

**RSPO – Fourth Annual Surveillance Assessment (ASA4)**  
**Public Summary Report**

<p>Company Name <b>Sime Darby Plantation Sdn Bhd</b> <b>Bukit Benut Palm Oil Mill and Supply Base</b></p>
<p>Certification Unit: <b>SOU 22 Management Unit (KKS Bukit Benut)</b> <b>KM 12 Jalan Mengkibol, 86009 Kluang,</b> <b>Johor, MALAYSIA</b></p>

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## Section 1 Scope of the Re-Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Date</b>	Member since: 6 September 2004
<b>Company Name</b>	Sime Darby Plantation Sdn Bhd		
<b>Address</b>	Head Office: Level 3A, Main Block, Plantation Tower, No 2 Jalan P.J.U 1A/7, 47301 Ara Damansara, Selangor, Malaysia.		
<b>Mill Address</b>	SOU 22 Management Unit (KKS Bukit Benut), KM 12, Jalan Mengkibol, P.O. Box 513, 86009 Kluang, Johor, Malaysia		
<b>Subsidiary of (if applicable)</b>	N/A		
<b>Contact Name</b>	Pn. Sabarinah Marzuki (Head Office) Mr. Khaizaruddin Awaludin (Mill Manager)		
<b>Web site</b>	<a href="http://www.simedarby.com">www.simedarby.com</a>	<b>E-mail</b>	<a href="mailto:kks.bk.benut@simedarby.com">kks.bk.benut@simedarby.com</a>
<b>Telephone</b>	607-7723479	<b>Facsimile</b>	607-7766479

2. RSPO Certification Information			
<b>Certificate Number</b>	SPO 591229	<b>Certified Issued Date</b>	5 Oct 2011
		<b>Expiry Date</b>	4 Oct 2016
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production from Bukit Benut Palm Oil Mill and Supply Base (Bukit Benut Estate, Lambak Estate, CEP Nyior Estate).		
Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
AR0119	ISO 9001 QMS (Bukit Benut Mill)	SIRIM	29 September 2017
AR1094	ISO 9001 QMS (Bukit Benut Estate)	SIRIM	8 July 2018
EU-ISCC-Cert-DE119-6014971	ISCC	ASG	22 December 2015

3. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Eastings	Northing
Bukit Benut POM	KKS Bukit Benut, PO Box 513, 86009 Kluang, Johor	103° 19' 59"	1° 54' 42"
Bukit Benut Estate	Ladang Bukit Benut, PO Box No.513, 86009 Kluang, Johor	103° 21' 54"	1° 54' 42"
CEP Nyior Estate	Ladang CEP Nyior, K/B No.514, 86009 Kluang, Johor	103° 16' 22"	1° 54' 30"
Lambak Estate	Ladang Lambak/Elaeis, P.O Box 510, 86009 Kluang Johor	103°19' 08"	1° 58' 43"

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4. Description of Certified Supply Base						
Estate	Mature (ha)	Immature (ha)	Total Planted Area (ha)	Infrastructure & Other (ha)	Total Hectareage	% of Planted
Bukit Benut Estate	2,178.60	401.83	2,580.43	220.70	2,801.13	92
CEP Nyior Estate	1,226.36	261.54	1,487.90	50.84	1,538.74	97
Lambak Estate	3,101.77	219.04	3,320.81	423.95	3,744.76	89
Total	6,506.73	882.41	7,389.14	695.49	8,084.63	91

5. Plantings & Cycle								
Estate	Age (Years) & Hectare					FFB Tonnage / Year		
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Estimated (July 14 June-15)	Actual (July 14 June-15)	Forecast (July 15-June 16)
Bukit Benut Estate	401.83	990.61	891.38	224.49	72.12	47,198	41,045	65,932
CEP Nyior Estate	261.54	485.69	507.01	233.66	0	31,958	8,842	27,292
Lambak Estate	219.04	1,621.27	1,234.36	246.14	0	68,090	60,493	45,120
Total	882.41	3,097.57	2,632.75	704.29	72.12	147,246	110,380	138,344

6. Certified Tonnage									
Mill	Estimated (Previous Year (July 14 June-15))			Actual (This Year (July 14 June-15))			Forecast (Next Year (July 15-June 16))		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Bukit Benut POM	147,246	32,472	7,804	110,380	24,341	5,899	138,344	31,473	7,332
Group Estate certified FFB processed	-	-	-	993			-	-	-
TOTAL	147,246	32,472	7,804	111,373	24,341	5,899	138,344	31,473	7,332

## Section 2 Assessment Process

BSI Services Malaysia Sdn Bhd,  
(ASI Accreditation Number: RSPO-ACC-19)  
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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 is ASI Accredited (RSPO-ACC-19) since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an affiliate office at Singapore, Jakarta, Bangkok and Australia which involve in RSPO Certification Program.

### Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted from 11-13 August 2015. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply bases as a RSPO Certification Unit. Mill was audited together with the sample estates (Bukit Benut and Lambak Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families, review of documentation and monitoring data. RSPO P&C MYNI-2014 was used as Checklists and questionnaires were used to guide the collection of information. The comments made by external stakeholders were also taken into account in the assessment.

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

The Major nonconformity that was assigned during the third annual surveillance audit (ASA3) which was closed during the last assessment was followed up to ensure it is remaining closed. Previous nonconformities remains closed and re-verified during this assessment. The assessment findings are detailed in Section 3.3.

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

This report was internally reviewed by Mr. A. Senniah (RSPO Scheme Manager) prior to certification decision by BSI.

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

<b>1. Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5 (recertification)</b>
Bukit Benut Palm Oil Mill	√	√	√	√	√
Bukit Benut Estate	√		√	√	√
Lambak Estate	√	√		√	
CEP Nyior Estate		√	√		√

**Tentative Date of Next Visit: July 2016**

**Total No. of Mandays: 9 mandays**

**BSI Assessment Team:**

**Mohamed Hidhir – Lead Assessor**

He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 14001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.

**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 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 completed the RSPO Lead Auditor Training in April 2013 and passed the course. He is also passed the ISO 14001 Lead Auditor Training, OHSAS 18001 Lead Auditor Training Course and qualified as EICC auditor. He has completed International Sustainable and Carbon Certification (ISCC) Lead Auditor Training Courses. Recently he has attended the RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing Workshop on 17 – 19 September in Bangkok, Thailand. 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 environment, Safety and Health, Legal, Social and community engagements, Stakeholders consultation, and workers welfare. He is able to speak and understand Bahasa Malaysia, English, Tamil and Bahasa Indonesia.

**Hafriazhar Mohd Mokhtar – Team member**

Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.

**Accompanying Persons:** Not Applicable

## Section 3 Summary of Assessment Findings

### 3.1 Details of audit results are provided in the following Appendix:

- RSPO P&C MYNI 2014 Checklist – **Appendix A:** Summary report of the Assessment.
- Sime Darby Plantations Sdn Bhd Time Bound Plan – **Appendix B:** Time Bound Plan.
- RSPO Supply Chain Certification Checklist – **Appendix F:** CPO Mill Supply Chain Assessment Report.

### 3.2 Progress against Time Bound Plan

Sime Darby Time Bound Plan (TBP) is included as Appendix B. Sime Darby has achieved RSPO certification for 34 management units in Malaysia and 24 Management Units in Indonesia. There are no any changes in the existing certified units in Malaysia. All units' certifications are valid. Sime Darby has acquired NBPOL. NBPOL is managed as a separate management unit. NBPOL has its own RSPO membership (1-0016-04-000-00) and have achieved certification for all the certification units.

There was a change of the Time Bound Plan (TBP) under Sime Darby Indonesia Operation due to the on-going mediation and DSF facilitation Process by RSPO DSF at PT Mitra Austral Sejahtera (PT MAS). This was the result from the mediation meeting held on 22 July 2014. PT MAS was audited as per the original TBP by RSPO accredited Certification Body in 2011. Due to the on-going mediation process, the CB that assessed PT MAS is yet to issue the certificate. BSI has accepted the revision as justified revision due to the commitment shown by all parties involves resolving the community issue. This is also accepted by the CB that assessed PT MAS. Discussion was held with the CB that assessed the PT MAS and Sime Darby.

Due to the present mediation process, PT Mitra Austral Sejahtera TBP was revised to 2015 by Sime Darby pending on the resolution and mediation process which is acknowledged by RSPO. The final decision of issuing the certificate is under the CB that audited the PT MAS. BSI has contacted the CB and consultation was held. The CB that audited PT MAS accepted the revision of the TBP. BSI accepted the feedback from the CB that audited PT MAS as per the RSPO Certification System requirement "Where the Certification Body conducting the surveillance audit is different from that which first accepted the time-bound plan, the later Certification Body shall accept the appropriateness of the time-bound plan at the moment of first acceptance and shall only check continued appropriateness". BSI understands that there are community issue still under negotiation through agreed process. The improvement is in progress and acknowledge by RSPO and all parties as mutually agreed process. Latest meeting among the community, RSPO and the Sime Darby was held on 22 July 2014. BSI has consider that Sime Darby still comply with the RSPO requirement for partial certification and has justified the revision to TBP.

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1. There is no any other isolated lapse in Time Bound Plan.
2. No systematic failures to proceed with implementation of the Time Bound Pan since first certified.
3. The changes in the Time bound Plan for PT Mitra Austral Sejahtera was justified and appropriate.

BSI has continued involvement with assessments of Sime Darby Management Units during the 2014 period and beginning 2015. BSI is also communicating with other Certification Bodies that auditing Sime Darby’s other operating units to identify any noncompliance with rules of partial certification as per requirement in RSPO Certification System. During this assessment BSI has contacted the certification body that audited PT MAS to get the latest update of the progress. Sime Darby consistently has kept BSI informed of any emerging issues and claims made against it. Other than the PT MAS issue, at the time of preparation of this Report, BSI is not aware of any new issues involving:

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

BSI considers that Sime Darby complies with the RSPO requirements for Partial Certification rules.

**3.3 Details of findings**

The nonconformity is listed below. The summary of the findings by criteria is listed in Appendix A.

During the annual surveillance assessment (ASA 4) there were 1 major and 1 minor nonconformities issued. Bukit Benut Palm Oil Mill and Supply Base Estates submitted Corrective Action Plans for the nonconformities. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted. The evidence of implementation for the major nonconformities was verified. The major nonconformity was closed on 22 August 2015. Following are the details of the nonconformities:

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1223225M1	<b>Requirements – Indicator 2.1.1:</b> i) Evidence of compliance with relevant legal requirements shall be available ii) Highly Toxic Pesticides Regulations 1996 : Regulations 4 - Maintenance of records	Major
	<b>Evidence of Nonconformity:</b> Referred to application date 14/7/15 and 15/7/15 at field 02A i) Information recorded in form I, II & III was incomplete for the said date. ii) Permit to Work (PTW) used was not completely filled, without applicant details, PPE visual inspection checklist, approval and verification part after completion of work.	
	<b>Statement of Nonconformity:</b> Records of highly toxic pesticide (methamidophos) application was not consistently recorded and maintained as per legal requirement and Trunk Injection SOP, under section 2.3 (Permit To Work)	
	<b>Action:</b> To retrain the person in-charge of the activity and workers involved in TI.	



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	<p>Training has been planned to be conducted by PSQM- ESH on 20th August 2015.</p> <p><b>Status:</b>          Trunk injection training was conducted on 18/8/15 involving executive, staff and trunk injection gang. Verified training attendance for the said group and sample of PTW used as well as form I, II and III. As for the long term measures, management has decided to substitute the use of class I chemical to class III chemical (Acephate). The major NC was close out on 22/8/15.</p>	
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<b>Non-Conformity</b>		
<b>NCR #</b>	<b>Description</b>	<b>Category (Major / Minor)</b>
<b>1223225N1</b>	<p><b>Requirements – Indicator 5.3.3 :</b>            A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented</p> <p><b>Evidence of Nonconformity:</b>            ) It was found that there are no records of storage (inventory-5th schedule) and disposal (consignment- 6th schedule) of SW 102 (used lead acid batteries); SW 410 (contaminated oil filters) and SW 404 (medical waste) (although it was sighted being stored during the site visit in the scrap/waste store and clinic of Lambak Estate            ii) It was found that the debris of demolished old bungalows was left unmanaged at Lambak Estate</p> <p><b>Statement of Nonconformity:</b>            i) Waste management and disposal plan not being implemented for three scheduled waste categories i.e. SW 102, SW 410 and SW 404 in Lambak Estate            ii) Management and disposal plan for construction waste was not documented and implemented in Lambak Estate</p> <p><b>Action:</b>            i) To train the new person in-charge of the activity and workers involved in Scheduled Waste Management. Training has been planned to be conducted on the 21st August 2015.            ii) To update schedule waste records (inventory and consignment note) and clear all demolished bungalow debris.</p> <p><b>Status:</b>            The status of corrective action taken will be verified in the next assessment.</p>	Minor

<b>Observation</b>	
<b>OBS #</b>	<b>Description</b>
NIL	

Positive Findings	
PF #	Description
1	The palm oil mill has maximized the use of renewable energy by consuming shell and fibre produced internally.
2	KAIZEN projects have been initiated to improve on safety working environment and process efficiency to maximize output and minimize lost time incident on human and machinery.
3	All operating units has maintained good relationship with the local community and other stakeholders. Positive feedback was given to the audit team during interview.
4	Bukit Benut palm oil mill and estate area certified under other standards such as ISCC and ISO 9001:2008/Quality Management System.

Issues raised by Stakeholders	
<p>Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Bukit Benut Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.</p> <p>Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. These have been incorporated into the assessment findings.</p> <p>Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix E.</p>	
IS #	Description
1	<b>Issues:</b> (Independent Smallholders) – Promotion on RSPO and stakeholder meeting
	<b>Management Responses:</b> Will provide information on RSPO and invite the smallholders for the meeting
	<b>Audit Team Findings:</b> No unresolved and dispute issues noted. Management continue the good relationship with the stakeholder
2	<b>Issues:</b> School headmaster, SJK(T) Ladang Bukit Benut & SK Ladang Bukit Benut : It was re-confirmed that the management always support school activities. The relationship is good. No other issues.
	<b>Management Responses:</b> Management assists wherever possible.
	<b>Audit Team Findings:</b> No other issues.
3	<b>Issues:</b> Contractors: Contractors confirm payment is prompt as per agreed contract.
	<b>Management Responses:</b> Payment is made as per the agreed terms.
	<b>Audit Team Findings:</b> No other issues.

<p><b>4</b></p>	<p><b>Issues:</b> Foreign workers representative: During consultation there were no issue regarding pay and condition of work. The representative highlighted that they are treated equally. All foreign workers have access to all facilities similar to local workers.</p> <p><b>Management Responses:</b> The management highlighted that they treat all employees equally and no discrimination.</p> <p><b>Audit Team Findings:</b> No disputes were highlighted by foreign workers interviewed during consultation.</p>
<p><b>5</b></p>	<p><b>Issues:</b> Local workers: It was highlighted that they are satisfied with the work condition and payment. The workers also highlighted that they are receiving free cooking oil and rice from the management once in two month.</p> <p><b>Management Responses:</b> The management is continued to give attention to the welfare, pay and condition.</p> <p><b>Audit Team Findings:</b> There were no any issues that require further verification was highlighted. Consultation with stakeholders and document review confirm that there were no pending issues.</p>

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

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1071995M0	<p><b>Requirements:</b> Indicator 2.1.1 : Evidence of compliance with legal requirements.</p> <p><b>Evidence of Nonconformity:</b> Bukit Benut Estate: Document review found that Permit for diesel storage from KPDN (Ref. No.: (39) BPGK.JH (KLU) 0624 SK) was expired on 23 April 2014. New permit was not available during the audit.</p> <p><b>Statement of Nonconformity:</b> Diesel Storage Permit as required by Control of Supplies Act 1974 was expired.</p> <p><b>Action:</b> Estate has renewed the diesel storage permit. Referred to permit BPGK.JH(KLU) 0624 SK, valid until 25/7/16.</p> <p><b>Status:</b> The issue was re-verified and found that the NC is remained closed.</p>	Major

Observation	
OBS #	Description
NIL	

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**3.3.2 Summary of the Nonconformities and Status**

<b>CAR Ref.</b>	<b>CLASS</b>	<b>ISSUED</b>	<b>STATUS</b>
04/2009	Minor	24/02/2009	Closed out on 27/9/2012
05/2009	Minor	24/02/2009	Closed out on 27/9/2012
06/2009	Minor	24/02/2009	Closed out on 27/9/2012
A787320/1	Major	25/9/12	Closed out on 23/11/2012
A787320/1	Minor	25/9/12	Closed out on 28/6/2013
A787320/2	Minor	25/9/12	Closed out on 28/6/2013
A787320/3	Minor	25/9/12	Upgraded to Major NC (938174M1)
A787320/4	Minor	25/9/12	Closed out on 28/6/2013
938174M0	Major	28/6/13	Closed out on 20/8/2013
938174M1	Major	28/6/13	Closed out on 20/8/2013
938174M2	Major	28/6/13	Closed out on 20/8/2013
938174N4	Minor	28/6/13	Closed out on 1/7/2014
938174N5	Minor	28/6/13	Closed out on 1/7/2014
938174N6	Minor	28/6/13	Closed out on 1/7/2014
938174N7	Minor	28/6/13	Closed out on 1/7/2014
1071995M0	Major	4/7/14	Closed out on 11/7/2014
1223225M1	Major	13/8/15	Closed out on 22/8/2015
1223225N1	Minor	13/8/15	"open"

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<b>Assessment Conclusion and Recommendation:</b>	
Based on the findings during the recertification assessment Bukit Benut Palm Oil Mill Certification Unit and supply base complies with the RSPO P&C Malaysian National Interpretation (MY-NI 2014) and the RSPO Supply Chain Certification Standard (Nov 2014) for CPO Mill. It is recommended that the certification of Bukit Benut Palm Oil Mill Certification Unit is approved and continued.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> Khaizaruddin Awaludin	<b>Name:</b> Mohamed Hidhir Bin Zainal Abidin
<b>Company name:</b> Sime Darby Plantation Sdn Bhd	<b>Company name:</b> BSI Services Malaysia Sdn. Bhd.
<b>Title:</b> Bukit Benut Mill Manager	<b>Title:</b> Lead Auditor
<b>Signature:</b>  SIME DARBY PLANTATION SDN. BHD. BUKIT BENUT OIL MILL ..... KHAIZARUDIN BIN AWALUDIN MILL MANAGER IN-CHARGE	<b>Signature:</b>  <b>Date : 11<sup>th</sup> September 2015</b>

**Appendix A: Summary Report of the Assessment**

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Commitment to Transparency</b>			
<b>Criterion 1.1:</b> Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Requests for information from the Regulatory Department such as DOSH during compliance visit were attended and no noncompliance or complaints were noted.	<b>Complied</b>
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance-	All operating units maintain records of information request and response. Request for information are attended promptly and confirmed by stakeholders interviewed.	<b>Complied</b>
<b>Criterion 1.2:</b> Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

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<p>1.2.1</p> <p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>• HCV documentation (Criteria 5.2 and 7.3);</li> <li>• Pollution prevention and reduction plans (Criterion 5.6);</li> <li>• Details of complaints and grievances (Criterion 6.3);</li> <li>• Negotiation procedures (Criterion 6.4);</li> <li>• Continual improvement plans (Criterion 8.1);</li> <li>• Public summary of certification assessment report;</li> <li>• Human Rights Policy (Criterion 6.13).</li> </ul> <p>- Major compliance –</p>	<p>There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>Sime Darby Plantations Sdn Bhd continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available through Sime Darby Plantations Sdn Bhd website at <a href="http://www.simedarbyplantation.com/Sustainability.aspx">http://www.simedarbyplantation.com/Sustainability.aspx</a></p> <p>Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> <li>• Good Agricultural Practices</li> <li>• Social Enhancement</li> <li>• Sustainability Management Programmes</li> <li>• Complaint and Grievances procedure.</li> <li>• Environmental Conservation</li> </ul> <p>These documents highlight current Sime Darby Plantations Sdn Bhd practices and their continual improvement plans. Besides the above document Sime Darby Plantations Sdn Bhd policy on the followings are also available at the same website:</p> <ol style="list-style-type: none"> <li>1) Social</li> <li>2) Quality</li> <li>3) Food Safety</li> <li>4) Occupational Safety &amp; Health</li> <li>5) Environment &amp; Biodiversity</li> <li>6) Slope Protection and Buffer Zone</li> <li>7) Lean Six Sigma</li> <li>8) Gender</li> </ol> <p>In addition to the website, the policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p>	<p><b>Complied</b></p>
<p><b>Criteria 1.3:</b>            Growers and millers commit to ethical conduct in all business operations and transactions.</p>		
<p>1.3.1</p> <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Sime Darby plantation has established policy on code of ethical conduct and integrity which covers all operations in the plantation operation. Policy displayed on the notice board and communicated to employees. Interview with employees reveal that they are aware of the policy.</p>	<p><b>Complied</b></p>
<p><b>Principle 2: Compliance with applicable laws and regulations</b></p>		
<p><b>Criterion 2.1:</b>            There is compliance with all applicable local, national and ratified international laws and regulations.</p>		

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<p>2.1.1 Evidence of compliance with relevant legal requirements shall be available.            - Major compliance -</p>	<p>SOU 22 had continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and PSQM sustainability team. SOU 22 had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were :</p> <p><b><u>Bukit Benut Palm Oil Mill</u></b></p> <ul style="list-style-type: none"> <li>a) DOE Licence/ <i>Jadual Pematuhan</i>: 002208 (validity period 1/7/2015 - 30/6/2016) for 20 MT/hr and method of POME discharge is water course and Land application (BOD below 100mg/l).</li> <li>b) MPOB: 528154004000, processing capacity 120,000 Mt, valid until 31/3/16</li> <li>c) Licenses for Steam Boiler - PMD (valid until 8/5/16), unfired pressure vessel (UPV) (sterilizers PMD 940).</li> <li>d) Water extraction license – No. 08/A/Klg/014 valid until 31/12/2015</li> <li>e) Fire Certificate – No.: JBPM:JH/7/062/2015 from BOMBA valid until 5/4/2016</li> <li>f) Electrical Charge man license – A4 registration number (PJ-T-4-H-0006-2006).</li> <li>g) Confined space competence person license – AESP &amp; AGT (NW-HQ-AE-R-4340-M) valid until 3/11/2016.</li> <li>h) DOE Quarterly report for the second quarter (1/4/2015 – 30/6/2015) send to DOE on 17/7/2015</li> </ul> <p><b><u>Bukit Benut Estate</u></b></p> <p>CF for air compressor – JH PMT 3178, last inspection was done on 16/6/15.</p> <p>Diesel and petrol permit : BPGK.JH(KLU) 0624 SK, valid until 25/7/16</p> <p>MPOB 522307002000 – valid until 31/7/2016.</p> <p>Based on document review it was found that records of highly toxic pesticide (methamidophos) application was not consistently recorded and maintained as per legal requirement and Trunk Injection SOP, under section 2.3 (Permit To Work) at Bukit Benut Estate. Thus, major NC 1223225M1 was raised.</p>	<p><b>Major non-compliance</b></p>
<p>2.1.2 A documented system, which includes written information on legal requirements, shall be maintained.            - Minor compliance -</p>	<p>List of applicable legal and other requirements was made available during the assessment and compiled in the QSHE/04/5.2.4 folder. Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008</p>	<p><b>Complied</b></p>



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2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance -	A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU22. PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance. Refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.	<b>Complied</b>
2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law been well implemented. E.g. regular notification by Head Office and regular updates from the DOE/DOSH websites as well as from MAPA circulars.	<b>Complied</b>
<b>Criterion 2.2:</b> The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.		
2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land was made available at all visited sites. Sample of land title as follows:  <b>Bukit Benut Estate</b> Latest quit rent for 2015 : Lot #873, hectarage: 195.969 ha, Mukim Renggam Type of land used : Agriculture DHM# 98998 (Sime Darby Plantation Sdn Bhd) Quit rent receipt# 890743  Lot #1085, hectarage: 180.8942 ha, Mukim Renggam Type of land used : Agriculture DHM# 120741 (Sime Darby Plantation Sdn Bhd) Quit rent receipt# 890732  <b>Lambak Estate</b> Latest quit rent for 2015 : Lot #1532, hectarage: 605.05 ha, Mukim Kluang Type of land used : Agriculture DHM# 94497 (Sime Darby Plantation Sdn Bhd) Quit rent receipt# 879628  Lot #3152, hectarage: 372.108 ha, Mukim Kluang Type of land used : Agriculture DHM# 99139 (Sime Darby Plantation Sdn Bhd) Quit rent receipt# 879624	<b>Complied</b>

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2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	During the field visit it was noted that legal boundaries are clearly demarcated and visibly maintained throughout the estate. Sample boundary marker checked at Bukit Benut estate field No.: Po2B bordering with smallholder was visibly maintained	<b>Complied</b>
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	Sime Darby did not acquire land from landowners, but leased it directly from the government. There were no issues of land disputes noted during the stakeholder interview and documents check.	<b>Complied</b>
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the SOU22 at the time of audit. The land belongs to Sime Darby and land ownership documents verified	<b>Complied</b>
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the SOU22 at the time of audit. The land belongs to Sime Darby and land ownership documents verified	<b>Complied</b>
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute in the SOU22 at the time of audit. The land belongs to Sime Darby and land ownership documents verified	<b>Complied</b>
<b>Criterion 2.3:</b> Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).. - Major compliance -	There is no land dispute in the SOU22 at the time of audit. The land belongs to Sime Darby and land ownership documents verified.	<b>Complied</b>

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2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	There is no land dispute in the SOU22 at the time of audit. The land belongs to Sime Darby and land ownership documents verified.	<b>Complied</b>
2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	There is no land dispute in the SOU22 at the time of audit. The land belongs to Sime Darby and land ownership documents verified.	<b>Complied</b>
2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There is no land dispute in the SOU22 at the time of audit. The land belongs to Sime Darby and land ownership documents verified.	<b>Complied</b>
<b>Principle 3: Commitment to long-term economic and financial viability</b>		
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.		

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3.1.1 A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	<p>SOU22 has continued its commitment to long term sustainability and improvements through a capital expenditure programme. Bukit Benut Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year. Sample of gazzeted CAPEX noted at the visited operating unit are:</p> <p><b><u>Bukit Benut Estate</u></b>            Buliding – workers quarters 10 unit            Tractors – Ford New Holland T56 110            Tractors - Ford New Holland T55</p> <p><b><u>Lambak Estate</u></b>            Tractor Ford New Holland TD5.90</p>	<b>Complied</b>
3.1.2 An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	<p>Estates have long range replanting programme for 5 year from 2015-2020 and reviewed yearly. 5 years replanting programme for Bukit Benut and Lambak Estate as follows:</p> <p><b><u>Bukit Benut Estate</u></b>            5 years replanting programme            15/16 – 168.12 Ha (90 &amp; 98 )            16/17 – 128.49 Ha (91)            17/18 – (No programme)            18/19 – 190.54 Ha (95 &amp; 96)            19/20 - (No programme)</p> <p><b><u>Lambak Estate</u></b>            5 years replanting programme            15/16 – 99.84 Ha (92A, 92B &amp; 93D )            16/17 – No programme            17/18 – 134.95 Ha (94B &amp; 95A)            18/19 – 96.72 Ha (95C )            19/20 - 124.02 Ha (95C &amp; 2000A)</p>	<b>Complied</b>
<b>Principle 4: Use of appropriate best practices by growers and millers</b>		
<b>Criterion 4.1:</b> Operating procedures are appropriately documented, consistently implemented and monitored.		
4.1.1 Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	<p>SOP available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs: Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. SOP for the Composting Plant dated 15/8/2011: Composting Management System version 1:2011 Estates have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc.</p>	<b>Complied</b>

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4.1.2 A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	Mill Advisor and a Planting Advisor inspect and report on the operations on annual basis. The on-site managers develop Action Plans from the Advisory Reports for improvement of the operations. Review of Advisory Reports, Action Plans and site inspections confirmed consistent records of implementation of SOPs. During mill visit it was noted that that operating parameters were consistently recorded by the operators.	<b>Complied</b>
4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	The records of monitoring and the actions taken maintained for more than 12 months. Records were verified during the document review found compliance. Mill advisor last visit: 18-19/12/14 (report No.: SOU 22/BBM/01/14-15). DOE visited the on 9/2/2015 – No issues. 16/6/2015 visited by DOSH – Requested to submit form JKPP 7 for workers detected with hearing impairment. Mill submitted the form on 14/7/2015.  Internal RSPO audit was conducted on 8/7/2015 by the PSQM executives.  <u>Bukit Benut estate:</u> Planting Advisor visited the on 12/11/14 (Report No.: PAR/SOU22/BBE/01/14-15 Agronomist visit: 27-28 March 2015 <u>Lambak estate:</u> PA visited on 8-10/12/2014 (Report No.: PAR/SOU22/LE/01/14-15) Agronomist visit: 25-26 March 2015	<b>Complied</b>
4.1.4 The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Bukit Benut mill maintains a daily record of all FFB received. The records show the origin, weight, transporters details and etc of the FFB received. Bukit Benut mill only receives FFB from own supply base and other Sime Darby adjacent estates.	<b>Complied</b>
<b>Criterion 4.2:</b>		
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.		
4.2.1 There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	SOU22 estates operates in accordance with the Sime Darby management systems and standard operating procedures. The practices consistently monitored by mill and plantation advisors and recommendations for improvements are given to maintain the sustainable practices.  <u>Bukit Benut Estate:</u> Agronomist visited the estate on 27/3/15 prior to the fertilizer recommendation were developed.  <u>Lambak Estate:</u> Agronomist visited the estate on 26/3/15	<b>Complied</b>
4.2.2 Records of fertiliser inputs shall be maintained. - Minor compliance -	Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators.	<b>Complied</b>

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4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	Leaf sampling has been carried out by R&D department on December 2014 for both estates visited i.e: Bukit Benut and Lambak estates and the results were incorporated in the Fertilizer recommendation. Last soil sampling was conducted on 16/3/15 (Report No.S20/2015) by R&D Carey Island.	<b>Complied</b>
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	All palm by-products including fronds, EFB, and expeller are recycled. EFB is applied at the rate of 40mt/ha on selected area close to the mill.	<b>Complied</b>
<b>Criterion 4.3:</b> Practices minimise and control erosion and degradation of soils.			
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	There are no peat soils or soil categorised as problematic or fragile soil at all estates. Both estates visited soils are mostly Rengam and Jeranggau series.	<b>Complied</b>
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Landscapes of both estates visited are mostly flat and undulating. However, Sime Darby has a policy on slope planting and this will be implemented during replanting. Areas more than 25 degrees were maintained as conservation area. Jungle tree were planted at the area to enhance the biodiversity.	<b>Complied</b>
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Estates have implemented annual road maintenance programme. Example of programme checked at Bukit Benut and Lambak estates shows the map indicating road repairs and maintenance for the whole estate roads includes grading, compacting and stone application to strengthen the road surface. Visit to the field and main roads found to be well maintained and accessible.	<b>Complied</b>
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	There are no soils categorized as problematic or fragile soil at all estates.	<b>Complied</b>
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	There are no soils categorized as problematic or fragile soil at all estates.	<b>Complied</b>
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	There are no soils categorized as problematic or fragile soil at all estates.	<b>Complied</b>
<b>Criterion 4.4:</b> Practices maintain the quality and availability of surface and ground water.			

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<p>4.4.1</p> <p>An implemented water management plan shall be in place.                      - Minor compliance -</p>	<p>Mill Water Management Plan:</p> <ul style="list-style-type: none"> <li>Water treatment for process and domestic (executive and staff housing)</li> <li>SAJ for line site</li> </ul> <table border="1" data-bbox="662 533 1297 797"> <tr> <td>Process Operation- Boiler &amp; Cleaning</td> <td>Rainwater &amp; river</td> <td>186567m<sup>3</sup></td> </tr> <tr> <td>Office Use- Washrooms, Drinking, Laboratory</td> <td>Lembaga Air Perak (LAP)</td> <td>24539m<sup>3</sup></td> </tr> <tr> <td>Domestic use- linesite</td> <td>Lembaga Air Perak</td> <td>16224m<sup>3</sup></td> </tr> </table> <p>Estate implemented the following water management plan:</p> <ul style="list-style-type: none"> <li>Monitoring of all water meters</li> <li>Reduce water used for floor cleaning</li> <li>Chemical premix plant water recycle</li> <li>Domestic water usage control</li> </ul> <p>Drinking water monitoring:                      Spectrum Laboratories (Johore) Sdn. Bhd.                      Report # W/1505/98010                      Date: 7/5/2015                      Against WHO Guideline</p> <p>Bukit Benut estate rainfall water monitoring:                      Period: 1/1/2015 – 31/7/2015                      No. of rainy days: 60 days                      Rain volume: 672.00ml</p>	Process Operation- Boiler & Cleaning	Rainwater & river	186567m <sup>3</sup>	Office Use- Washrooms, Drinking, Laboratory	Lembaga Air Perak (LAP)	24539m <sup>3</sup>	Domestic use- linesite	Lembaga Air Perak	16224m <sup>3</sup>	<p><b>Complied</b></p>			
Process Operation- Boiler & Cleaning	Rainwater & river	186567m <sup>3</sup>												
Office Use- Washrooms, Drinking, Laboratory	Lembaga Air Perak (LAP)	24539m <sup>3</sup>												
Domestic use- linesite	Lembaga Air Perak	16224m <sup>3</sup>												
<p>4.4.2</p> <p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.                      - Major compliance -</p>	<p>Documented as a Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). Buffer zones established as following:</p> <table border="1" data-bbox="662 1406 1297 1592"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>&gt; 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Bukit Benut Estate implemented the monitoring of river water flowing towards Sungai Lambak sampling point. Samples were taken from 2 sampling points (upstream and downstream) of streams running across Bukit Benut Estate. Sample analyses were done every 3 months by Sime Darby Research Sdn. Bhd. R&amp;D Centre Carey Island. Sampled analysis report (report # PL212/2015 dated 6/5/2015)</p>	River width	Buffer zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters	<p><b>Complied</b></p>
River width	Buffer zone													
> 40 meters	50 meters													
20 to 40 meters	40 meters													
10 to 20 meters	20 meters													
5 to 10 meters	10 meters													
< 5 meters	5 meters													

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<p>4.4.3</p> <p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6).                      - Minor compliance -</p>	<p>Anaerobic POME treatment with polishing plant. Limit DOE Licence/ Jadwal Pematuhan: JPKKS 002208 (validity period 1/7/2015 - 30/6/2016) for 20 MT/hr and method of POME discharge is 50% water course and 50% land application. Limit for water course discharge BOD is 100mg/l while for land application is 5000mg/l.</p> <p>Effluent monitoring records: Monthly Effluent Analysis Test Report; Test Report no. EP363/2015 dated 10/7/2015 by Sime Darby Research Sdn. Bhd.; parameter monitored:- pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&amp;G. Other sampled records of BOD Analysis for the month of June, May, April, March, February and January 2015 shown that the mill effluents were in compliance with license regulations.</p> <p>River water monitoring records: Monthly River Water Analysis Test Report; Test Report no. IE573/2015 dated 10/7/2015 by Sime Darby Research Sdn. Bhd.; parameter monitored:- pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&amp;G. Other sampled records of BOD Analysis for the month of June, May, April, March, February and January 2015 shown that the mill effluents were in compliance with license regulations.</p>	<p><b>Complied</b></p>
<p>4.4.4</p> <p>Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored.                      - Minor compliance -</p>	<p>Mill: Achievement for Financial year 2014/2015:                      Total FFB Processed: 111,373 mt                      Total Process Water Usage: 131043.88m<sup>3</sup>                      Total Consumption: 1.2 m<sup>3</sup>/mt FFB</p>	<p><b>Complied</b></p>
<p><b>Criterion 4.5:</b>                      Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>		
<p>4.5.1</p> <p>Implementation of Integrated Pest Management (IPM) plans shall be monitored.                      - Major compliance -</p>	<p>IPM Plan includes the planting of beneficial plants and control of damage by rodents. Beneficial plants such as Turnera subulata and Casia are grown in the estates. Records of planting of new areas and maintenance of existing areas of beneficial plants and location maps are available. Records of rat baiting and barn owl census are available.</p>	<p><b>Complied</b></p>
<p>4.5.2</p> <p>Training of those involved in IPM implementation shall be demonstrated.                      - Minor compliance -</p>	<p>Training records for staff on IPM implementation were available and verified to be satisfactory during on-site assessment.</p>	<p><b>Complied</b></p>
<p><b>Criterion 4.6:</b>                      Pesticides are used in ways that do not endanger health or the environment</p>		
<p>4.6.1</p> <p>Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available.                      - Major compliance -</p>	<p>Justification of pesticides applied is available in the Sime Darby Agriculture Reference Manual Section 15 item 3.4. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species.</p>	<p><b>Complied</b></p>



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4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	<b>Complied</b>
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	<b>Complied</b>
4.6.4	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -</p> <p><b><u>Bukit Benut Estate</u></b>            Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. At the time of assessment, Class 1a chemical was used at Bukit Benut Estate for Bagworm treatment.</p> <p>Permit for Class 1A chemical was granted from Department of Agriculture (DOA), refer to permit JH/METHA(GL)/15/73 for the quantity of 200 liter and approved on 22/7/15.</p> <p><b><u>Lambak Estate</u></b>            Permit for Class 1A chemical was granted from Department of Agriculture (DOA), refer to permit JH/METHA(GL)/15/76 for the quantity of 320 liter and approved on 29/7/15.</p> <p>Noted internal memo for the substitution of class IA chemical (methamidophos) to class III chemical (acephate) for bagworm treatment. Effectiveness of the chemical application shall be further verified in the next audit.</p>	<b>Complied</b>
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	<b>Complied</b>
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	<b>Complied</b>

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4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5	<b>Complied</b>
4.6.8 Pesticides shall be applied aerielly only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spraying at SOU22.	<b>Complied</b>
4.6.9 Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders at SOU22. Employees demonstrate knowledge and skills on pesticide handling. MSDS/SDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as the use of safety pictorial poster for the easy understanding of the agrochemical handlers.	<b>Complied</b>
4.6.10 Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Disposal method of all identified waste was already included in the pollution prevention plan where the site visit confirmed that the practice of reduce, reuse and recycle of materials has been implemented throughout the company within mill and estates.	<b>Complied</b>
4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	Medical surveillance carried out once a year for all pesticide handlers. Last medical check-up was conducted on 25/3/2015 by DOSH Registered doctor. No.: HQ/08/DOC/00(597) at Bukit Benut Estate.	<b>Complied</b>
4.6.12 No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	There are female pesticide operators but only for normal weeding work. However, based on interview with female workers confirmed knowledge of the policy of transfer to alternative duties if they wished to continue working when pregnancy was confirmed or breast-feeding.	<b>Complied</b>

**Criterion 4.7:**

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

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<p>4.7.1</p> <p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.                      - Major compliance -</p>	<p>SOU22 has maintained an approved Health and Safety Policy dated April 2011 that is displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site safety officers and monitored by OSH Manager from Head Office. Environment safety and health (ESH) management plan for each operating unit had been established. The ESH management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training programme, accident and emergency procedures, treatment of illness/injury during the job, use of PPE, OSH Committee meetings, etc. The latest ESH plan FY2015/2016 was made available during this assessment. Sample of OSH activities as follows:</p> <p><b><u>LEV inspection</u></b></p> <p>Annual examination and testing of LEV by PAC Testing &amp; Consulting Sdn Bhd (Ref:PAC-LEV-141112) done by JKPP/HIE/127/171-3/2(27).</p> <p>Face velocity : 82 fpm, transport velocity : 1229 fpm</p> <p>Comply with ACGIH recommended value.</p> <p>July 2015 : last internal inspection on 30/7/15.</p> <p><b><u>Chemical Exposure monitoring</u></b></p> <p>Pottasium Chromate, N-hexane and hexane.</p> <p>Chemical Exposure Monitoring (Environmental Science (M) Sdn Bhd) PO#4300287189 dated 16/6/15 for monitoring of N-hexane and inhalable dust. Full report will be verified in the next audit.</p> <p><b><u>Medical Surveillance Programme</u></b></p> <p>Last medical check-up at was conducted on 20/3/2015 by DOSH registered doctor, from Klinik Rengam (HQ/08/DOC/00/597. Workers from various mill departments were sent for check-up and found fit to work.</p>	<p><b>Complied</b></p>

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<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.            - Major compliance -</p>	<p>SOU 22 had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. Refer to CHRA report for Bukit Benut POM, (JKKP IH 127/171-(2)317 dated February 2014. All recommended under form F have been implemented based on site review. Chemical register dated 13/10/14 was shown to the auditor with the latest list of chemical used for mill's activities.</p> <p><b>Bukit Benut Estate</b>            CHRA dated July 2010 by IHT (JKKP IHT 127/171-2(124) and in progress for renewal. New CHRA will be verified in the next audit. Based on the last CHRA, it was recommendation to carry out medical surveillance for chemical mixer, WTP and Sprayer. Refer to indicator 4.6.11 for further details.</p>	<p><b>Complied</b></p>
<p>4.7.3</p> <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.            - Minor compliance -</p>	<p>Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Suitable PPE has been provided to the workers based on the information in the MSDS/CSDS and CHRA assessor's recommendation.</p> <p>List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities.</p> <ul style="list-style-type: none"> <li>i) Sterilizer and boiler/power operator – Safety Helmet, Semi leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff</li> <li>ii) Lab operator – Respirator (double cartridge) Nitrile Glove (chemical resistant), safety boots, Ear plug (NRR = 24 dB)</li> <li>iii) Field workers (sprayer, manurer &amp; harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover.</li> </ul>	<p><b>Complied</b></p>

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<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.                      - Major compliance -</p>	<p>Assistant manager at each of the operating units are appointed as OSH Coordinators and Estate Hospital Assistant as Safety and Health Committee Secretary. OSH Committees meeting conducted quarterly and meeting minutes includes issues raised and action taken from workplace inspection report etc. The last meeting was conducted on the 30/6/15 at Bukit Benut Palm Oil Mill. 18 members has attended the meeting with discussion on the accident review, safety improvement plan, issues from workers has been discussed and action to be taken. There was no major issue.</p> <p><b><u>Bukit Benut Palm Oil Mill</u></b>                      SHC organization chart FY14/15                      i) Chairman – Khaizaruddin Bin Awaludin (Mill Manager)                      ii) Secretary – Navindran A/L Vijaya (Assistant Manager)</p> <p><b><u>Lambak Estate</u></b>                      SHC organization chart FY14/15                      i) Chairman – Yusri Bin Yusoff (Estate Manager)                      ii) Secretary – Jaya Perigas (HA)</p> <p>Latest SHC meeting – 14/4/15</p>	<p><b>Complied</b></p>
<p>4.7.5</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.                      - Minor compliance -</p>	<p>Emergency Response Plan (ERP) has been established and defined in procedure, Level 2, Standard Operation Manual, Sub Section 5.5, Management Responsibility, Appendix 5.5.3.3 Emergency Preparedness and Response Procedure, version:1, issue :1 dated 1/11/2008. Emergency response activities were also included in the ESH plan FY 14/15. The following were Emergency Response Plan were addressed: Fire Outbreak, Accident and incident occurrence, Oil Spillage and etc. Latest fire evacuation drill was done on 20/1/15 at Bukit Benut Palm Oil Mill.</p> <p>Accident and emergency procedures have been communicated to employees, contractors and visitors. Workers trained in First Aid were present in the mill and field operations. First Aid Kits were available at worksites. Records on all accidents kept and summary sent to Head Office. Quarterly review on accident cases carried out during OSH quarterly meeting. All operating units keeping all the JKKP 6 &amp; 8 forms. The previous nonconformity remains closed and the action plans implemented.</p>	<p><b>Complied</b></p>
<p>4.7.6</p> <p>All workers shall be provided with medical care, and covered by accident insurance.                      - Minor compliance -</p>	<p>Medical care is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme. Mill: RHB Insurance Berhad Policy No.: FW116690 valid till 23/4/2016 covering 3 workers.                      Estate: RHB Insurance Berhad Policy No.: FW144902 valid till 30/6/2016.</p>	<p><b>Complied</b></p>

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<p>4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics                      - Minor compliance -</p>	<p>Records on Lost Time Accident (LTA) metrics displayed at the operating units through Safety Statistic Billboard and reported to PSQM-ESH department using new online system called SMS-IT. Sample of accident statistic as shown below :</p> <table border="1" data-bbox="699 562 1273 757"> <thead> <tr> <th>Year</th> <th>Bukit Benut Mill</th> <th>Bukit Benut Estate</th> <th>Lambak Estate</th> </tr> </thead> <tbody> <tr> <td>2014</td> <td>1 (0 LTA)</td> <td>14 (141 LTA)</td> <td>6 (768 LTA)</td> </tr> <tr> <td>2015</td> <td>3 (76 LTA)</td> <td>4 (72 LTA)</td> <td>1(154 LTA )</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days (MC)</p> <p>Sample of cases that contributes to high LTA as follows:</p> <p><u>Bukit Benut Estate</u>                      Road accident : 41 LTA (fractured hand)                      51 LTA (fractured hand &amp; deep wound)</p> <p>Harvesting : Finger cut, tendon / deep wound – 37 days</p>	Year	Bukit Benut Mill	Bukit Benut Estate	Lambak Estate	2014	1 (0 LTA)	14 (141 LTA)	6 (768 LTA)	2015	3 (76 LTA)	4 (72 LTA)	1(154 LTA )	<p><b>Complied</b></p>
Year	Bukit Benut Mill	Bukit Benut Estate	Lambak Estate											
2014	1 (0 LTA)	14 (141 LTA)	6 (768 LTA)											
2015	3 (76 LTA)	4 (72 LTA)	1(154 LTA )											
<p><b>Criterion 4.8:</b>                      All staff, workers, smallholders and contract workers are appropriately trained.</p>														
<p>4.8.1</p>	<p>A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.                      - Major compliance -</p>	<p>A formal training programme on all aspects of RSPO principle and Criteria has been established and implemented. The training need analysis and program was made available for verification at all visited sites. Training plan FY 2015/2016 was available at all visited operating units.</p>	<p><b>Complied</b></p>											

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4.8.2 Records of training for each employee shall be maintained. - Minor compliance -	<p>Sample of training records as per established plan as follows :</p> <p>Exec (Cadet Engineer) Clean Air Regulation 2014 – 2/2/15</p> <p>Boiler water treatment and chemical safe handling – 3/6/15</p> <p>RSPO &amp; ISCC Supply Chain – 20/4/15</p> <p>Authorized Entrant and Standby Person (AESP) - 8/10/14</p> <p>2nd grade steam engineer – 11/9/14</p> <p><u>Staff and workers</u></p> <p>RSPO and ESH Training – 20/4/15</p> <p>Sterilizer Operation Training – 6/12/14</p> <p>Blake Smoke Boiler Operation – 18/5/15</p> <p>Oil Room and Press Operation – 23/5/15</p> <p><u>Bukit Benut Estate</u></p> <p>Accident investigation technique – 26/9/14</p> <p>Chemical and Spraying Safe Operating Procedures- 13/5/15 (Bayer crop)</p>	<b>Complied</b>
<b>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</b>		
<b>Criterion 5.1:</b> Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.		
5.1.1 An environmental impact assessment (EIA) shall be documented. - Major compliance -	<p>Plans and impact assessments relating to environmental impacts based on documents as following:</p> <ul style="list-style-type: none"> <li>• Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register</li> <li>• Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI</li> <li>• Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE</li> </ul>	<b>Complied</b>

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<p>5.1.2</p> <p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.                      - Minor compliance -</p>	<p>Bukit Benut Mill: Environmental Aspect Identification (EAI) and Environmental Evaluation (EIE) reviewed and updated on 1/7/2015. No changes to the current environmental aspect identified and impact evaluated since last review.</p> <p>Bukit Benut Estate – Environment Aspect and Impact Identification for various activities- construction work, compound, dispensary, field, harvesting and collection, main entrance, pest and disease control, petrol and diesel, power station, replanting, road, schedule waste store, workshop.</p> <p>Bukit Benut Estate has updated its identified aspect i.e. POME application in the field (Environmental aspect and impact identification form area/station: Field – POME; Serial #: EAI/2014/2015/18-001; File # EMS/5.4.3/EAI.</p> <p>This updated aspect has been evaluated accordingly (Environmental impact evaluation form; POME Application; Serial #: EIE/2014/2015/18-001(1); Reference #: EAI/2014/2015/18-001(1)</p> <p>Lambak Estate: Environment Aspect and Impact Identification review meeting was conducted on 17/5/2015 with no any changes to the estate activity and operation.</p> <p>It was observed that the reviewing and updating on the registers were done annually if there’s no any new activity within respective sites.</p>	<p><b>Complied</b></p>



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<p>5.1.3</p> <p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p>The monitoring was based on Sustainable Plantation Management System version 1, year 2008, issue no. 1, dated 1 October 2008.</p> <p>Monitoring plan for mill was established based on DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling</p> <p>Based on Sustainable Plantation Management System Appendix 10 Procedure for Mill Environmental Performance version 1, year 2008, issue no. 1, dated 1 October 2008. Uses the Mill Environmental Performance Review (Form A) Mill environmental monitoring records available/sighted:</p> <ul style="list-style-type: none"> <li>• Effluent monitoring records: Monthly Effluent Analysis; parameter monitored:- pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&amp;G</li> <li>• Boiler stack sampling records – six monthly basis</li> <li>• Online scheduled waste inventory &amp; consignment – monthly updating of scheduled waste storage and disposal</li> </ul> <p>It was noted that Sime Darby Plantation under its ESH unit are in the midst of revising its ESH monitoring protocols which also related to its sustainable operation of the mill and estates. It is expected that all operation units will be trained and implemented this revised monitoring protocols before the end of 2015.</p>	<p><b>Complied</b></p>
<p><b>Criterion 5.2:</b>            The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>		
<p>5.2.1</p> <p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p>	<p>As reported during last assessment, the initial HCV assessment was conducted internally to identify possible presence of HCVs within and adjacent to the estates prior to the initial assessment in 2009.</p>	<p><b>Complied</b></p>
<p>5.2.2</p> <p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>Regular patrols within the operating unit estates were carried out and findings recorded by the respective Estate executives to monitor the Conservation / buffer zone areas. Mechanism for reporting the sightings of various types of wildlife, were found to have been in place. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented. Signage's that prohibit hunting, fishing and water polluting activities were verified on-site at the both visited estates found to have been satisfactorily maintained.</p>	<p><b>Complied</b></p>

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5.2.3	<p>There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance -</p>	<b>Complied</b>
5.2.4	<p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the management plan.</li> </ul> <p>- Minor compliance -</p>	<b>Complied</b>
5.2.5	<p>Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights.</p> <p>- Minor compliance -</p>	<b>Complied</b>
<p><b>Criterion 5.3:</b>  Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>		
5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<b>Complied</b>

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5.3.2 All chemicals and their containers shall be disposed of responsibly. - Major compliance -	<p>Based on policy to reduce, reuse and recycle, the management of used chemicals and containers were done in accordance Scheduled Waste regulations.</p> <p>For estates, the empty pesticides container were collected in scheduled waste store after being triple rinsing and punctured at the bottom of the container.</p> <p>Stores for scheduled waste were inspected at audited sites in mill and estates and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill and estates also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.</p>	<b>Complied</b>
5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	<p>Mill:</p> <ul style="list-style-type: none"> <li>• Latest Scheduled Waste disposal done on 7/8/2015, consignment # 091041-001 (SW 324), # 091041-002 (SW 323), # 091041-003 (SW 410), # 091041-004 (SW 409), # 091041-005 (SW 110), # 091041-006 (SW 306), # 091041-R02 (SW 305), # 091041-R03 (SW 305), # 091041-006 (SW 322) &amp; # 091041-R04 (SW 424) by Kualiti Khidmat Alam Sdn. Bhd.</li> </ul> <p>Bukit Benut Estate:</p> <ul style="list-style-type: none"> <li>• Latest Clinical Waste (SW 404) disposal was done on 28/4/2015 by Medivest Sdn. Bhd. (Consignment # P572283). Disposal was done at Medivest facility in Tanjung Minyak, Melaka</li> <li>• Waste oil (SW 305 &amp; SW 306) latest disposal was done by Perniagaan Saudara Baru on 25/6/2014 (Consignment # 9152)</li> <li>• Scheduled waste categories SW 102 (used lead acid batteries) and SW 410 (contaminated oil filters) disposal is due on September 2015</li> </ul> <p>Lambak Estate:</p> <ul style="list-style-type: none"> <li>• Waste oil (SW 305 &amp; SW 306) latest disposal was done by Perniagaan Saudara Baru on 20/6/2014 (Consignment # 10787)</li> <li>• Latest disposal of empty chemical containers (SW 409) was done on 10/8/2015 through SS Setia Teknologi Enterprise (Consignment # 0071).</li> <li>• It was found that there are no records of storage (inventory-5<sup>th</sup> schedule) and disposal (consignment- 6<sup>th</sup> schedule) of SW 102 (used lead acid batteries); SW 410 (contaminated oil filters) and SW 404 (medical waste) (although it was sighted being stored during the site visit in the scrap/waste store and clinic of Lambak Estate</li> </ul> <p>It was found that the debris of demolished old bungalows at Lambak Estate was left unmanaged. Therefore, minor NC 1223225N1 was issued.</p>	<b>Minor Non-compliance</b>

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<b>Criterion 5.4:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised.			
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement.</p> <p>Apart from use of diesel for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler. The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis respectively. Monthly records of energy consumption of non-renewable and renewable fuel per metric tonne of palm product at the Mill were available.</p> <p>At the estates, diesel consumption per metric ton FFB was also monitored on a monthly basis. It was verified that energy usage are being monitored at the operating units for better control and comparison of trends.</p>	<b>Complied</b>
<b>Criterion 5.5:</b> Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	<p>Based on the action plan to prevent open burning which includes planting cover crops, installing zero burning notice boards, briefing and etc.</p> <p>Furthermore, the Group policy of "Zero open burning" is enforced since July 2008. The operating units adhered to the policy of "Zero open burning" for any replanting, if any, in the estates. Field inspections made in Bukit Benut and Lambak estates field showed no evidence of open burning.</p>	<b>Complied</b>
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	The operating units have adhered to the zero burning policy for replanting at the estates. During the audit, there were no replanting activities carried out in the Bukit Benut and Lambak estates. There was no evidence of any burning of domestic waste at the housing line sites and at the domestic landfills of the estates during on site field assessment.	<b>Complied</b>
<b>Criterion 5.6:</b> Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			

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Criterion / Indicator	Assessment Findings	Compliance
5.6.1 An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, identified source was boiler chimney. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring of dust particulate. Sampled monitoring report done on 20/4/2015 by Procoma Environmental (M) Sdn. Bhd. (Report ref. # PR 15-ISS-0033; dated 20/5/2015) for boiler chimney no. 3. Result shown the stack emissions are within limit at 0.3798 g/Nm <sup>3</sup> .  Additionally, Bukit Benut estate has also monitored its ambient air quality through Procoma Environmental in two points within the mill at ramp and guard house area. Results obtained were 50.5mg/m <sup>3</sup> and 56.5 mg/m <sup>3</sup> (report ref. # PR15-AAM-0008; dated 26/5/2015). The report indicated that results were within the Recommended Malaysia Air Quality Guidelines (RMAQG) limits respectively	<b>Complied</b>
5.6.2 Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH <sub>4</sub> ) emission through POME treatment. The company are in process of obtaining proposals to construct methane capture facilities in POME treatment pond. Project arrangement handled by HQ and the project expected to complete the construction of the biogas plant by 2016.  Other less significant GHG emissions identified including CO <sub>x</sub> , SO <sub>x</sub> and NO <sub>x</sub> from various sources including fossil fuel, chemical and fertilizer consumptions.	<b>Complied</b>
5.6.3 A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Monitoring of the GHG quantity was done through its licensed GHG calculator where all GHG sources was input into the calculator. Default values of emissions factor Calculation of the GHG emissions were derived from publicly available sources including World Resource Institute and BioGrace. These calculations were reported to RSPO by Sime Darby head office The GHG calculations were done separately between the mill and estates.	<b>Complied</b>

**Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.**

**Criterion 6.1:**

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

6.1.1 A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Plantation Sustainability and Quality Management (PSQM) Department has conducted the baseline social impact assessment in 2009 for Bukit Benut operating unit. The assessment has been done with the participation of internal and external stakeholders. The attendance records are available.	<b>Complied</b>
6.1.2 There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Meeting attendance and interview with stakeholders found they were invited for the meeting and the issues highlighted by them have been included in the management plan. Mill and estates together conducted the latest stakeholder meeting on 9/4/2015 attended by 21 people.	<b>Complied</b>

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Criterion / Indicator	Assessment Findings	Compliance
6.1.3 Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	Social management plan has been included in the SIA assessment to mitigate the negative impacts with time frame and person in charge. There were no negative impacts raised by any external stakeholders. Internal stakeholders raised mainly issues on housing repair and other facilities	<b>Complied</b>
6.1.4 The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	Annual SIA improvement plans reviewed in July 2015. The assessment was through meeting with the effected parties and stakeholders. Latest stakeholder meeting conducted on 9/4/2015 attended by 21 people. Meeting minute's shows there were no negative issues highlighted.	<b>Complied</b>
6.1.5 Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder schemes at Bukit Benut Certification Unit	<b>Complied</b>
<b>Criterion 6.2:</b> There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.		
6.2.1 Consultation and communication procedures shall be documented. - Major compliance -	Consultation and communication procedure is similar to the procedure reported during the previous assessments.	<b>Complied</b>
6.2.2 A management official responsible for these issues shall be nominated. - Minor compliance -	The mill and estates have appointed the assistant managers as the management official for any social issues. Appointment letters dated 2/7/15 sighted during the audit	<b>Complied</b>
6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	The mill and estates have an updated list of stakeholders. It includes internal and external stakeholders such as government departments, contractor, suppliers and workers representatives.	<b>Complied</b>
<b>Criterion 6.3:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.		
6.3.1 The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	A documented dispute resolution procedure is available in Mill and Estate Quality Management System Manual which is effective, timely, appropriate and open to any affected parties. The complaint and grievances is open to effected parties including internal and external stakeholders.	<b>Complied</b>

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Criterion / Indicator	Assessment Findings	Compliance
6.3.2 Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance -	SOP to resolve social disputes "Handling Social Issues" SOP dated 01 Nov 2008 has been established. Stakeholder meetings are held regularly to identify and give opportunity to stakeholders to complaint or raise disputes. Issues are discussed and consensual agreements reached during stakeholder meetings. Follow-up actions had timelines, responsibilities, and details of actions were included in the social action plan and monitored by managers for satisfactory conclusion. Minutes of meetings are maintained and reviewed.	<b>Complied</b>
<b>Criterion 6.4:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		
6.4.1 A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	SOP to identify legal and customary rights as well as people entitled to compensation has been established- titled "Handling Land Disputes" SOP dated 01 Nov 2008. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	<b>Complied</b>
6.4.2 A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP is as per in 6.4.1 above.	<b>Complied</b>
6.4.3 The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders to date.	<b>Complied</b>
<b>Criterion 6.5:</b> Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.		
6.5.1 Documentation of pay and conditions shall be available. - Major compliance -	Workers contract and payment follow the MAPA/NUPW Agreement. Payslip and contract of mill workers and plantation workers are as per the contract signed by them and follow the NUPW and MAPA agreement. All the workers earn more than RM 900. Inspection on (Employees No.: 17544, 44813 and 81217) for the month of July 2015 shows that pay is more than the minimum wage of RM 900.00 set by the government.	<b>Complied</b>



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Criterion / Indicator	Assessment Findings	Compliance
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.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -	The contract agreement clearly stated that is in accordance with the MAPA / NUPW provisions. Interviews of staff and workers confirmed that they understood the terms and conditions of their contract of employment and received benefits accordingly.  <b>Complied</b>
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance -	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 School (SJKT Ladang Bukit Benut) is located at Bukit Benut estate and (SJKT Ladang Lambak) at Lambak estate  <b>Complied</b>
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	Accesses to food for the workers are considered adequately and sufficiently  <b>Complied</b>
<b>Criterion 6.6:</b> The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.		
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Workers have freedom to join the workers union. Policy on Freedom of Association dated April 2011.  <b>Complied</b>
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Latest NUPW union meeting was done on 10/7/2015 at Mill together with Bukit Benut estate attended by 12 representatives. As for Lambak estate, last NUPW meeting was done on 24/7/2015 attended by 8 workers representatives. Local and foreign workers are represented in the NUPW.  <b>Complied</b>
<b>Criterion 6.7:</b> Children are not employed or exploited.		
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Bukit Benut operating units are complied with the minimum age requirement. No employees below the age of 18.  <b>Complied</b>
<b>Criterion 6.8:</b> Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.		
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	A policy dated April 2011 on equal opportunity available and displayed at the offices along with the other policies  <b>Complied</b>



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Criterion / Indicator	Assessment Findings	Compliance
6.8.2 Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Migrant workers are recruited with 3 years contract. Local workers are on a long term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, water and electricity supplies, medical care are given to all employees without discrimination. All employees are aware of the grievance procedures through the various Committees such as Gender Committee for women, foreign workers representation and union committee to highlight their concerns and grievances if any. No grievances were highlighted to the audit team by internal and external stakeholders.	<b>Complied</b>
6.8.3 It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. It was noted during the audit that there is no discrimination based on nationality, race, gender, age, etc.	<b>Complied</b>
<b>Criterion 6.9:</b> There is no harassment or abuse in the work place, and reproductive rights are protected.		
6.9.1 Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Policy on protection against Sexual Harassment and other forms of harassment available and implemented. There is no any reported case of harassment in the operating units.	<b>Complied</b>
6.9.2 A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	Reproductive rights of the female workers are protected. Female employees are aware that they are entitled for two months paid maternity leave.	<b>Complied</b>
6.9.3 A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	Sime Darby has developed a Handbook for gender committee in 2014. Mill has formed gender committee. Latest meeting was done on 22/6/15 attended by 11 members from mill. No issues were highlighted during the meeting. As for estate, last meeting was done on 7/5/2015 attended by 29 members.	<b>Complied</b>
<b>Criterion 6.10:</b> Growers and mills deal fairly and transparently with smallholders and other local businesses.		
6.10.1 Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Bukit Benut palm oil mill process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	<b>Complied</b>
6.10.2 Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	Bukit Benut palm oil mill process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	<b>Complied</b>

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Criterion / Indicator	Assessment Findings	Compliance
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Contractors/suppliers understand contractual agreement and stated that the contract is transparent and fair. The company has standard term and condition of contract agreement which is explained prior to signing. <b>Complied</b>
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	Interview of contractors and workers confirmed payment is made promptly. Inspection to the "Grievance Book" indicated no complaint was raised in relation to processing of the payment. <b>Complied</b>
<b>Criterion 6.11:</b> Growers and millers contribute to local sustainable development where appropriate.		
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance -	Bukit Benut mill and estates contribute to local development through donations to local schools, temples and mosques, which are considered an appropriate form of assistance. <b>Complied</b>
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance -	No scheme smallholders at SOU22. <b>Complied</b>
<b>Criterion 6.12:</b> No forms of forced or trafficked labour are used.		
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	Workers, staff and stakeholder interview confirm that there is no any form of forced labour or trafficked labour in the operating units. All employees have employment contract and paid the agreed national minimum wages. <b>Complied</b>
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance -	No contract substitution was noted. <b>Complied</b>
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Equal opportunity and non-discriminatory policy is implemented. No temporary workers. Migrant workers are treated equally as per the locals. <b>Complied</b>
<b>Criterion 6.13:</b> Growers and millers respect human rights.		
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	The existing policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations. <b>Complied</b>
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable for Peninsular Malaysia. <b>Not applicable</b>

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Criterion / Indicator	Assessment Findings	Compliance
<p><b>Principle 7: Responsible development of new plantings</b>  <b>Bukit Benut Palm Oil Mill</b> Certification unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this recertification assessment. The immature area are replanted area.</p>		
<p><b>Principle 8: Commitment to continual improvement in key areas of activity</b></p>		
<p><b>Criterion 8.1:</b>            Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.</p>		
<p>8.1.1</p>	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);</li> <li>• Optimising the yield of the supply base.</li> </ul> <p>- Major compliance -</p>	<p>Bukit Benut Palm Oil Mill and supply base estates have carried out annual review of the environmental and social aspects of its operations to identify improvements. The Social Action Plan has continued to work towards improving stakeholder relationship through engagement and dialogue besides further improving the workers housing. Initiative on KAIZEN project at Bukit Benut Palm Oil Mill showed commitment towards continual improvement to improve plant safety and process performance.</p> <p>Example of KAIZEN projects such as:</p> <ul style="list-style-type: none"> <li>i) Oil room improvement : Distribution and sand collection tank (increase volume /capacity to prevent spillage)</li> <li>ii) Kernel vibrating screen modification : based on kernel histogram (15 mm gap reduce 12 mm)</li> <li>iii) Anti –clock wise rotation for thresher drum – increase retention time</li> <li>iv)Alarm system for fibre cyclone – to alarm and prevent fibre cyclone major chockage</li> <li>v) Priming tank for pumping system – to avoid pump cavitation</li> <li>vi) Condensate (sterilizer strainer) – resizing for better drainage</li> <li>vii) VCT stirrer – Better clarification, homogenous</li> </ul> <p>Pesticide use is limited to use only when there is outbreak and justified with census prior to application. IPM is continuously implemented as part of efforts to reduce pesticide usage. Paraquat is completely eliminated. Recycling awareness is progressively implemented and evidence of recycling was noted during the assessment.</p>

**Appendix B: Time Bound Plan**

<b>TIME BOUND PLAN – Certification Units in Malaysia</b>			
<b>No.</b>	<b>MANAGEMENT UNIT</b>		<b>LOCATION</b>
	<b>P O M</b>	<b>Time Bound</b>	
1	Sg Dingin	Certified 2010 – Recertification completed in June 2015	Kedah
2	Chersonese	Certified 2011	Perak
3	Elphil	Certified 2011	Perak
4	Flemington	Certified 2011	Perak
5	Seri Intan	Certified 2011	Perak
6	Selaba	Certified 2011	Perak
7	Tennamaram	Certified 2011	Selangor
8	Bkt Kerayong	Certified 2011	Selangor
9	East	Certified 2010 – Recertification Completed in February 2015	Selangor
10	West	Certified 2010 – Recertification Completed in March 2015	Selangor
11	Bukit Puteri	Certified 2011	Pahang
12	Kerdau	Certified 2011	Pahang
13	Jabor	Certified 2011	Pahang
14	Labu	Certified 2011	N. Sembilan
15	Tanah Merah	Certified 2010 – Recertification Completed in February 2015	N. Sembilan
16	Sua Betong	Certified 2014	N. Sembilan
17	Kok Foh	Certified 2011	N. Sembilan
18	Kempas	Certified 2010 – Recertification completed in April 2015.	Malacca
19	Diamond Jubilee	Certified 2011	Malacca
20	Bukit Kerayong	Certified 2014	Johor
21	Chaah	Certified 2010 – Recertification in August 2015	Johor
22	Gunung Mas	Certified 2010 – Recertification completed.	Johor
23	Bukit Benut	Certified 2011	Johor
24	Ulu Remis	Certified 2011	Johor
25	Hadapan	Certified 2011	Johor
26	Sandakan Bay	Certified 2008. Recertification completed.	Sabah
27	Melalap	Certified 2011	Sabah
28	Binuang	Certified 2009. Recertification completed.	Sabah
29	Giram	Certified 2009. Recertification completed.	Sabah
30	Merotai	Certified 2009. Recertification completed.	Sabah
31	Lavang	Certified 2011	Sarawak
32	Rajawali	Certified 2011	Sarawak
33	Derawan	Certified 2011	Sarawak
34	Pekaka	Certified 2011	Sarawak

<b>TIME BOUND PLAN – Certification Units in Indonesia</b>			
<b>No.</b>	<b>MANAGEMENT UNIT</b>		<b>LOCATION</b>
	<b>P O M</b>	<b>Time Bound</b>	
1	Sekunyir (PT. Indotruba Tengah)	Certified 2010	Seruyan and West Kotawaringin District – Central Kalimantan
2	Manggala (PT. Tunggal Mitra Plantations)	Certified 2010	Rokan Hilir District – Riau
3	Bk. Ajong (PT. Sime Indo Agro)	Certified 2010	Sanggau District – West Kalimantan
4	Teluk Siak (PT Aneka Inti Persada)	Certified 2011	Pekanbaru, Siak District – Riau
5	Sungai Pinang (PT. Bina Sains Cemerlang)	Certified 2012	Musi Rawas District – South Sumatera
6	Sukamandang (PT. Kridatama Lancar)	Certified 2011	Seruyan and East Kotawaringin District – Central Kalimantan
7	Pematang (PT. Teguh Sempurna)	Certified 2011	Seruyan and East Kotawaringin District – Central Kalimantan
8	Alur Dumai (PT Lahan Tani Sakti)	Certified 2011	Rokan Hilir District – Riau

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9	Teluk Bakau (PT. Bhumireksa Nusa Sejati)	Certified 2011	Indra Giri Hilir District – Riau
10	Mandah (PT. Bhumireksa Nusa Sejati)	Certified 2014	Indra Giri Hilir District – Riau
11	Angsana Mini (PT Sajang Heulang)	Certified 2011	Tanah Bumbu District – South Kalimantan
12	AngsanaPT Ladangrumpun Suburabadi	Certified 2011	Tanah Bumbu District – South Kalimantan
13	Mustika (PT Sajang Heulang)	Certified 2013	Tanah Bumbu District – South Kalimantan
14	Gunung Aru (PT Bersama Sejahtea Sakti)	Certified 2011	Kotabaru District – South Kalimantan
15	Bebunga (PT. Langgeng)	Certified 2011	Kotabaru District – South Kalimantan
16	Blang Simpo (PT Padang Palma Permai)	Certified 2013	Aceh Tamiang, Nangroe Aceh Darussalam
17	Pondok Labu (PT Paripurna Swakarsa)	Certified 2012	Kotabaru District – South Kalimantan
18	Selabak (PT Swadaya Andhika)	Certified 2012	Kotabaru District – South Kalimantan
19	Rantau (PT Laguna Mandiri)	Certified 2012	Kotabaru District – South Kalimantan
20	Betung (PT Laguna Mandiri)	Certified 2014	Kotabaru District – South Kalimantan
21	Ungkaya (PT Tamaco Graha Krida)	Certified 2012	Morowali District – Sulawesi Tengah
22	Ladang Panjang (PT Bahari Gembira Ria)	Certified 2012	Muaro Jambi District - Jambi
23	Rantau Panjang (PT Guthrie Pecconina Indonesia)	Certified 2012	Musi Banyuasin District – South Sumatera

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24	<p>MAS (PT Mitra Austral Sejahtera)  The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO for Partial Certification and the report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. Regular discussions is ongoing between Sime Darby Plantation and the project affected communities.</p> <p><b>RSPO Certification Target Date for PT MAS</b></p> <ul style="list-style-type: none"> <li>The target date for certification is by end 2015. However, this is subject to the progress of the matter being resolved.</li> </ul> <p><b>Progress Update (Sept 2014 – March 2015)</b></p> <ul style="list-style-type: none"> <li>Regular discussions is ongoing between Sime Darby Plantation and the project affected communities (PAC). The most recent SDP-PAC meeting was held on 23 Feb 2015.</li> <li>SDP will maintain to liaise with the communities via 'Tim Kerja Perwakilan Petani (TKPP) and direct discussion with Kerunang/ Entapang communities.</li> <li>On the community request for DSF mediation (from 2 out of 9 villages), ref letter to RSPO 12 June 2014. SDP visited the communities on 27 August 2014 to listen and have a better understanding on the requests from these two communities and the subsequent meeting with the communities of Entapang and Kerunang was held on 12 Dec 2014 where the communities highlighted that they will not join the current SDP-PAC committee meetings and will continue to engage directly with SD.</li> <li>SDP is continuing to work on direct engagement with PAC – working towards a consensus with the PAC to withdraw their complaint.</li> <li>RSPO Secretariat is well informed on the progress of this matters through regular briefing and progress reports.</li> <li>To-date, 12 out of 14 demands from the other 7 communities have been resolved, another two remaining demands are related to land matters.</li> </ul>	2015	Sanggau District – West Kalimantan
25	Lembiru (PT Sandika Nata Palma)	Certified 2014	Ketapang District – West Kalimantan

**Appendix C: RSPO Certificate Details**

Sime Darby Plantation Sdn. Bhd,  
 SOU 22 Management Unit (KKS Bukit Benut)  
 KM 12 Jalan Mengkibol, 86009 Kluang,  
 Johor, MALAYSIA

RSPO Membership number: 1-0008-04-000-00

BSI RSPO Certificate No: SPO 591229

Date of Initial Certificate Issued: 5 October 2011

Date of Expiry: 4 October 2016

Applicable Standards: RSPO P&C MYNI 2014; RSPO Certification System June 2007 (revised March 2011); RSPO P&C MY-NIWG 2010; RSPO Supply Chain Certification Standard 21 November 2014 Module D - CPO Mills: Identity Preserved

<b>Bukit Benut Palm Oil Mill and Supply Base</b>					
Location Address	SOU 22 Management Unit (KKS Bukit Benut) KM 12 Jalan Mengkibol, 86009 Kluang, Johor, MALAYSIA				
GPS Location	Longitude: 103° 19' 59" E Latitude: 1° 54' 42" N				
CPO Tonnage Total	31,473mt				
PK Tonnage Total	7,332mt				
CPO Claimed for Certification	31,473mt				
PK Claimed for Certification	7,332mt				
Own estates FFB Tonnage	138,344mt				
Scheme Smallholder FFB Tonnage	-				
Non-company suppliers FFB Tonnage - Other adjacent estates	-				
Estates	Production Area		Other use (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Bukit Benut Estate	2,178.60	401.83	220.70	2,801.13	65,932
CEP Nyior Estate	1,226.36	261.54	50.84	1,538.74	27,292
Lambak Estate	3,101.77	219.04	423.95	3,744.76	45,120
Total	6,506.73	882.41	695.49	8,084.63	138,344

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#### Appendix D: Assessment Plan

PRELIMINARY AGENDA					
Date	Time	Subjects	Hidhir	Hafriazhar	Haris
Monday 10/8/2015	PM	Audit Team travelling to site	√	√	√
Tuesday 11/8/2015  <b>Bukit Benut Palm Oil Mill</b>	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).</li> </ul>	√	√	√
	09.00 – 12.00	<b>Bukit Benut Palm Oil Mill</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.30	<b>Bukit Benut Palm Oil Mill:</b> Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	16.30-17.00	Interim Closing briefing.	√	√	√
Wednesday 12/8/2015	08.30 – 12.00	<b>Bukit Benut Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	-
	09.00 – 12.00	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.30	<b>Bukit Benut Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30-17.00	Interim Closing Briefing	√	√	√
Thursday 13/8/2015	8.30 – 12.00	<b>Lambak Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	12.00 – 14.00	Lunch	√	√	√



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PRELIMINARY AGENDA					
Date	Time	Subjects	Hidhir	Hafriazhar	Haris
	13.00 – 16.30	<b>Lambak Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30-17.30	Prepare for closing meeting Closing Meeting	√	√	√
Friday 14/8/2015	AM	Audit Team Travelling	√	√	√

**Appendix E: Stakeholders Contacted**

<p><b>Internal Stakeholders</b></p> <p>Managers and Assistants  Male Mill Staff/Workers  Female Mill Staff/Workers  Foreign Workers  Male and Female Estate workers  Hospital Assistant  Female Assistant at Clinic  Union Representatives  Gender Committee Secretary</p>	<p><b>External Stakeholders</b></p> <p>Head of the Village  Join Consultative Committee at village  NUPW Representative  AMESU Representative  Smallholder</p>
<p><b>Contractors &amp; Consultants</b></p> <p>Electrical Contractor  General Supplier  FFB transporter</p>	<p><b>Government Departments</b></p> <p>Head Master, SJK(T) Ladang Bukit Benut  Head Master, SK Ladang Bukit Benut</p>

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

Requirements	Compliance
<b>D.1. Definition</b>	
<p>D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&amp;C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.</p>	<p>Bukit Benut Palm Oil Mill only receives certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&amp;C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>
<b>D.2 Explanation</b>	
<p>D.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>D.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>
<b>D.3 Documented procedures</b>	
<p>D.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</li> <li>b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.</li> </ul>	<p>Latest written documented procedures (RSPO SCCS v.2 Year 2014) for the chain of custody is with Identity Preserved (IP) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15. This developed based on the RSPO SCCS 21 November 2014. The previous SOP was for SG. The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive. The IP model is used because only certified FFB from own supply base is received and processed at Bukit Benut Palm Oil Mill. Noted draft procedure , SD/SSDP/PSQM/001, rev :0 dated 1/3/15 has yet to be approved for the SCCS procedure to incorporate latest changes internally and externally under RSPO SCCS November 2014.</p> <p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>
<p>D.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Bukit Benut Palm Oil mill has documented procedures (as per above in D 3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing certified and non-certified</p>
<b>D.4 Purchasing and goods in</b>	

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<p>D.4.1 The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p>	<p>Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. Bukit Benut mill have system to verify at the weighbridge.  Sample of weighbridge ticket :</p> <p><b><u>SOU 24 (CEP Renggam Estate)</u></b>  Code : E-031, WB ticket 24690, dated 30/11/14, Field 2002A (A crop) Weight : 11.11 MT</p> <p><b><u>SOU 23 (Cenas Ropel Estate)</u></b>  Code : E-104, WB ticket 58553, dated 13/06/15, Field 2009B (A crop) Weight : 13.1 MT</p> <p><b><u>SOU 23 (Tun Dr Ismail Estate)</u></b>  Code : E-108, WB ticket 56760, dated 11/04/15, Field 1999A (A crop) Weight : 14.17 MT</p>
<p>D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>The facilities aware of this procedure and stated in the.</p>
<p><b>D.5 Record keeping</b></p>	
<p>D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p>	<p>All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place. No PKO and Palm kernel meal at Bukit Benut Palm Oil mill. PK is sold to Sime Darby's Kernel Crushing Plant and also other 3<sup>rd</sup> party KCP . Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the FFB received. Records of certified FFB received verified during annual surveillance. Records verified by internal and external audit.</p>
<p><b>D.6 Processing</b></p>	
<p>D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from noncertified material including during transport and storage.</p>	<p>During this assessment it was confirmed that only certified source of FFB from own plantation is processed. This ensures that there is no possibility of mixing during processing. There is a possibility that the mill will receive Certified FFB from other Sime Darby's Certified Estate which was certified under SOU23 SGS-RSPO/PM-00722 valid until 10 April 2016 &amp; SGS-RSPO/PM-00715 valid until 28 March 2016. This will be further verified during next surveillance assessment if such cases occurred and observed. No non-certified FFB received.</p> <p>SOU 23 – Ulu Remis Palm Oil Mill and Supply Base (Tun Dr Ismail &amp; Cenas Ropel Estate) SGS certificate SGS-RSPO/PM-00722 valid until 10 April 2016.</p> <p>SOU 24 – Hadapan Palm Oil Mill and Supply Base (CEP Renggam Estate) SGS certificate SGS-RSPO/PM-00715 valid until 28 March 2016.</p>
<p>D.6.2 The objective is for 100 % segregated material to be reached.</p>	<p>Processing and storage records can trace back to only certified segregated FFB and finish product (CPO and PK) through traceability records such as weighbridge records. This ensures that 100% segregated materials are reached.</p>

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### Actual Tonnage Certified Palm Production – 01 July 2014 – 30 June 2015 (ASA4)

Mill	Capacity	CPO	PK
Bukit Benut Palm Oil Mill	20 mt/hr	24,341.27 mt	5,899.52 mt

### Actual Tonnage Sales of Certified Palm Products - 01 July 2014 – 30 June 2015 (ASA4)

Mill	Certified CPO Sales	Certified PK Sales	Remarks
Bukit Benut Palm Oil Mill	17,800 mt	324.78 mt	Based on etrace transaction

### Actual Tonnage Certified FFB Received Monthly - 01 July 2014 – 30 June 2015 (ASA4)

Month	Bukit Benut Estate	CEP Nyior Estate	Lambak Estate	Other certified estates	Total FFB/Month
July 2014	3,171.87	0	5,059.17	0	8,231.04
August 2014	4,224.06	663.09	6,073.76	0	10,960.91
Sept. 2014	3,776.26	1,002.04	5,287.54	0	10,065.84
Oct. 2014	3,901.61	946.19	5,452.25	0	10,300.05
Nov. 2014	3,923.19	0	5,519.56	112.65	9,555.4
Dec. 2014	2,893.90	902.15	3,747.42	0	7,543.47
Jan 2015	2,588.36	1,313.10	3,430.39	0	7,331.85
Feb 2015	1,827.27	830.57	3,024.60	0	5,682.44
Mar 2015	3,532.23	2,027.00	4,732.24	0	10,291.47
Apr 2015	4,180.27	459.82	6,398.93	333.49	11,372.51
May 2015	3,535.91	698.45	5,939.01	0	10,173.37
June 2015	3,490.66	0	5,827.77	546.73	9,865.16
<b>Total</b>	<b>41,045.59</b>	<b>8,842.41</b>	<b>60,492.64</b>	<b>992.87</b>	<b>111,373.51</b>

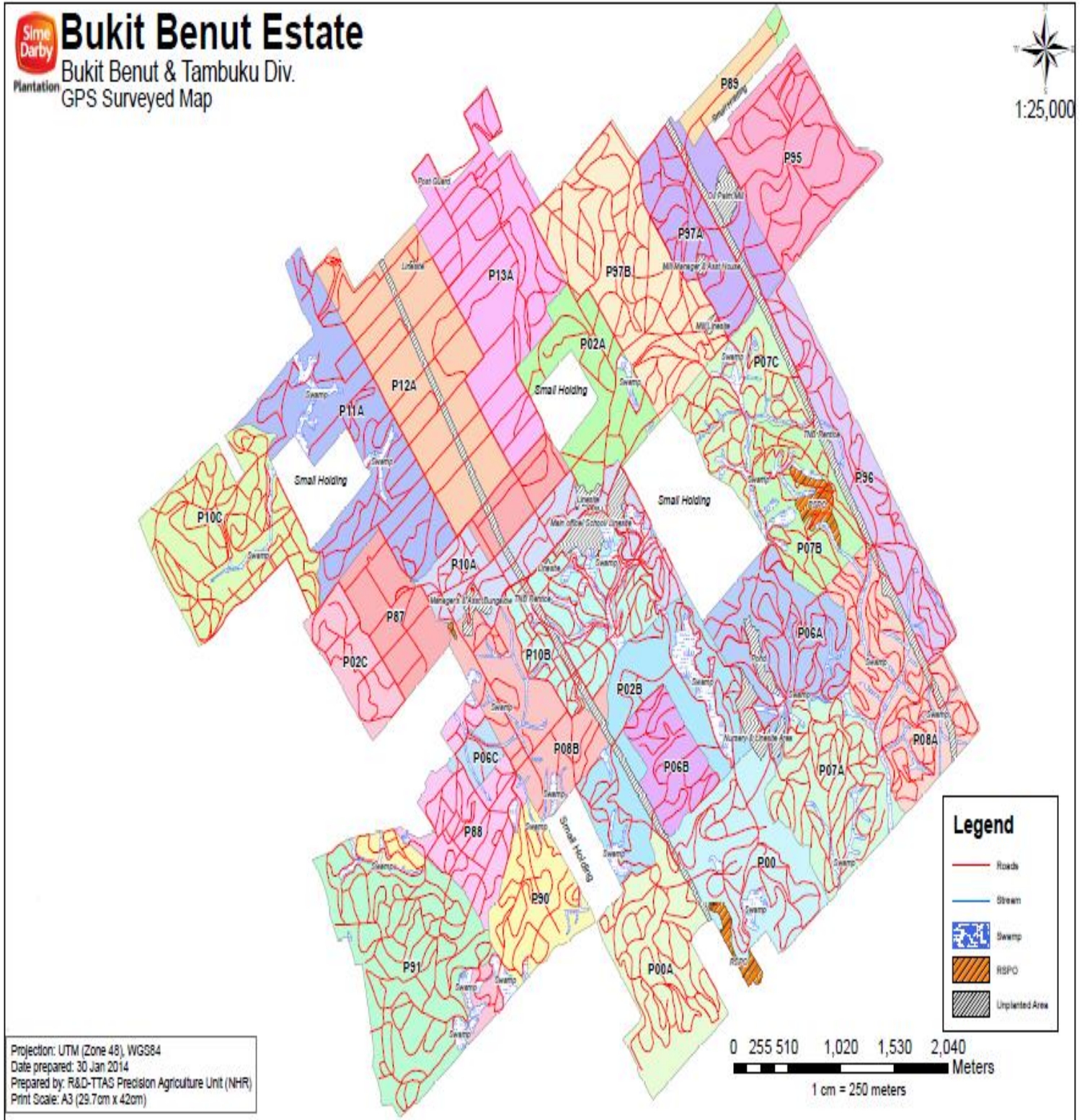
\*FFB received from other certified estate under SOU 23 and 24.

SOU 23 – Ulu Remis Palm Oil Mill and Supply Base (Tun Dr Ismail & Cenas Ropel Estate) SGS certificate SGS-RSPO/PM-00722 valid until 10 April 2016.

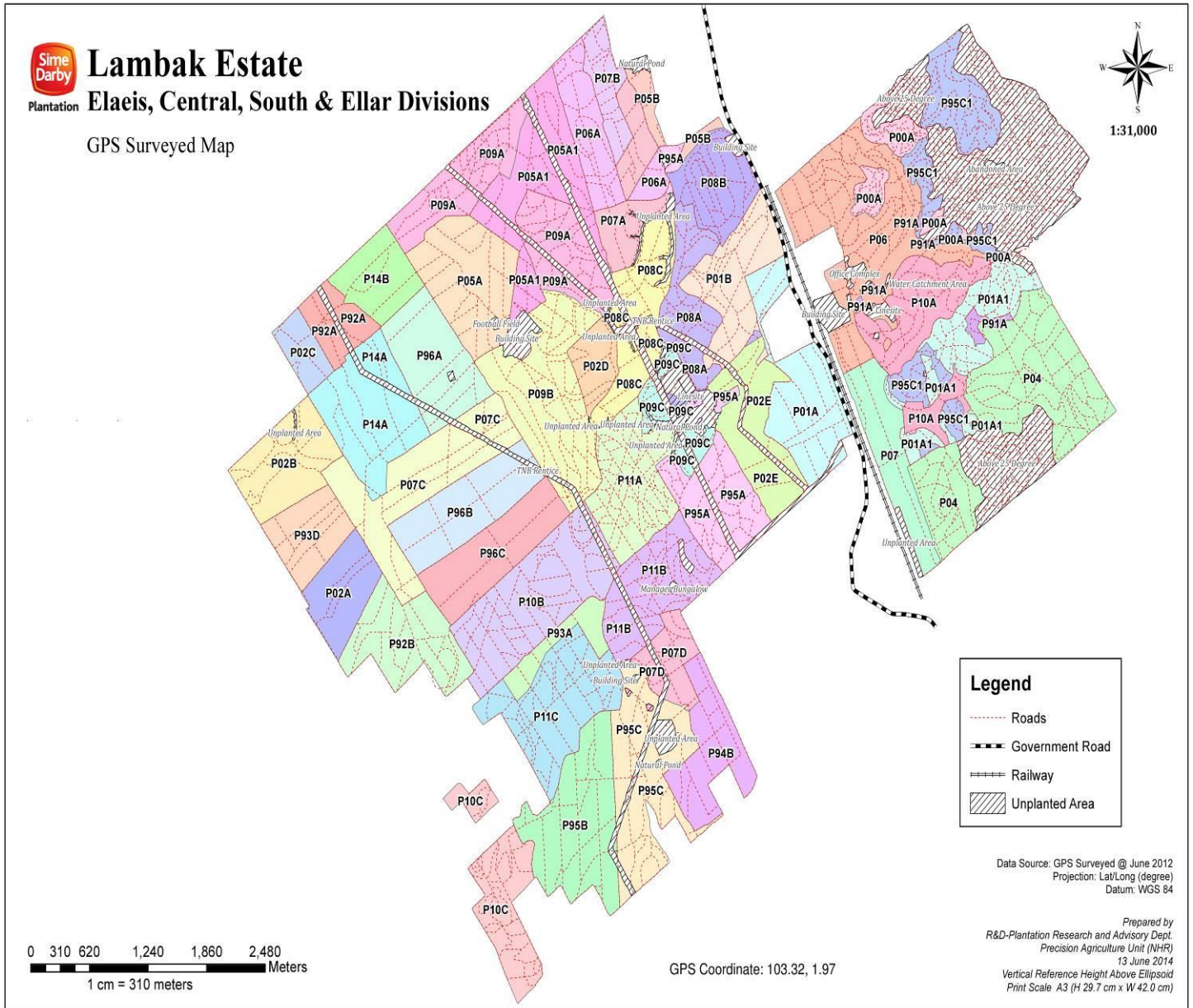
SOU 24 – Hadapan Palm Oil Mill and Supply Base (CEP Renggam Estate) SGS certificate SGS-RSPO/PM-00715 valid until 28 March 2016.



**Appendix G: Bukit Benut Estate Field Map**



**Appendix H: Lambak Estate Field Map**





**Appendix I: List of Abbreviations Used**

ASA	Annual Surveillance Assessment
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CIP	Continual Improvement Plan
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EIA	Environmental Impact Assessment
EMS	Environmental Management System
ERP	Emergency Response Plan
FFB	Fresh Fruit Bunch
GMP	Good Manufacturing Practice
HCV	High Conservation Value
IAV	Initial Assessment Visit
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
MPOA	Malaysian Palm Oil Association
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
MY-NI	Malaysian National Interpretation
NGO	Non Governmental Organisation
OSH	Occupational Safety & Health
PK	Palm Kernel
PKO	Palm Kernel Oil
PPE	Personal Protective Equipment
RC	Re-Certification
RED	Renewable Energy Directive
RSPO P&C	Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure