contribute to local community.

3.2 Identified Nonconformities and Noteworthy Observations (ASA3)

During the ASA3, one nonconformity was assigned against Minor Compliance indicators of RSPO P&C. Along with these, three observations for improvement were identified.

Bukit Kerayong Certification Unit prepared a Corrective Action Plan for addressing the identified nonconformities, which BSi audit team has reviewed and accepted. All the operating units made a commitment to implement corrective action plans for addressing the nonconformities immediately following the ASA3. The effectiveness of corrective action for the minor nonconformities will be checked and followed up during the next Surveillance Assessment that will be scheduled within twelve months from the Certification anniversary.

MINOR NONCONFORMITIES

CAR Reference: 1021303N3

6.2.3 Maintenance of a list of stakeholders, records of all communication and records of actions taken in response to input from stakeholders.

At Bukit Kerayong Mill the stakeholder consultation yet to be conducted. At Bukit Cerakah Estate the stakeholder list was not updated to reflect the current existing stakeholders. Document audit at Bukit Kerayong POM revealed that the stakeholder meeting involving the affected parties such contractors, local communities, government agencies is yet to be conducted for the Year 2014. The stakeholder list in Bukit Cerakah Estate updated on 18/02/2014 however did not include two parties, Smart Road System Sdn Bhd and AJK Taman Permai who was invited for the consultation on 19/02/2014.

Corrective Action Plan:

The palm oil mill appointed the on-site quality assurance staff to organise a formal consultation with stakeholders before the end of financial year 13/14 in June 2014. Bukit Cheraka estate have updated the stakeholder list and appointed the assistant manager to update the list half yearly.

BSi audit team verified the Corrective Action Plan and accepted the Corrective Action Plan. The implementation will be followed up during subsequent surveillance visits.

Observations/Opportunities for Improvement (ASA3)

Observation 1: 4.7.1 Elmina Estate: The water treatment area is fenced, but the fencing is too low and easily can be trespass.

Observation 2: 6.3.2 Bukit Kerayong Mill & Bukit Cheraka Estate – Free cooking oil and rice provided by company as an extra benefit. There is a delay in providing the oil

and rice to workers as per normal schedule of two months interval.

Observation 3: Bukit Kerayong Mill: Awareness of gender policy and complaint procedure can be part of gender committee's meeting agenda.

Noteworthy Positive Components

- The Bukit Kerayong palm oil mill has achieved highest to-date OER of 20.21 since commissioning of the mill. This was achieved in February 2014. There was a achievement gathering was organised by the Bukit Kerayong Certification Unit to appreciate the efforts by all the staff.
- Bukit Cheraka Estate obtained 5S Certificate (Certificate number: AC 3985) issued on 23/12/2013 by Malaysian Productivity Corporation.
- Local communities and interviews of residents found there is a good relationship between the management and the local community because of regular informal meetings and employment of local people.

3.3. Status of Nonconformities (Major and Minor) Previously Identified

Corrective Actions for a Nonconformity identified during the ASA2 has been effectively and consistently implemented and the nonconformity remains closed. All the minor nonconformities raised during the ASA2 were closed on 19 February 2014.

CAR reference: A848470/1

5.3.2 Having identified wastes and pollutants, an operational plan should be developed and implemented, to avoid or reduce pollution.

Nonconformity was raised against minor indicator 5.3.2. The agrochemical mixing is carried out on the soil surfaced area and no mitigation plan implemented to avoid or reduce pollution at Bukit Cheraka Estate.

Close out evidence:

The chemical mixing at Bukit Cheraka is moved to Bukit Cloh Division permanently where a proper and required facility is available. The mixing area was visited and found to be comply and suitable for the agrochemical mixing. BSi audit team considered that the corrective action was satisfactorily and appropriately implemented. The nonconformity was closed on 19/2/2014.

CAR reference: A848470/2

6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc) are available in the

language understood by the workers or explained carefully to them by a plantation management official in the operating unit.

Nonconformity was raised against minor indicator 6.5.2. Copy of the contract of employment (or letter of appointment) detailing labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc) is not available for employees. Example checked at Bukit Cheraka Estate: Arun and Risal Kumar (from Bihar, India), Rameshwary (tractor driver), Poovarasam (Harvester), Salaman Raj (joined in Dec 2012)

Close out evidence:

Bukit Cheraka Estate has prepared the copies of contracts which were misplaced during the previous assessment by the previous assistant when he was transferred out. The copies of employment contract were made available during the ASA3. The operating unit managed to find all the copies. The operating unit also appointed a staff to be in-charge of maintaining copies of workers contract. BSi audit team considered the corrective actions plan was satisfactorily implemented. The nonconformity was closed on 19/2/2014.

Review of Progress with Observations/ Opportunities for Improvement Previously Identified

Seven (7) Observations for improvement were identified during the ASA2 was followed up. The progress with these as followed.

01 (P2.1.1) As an area for improvement an observation was raised at Bukit Kerayong Mil. The mill conducted evaluation for the compliance to legal and other regulations in 2012. Delay noted on internal evaluation again for 2013.

ASA3 Findings: The internal evaluation was carried out on 16/8/2013. Compliance was found during the evaluation of compliance.

02 (2.1.3) As an area for improvement an observation was raised at Bukit Kerayong Estate and Bukit Cheraka Estate. Marking the PMT number on the air compressor was not permanent but using temporary marking with pen to avoid confusion and changing of air compressors.

ASA3 Findings: During the ASA3 it was noted that the PMT number was displayed with permanent markers.

03 (2.1.3) As an area for improvement an observation was raised at Bukit Kerayong Estate. The estate management should make the DOSH log book available at all time for reference during any assessment. The book was misplaced and was given to auditor late evening.

ASA3 Findings: All the operating units maintain the DOSH visit book and were available during the assessment.

04 (2.2.2) As an area for improvement an observation was raised at Bukit Kerayong Estate (Sg Kapar Division.

Process of transferring the ownership from the previous owner to the new owner (Sime Darby) is completed in December 2012. Now the company is in the progressively changing the crop from rubber to oil palm for Lot 40, 41 and 42. The progress will be checked during next surveillance assessment.

ASA3 Findings: The terms stated in the land title is for agriculture and the operations are consistent with the permit conditions.

05 (4.4.3) As an area for improvement an observation was raised at Bukit Kerayong mill. Marking the effluent final discharge point where the sampling is done was missing.

ASA3 Findings: The final discharge point is marked with permanent paint and was verified during the site visit.

06 (4.7.1b) As an area for improvement an observation was raised at Bukit Kerayong Mill. HIRARC is available and reviewed for the year 2012/2013. Review may consider internal OSH Manual Chapter 6 Section 8 as a reference.

ASA3 Findings: The HIRARC review was carried out on 20/1/2014 consistent with internal OSH Manual Chapter 6 Section 8 and includes all the work area.

07 (SCCS CPO Mill-Module D: Segregation): Bukit Kerayong Mill - Since the mill is ready to use the "segregation" model and have the system in place, ensure the implementation of the new supply chain model is effectively communicated.

ASA3 Findings: The operating unit conducted SCCS training on 23 February 2013 through the mill assistant who has been trained for SCCS. The training was attended by the weighbridge clerk, lab supervisor, processing supervisor, administration clerk and store clerk who are involved in SCCS implementation. During interview with the staff, it was noted that they understand the SCCS requirements for recording.

3.4 Issues Raised By Stakeholders

Stakeholders interviewed, both internal and external, had mainly positive comments. There were no pending issues or complaints raised during the ASA3 stakeholder interview process which require further investigation. The detail of stakeholders comment is included in the above criteria where relevant as part of this summary report.

Local communities: The village representative highlighted that the operating units always assist them when any request for donation are sent to the management. There is no land dispute or other disputes.

Company Response: The management is committed to keep good relationship with the surrounding communities.

Audit Team Finding: Positive comment.

Workers Union Representative and foreign workers representative: Interview with the union representative reveal that there is no any dispute or pending issues

between management and workers. Foreign workers confirm that they are treated and paid equally with local workers. They highlighted that some time there is delay in providing the free rice and cooking oil but agreed that they get the items as per entitlement without fail.

Company Response: The management follow Minimum Wage Order and union collective agreement. The delay was caused by the central store purchase from the Head Office. The management always ensure that the entitlement is given to all workers.

Audit Team Finding: Document check on the payment records reveal that minimum wage is paid. No issue. The issuance of free cooking oil and rice is given and recorded. There was a delay in December 2013 and the management ensures that the items are distributed immediately upon receiving the items. The workers interviewed confirmed that they received the free items. The issue was raised as an area for improvement. This issue will be further followed up during next assessment.

Contractor: During the interview, contractors agreed that they are have good relationship with the management, open communication and welcome any suggestion to improve estate's performance. PPE usage is closely inspected by management to ensure that they are wearing safety equipment before start working. Work contract is properly explained and no delay/outstanding payment as of Feb 2014. Contractors are aware of emergency and grievances procedure. No negative comments receive.

Company Response: Contractors are included in the OSH meeting to ensure safety is implemented. Contractors are also included in the stakeholder meetings to gather their feedback.

Audit Team Finding: No issue.

School: School teacher confirm that assistance is given by the management whenever request is forwarded to estate management.

Company Response: The management always assist the school when request is received and will continue assist.

Audit Team Finding: No issue.

NUPW Branch Secretary: At Bukit Kerayong Estate there are two workers yet to get the retirement gratuity and no respond from the estate to update the payment status.

Company Response: The management has sent a reply to the employees dated 2/1/2014 indicating that the payment is waiting for final approval from the Selangor Central Zone General Manager. The management also informed the employees accordingly. Management will update the NUPW as well.

Audit Team Finding: Documents relate to the two workers who already retired (employee number 075787) and 5128 (choose to retire early) was checked and verified. The management has sent a reply dated 2/1/2014 indicating that the payment is waiting for final approval from the Selangor Central Zone General Manager. The details were verified. The progress of completion of payment will be followed up during the next surveillance.

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1 Date of Next annual surveillance Visit - ASA4

The next surveillance assessment visit is planned not later than 12 month of anniversary date of the certificate.

4.2 Date of Closing Nonconformities (Major and Minor)

Table 5: Status of Nonconformities

CAR Ref.	CLASS	ISSUED	STATUS
CR01	Major 1.2.5	IAV 31/07/2009	Closed on 20/09//2010
CR02	Major 2.1.1	IAV 31/07/2009	Closed on 03/01/2011
CR03	Major 4.7.1	IAV 31/07/2009	Closed on 03/01/2011
CR04	Major 5.5.1	IAV 31/07/2009	Closed 20/09/2010
CR05	Minor 2.1.3	IAV 31/07/2009	Closed 20/09/2010
CR06	Minor 4.4.6	IAV 31/07/2009	Closed 20/09/2010
CR07	Minor 4.4.7	IAV 31/07/2009	Closed 20/09/2010
CR08	Minor 4.5.4	IAV 31/07/2009	Closed 20/0/2010
CR09	Minor 5.3.2	IAV 31/07/2009	Closed 20/09/2010
CR10	Minor 5.4.2	IAV 31/07/2009	Closed 20/09/2010
CR11	Minor 5.5.3	IAV 31/07/2009	Closed 14/04/2010
CR12	Major 4.6.3	ASA1 14/04/2012	Closed 31/05/2012
CR13	Minor 5.2.3	ASA1 14/04/2012	Closed 22/02/2013
CR14	Minor 6.1.3	ASA1 14/04/2012	Closed 22/02/2012
A848470/1 (465344-1M)	Major 4.6.5	ASA2 22/02/2013	Closed 05/04/2013
A848470/2 (465344-2M)	Major 4.7.1	ASA2 22/02/2013	Closed 05/04/2013
A848470/3 (465344-3M)	Major 4.8.1	ASA2 22/02/2013	Closed 05/04/2013
A848470/4 (465344-4M)	Major SCCS D.6	ASA2 22/02/2013	Closed 05/04/2013
A848470/1 (465344-1)	Minor 5.3.2	ASA2 22/02/2013	Closed 19/02/2014
A848470/2 (465344-2)	Minor 6.5.2	ASA2 22/02/2013	Closed 19/02/2014
1021303N3	Minor 6.2.3	ASA3 21/02/2014	"Open"

4.3 Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings

Bukit Kerayong Certification Unit acknowledges and confirms acceptance of the Assessment Report contents, including assessment findings. Bukit Kerayong Certification Unit accepts the responsibility for implementing the corrective actions and addressing the opportunities for improvement detailed in the Assessment Report.

Signed for on behalf of
Sime Darby Plantation Sdn Bhd

SIME DARBY PLANTATION SDN BHD
KILANG KELAPA SAWIT BUKIT KERAYONG (647766-V)

.....
Date:


ANUAR BIN ZAKARIA
MILL MANAGER

Signed for on behalf of
BSi Group Singapore Pte Ltd



.....
Mr. Senniah Appalasamy
BSI RSPO Lead Auditor
Date: 26/3/2014

Appendix A: Sime Darby Plantation Time bound Plan

certification Status	Malaysia	Indonesia	Time bound for certification	Status during ASA02
Certified	33 operating units	19 operating units	52 operating units	Total Certified: 52
Decommissioned	1 (Segaliud)	-	-	-
New mill added to Time bound Plan	2	-	2	Certification in 2013
RSPO EB Review	0	6 operating units	6 operating units	Ongoing peer review.
Total	35 operating units	25 operating units	60 operating units	-

Appendix B: Sime Darby Plantation Sdn Bhd – SOU 7 Bukit Kerayong Certification Unit RSPO Certificate Details

Sime Darby Plantation Sdn. Bhd.
 SOU 7 Management Unit (Bukit Kerayong Palm Oil Mill)
 Ladang Bukit Cheraka,
 45800 Jeram
 Selangor Darul Ehsan,
 MALAYSIA

BSI RSPO Certificate No: SPO 550181

Date of Initial Certificate Issued: 15 April 2011

Date of Expiry: 14 April 2016

Applicable Standards: RSPO Certification System June 2007 (revised March 2011) including Annex 4: Procedures for Annual Surveillance; RSPO P&C MY-NIWG 2010; and relevant element of Supply Chain requirements for CPO Mills; SCCS Standard Nov 2011 Module – Segregation.

Bukit Kerayong Palm Oil Mill and Supply Base	
Location	District of Jeram, Selango Darul Ehsan, Malaysia.
Address	SOU 7 Management Unit (KKS Bukit Kerayong), Ladang Bukit Cheraka, 45800 Jeram, Selangor Darul Ehsan, MALAYSIA
GPS	102° 22' 36.66" E; 3° 11' 24.58"N
CPO Tonnage Total Production (Certified)	32,605
PK Tonnage Total Production(Certified)	8,747
Company Estate FFB Tonnage (Certified)	159,048
Estates FFB Tonnage (Certified)	Bukit Kerayong Estate : 49,168
	Bukit Cheraka Estate : 74,940
	Elmina Estate : 32,985

Appendix C: 3rd Annual Surveillance Assessment Program

Date	Time	Subjects	Senniah	Nabila	Muhd Haris
Tuesday 18/2/2014 Karayong Palm Oil Mill	08.00 – 09.00	Opening Meeting: <ul style="list-style-type: none"> • Presentation by the Estate and mill managers • Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). 	√	√	√
	09.00 – 12.00	Karayong Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management, Effluent Ponds, OSH, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection.	√	√	-
	09.00 – 12.00	Meeting with stakeholders (Government, village rep, Union Leader, contractor etc.)	-	-	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 17.00	Karayong Palm Oil Mill: Document Audit, SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, permits, mill inspection records, verify closing of previous NC and observation etc.	√	√	√
Wednesday 19/2/2014	08.00 – 12.00	Bukit Cheraka Estate Field visit, boundary inspection, fertiliser application, field spraying, harvesting, workers interview, buffer zone, HCV area, Office, workshop, worker housing, clinic, Landfill, Chemical store and mixing, etc. And Document Audit.	√	√	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 17.00	Bukit Cheraka Estate Document review (General Documentation e.g. Legal, Manual and Procedure, HCV identification, SEIA documents, Health and Safety, Time bound plan verification, review pay documents etc), verify closing of previous NC and observation etc.	√	√	√
Thursday 20/2/2014	8.00 – 12.00	Elmina Estate Field visit, boundary inspection, fertiliser application, field spraying, harvesting, workers interview, buffer zone, HCV area, Office, workshop, worker housing, clinic, Landfill, Chemical store and mixing, etc. And Document Audit.	√	√	-
	8.00 – 12.00	Elmina Estate Meeting with stakeholders (Government, village rep, Union Leader, contractor etc.)	-	-	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 17.00	Bukit Cheraka Estate Document review (General Documentation e.g. Legal, Manual and Procedure, HCV identification, SEIA documents, Health and Safety, Time bound plan verification, review pay documents etc).	√	√	√
Friday 21/2/2014	8.00 – 10.00	Auditor meeting & Preparation for closing meeting	√	√	√
	10.00 – 12.00	Closing Meeting	√	√	√
	12.30	Audit team travel back to KL	√	√	√

Appendix D: List of Stakeholders Contacted

Internal Stakeholders Female Mill and Estate Staff/Workers Male Mill and estate Staff/Workers Foreign Worker Mill and Estate Male Housing Residents Female Housing Residents Hospital Assistant Female Assistant at Clinic	Local Communities Kampung Simpang Tiga, Jeram Representatives. Taman Permai Village Committee Representative.
Contractors & Consultants Electrical Contractor General Supplier	Others AMESU NUPW State of Selangor
Government Departments School – SJK(T) Ladang Braustein	

Appendix E: Bukit Kerayong Palm Oil Mill Supply Chain Assessment (Module D: Segregation)

Requirements	Compliance
D.1. Documented procedures	
D.1.1 The facility shall have written procedures and/or work instructions to ensure implementation of all the elements specified for Segregation (SG) supply chain requirements. a) Complete and up to date procedures covering the implementation of all the elements. b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the facilities procedures for the implementation of this standard.	Bukit Kerayong palm oil mill have written documented procedures (<i>SPMS: 2012 Appendix 15- Standard Operating Procedure for Traceability and RSPO Supply Chain Certification System</i>) for the chain of custody with SG and MB model covering certified and non certified FFB. The mill manager has the responsibility to ensure implementation. The SG model used because only certified FFB is processed at the moment. However, the palm oil mill also have the system in place to use Mass Balance model through either down grading the SG to MB or through purchasing non certified FFB in the future.
D.1.2 The facility shall have documented procedures for receiving and processing certified and non-certified FFBs.	Bukit Kerayong mill has documented procedures for the incoming FFB, processing and outgoing palm products (CPO and PK). System available to make marking on the receiving documents to differentiate the certified and non-certified FFB received.
D.2. Purchasing and goods in	
D.2.1 The facility shall verify and document the volumes of certified and non-certified FFBs received.	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non certified FFB. Records verified by internal and external audit.
D.2.2 The facility shall inform the CB immediately if there is a projected overproduction.	The facilities aware of this procedure.
D.3. Record keeping	
D.3.1 The facility shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of certified and noncertified palm products.	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non certified FFB. Records verified by internal and external audit.
D.3.2 Retention times for all records and reports shall be at least five (5) years	The retention period is specified as five years and financial documents retained longer based on the local regulation requirement.
D.3.3 The facility shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO, PKO and palm kernel meal on a three-monthly basis.	All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. No PKO and Palm kernel meal at Bukit Kerayong mill. PK is sold to Sime Darby's subsidiary kernel crushing plant.
D.3.4 The following trade names should be used and specified in relevant documents, e.g. purchase and sales contracts, e.g. *product name*/SG or Segregated. The supply chain model used should be clearly indicated.	System in place to indicate CPO/Segregated on the documents related to the supply chain. Delivery record for the date 18/2/2014 was checked and verified.
D.4. Sales and goods out	
D.4.1 The facility shall ensure that all sales invoices issued for RSPO certified products delivered include the following information	No sales of certified palm product through UTZ. Sime Darby trade through GreenPalm as a group. Due to this it was not possible to relate to a particular mill. Sample of existing sales documents were checked and found that the balance palm products were sold as conventional palm products. The information on the documents are:
(a) The name and address of the buyer	Name and address of buyer written on the existing invoice. i.e. Sime Future Trading Sdn Bhd, Kuala Langat, Selangor.
(b) The date on which the invoice was issued	Date is written on all dispatch and relevant documents.
(c) A description of the product, including the applicable supply chain model (Segregated)	System in place to write product description and supply chain model is written. Previous delivery record seen during ASA2 for the date 5/1/2013 indicated "CPO/MB" because the buyer wants only "MB" although the mill has "SG" product. During the ASA3 it was noted that the mill has sample documents to implement "CPO/SG".
(d) The quantity of the products delivered	Quantity in tonne.
(e) Reference to related transport documentation	Weighbridge documents and D/O includes all the transport references. Weighbridge ticket number 007132 dated 18/2/2014 was checked and verified conform to the requirement. Transport details i.e. Vehicle number and driver's name included.
D.5. Processing	
D.5.1 The facility shall assure and verify through clear procedures and record keeping that the RSPO certified palm oil is kept segregated from non certified material including during transport and storage and be able to demonstrate that is has taken all reasonable measures to ensure that contamination is avoided. The objective is for 100 % segregated material to be reached. The systems should	During this assessment it was confirmed that only certified source of FFB from own plantation is processed as a segregated FFB. This ensures that there is no possibility of mixing during processing.

guarantee the minimum standard of 95 % segregated physical material; up to 5 % contamination is allowed	
D.5.2 The facility shall provide documented proof that the RSPO certified palm oil can be traced back to only certified segregated material.	Processing and storage records can trace back to only certified segregated raw material (FFB) and finish product (CPO and PK).
D.5.3 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that: <ul style="list-style-type: none"> The crush operator conforms to these requirements for segregation The crush is covered through a signed and enforceable agreement 	There is no outsourcing activity directly handled by the mill. The kernel is sold to a subsidiary kernel crushing plant belong to Sime Darby Group. The kernel crushing plant have own supply chain certificate and it is independent from the mill and it is outside the scope of the mill certification.
D.6 Training	
D.6.1 The facility shall provide the training for all staff as required to implement the requirements of the Supply Chain Certification Systems.	During interview with the weighbridge clerk, it was noted that she now understand the SCCS requirements for recording. The previously identified nonconformity remains closed since 5 April 2013. The operating unit conducted SCCS training on 23 February 2013 through the mill assistant who has been trained for SCCS. The training was attended by the weighbridge clerk, lab supervisor, processing supervisor, administration clerk and store clerk who are involved in SCCS implementation.
D.7. Claims	
D.7.1 The facility shall only make claims regarding the use of or support of RSPO certified palm oil that are in compliance with the RSPO Rules for Communications and Claims.	No claims made because the CPO is delivered/sold to downstream refineries.

Actual Certified Palm Production – January 2013 - December 2013 (ASA2)

MILL	CAPACITY	CPO	PK
Bukit Kerayong Palm Oil Mill	30 mt/hr	28,452	7,745

Actual Sales of Certified Palm Products – January 2013 - December 2013 (ASA2)

MILL	Certified CPO Sales (mt)	Certified PK Sales (mt)	Remarks
Bukit Kerayong Palm Oil Mill	NIL	NIL	No sales of certified CPO. CPO sold as normal palm products because buyers want only normal conventional palm products.

Actual Certified FFB Received Monthly – January 2013 - December 2013 (ASA2)

Month	Bukit Kerayong Estate	Bukit Cheraka Estate	Elmina Estate	Total FFB/Month
January 2013	3,954	5,762	2,474	12,190
February 2013	3,552	5,451	2,699	11,702
March 2013	3,544	5,701	2,894	12,139
April 2013	2,941	5,275	2,089	10,305
May 2013	3,282	5,339	2,360	10,981
June 2013	3,524	5,520	2,478	11,522
July 2013	3,622	5,079	2,667	11,368
August 2013	3,516	6,124	2,538	12,178
September 2013	4,135	6,928	2,228	13,291
October 2013	4,895	7,238	2,926	15,059
November 2013	4,134	5,690	2,162	11,986
December 2013	4,050	4,985	2,430	11,465
Total	45,149	69,092	29,945	144,186