

## MALAYSIAN SUSTAINABLE PALM OIL INITIAL ASSESSMENT Public Summary Report

## Seong Thye Plantations Sdn Bhd

Client company Address: Suite 2B-3A-2, Block 2B, Level 3A, Plaza Sentral, Jalan Stesen Sentral 5, 50470 KL Sentral, Kuala Lumpur.

Certification Unit:

Ladang Rompin POM and Ladang Padang POM

&

Ladang Rompin and Ladang Padang

Location of Certification Unit:

1) Ladang Rompin POM and Ladang Rompin: 26700, Muadzam Shah, Pahang, Malaysia

2) Ladang Padang POM and Ladang Padang: 86700, Kluang, Johor, Malaysia

### **Report prepared by:**

Valence Shem (Lead Auditor)

Report Number: 9784380

### **Assessment Conducted by:**

BSI Services Malaysia Sdn Bhd, Unit 3, Level 10, Tower A The Vertical Business Suites, Bangsar South No. 8, Jalan Kerinchi, 59200 Kuala Lumpur Tel +603 2242 4211 Fax +603 2242 4218 www.bsigroup.com

# MSPO Public Summary Report Revision 0 (Aug 2017)

### TABLE of CONTENTS

### Page No

Section 1: Executive Summary
1.1 Organizational Information and Contact Person
1.2 Certification Information
1.3 Location of Certification Unit
1.4 Plantings & Cycle
1.5 FFB Production (Actual) and Projected (tonnage)4
1.6 Certified CPO / PK Tonnage4
1.7 Details of Certification Assessment Scope and Certification Recommendation:5
Section 2: Assessment Process
1. Assessment Program7
Section 3: Assessment Findings8
3.1 Details of audit results
3.2 Details of Nonconformities and Opportunity for improvement
3.3 Status of Nonconformities Previously Identified and OFI 17
3.4 Issues Raised by Stakeholders
3.5 Summary of the Nonconformities and Status
3.6 Summary of the findings by Principles and Criteria
4.0 Assessment Conclusion and Recommendation:
Appendix A: Assessment Plan 102
Appendix B: List of Stakeholders Contacted 104
Appendix C: Smallholder Member Details 105
Appendix D: Location and Field Map 106
Appendix E: List of Abbreviations 111

## Section 1: Executive Summary

1.1 Organizational Information and Contact Person				
MPOB License	Ladang Rompin POM: 500216-10	)4000		
	Ladang Rompin Estate: 502448-2	202000		
	Ladang Padang POM: 500014-10	4000		
	Ladang Padang Estate: 501483-	502000		
Company Name	Seong Thye Plantations Sdn Bhd			
Address	Suite 2B-3A-2, Block 2B, Level 3A, Plaza Sentral, Jalan Stesen Sentral 5, 50470 KL Sentral, Kuala Lumpur.			
Group name if applicable:	N/A			
Subsidiary of (if applicable)	N/A			
Contact Person Name	Ng Yeen Chern			
Website	-	E-mail	sinthyekl@yahoo.com	
Telephone	03-2261 4633	Facsimile	03-2261 4733	

1.2 Certification Information					
Certificate Number	Mills: MSPO 712226	5			
	Plantations: MSPO	712227			
Issue Date	26/06/2019		Expiry date	25/06/2024	
Scope of Certification	on Mill: Production of S	Sustainable Palr	n Oil and Palm Oil	Products	
	Estate: Production of	of Sustainable (	Dil Palm Fruits		
Stage 1 Date		8-10/5/2019			
Stage 2 / Initial Assessment Visit Date (IAV)		28-31/5/2019			
Continuous Assessn	nent Visit Date (CAV) 1	N/A			
Continuous Assessment Visit Date (CAV) 2		N/A			
Continuous Assessn	Continuous Assessment Visit Date (CAV) 3		N/A		
Continuous Assessment Visit Date (CAV) 4 N/A					
<b>Other Certificat</b>	ions				
Certificate Number	Standard(	Standard(s) Certificate Issued by		Issued by	Expiry Date
Nil					

## MSPO Public Summary Report Revision 0 (Aug 2017)

1.3 Location of Certification Unit						
Name of the Certification Unit	Site Address	GPS Reference	of the site office			
(Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)		Latitude	Longitude			
Ladang Rompin POM	Lot 5082, Mukim Rompin, Pahang	2° 56′ 24.5″ N	103° 14′ 42.9″ E			
Ladang Rompin Estate	Lot 5082, Mukim Rompin, Pahang	2° 56′ 24.5″ N	103° 14′ 42.9″ E			
Ladang Padang POM	Lot 3222, Mukim Kahang, Kluang, Johor	2° 18′ 36.9″ N	103° 31′ 45.2″ E			
Ladang Padang Estate	Lot 3222, Mukim Kahang, Kluang, Johor	2° 18′ 36.9″ N	103° 31′ 45.2″ E			

### 1.4 Plantings & Cycle

Age (Years) - ha					
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
Ladang Rompin	734	487	2	884	891
Ladang Padang	-	-	2,194	-	-
Total	734	487	2,196	884	891

1.5 Certified FFB Production (Actual) and Projected (tonnage)					
Producer Group	Estimated (Jul 2018-Jun 2019)	Actual (Jul 2018-Jun 2019)	Forecast (Jul 2019-Jun 2020)		
Ladang Rompin	NA	NA	43,940		
Ladang Padang	NA	NA	54,800		
Total	NA	NA	98,740		

1.6 Certified CPO / PK Tonnage (Ladang Rompin POM)					
	Estimated (Jul 2018-Jun 2019)	Actual (Jul 2018-Jun 2019)	Forecast (Jul 2019-Jun 2020)		
Mill Capacity:	FFB	FFB	FFB		
30 MT/hr	NA	NA	43,940		
SCC Model:	CPO (OER: %)	CPO (OER:%)	CPO (OER: 19.54%)		
MB	NA	NA	8,587.72		
	PK (KER: %)	PK (KER: %)	PK (KER: 5.51%)		
	NA	NA	2,420.54		

## MSPO Public Summary Report Revision 0 (Aug 2017)

1.7 Certified CPO / PK Tonnage (Ladang Padang POM)					
	Estimated (Jul 2018-Jun 2019)	Actual (Jul 2018-Jun 2019)	Forecast (Jul 2019-Jun 2020)		
Mill Capacity:	FFB	FFB	FFB		
20 MT/hr	NA	NA	54,800		
SCC Model:	CPO (OER: %)	CPO (OER:%)	CPO (OER: 19.25%)		
МВ	NA	NA	10,549.00		
	PK (KER: %)	PK (KER: %)	PK (KER: 5.42%)		
	NA	NA	2,970.16		

1.8 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Ladang Rompin	2,998	0	39	3,037	98.7
Ladang Padang	2,194	0	32	2,226	98.5
TOTAL	5,192	0	71	5,263	

### **1.9 Details of Certification Assessment Scope and Certification Recommendation:**

BSI Services Malaysia Sdn Bhd has conducted the Initial Assessment of Seong Thye Plantations Sdn Bhd located at Muadzam Shah, Pahang and Kahang, Johor, Malaysia comprising 2 mills, 2 estates and infrastructures. The type of certification is multi-sites.

The onsite assessment was conducted to assess the compliance of the certification unit against the MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill.

The assessment is a combined assessment for the mill and the group of estates that is supplying to the mill. However the assessment criteria for the mill and the estates were separated following to the required standards. The certification assessment scope is Ladang Rompin POM and Ladang Padang POM which act as the group manager for Ladang Rompin Estate and Ladang Padang Estate. This report is the combined report for both mills and both estates.

The onsite assessment was conducted on 28-31/5/2019.

Based on the assessment result, Seong Thye Plantations Sdn Bhd complies with the MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill and recommended for certification to be approved.

### **Section 2: Assessment Process**

### **Certification Body:**

BSI Services Malaysia Sdn Bhd, Unit 3, Level 10, Tower A The Vertical Business Suites, Bangsar South No. 8, Jalan Kerinchi 59200 Kuala Lumpur Tel +603 2242 4211 Fax +603 2242 4218 Nicholas Cheong: <u>Nicholas.Cheong@bsigroup.com</u> www.bsigroup.com

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.

### Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 28-31/5/2019. The audit programme is included as Appendix A. The approach to the audit was to treat the Ladang Rompin POM and Ladang Padang POM as an MSPO Certification Unit and Ladang Rompin Estate and Ladang Padang Estate as another MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, 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 and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 or MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment where the stakeholder notification was publicly published on 24/04/2019.

The estates or smallholders sample were determined based on formula  $S = r\sqrt{n}$  where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula  $(r\sqrt{n})$ ; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSPO 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 these have been incorporated into the assessment findings.

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

All the previous nonconformities are remains closed. The assessment findings for the initial assessment are detailed in Section 4.2.

This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by MSPO approved Peer Reviewers prior to certification decision by BSI.

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

1. Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Ladang Rompin POM	✓	$\checkmark$	✓	1	✓
Ladang Rompin Estate	1	✓	✓	✓	✓
Ladang Padang POM	1	√	✓	✓	✓
Ladang Padang Estate	✓	✓	✓	✓	✓

### Tentative Date of Next Visit: May 25, 2020 - May 28, 2020

#### **Total No. of Mandays: 8**

#### **BSI Assessment Team:**

#### Valence Shem - Lead Assessor

He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, stakeholders issues, workers issues, social issues and traceability. Able to communicate in Bahasa Malaysia and English.

#### <u>Selvasingam T Kandiah</u>

He holds a B. Sc. (Hons) Agriculture and had worked as a planter with Sime Darby Plantation Sdn Bhd (formerly known as Kumpulan Guthrie Berhad) for more than 10 years including one year in Liberia and 2 years in Estate Department of Kumpulan Guthrie Headquarters. During this assessment, he assessed on the aspects of legal, mill best practices, environmental and workers and stakeholders consultation.

#### Accompanying Persons: N/A

## **Section 3: Assessment Findings**

### 3.1 Details of audit results

This assessment has be assessed using the following RSPO normative requirements. The assessment details are provided in Appendix A.

□ MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
 ⊠ MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
 ⊠ MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

### 3.2 Details of Nonconformities and Opportunity for improvement

During the Certification Assessment there were 2 major and 9 minor nonconformities raised. The corrective action plans for all the NCRs have been accepted by the audit team members and the effectiveness and evidence of implementation shall be verified in the next surveillance assessment.

Finding Reference	1774601-201905-M1	Certificate Reference	MSPO 712226		
Certificate Standard	MS 2530:2013 Part-3	Clause	4.3.1.1 (Part 3)		
Category	Major				
Area/Process:	As per public summary report.				
Statement of non conformance:	Compliance with some legal require	ments was not adequate	ely demonstrated.		
Clause requirements	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.				
Objective evidence	<ol> <li>The Medical Assistant at Ladang Rompin Estate (LRE), Muhammad Fazrul Abdul Razak, did not have valid 'Surat Perakuan Tahunan'. The latest certificate was expired in 2017. This is not incompliance with AKTA PEMBANTU PERUBATAN (PENDAFTARAN) 1977 (Revised 1 Jan 2006).</li> <li>At Ladang Padang Estate (LPE), records showed that Trunk Injection using Methamidophos was carried on 5th, 6th and 8th of April 2019 at LPE. However, the duly completed Form I, II &amp; III as per Second Schedule of the Pesticide (Highly Toxic Pesticide) Regulations 1996 was not available.</li> </ol>				
Cause	<ol> <li>The checklist of important license is not comprehensive</li> <li>Lack of checking the record and updating the legal requirement</li> </ol>				
Correction / containment	<ol> <li>The MA was absent without leave and can't get renew. Clinic has to be ceased operation.</li> <li>Implementing the Form I, II and III as per Second Schedule of the Pesticide (Highly Toxic Pesticide) Regulation for Trunk Injection Activities.</li> </ol>				

# MSPO Public Summary Report Revision 0 (Aug 2017)

Corrective action	<ol> <li>To include the 'Surat Perakuan Tahunan' Medical Assistant in the checklist</li> <li>Having checklist and Form I, II, III for Trunk Injection Activities</li> </ol>
Assessment team conclusions	<ul> <li>Evidence submitted:</li> <li>The completed Pesticide (Highly Toxic Pesticide) Regulation form I, II and III</li> <li>copy of the checklist that shows the "<i>Surat Perakuan Tahunan</i>" has been included</li> <li>The corrective action and evidence found to be adequate to close the NCR. The effectiveness of implementation shall be verified in the next assessment.</li> </ul>

Finding Reference	1774601-201905-M2	Certificate Reference	MSPO 712226
Certificate Standard	MS 2530:2013 Part-3	Clause	4.4.4.2.(i) (Part 3)
Category	Major		
Area/Process:	As per public summary report.		
Statement of non conformance:	First Aid Kits were not available at each worksite.		
Clause requirements	Employees trained in First Aid should be present at all field operations. A First Aid Kit should be available at each worksite.		
Objective evidence	At time of visit First Aid Kits were not available at the Rat Baiting worksite at Block TL3 and at the Circle Raking worksite at Block TL9B of LPE.		
Cause	Lack of regulations on checking to ensure Madore bring their first aid kit as instructed		
Correction / containment	Enforce all Madore carry first aid kit during field work and management monitor them from time to time		
Corrective action	Implement checklist for first aid kit and checking during morning mustering		
Assessment team conclusions	<ul> <li>Evidence submitted:</li> <li>Pictures that show first aid kits have been handed over to the persons incharge (Mandores)</li> <li>Morning muster checklist of First Aid Kits that show the mandores (for estate and contractor) have signed as acknowledgment of receiving and checking the First Aid Kits</li> <li>The corrective action and evidence found to be adequate to close the NCR. The effectiveness of implementation shall be verified in the next assessment.</li> </ul>		

Finding Reference	1774601-201905-M3	Certificate Reference	MSPO 712226
Certificate Standard	MS 2530:2013 Part-3	Clause	4.4.5.3 (Part 3)

Category	Major	
Area/Process:	As per public summary report.	
Statement of non conformance:	Records showed that some employees were paid wages that did not meet legal requirements.	
Clause requirements	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.	
Objective evidence	At LRE Records for April 2019 showed that employees, Suparman and Mohd Rasin, had worked on days of rest (Fridays) but were not paid double rate required as per Employment Act 1955.	
Cause	The training on legal wage to the field conductor was not effective	
Correction / containment	To reimburse the underpayment	
Corrective action	To train the field conductor in legal requirements on wage as per employment act and different document for rest day.	
Assessment team conclusions	<ul> <li>Evidence submitted:</li> <li>A copy of receipt that shows the affected worker(s) have been reimbursed.</li> <li>A copy of training records for the field conductors with regards to legal requirements on wage</li> <li>The corrective action and evidence found to be adequate to close the NCR. The effectiveness of implementation shall be verified in the next assessment.</li> </ul>	

Finding Reference	1774601-201905-N1	Certificate Reference	MSPO 712226
Certificate Standard	MS 2530:2013 Part-3	Clause	4.4.1.1 (Part 3)
Category	Minor		
Area/Process:	As per public summary report.	As per public summary report.	
Statement of non conformance:	The mitigation and promotion of some identified social impact through questionnaire filled in by the external stakeholder identification of root-cause has yet to be addressed.		
Clause requirements	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.		
Objective evidence	The method of assessment at LRE & LRPOM was by conducting a stakeholders meeting and utilization of SIA Questionnaires. Thereafter, the impacts identified were registered in the "Stakeholder Concerns and Resolution Matrix" for establishment of resolution/action. However, some of the concerns raised by the stakeholders through the questionnaire such as: - Adakah pendatang asing membawa penyakit dari luar negara? - Adakah wujudnya pencemaran Bahasa dengan wujudnya pekerja Indonesia, Bangladesh, Pakistan, dll?		

	<ul> <li>- Adakah pekerja asing syarikat membawa budaya tak baik seperti pakaian tak senonoh?</li> <li>- Adakah peluang pekerjaan/berniaga bertambah dengan kewujudan syarikat?</li> <li>- Secara am, kewujudan syarikat mendatangkan manfaat kepada kawasan Rompin – Muadzam Shah were not addressed (mitigated or promoted) through the utilization of the "Stakeholder Concerns and Resolution Matrix". There was also no information of which stakeholders filled in the questionnaire.</li> </ul>
Cause	The evaluation of concerns raised by the stakeholders through the questionnaire Social officer is not effective
Correction / containment	To include and review the concerns raised by the stakeholders through the questionnaire
Corrective action	To train the Social officer to evaluate and documented the concerns raised by the stakeholders through the questionnaire
Assessment team conclusions	The CAP is accepted. The evidence of corrective action shall be verified in the next assessment.

Finding Reference	1774601-201905-N2	Certificate Reference	MSPO 712226
Certificate Standard	MS 2530:2013 Part-4	Clause	4.4.1.1 (Part 4)
Category	Minor		
Area/Process:	As per public summary report.		
Statement of non conformance:	The mitigation and promotion of some identified social impact through questionnaire filled in by the external stakeholder identification of root-cause has yet to be addressed.		
Clause requirements	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.		
Objective evidence	The method of assessment at LRE & LRPOM was by conducting a stakeholders meeting and utilization of SIA Questionnaires. Thereafter, the impacts identified were registered in the "Stakeholder Concerns and Resolution Matrix" for establishment of resolution/action. However, some of the concerns raised by the stakeholders through the questionnaire such as: - Adakah pendatang asing membawa penyakit dari luar negara? - Adakah wujudnya pencemaran Bahasa dengan wujudnya pekerja Indonesia, Bangladesh, Pakistan, dll? - Adakah pekerja asing syarikat membawa budaya tak baik seperti pakaian tak senonoh? - Adakah peluang pekerjaan/berniaga bertambah dengan kewujudan syarikat? - Secara am, kewujudan syarikat mendatangkan manfaat kepada kawasan Rompin – Muadzam Shah were not addressed (mitigated or promoted) through the utilization of the "Stakeholder Concerns and Resolution Matrix". There was also no information of which stakeholders filled in the questionnaire.		



Cause	The evaluation of concerns raised by the stakeholders through the questionnaire Social officer is not effective	
Correction / containment	To include and review the concerns raised by the stakeholders through the questionnaire	
Corrective action	To train the Social officer to evaluate and documented the concerns raised by the stakeholders through the questionnaire	
Assessment team conclusions	The CAP is accepted. The evidence of corrective action shall be verified in the next assessment.	

Finding Reference	1774601-201905-N3	Certificate Reference	MSPO 712226
Certificate Standard	MS 2530:2013 Part-3	Clause	4.4.5.4 (Part 3)
Category	Minor		
Area/Process:	As per public summary report.		
Statement of non conformance:	No employment contract between a contractor and its employees.		
Clause requirements	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.		
Objective evidence	At LRE, there was no evidence that the employment contract between a contractor (Koh Sing Huat) and its employees.		
Cause	The training on legal and documentation to the contractor clerk was not effective		
Correction / containment	Contractor Provide and prepare the employment contract between the contractor and their employees.		
Corrective action	To train the contractor clerk in legal and documentations as per employment act 1955.		
Assessment team conclusions	The CAP is accepted. The evidence of corrective action shall be verified in the next assessment.		

Finding Reference	1774601-201905-N4	Certificate Reference	MSPO 712226
Certificate Standard	MS 2530:2013 Part-3	Clause	4.4.5.11 (Part 3)
Category	Minor		
Area/Process:	As per public summary report.		

Statement of non conformance:	The checklist used for weekly line-site inspection was not found to be effective in capturing some lapses.
Clause requirements	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.
Objective evidence	During the line-site visit at Block M4 of LRE and TL Division of LPE, some lapses were observed such as illegal wiring, illegal structure on septic tank, illegal extension structure of house building and presence of chicken coop. However, these lapses were not reported in the line-site inspection checklist.
Cause	The evaluation criteria in the checklist is not comprehensive – it's too general
Correction / containment	Dismantle all the illegal extension structure, wiring, and chicken coop
Corrective action	Revise weekly line-site inspection checklist to be included illegal extension structure, wiring, and chicken coop
Assessment team conclusions	The CAP is accepted. The evidence of corrective action shall be verified in the next assessment.

Finding Reference	1774601-201905-N5	Certificate Reference	MSPO 712226
Certificate Standard	MS 2530:2013 Part-3	Clause	4.4.5.14 (Part 3)
Category	Minor		
Area/Process:	As per public summary report.		
Statement of non conformance:	Employment of young person was found.		
Clause requirements	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not expose to hazardous working conditions.		
Objective evidence	Based on the employee database record, it was found that the following persons were recruited at LRE: i) Emp. No. 02268, date of birth: 28/7/2001, date of join: 1/10/2017 ii) Emp. No. 02282, date of birth: 22/12/2000, date of join: 1/2/2018		
Cause	The recruitment has no information about age		
Correction / containment	Revise the application form include the minimum age for new recruits		



Corrective action	Operating Unit's management will ensure monitoring of applicants' documentation during recruitment process to comply with legal requirement.	
Assessment team conclusions	The CAP is accepted. The evidence of corrective action shall be verified in the next assessment.	

Finding Reference	1774601-201905-N6	Certificate Reference	MSPO 712226
Certificate Standard	MS 2530:2013 Part-4	Clause	4.4.5.14 (Part 4)
Category	Minor		
Area/Process:	As per public summary report.		
Statement of non conformance:	Employment of young person was found.		
Clause requirements	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not expose to hazardous working conditions.		
Objective evidence	Based on the employee database record, it was found that the following person was recruited at Ladang Padang Palm Oil Mill (LPPOM): i) Siti Zulaifah, date of birth: 19/5/2000, date of join: 1/3/2018		
Cause	Application form do not state any age requirement details		
Correction / containment	Revise the application form include the minimum age for new recruits		
Corrective action	Operating Unit's management will ensure monitoring of applicants' documentation during recruitment process to comply with legal requirement.		
Assessment team conclusions	The CAP is accepted. The evidence of corrective action shall be verified in the next assessment.		

Finding Reference	1774601-201905-N7	Certificate Reference	MSPO 712226		
Certificate Standard	MS 2530:2013 Part-3	:2013 Part-3 Clause 4.6.1.1 (Part 3)			
Category	Minor				
Area/Process:	As per public summary report.				
Statement of non conformance:	Standard operating procedure on stacking of pruned fronds was not consistently implemented and monitored.				

Clause requirements	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.
Objective evidenceAt time of visit, it was observed that pruned fronds were not stacked as p Chapter D on Pruning of the SOP – Guidelines on Good Agriculture Practic dated 1st January 2019. Instead, pruned fronds were found in palm circle 	
Cause	Lacking of pruning training on SOP-Guidelines of Good Agricultural Practices
Correction / containmentPruned fronds will be restack as stated in Chapter D on Pruning SOP- Guidelines of Good Agricultural Practices	
Corrective action Conduct training for field conductor on SOP-Guidelines of Good Agric Practices	
Assessment team conclusions	The CAP is accepted. The evidence of corrective action shall be verified in the next assessment.

Finding Reference	1774601-201905-N8	Certificate Reference	MSPO 712226
Certificate Standard	MS 2530:2013 Part-3	Clause	4.5.1.2 (Part 3)
Category	Minor		
Area/Process:	As per public summary report.		
Statement of non conformance:	The Environmental Aspect and Impact assessment did not cover all operations.		
Clause requirements	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations.		
Objective evidence	Based on the EAI Assessment report, not all operations at the estates were covered.		
Cause	Do not have a proper checklist on aspect and impacts analysis of all operation in estate		
Correction / containment	Include environmental policy & objectives in environmental management plan and reassess all estate operation on aspect and impacts analysis		
Corrective action	Have a proper checklist of aspect and impacts analysis of estate operations		
Assessment team conclusions	The CAP is accepted. The evidence of corrective action shall be verified in the next assessment.		

Finding Reference	1774601-201905-N9	Certificate Reference	MSPO 712226
Certificate Standard	MS 2530:2013 Part-4	Clause	4.5.1.2 (Part 4)
Category	Minor		
Area/Process:	As per public summary report.		
Statement of non conformance:	The Environmental Aspect and Impact assessment did not cover all operations.		
Clause requirements	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations.		
Objective evidence	Based on the EAI Assessment report, not all operations at the mills were covered.		
Cause	Do not have a proper checklist on aspect and impacts analysis of all operation in mill		
Correction / containment	Include environmental policy & objectives in environmental management plan and reassess all mill operation on aspect and impacts analysis		
Corrective action	Have a proper checklist of aspect and impacts analysis of mill operations		
Assessment team conclusions	The CAP is accepted. The evidence of corrective action shall be verified in the next assessment.		

	Noteworthy Positive Comments		
1	Good relationship being maintained with surrounding communities.		
2	Mill has continued maximized the use of renewable energy by consuming fibre and shell which produced		
	through internal process.		
3	Good cooperation from the management team in facilitation the assessment.		



### 3.3 Status of Nonconformities Previously Identified and OFI

Not applicable as this is the initial assessment.

### 3.4 Issues Raised by Stakeholders

IS #	Description		
	Issues		
	In general, all the stakeholders consulted have no issues with Seong Thye. Good relationships were well maintained by both parties.		
	Management Responses		
	None		
	Audit Team Findings		
	None		

### 3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1774601-201905-M1	Major	31/5/2019	Closed on 10/6/2019
1774601-201905-M2	Major	31/5/2019	Closed on 10/6/2019
1774601-201905-M3	Major	31/5/2019	Closed on 10/6/2019
1774601-201905-N1	Minor	31/5/2019	Open
1774601-201905-N2	Minor	31/5/2019	Open
1774601-201905-N3	Minor	31/5/2019	Open
1774601-201905-N4	Minor	31/5/2019	Open
1774601-201905-N5	Minor	31/5/2019	Open
1774601-201905-N6	Minor	31/5/2019	Open
1774601-201905-N7	Minor	31/5/2019	Open
1774601-201905-N8	Minor	31/5/2019	Open
1774601-201905-N9	Minor	31/5/2019	Open



### 3.6 Summary of the findings by Principles and Criteria

### MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders

Criterion / Indicator		Assessment Findings	Compliance
4.1 Prin	ciple 1: Management commitment & responsibility		
Criterio	<b>n 4.1.1 –</b> Malaysian Sustainable Palm Oil (MSPO) Policy		
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	The sustainability policy for Seong Thye Plantations Sdn Bhd is available and published in office, clinic and laboratory. The policy was signed by Mr Goh Wei Lei, Executive Chairman dated 02.01.2019.	Yes
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The policy has emphasize to continuously review and improve operations with respect to social, environmental and economic sustainability, guided by the principles of MSPO and best practices referenced by our industry.	Yes
Criterio	<b>n 4.1.2</b> – Internal Audit		
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	The internal audit has been planned annually as per MSPO Internal Audit Procedure MSPO-P1-C2, revisions 1.01, STM Sdn Bhd dated 30.08.2018. The audit planned for Rompin Estate and POM were 14 <sup>th</sup> March 2019 (all principles) and 13 <sup>th</sup> March (Safety & Health). For Padang Estate & Mill, the internal audit has been conducted on 20-22 March 2019.	Yes



Criterion / Indicator		Assessment Findings	Compliance
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.	MSPO Internal Audit Procedure MSPO-P1-C2, revisions 1.01, STM Sdn Bhd dated 30.08.2018 was available.	Yes
	- Major compliance -		
4.1.2.3	Report shall be made available to the management for their review.	Internal audit reports were available during the audit as below:	Yes
	- Major compliance -	1. Rompin Estate and POM, dated 14/3/2019 (all principles) conducted by 3 auditors led by Mr. Ng (HQ KL based) and 13/3/2019 (Safety & Health).	
		2. Padang Estate and POM the internal audit has been conducted on 20-22 March 2019.	
Criterio	<b>n 4.1.3</b> – Management Review		
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.	The MSPO Procedure for Management Review is available for initial release with procedure explanation from preparation of Management Review Meeting, submission of Management Review Agenda until end. Management review is planned annually.	Yes
	- Major compliance -	The management review was conducted for MSPO in both Rompin Mill & Estate (11.01.2019 attended by 18 persons) and Padang Mill & Estate (23.02.2019 attended by 7 people). Since this is the first management review meeting, all issues on MSPO requirement were discussed.	



Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -		Yes
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption Major compliance -		Yes
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	<ul> <li>For the projects, estate has the action plan in the Occasional Bulletin, in example:</li> <li>1. Occasional Bulletin 1 – Best Practices – Weeding, Use of Controlled Droplet Applicator (CDA).</li> </ul>	Yes

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	n / Indicator	Assessment Findings	Compliance
		2. Patrol report from 2019/04/03 07:00:00 to 2019/04/04 19:59:59 all data.	
		3. GAP-1, Harvesting-Guidelines, recommended field practice, version control: 1.0 dated 01.01.2019.	
4.2 Prine	ciple 2: Transparency		
Criterion	4.2.1 – Transparency of information and documents relevant	to MSPO requirements	
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.		Yes
	- Major compliance -	In Padang Mill and Estate, the stakeholder meeting has been conducted on 26.03.2019 (internal stakeholder) attended by 18 attendees and 18.04.2019 (external stakeholder) attended by 23 attendees.	
		Among the stakeholder's concerns are:	
		1. How does palm oil mill ensure that the mill waste is not polluting the environment?	
		2. Request to fix the outside road.	



Criterio	on / Indicator	Assessment Findings	Compliance
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	<ul> <li>Management has made the documents public as per List of Public Documents available for MSPO Stakeholder Inspection, Doc No: MSPO-P2-C1 Version Control 1 dated 01 January 2019.</li> <li>Among the public document shared are: <ol> <li>All MSPO policies and licenses</li> <li>Safety and health plan</li> <li>Plans and impact assessment relating to social impact</li> </ol> </li> </ul>	Yes
Criterio	<b>1 4.2.2 –</b> Transparent method of communication and consult	ation	
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	The Stakeholder Communication & Consultation Procedure is available and refer to the document: REF No: MSPO-03, Revision 0 dated 01.07.2018. The SOP is covering from inform, consult, engage the stakeholders and resolution. The information could be disseminated through: 1. Fact sheet 2. Verbal communication e.g.: phone call, door knocks 3. Letter 4. Email	Yes
4.2.2.2	A management official should be nominated to be responsible	5. Brochures In Rompin Estate, the appointed person in charge for internal and	Yes
	for issues related to Indicator 1 at each operating unit.	external (transparency) MSPO committee officer, Ja'far Bin Nayan dated 01 January 2019 and in Padang Estate, the person appointed is	

...making excellence a habit."



#### **Criterion / Indicator** Compliance **Assessment Findings** - Minor compliance -Mr. Pang Hau Chin as per appointment letter dated 01.01.2019 signed by Estate manager. Stakeholder list for both estates is available from various background, 4.2.2.3 List of stakeholders, records of all consultation and Yes which are MPOB, Orang Asli representative, contractors & suppliers, communication and records of action taken in response to input neighbouring estates, etc. from stakeholders should be properly maintained. - Major compliance -Criterion 4.2.3 – Traceability The Traceability procedure namely Survey of Workflow for Traceability, The management shall establish, implement and maintain a 4.2.3.1 Yes version 1, revision 1.01 dated 30.08.2018 is available from planting to standard operating procedure to comply with the requirements CPO/PK dispatch. for traceability of the relevant product(s). - Major compliance -4.2.3.2 The management shall conduct regular inspections on For Rompin Estate & Padang Estate, the management has made the Yes compliance with the established traceability system. check on the traceability from planting to CPO/PK dispatch. Sighted the check conducted on 05.09.2018 by the respective Estate Managers - Major compliance cum Mill Engineers. The traceability MSPO Committee Officer is Ms Kanageswary on 4.2.3.3 The management should identify and assign suitable Yes employees to implement and maintain the traceability system. 01.01.2019 (Rompin Estate) and Mr Choong Jing Hui (Padang Mill) on 01.01.2019. Among the roles and responsibility are: - Minor compliance -1. Keep abreast of changes to relevant MSPO requirement 2. Review relevant MSPO requirement. 3. Review compliance in fact and in documentation

...making excellence a habit.<sup>™</sup>

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained Major compliance -	Both estates keep the record of the storage, sales and delivery of FFB. Verified the FFB Purchase offer letter to Nilam Livestock Sdn Bhd, dated 25 January 2019 where the OER and KER are flexible and subject to grading and the credit note no: FFB/689 dated 30.04.2019 for RM 85,162.60. In Padang Estate, verified the FFB Purchase offer letter to Garisanemas Plantation Sdn Bhd dated 01.01.2019 and cash payment voucher Dr no: 11/5, dated 03.05.2019 for RM 206,761.89.	Yes
4.3 Prine	ciple 3: Compliance to legal requirements		
Criterio	n 4.3.1 – Regulatory requirements		
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	A mechanism to ensure compliance to legal and other requirement has been documented in Law enforcement File & Compliance to Legal Requirements – Updates on Legal Matters Doc: MSPO-P3-C1. Sample of licenses or permit viewed were: Rompin Estate i) MPOB license: 502448202000 (validity period 01.10.2018- 30.09.2019 for 2969.11 Ha ii) MPOB license: 578853011000 (validity period 01.12.2018- 30.11.2019 for OP Nursery iii) Diesel Permit, seral number: P (C000004-RPN), ref# PHG/RPN/043/95 SK D for 15,000 litre and valid until 02.01.2020. Padang Estate i) MPOB license: 501483502000 (validity period 01.04.2019- 31.03.2020 for 2194 Ha	Non- conformance

...making excellence a habit.<sup>™</sup>

## MSPO Public Summary Report

## Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
		<ul> <li>ii) Diesel &amp; Petrol Permit, seral number: J035918, ref# BPGKJH(KLU) 6662 SK for 22,500 (Diesel) 450 (Petrol) litre and valid until 18.07.2019.</li> <li>iii) Lesen Bagi Mengutip Tol-tol valid from 17.02.2019 until 31.12.2019.</li> <li>However, it was found that the Medical Assistant at Ladang Rompin Estate (LRE), Muhammad Fazrul Abdul Razak, did not have valid 'Surat Perakuan Tahunan'. The latest certificate was expired in 2017. This is not incompliance with AKTA PEMBANTU PERUBATAN (PENDAFTARAN) 1977 (Revised 1 Jan 2006).</li> <li>Apart from that, on Padang Estate the Pesticide (Highly Toxic Pesticide) Regulations 1996 of the Pesticide Act 174 (Act 149) was not complied with.</li> <li>Records showed that Trunk Injection using Methamidophos was carried on 5th, 6th and 8th of April 2019. However, the duly completed Form I, II &amp; III as per Second Schedule of the Pesticide (Highly Toxic Pesticide) Regulations 1996 was not available. Thus, a non-conformity report was assigned due to this lapse.</li> </ul>	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register Major compliance -	The management of both Rompin & Padang Estates had a list of all laws applicable to their operations in a legal requirement register. It was addressed in "Register of Laws and List of Relevant Acts, Laws and Regulations" [MSPO-P3-C1, ver. 1, dated 1/1/2019]. It contained information on Acts and was available in their website.	Yes
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.	The legal requirements register on both Rompin & Padang Estates had been updated as and when there are any new amendments or any new regulations coming into force.	Yes



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -		
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.	Seong Thye Plantations Sdn Bhd had established a SOP to update legal register- "Updates on Legal Matters" procedure [MSPO-P3-C1, ver. 1, dated 1/1/2019.	Yes
	- Minor compliance -		
		The person responsible to track and update changes was (Mr. Chua Kok Siang, Chief Administrator) from the Head Quarters at KL. Methods used were:	
		<ul> <li>Circulars from MAPA</li> <li>Seminars/training courses participation</li> <li>Other public sources – government, stakeholders, etc.</li> </ul>	
		PIC to monitor status of compliance – Mr Lim (Legal Officer). The legal register was used as the document to monitor on compliance on legal requirements.	
Criterio	n 4.3.2 — Lands use rights		
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.	There are valid land titles belonged to Seong Thye Plantations Sdn Bhd for both estates. The palm oil mill did not diminish the land use rights of other users.	Yes
	- Major compliance -		
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.	The management had photocopies of documents showing legal ownership or lease and the actual use of the land. The original documents were kept in the Headquarters. They were:	Yes

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Rompin EstateNo. Hakmilik 5330 - Lot No. 5082 - 2,428 Ha – Leasehold until11.11.2090No. Hakmilik 1321 – Lot No. 2663 - 2.025 Ha – FreeholdNo. Hakmilik 5468 – Lot No. 3244 - 610.6 Ha – Lease hold until01.03.2093.Padang EstateNo. Hakmilik 37218 - Lot No. 3222 - 2,226 Ha – Lease hold until04.11.2074All Titles were owned by Seong Thye Plantations Sdn Bhd and land use was for "Pertanian".	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable Major compliance -	During Field visits a number of legal perimeter boundary markers were sighted on both Rompin & Padang Estates. The markers were concrete pegs and 2inch PVC cylinder filled with concrete and painted with red/white stripe.	Yes
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC).	So far, there is no dispute with the stakeholder in regards of land usage.	Yes
	- Minor compliance -		



Criterion / Indicator		Assessment Findings	Compliance
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.	There is no customary rights land in both estates.	NA
	- Major compliance -		
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	There is no customary rights land in both estates.	NA
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.	There is no customary rights land in both estates.	NA
	- Major compliance -		
4.4 Prin	ciple 4: Social responsibility, health, safety and emplo	oyment condition	
Criterio	n 4.4.1: Social Impact Assessment (SIA)		
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.	Social Impact Assessment has been conducted in April & May 2019, which participated by both internal and external stakeholders. Among the stakeholders consulted were workers, MPOB, contractors, surrounding villages, neighbouring estates & smallholders, suppliers. The method of assessment was by conducting a stakeholders meeting and utilization of SIA Questionnaires. Thereafter, the impacts identified were registered in the "Stakeholder Concerns and Resolution Matrix" for establishment of resolution/action. However, some of the concerns raised by the stakeholders through the questionnaire such as: - Adakah pendatang asing membawa penyakit dari luar negara?	Non- conformance

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
		- Adakah wujudnya pencemaran Bahasa dengan wujudnya pekerja Indonesia, Bangladesh, Pakistan, dll?	
		- Adakah pekerja asing syarikat membawa budaya tak baik seperti pakaian tak senonoh?	
l		- Adakah peluang pekerjaan/berniaga bertambah dengan kewujudan syarikat?	
		- Secara am, kewujudan syarikat mendatangkan manfaat kepada kawasan Rompin – Muadzam Shah,	
		were not addressed (mitigated or promoted) through the utilization of the "Stakeholder Concerns and Resolution Matrix" established by the organization. There was also no information of which stakeholders filled in the questionnaire. Thus, a non-conformity report was assigned due to this lapse.	
Criterio	n 4.4.2: Complaints and grievances		
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented.	Version control 1.00, revisions: 1.01 dared 26 August 2018 revised 08	Yes
	- Major compliance -	may 2019 available and implemented.	
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.	According to the procedure as in 4.4.2.1, the timeframe to close the complaint is based on criticality table and will settled not more than 14 days. Based on the complaint form records, all of the complaints were	Yes
	- Major compliance -	from internal stakeholders. The complaints at LRE & Ladang Rompin Palm Oil Mill (LRPOM) were addressed in timely manner and	

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
		acknowledged by the complainants. For Ladang Padang estate (LPE) & LRE, most of the complaints were still in the process to be resolved.	
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	Grievances/complaint form available in office. Sighted the complaint record are related to housing repairs. Apart from that, there is also a request from smallholder to use estate road on 13.02.2019 (Rompin Mill) while in Padang Mill, the complaint is raised through the external stakeholder meeting.	Yes
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.	There is complaint box placed in office and main gate (security guard) for stakeholder to lodge any complaint. There is also visitor book and grievances/complaint form available in office.	Yes
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.	Complaints were resolved and records were available since 2018.	Yes
	- Major compliance -		
Criterio	n 4.4.3: Commitment to contribute to local sustainable develo	opment	
4.4.3.1	Growers should contribute to local development in consultation with the local communities.  - Minor compliance -	Rompin Mill & Estate has donated some money to the local community (i.e): Sports Day Fund to SK Muadzam Jaya on 28.02.2019 and Estate Football Field on 01.05.2019.	Yes
		In Padang Mill & Estate, the mill has also donated some money to SK Ladang Mutiara for PIBG and annual sports day 2019 on 19.02.2019, food aids on flood time for employees on Feb 2018.	



Criterio	on / Indicator	Assessment Findings	Compliance
Criterio	n 4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	Seong Thye Plantations Sdn Bhd had established and documented an occupational safety and health policy. The policy, in both English and Bahasa Malaysia, dated 02.01.2019 was signed by the Executive Chairman (Mr. Goh Wei Lei).	Yes
		In the policy it was stated "This safety and health policy is a commitment and shall guide all workers, contractors, third parties and stakeholders within the organization towards practices which shall achieve a safe and healthy work culture".	
		The policy was displayed at notice boards, roll call areas, offices, clinics & line-sites and communicated to workers via safe briefings at muster and training and to stakeholders via stakeholder meetings.	
		Rompin Estate	
		- Stakeholder meetings 16/4/2019	
		- trainings – e.g. on 23/11/2018, training title: " <i>Latihan Pengenalan Polisi Keselamatan dan Kesihatan Pekerjaan</i> "	
		Padang Estate	
		- Internal Stakeholder meeting was conducted on 26/3/2019 whereas external stakeholder meeting was on 18/4/2019. Internal for workers & contractors, external – surrounding estates, villages, schools & suppliers.	
		Communicated to workers on 7/1/2019 including contractors	

...making excellence a habit." Page 32 of 111

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterie	on / Indicator	Assessment Findings	Compliance
		(harvesting, pruning, weeding and manuring).	
4.4.4.2	<ul> <li>The occupational safety and health plan shall cover the following:</li> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risks of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: <ul> <li>i. all employees involved shall be adequately trained on safe working practices</li> <li>ii. all precautions attached to products shall be properly observed and applied</li> </ul> </li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</li> <li>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust</li> </ul>	<ul> <li>a) The policy was exhibited at notice boards, roll call area, office, clinics &amp; line-sites and communicated to workers via safe briefings at muster and training and to stakeholders via stakeholder meetings. It was implemented and monitored via Occupational Safety and Health Plans.</li> <li>b) The risks of all operations had been assessed and documented. On Rompin Estate the HIRARC was reviewed on 10.04.2019. It covered activities like manuring, chemical application, store, workshop, planting OP, AA bag mulching, manual buffalo loading, travelling to &amp; from work, harvesting, general work, motorcycle riding, nursery, grass-cutting, etc.</li> <li>On Padang Estate the HIRARC dated 18.01.2019 – covering all activities such as planting tractor driving, loading fertilizer &amp; manuring, spraying, travelling to &amp; from workplace, transporting FFB to mill, using backhoe, road maintenance using motor grader, receiving agrochemicals, diesel skid tank, trunk injectior harvesting, bush-cutting, fixing/repairing roof, WTP, manual buffalo loading.</li> <li>On Rompin Estate a CHRA was conducted on conducted on 18/12/2018 by Ms. Lim Suet Lai (JKKP HIE 127/171-2(20) of CN Consultants (Northern) Sdn Bhd.</li> <li>On Padang Estate a CHRA was conducted together with the Mill on conducted on 26.06.2015.</li> <li>Both the CHRA was conducted by Mr. Wong Tai Chen - JKKP IH 127/171-2(51) of OSH Safety and Health Services.</li> <li>c) Awareness and training programme which included safe working practices and on observation of precautions had been established on both Rompin &amp; Padang Estates. All employees whose involve</li> </ul>	, L I d

...making excellence a habit.<sup>™</sup>

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterion / Indicator	Assessment Findings	Compliance
<ul> <li>must have knowledge and access to latest national regulations and collective agreements.</li> <li>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</li> <li>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</li> <li>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</li> <li>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</li> <li>- Major compliance -</li> </ul>	<ul> <li>in the critical operation such as spraying and manuring works had been given an adequate training Trainings were conducted based on CHRA, SDS of the Chemicals used and SOPs. Records of the latest trainings verified were: Rompin Estate <ul> <li>Training for 23 Sprayers on Chemical safety management, PPE, on SDS and on SOP on 22.01.2019.</li> <li>Training on Manuring for 13 workers was conducted on 24.01.2019</li> </ul> </li> <li>Padang Estate: <ul> <li>Training for 18 Sprayers on Chemical safety management, PPE, on SDS and on SOP and Buffer Zone on 03 &amp; 04.05.2019.</li> <li>Training on Manuring for 23 workers was conducted on 9 &amp; 19.03.2019</li> </ul> </li> <li>d) Records showed that the management of both Rompin &amp; Padang Estates had provided the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control, Hazard Identification, Risk Assessment and Risk Control (HIRARC) and CHRA. PPE issue books were verified.</li> <li>During the audit it was observed that sprayers in Block K3 in Rompin Estate and workers applying Rat Baits in Block TL3 were using the appropriate PPE.</li> <li>e) Seong Thye Plantations had established Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labelling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure</li> </ul>	

...making excellence a habit."

# MSPO Public Summary Report Revision 0 (Aug 2017)

Criterion / Indicator	Assessment Findings	Compliance
	<ul> <li>of Chemical Hazardous to Health) Regulation 2000. There were addressed in Sin Thye Management Sdn Bhd's, "Manual Keselamatan &amp; Kesihatan Pekerja", dated 1/1/2019 which was established with reference to HIRARC, CHRA &amp; SDS. The chapters were: <ul> <li>9 – Prosedur Kerja Selamat Penggunaan Bahan Kimia/Racu</li> <li>18 - Prosedur Kerja Selamat Stor Baja</li> <li>19 - Prosedur Kerja Selamat Stor Bahan Kimia/Racun</li> <li>51 - Prosedur Kerja Yang Selamat (SOP Tumpuan Bahan Kimia)</li> <li>Chemicals Stores on both estates were secured, well ventilated and chemicals stored according with SDS available. Class 1 chemicals were stored separately in a locked compartments inside the secured chemical stores.</li> </ul> </li> <li>f) The management of Seong Thye Plantations Sdn Bhd had appointed responsible persons, who had knowledge and access to latest national regulations and collective agreements, for workers' safety and health. The Managers of Rompin Estate and Padang Estate had been appointed as the persons responsible f their respective estates. In addition, the respective estate had appointed a safety and health supervisor for each estate. There were: Mr. Mohd Fazru for Rompin Estate/Mill and Mr. Ihsan Sabri for Padang Estate/Mill. Appointment letters for all were sighted.</li> <li>g) The management of Seong Thye Plantations Sdn Bhd had established a Safe and Health committee in each Rompin and Padang Estates/Mills. The Safety and Health Committee had conducted regular two-way communication with their employee</li> </ul>	l or

...making excellence a habit.<sup>™</sup>

# **MSPO Public Summary Report** Revision 0 (Aug 2017)

Criterion / Indicator	Assessment Findings	Compliance
	<ul> <li>where issues affecting their business such as employee's health, safety and welfare were discussed openly.</li> <li>On Rompin Estate/Mill the Committee consisted of Chairman (Estate Manager Cum Mill Engineer), Safety &amp; Health Officer, Secretary (Lab Assistant), 7 Management and 7 Workers Representatives each.</li> <li>On Padang Estate the Committee consisted of Chairman (Estate Manager) Vice Chairman (Mill Engineer), Safety &amp; Health Officer, Secretary, 4 Management and 15 Workers Representatives each.</li> <li>Records from these OSH meetings were kept and the concerns of the employees and any remedial actions taken were recorded.</li> <li>Minutes of these meetings verified were held on:</li> <li>Rompin Estate/Mill: 08.04.2019, 01.12.2018, 05.09.2018, 30.07.2018 and 24.02.2018.</li> <li>Padang Estate: 22.03.2019, 27.12.2018, 27.09.2018, 27.06.2018 and 28.03.2018.</li> <li>Seong Thye Plantations Sdn Bhd had established and documented common Emergency Response Plans (ERP)for both Estates and Mills.</li> <li>Emergency situations that had been identified included:</li> <li>Major spillage Chemical, CPO, Fuel</li> <li>Fire</li> <li>Accident</li> <li>Flood</li> <li>Explosion</li> <li>Effluent over flow/ bund breakage</li> <li>Procedure to respond to emergency situation had been communicated to all internal and external stakeholders. This included emergency contact number, firefighting equipment at</li> </ul>	

...making excellence a habit.<sup>™</sup>
# MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
		<ul> <li>line sites, staff quarters, office, stores, etc. Interviewed workers confirmed that they were aware of emergency procedures.</li> <li>i) Trained first aiders were available at all work area in the estates and mill. Records showed that most of the estate mandores and department heads were trained on first aid. The last centralized training on First Aid &amp; CPR was conducted on 25 &amp; 26.07.2018 at Jemima Estate, Port Dickson by the Malaysia Red Crescent Society.</li> <li>Though, first aid boxes were provided and maintained at several locations in the estates' office, stores and workshops, on Padang Estate at time of visit First Aid Kits were not available at the Rat Baiting worksite at Block TL3 and at the Circle Raking worksite at Block TL9B. Thus, a non-conformity report was assigned due to this lapse.</li> <li>Records of all accidents had been kept by the Hospital Assistants and Safety and health Supervisors. The accidents were recorded in the JKKP 6, 7 &amp; 8 as per OSHA format. JKKP 8 form submitted by both Estates/Mills to DOSH in January 2019 showed that there were no accidents in 2018.</li> </ul>	
Criterio	n 4.4.5: Employment conditions		
4.4.5.1	regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively 02.01.2019.		Yes
	- Major compliance -	At Ladang Rompin, the policy has been communicated to the workers through the morning muster on 23.11.2018 while at Ladang Padang it	

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance			
		was communicated on 15/5/2019. Records of attendance were available for verification.				
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	tment board signed by Mr. Goh Wei Lei, Executive Chairman dated pinion, 02.01.2019.				
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	Based on sampled pay slips below, the pay and condition have met the Minimum Wage Order 2018: 1) Saidin a/l Rawi 2) Mimi Nur Aznida Misnan 3) Khairulamnizam Osman 4) Siti Zulaifah 5) Jalaluddin Mohd Basir 6) Awie Alpian 7) Muhammad Alpatoni 8) Suhardi 9) Nurdin 10) Sahrim 11) Ram Darnal 12) Som Bahadur 13) Vellayutam a/l Supramani 14) Durga Bahadur Magar 15) Zainun Ali 16) Zulkifli Ibrahim	Non- conformance			

...making excellence a habit.<sup>™</sup>

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
		<ul> <li>17) Nur Cholis</li> <li>18) Sapali</li> <li>19) Syamsudin</li> <li>20) Mohd Nur Jakaria</li> <li>However, based on information given by workers, it was found that at</li> <li>Rompin Estate, records showed that for April 2019 showed that</li> <li>employees, Suparman and Mohd Rasin, had worked on days of rest</li> <li>(Fridays) but were not paid double rate required as per Employment</li> <li>Act 1955. Thus a non-conformity report was assigned due to this lapse.</li> </ul>	
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	<ul> <li>There are 2 contractors used in Rompin Estate namely Lim Yang Enterprise and Koh Sing Huat Enterprise for harvesting and weeding for month February 2019, March 2019 and April 2019.</li> <li>Sampled below contractor's worker pay slip: <ol> <li>Ramdan (Passport No: C2746991)-Koh Sing Huat</li> <li>Putraji (Passport No: C1281372)-Lim Yang</li> </ol> </li> <li>The mechanism to ensure that the contractor's overtime and working on rest were paid accordingly is by obtaining the pay slip of the workers from the contractor. Based on verification of pay slips of Koh Sing Huat, Zaharudin Bin Zainal, Lee Kian Yap, Nallian Enterprise and TY Seng Enterprise, the pay slip for contractor workers has the information about overtime, work on rest day or public holiday, unpaid leave, annual leave, etc. The pay was also found to be in accordance to minimum standards.</li> <li>However, at LRE, there was no evidence that the employment contract between a contractor (Koh Sing Huat) and its employees. Thus a non-conformity report was assigned due to this lapse.</li> </ul>	Non- conformance

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
		In Padang Estate, verified the pay slip for Morad Hosein (Passport No: BM0957827) and Hardi (Passport No: B7206428).	
		Employment contract between contractors, namely Zaharudin Bin Zainal, Lee Kian Yap, Nallian Enterprise and TY Seng Enterprise and their workers were available. Verification on the contract agreement showed that the contents were in line with legal requirements.	
4.4.5.5	<b>4.5.5</b> The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.		Yes
	- Major compliance -		
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records. - Major compliance -	<ul> <li>The employment contract is available and signed by both employee and employer. Sampled of below worker's document:</li> <li>1. Worker ID: 2183 (Rompin Estate)</li> <li>2. Worker ID: 02292 (Rompin Estate)</li> <li>3. Passport ID: B1222861 (Padang Estate)</li> <li>4. Passport ID: AT389747 (Padang Estate)</li> <li>5. Passport ID: AU095657 (Padang Estate)</li> </ul>	Yes
		All of the sampled employment contracts and appointment letters were signed by the employees.	
makes working hours and overtime transparent for both employment contract as below:		Rompin Estate has established the working hours and overtime as per employment contract as below:	Yes
	employees and employer.	Working days and working hours: 8 hours and 6 days per week	

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	Overtime: According to Malaysia Labour Law as follows:	
		On normal days: salary X 1.5	
		On Sunday/rest days: salary X 2.0	
		On Public Holidays: salary X 3.0	
4.4.5.8	and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and	The overtime given to the workers are within the legal standards which are not more than 104 hours/month.	Yes
		Sampled of below worker's document:	
		1. Worker ID: 2183 (Rompin Estate)	
	- Major compliance -	2. Worker ID: 02292 (Rompin Estate)	
		3. Passport ID: B1222861 (Padang Estate)	
		4. Passport ID: AT389747 (Padang Estate)	
		5. Passport ID: AU095657 (Padang Estate)	
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	Wages and overtime was paid according to the Malaysian Labour Law and employment contract.	Yes
	- Major compliance -		
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.	Employer has provided the free accommodation, electricity and water supply, medical care in estate, transportation for worker's children to go to school.	Yes



Criterio	n / Indicator	Assessment Findings	Compliance
	- Minor compliance -		
4.4.5.11	<ul> <li>5.11 In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</li> <li>Major compliance -</li> <li>Major compliance -</li> <li>Major compliance -</li> </ul>		Non- conformance
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Seong Thye Plantations Sdn Bhd has the Social and Human rights Policy, signed by Executive Chairman on 02.01.2019 which mention that they will provide workplace free of violence and sexual harassment whether directly or indirectly against all employees and stakeholders. Apart from that there is also a guideline for addressing sexual harassment ver. 1, dated 29/8/2018.	Yes
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be	There is no restriction of worker to form any trade union or workers committee but none of them join any union.	Yes



Criterio	n / Indicator	Assessment Findings	Compliance	
	discriminated against or suffer repercussions Major compliance -			
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.	Seong Thye Plantations Sdn Bhd has the Social and Human Rights Policy, signed by Executive Chairman on 02.01.2019 which mention that management will prohibit employment by coercion. Children and young persons shall not be employed or exploited, the minimum age shall comply with local, state and national legislation.	Non- conformity	
	- Major compliance -	However, based on the employee database record, it was found that the following persons were recruited at Ladang Rompin Estate:		
		i) Emp. No. 02268, date of birth: 28/7/2001, date of join: 1/10/2017		
		ii) Emp. No. 02282, date of birth: 22/12/2000, date of join: 1/2/2018		
		Thus, a non-conformity report was assigned due to this lapse.		
Criterior	<b>4.4.6:</b> Training and competency			
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance -	The management of both Estates had planned, established and documented trainings which were to be carried out internally throughout the year 2019. The training was all employees, contractors and their employees. The trainings were on Safety and on SOP like harvesting, manuring, spraying, chemical handling, etc. In the 2019 training matrix there were a total of 42 trainings planned.	Yes	
		Training identification was done through Training Needs Analysis		
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and	(TNA) form. From the results of the evaluation, the training programs were generated.	Yes	

...making excellence a habit."



Criterion / Indicator		Assessment Findings	Compliance	
	competency required to all employees based on their job description.			
	- Major compliance -			
4.4.6.3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.	ained to ensure that all employees were well trained in their job		
	- Minor compliance -	Some of the records on the latest trainings verified were: Rompin Estate & Mill: Riding Motor Bike – on 22.01.2019 for 17 employees Spraying - on 17.01.2019 for 23 employees PPE use - on 24.01.2019 for 13 employees Chemical handling - on 24.01.2019 for 13 employees Tractor Driving - on 14.02.2019 for 21 employees On Policies - on 20.03.2019 for 209 employees Fire Drill – on 25.95.2019 for 105 employees. Padang Estate: Manuring – on 19.03.2019 for 23 employees Spraying - on 03.05.2019 for 18 employees Buffer Zone - on 04.05.2019 for 18 employees Tractor Driving - on 12.01.2019 for 6 employees		

### 4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services

Criterion 4.5.1: Environmental Management Plan

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	<ul> <li>Seong Thye Plantations Sdn Bhd had established and documented an Environmental Policy dated 02.10.2019 signed by Executive Chairman (Mr. Goh Wei Lei). The policy was available both English and Bahasa Malaysia. The policy ensures commitment to comply with legal requirements, pollution reduction and continuous improvement. Communications to the employees were through training sessions and briefings at muster grounds. The latest trainings in relation to environment were conducted on 01.04.2019 for 209 participants (Rompin Estate/Mill) and on 26.03, 18.04 &amp; 15.05.2019 for 89 participants (Padang Estate/Mill). It was also communicated to internal and external stakeholders via</li> <li>Stakeholder meetings 16/4/2019</li> <li>displayed at notice boards, roll call area, office, clinic &amp; line-site</li> <li>quarterly JKKP meetings</li> </ul>	Yes
4.5.1.2	<ul> <li>The environmental management plan shall cover the following:</li> <li>a) An environmental policy and objectives;</li> <li>b) The aspects and impacts analysis of all operations.</li> <li>- Major compliance -</li> </ul>	Rompin Estate had established its environmental aspects/impacts register associated with their activities. The environmental aspect and impact (EAI) covered estate operations, all activities from harvesting, manuring, weeding, nursery, pest and disease, upkeep programs until delivery to mill has been identified. On Rompin Estate in addition to the above activities Impact and aspects for replanting had be assessed. The aspects and impacts evaluation were guided by "MSPO Procedure: Environmental Management Plan (EMP)", rev. 0, dated 2/1/2019. The procedure used to do the EAI Assessment However, on Padang Estate the aspects and impacts analysis did not indicate which operation it was for. EAI Assessment did not have which	Non- conformance

...making excellence a habit.<sup>™</sup>

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
		operation was assessed. The plan only had environmental Aspect, Env. Impact, Scoring, Mitigation measure and Monitoring Program. Thus, a non-conformity report was assigned due to this lapse.	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.	Both Estates have implemented its environmental action plans, which was developed to mitigate negative impacts and improve positive impacts. The plans specify the responsible persons. Among the related plans were:	Yes
	- Major compliance -	<ul> <li>"Environmental Improvement Plan / Pollution Prevention Plan, FY 2019",</li> </ul>	
		<ul> <li>"Waste Management Action Plan 2019".</li> </ul>	
		The plans generally included the control and monitoring of wastes, including scheduled wastes and domestic wastes, river water quality, buffer zone, slope area and replanting activities.	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan.	Programmes to promote positive impacts had been included in the continual improvement plan of both Estates/Mills.	Yes
	- Minor compliance -		
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.	t and (Remptine Estate/Mill) and on 26.03 18.04 & 15.05.2019 for 20	
	- Major compliance -	<ul> <li>Stakeholder meetings 16/4/2019</li> <li>displayed at notice boards, roll call area, office, clinic &amp; line-site</li> <li>quarterly JKKP meetings</li> </ul>	

...making excellence a habit."

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterion / Indicator			Assessment Findings				
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed Major compliance -	Both Estates h their concerns On both es Environmental quarterly OSH verified was 22.03.2019 (Pa	Yes				
Criterion 4.5.2: Efficiency of energy use and use of renewable ener		gy					
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	Consumption of non-renewable energy, Diesel, Petrol & Electricity, was monitored by both Estates. Records of diesel, petrol and electricity utilized were maintained and monitored. The consumption figures					Yes

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings					Compliance
		Total Diesel Total FFB Litres/Ton Total Petrol Litres/Ton	Jan 13,759.20 14,338.42 0.96 387.00 0.03	Feb 9,172.80 12,281.54 0.75 258.00 0.02	Mar 11,466.00 12,194.95 0.94 322.50 0.03	Apr 11,466.00 11.589.95 1.0 322.50 0.03	
4.5.2.2	The oil palm premises shall estimate the direct usage of non- renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	was monitored On Rompin Es collated no b consumption for Padang Estate based on the 2	Consumption of non-renewable energy, Diesel, Petrol & Electricity, was monitored by both Estates/Mills. On Rompin Estate/Mill, as this is an initial year where data was being collated no baseline values had been established. The average consumption for 2019 will be used as the baseline for the future. Padang Estate/Mill had established a baseline for Diesel consumption based on the 2018 data. For 2019, the baseline value established was 2.16 litres/ton FFB.				
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	The use of renewable energy has not been identified by both Estates.					Yes
Criterio	n 4.5.3: Waste management and disposal						
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Guided by MSPO Procedure: Waste Management – wastes products and source of generation were listed in "List of Waste Identified" covering both mill and estate. Identification normally done using EAI evaluation. Listed in the "List of Wastes" as at 1/1/2019:				Yes	

...making excellence a habit.<sup>™</sup>

# **MSPO Public Summary Report** Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Fin	dings	Compliance
		WasteFood WastePlasticPaperScrap IronEffluentDecanter CakeEFBFibrePalm ShellSW 305 (Spent Lubricants)SW 306 (Spent hydraulic Oil)SW 409 (Empty Chemical Containers)SW 410 (Oil Filter, Rags)	Source Workers/Staff Quarters Workers/Staff Quarters Workshops Mills Mills Mills Mills Mills Workshops Workshops Spraying Workshops	
4.5.3.2	<ul> <li>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</li> <li>a) Identifying and monitoring sources of waste and pollution</li> <li>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</li> </ul>	On Both Estates/Mills a management plat was addressed in the "Waste Manageme and Office (non-scheduled wastes)" and and Solid Waste. Domestic waste was collected weekly fro and disposed at landfills. Scheduled wastes observed labelled wi hazard sign, and disposed to valid license	nt Plan Year 2019 – Domestic d Schedule Waste, Industrial m staff and workers quarters th relevant information and	Yes

...making excellence a habit.<sup>™</sup>



Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.5.3.3	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. - Major compliance -	Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal had been addressed in the Prosedur Stor Penyimpanan Barang Terjadual and in "Waste Management Plan" Year 2019. Records showed that Schedule Waste, SW 305, Sw409 & SW410 were disposed to the licensed company OLST Petro Chemical Sdn Bhd on 22.03.2019.	Yes
4.5.3.4	Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.	Empty pesticide containers were disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Some pesticide containers were punctured before disposal while some were disposed through licensed Schedule Waste collector.	Yes
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.	Domestic waste was collected weekly from staff and workers quarters and disposed at landfills. The landfills were in Block K4 (Rompin Estate/Mill and at Block K3 (Padang Estate/Mill).	Yes



Criterio	on / Indicator	Assessment Findings	Compliance
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	An assessment of all polluting activities has been conducted through environmental impact assessment. These assessment has also included greenhouse gas emissions, scheduled wastes and solid wastes.	Yes
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The "Environmental Aspect & Impact Assessment Identification" had included plans to reduce identified significant pollutants and emissions.	Yes
Criterio	n 4.5.5: Natural water resources		
4.5.5.1	<ul> <li>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</li> <li>a. Assessment of water usage and sources of supply.</li> <li>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.</li> <li>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> </ul>	<ul> <li>A water management plan to maintain the quality and availability of natural water resources had been addressed in Water Management Plan for Estate &amp; Mill. Among the plans:</li> <li>a) Recording of water usage – however consumption can be further improved by taking consideration of the previous year's actual consumption <ul> <li>LPE: ditto</li> </ul> </li> <li>b) Monitoring through Geylang River water quality – 1 sampling point (outlet) – guided by Water Quality Assessment Report [MSPO-P5-3] – parameters: AN, BOD, COD, DO, pH, TSS &amp; WQI <ul> <li>LPE: Monitoring through river water quality – 3 sampling</li> </ul> </li> </ul>	Yes
	d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at	points – guided by Water Quality Assessment Report [MSPO-P5-3] – parameters: pH, COD, BOD, SS, AN, DO & WQI	

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
	or before planting or replanting, along all natural waterways within the estate.	<ul> <li>c) To optimize water &amp; nutrient usage – repair broken pipes, educate workers, etc.</li> </ul>	
	e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and	d) Buffer zones – guided by Establishment and Management of Riparian Zone [GAP-1, ver. 1, 1/1/2019].	
	<ul><li>implemented.</li><li>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</li></ul>	<ul> <li>e) Prohibition of activities spraying, application of fertilisers, hunting &amp; fishing, human &amp; vehicular activities</li> </ul>	
	- Major compliance -	Both estates had maintained buffer zone for protecting water courses. Noticeboards were used to identify the buffer zones and palms trunks ring marked with red paint (Rompin Estate) and blue and yellow (Padang Estate).	
		Water sampling was also conducted – sighted 6 Reports Ref: ACL/WAT-POT 190641 to 190646 dated 25.03.2019 of Allied Chemist. The analysis was for ph, COD, BOD, Suspended Solids, Ammonical Nitrogen, Dissolved Oxygen and Water Quality Index (WQI)	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	No construction of bunds, weirs and dams across Geylang River and natural water ways were observed during the visit.	Yes
	- Minor compliance -		
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).	Both Estates had implemented water harvesting practices like having, water conservation pits and terraces and surface run water from roads directed to into road side silt pits & field.	Yes
	- Minor compliance -		

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
4.5.6.1	<ul> <li>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</li> <li>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</li> <li>b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</li> <li><b>Major compliance -</b></li> </ul>	Both Estates had identified and collated information of high biodiversity value (HBV) ecosystems and on rare, threatened, or endangered (RTE) species guided by MSPO Procedure (MSPO-P5-C6 – Guidance on Biodiversity & Hunting) dated 1.01.2019: Status of Rare Threatened or Endangered Species & High Biodiversity Value Area on Rompin Estate was done by En. Jafar Nayan. The following were identified Tupai Gading, memerang kecil, musang jebat, kucing batu and badak cipan On Padang Estate the identification and collation was done by Identification was done by En. Tan Heng Yung (Environmental Officer). The following were identified: Babi hutan, ayam hutan, musang pulut, beruk ruak-ruak, serindit, ular sawa, sesumpah kuning, biawak air, riang, cengkerik raksaksa and serangga ranting The Estates & Mills have obtained list of Totally Protected Species (Mammals) under wildlife Protection Act, 1972from the Department of Wildlife and National Parks (DWNP) (PERHILITAN). Based on this lists there were no RTE species on both estates. There were also no High value Ecosystems in and around the Estates.	Yes
4.5.6.2	<ul> <li>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</li> <li>a) Ensuring that any legal requirements relating to the protection of the species are met.</li> <li>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to</li> </ul>	Not applicable, as based on the Identification and Information Collated by En. Jafar Nayan on Rompin Estate and by En. Tan Heng Yung (Environmental Officer) on Padang Estate, there were no RTE species and HCV ecosystem in both Estates. However, signage prohibiting hunting and fishing had been put up in the Buffer Zone Areas. Training on RTE species had also been conducted on Rompin Estate on 13.05.2019 for 29 workers.	Yes



Criterion / Indicator		Assessment Findings	Compliance
	resolve human-wildlife conflicts Major compliance -		
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	Though, based on the Identification and Information Collated by En. Jafar Nayan on Rompin Estate and by En. Tan Heng Yung (Environmental Officer) on Padang Estate, there were no RTE species and HCV ecosystem in both Estates it was addressed in Biodiversity Management Plan – 2019.	Yes
Criterio	n 4.5.7: Zero burning practices		
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	Seong Thye Plantations Sdn Bhd had a Zero Burning Policy addressed in their Environmental Policy dated 02.01.2019 and signed by the Executive Chairman Mr Goh Wei Lei.	Yes
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	Not applicable as there was no previous crop on Rompin Estate that was highly diseased and where there was a significant risk of disease spread or continuation into the next crop. There was no replanting in Padang Estate.	Yes
4.5.7.3	<ul> <li>Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.</li> <li>Major compliance -</li> </ul>	Not applicable as there was no controlled burning had been required on Rompin Estate and there had been no replanting activities on Padang Estate.	Yes



#### **Criterion / Indicator Assessment Findings** Compliance Previous crops should be felled or mowed down, chipped 4.5.7.4 It was evident that in the 2019 replant visited on Rompin Estate, Yes and shredded, windrowed or pulverized or ploughed and previous palms had been felled, chipped. Windrowed and left to mulched. decompose. - Minor compliance -4.6 Principle 6: Best Practices Criterion 4.6.1: Site Management 4.6.1.1 Standard operating procedures shall be Seong Thye Plantations Sdn Bhd had established and documented appropriately nondocumented and consistently implemented and monitored. Standard operating procedures. It was addressed in manual conformance "Guidelines on Good Agriculture Practices" dated 01.01.2019. Topics - Major compliance covered in the manual were chapters: A – Introduction to good agriculture practices B – Replanting • C – Manuring D - Harvesting E-P&D F – Others The procedures were monitored by program sheets, harvesting round records, production records, stock sheets, monthly progress reports, etc. Implementation was monitored by visits by COO, other HQ visiting executives and Agronomist. Standard operating procedures for safety was addressed in the Sin Thve Management Sdn Bhd's, "Manual Keselamatan & Kesihatan Pekerja", dated 1/1/2019

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
		However, on Rompin Estate & Padang Estate Standard operating procedure on stacking of pruned fronds was not consistently implemented and monitored. At time of visit, it was observed that pruned fronds were not stacked as per Chapter D on Pruning of the SOP – Guidelines on Good Agriculture Practices dated 1 <sup>st</sup> January 2019. Instead, pruned fronds were found in palm circles.	
		Rompin Estate: in Block 08	
		Padang Estate: In Block TL9B	
		Thus, a non-conformity report was assigned due to this lapse.	
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.	The management for areas where oil palm was grown within permitted levels on sloping land, had established and documented. Appropriate soil conservation measures to be implemented to prevent both soil erosion as well as siltation of drains and waterways was addressed under Chapter B – Replanting in the manual "Guidelines on Good Agriculture Practices" dated 01.01.2019.	Yes
	- Major compliance -	It was mainly addressed under the topic 'Terrace and Platform Construction, Road Construction and Drainage.	
		During the visit it was observed that the Estates also practiced ground cover management, that is, maintenance of the fern <i>Nephrolepis biserrata</i> and soft grasses in the interline, biomass recycling and planting of <i>Mucuna Bracteata</i> .	
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	The Estates had for visual identification/reference system documented in field Maps. On the ground the field blocks were identified/marked using concrete slabs with the following information - Block No., Year Planted & Ha.	Yes



# MSPO Public Summary Report

### Revision 0 (Aug 2017)

Criterio	n / Indicator		Assessment F	indings	Compliance
Criterio	1 4.6.2: Economic and financial viability plan				
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	2019 and projection, c of productio	projections until 2024. ost of production, cost per	e available on both Estates for Attention was given to crop ton and per hectare. The cost ared against expenditure each years.	Yes
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3- 5 years.	program:	wed that the replanting pro	term, a 10 year replanting grams for the current year and	Yes
	- Major compliance -	Year	Rompin Estate (Ha)	Padang Estate (Ha)	
		2019	183	0	
		2020	201	0	
		2021	370	0	
		2022	388	0	
		2023	288	287.50	
		2024	357	233.00	
4.6.2.3	The business or management plan may contain:	2019 and pr	ojections until 2024. Attentic	e available on both Estates for on was given to crop projection, hectare. The cost of production	Yes

...making excellence a habit."



Criterio	n / Indicator	Assessment Findings	Compliance
	<ul> <li>a) Attention to quality of planting materials and FFB</li> <li>b) Crop projection: site yield potential, age profile, FFB yield trends</li> <li>c) Cost of production : cost per tonne of FFB</li> <li>d) Price forecast</li> <li>e) e) Financial indicators : cost benefit, discounted cash flow,</li> </ul>	was reviewed and compared against expenditure each year with projections in place for future years.	
	return on investment - Major compliance -		
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.	Implementation of the management plan was regularly monitored via Monthly Progress and Production Reports, the computerized system, OPMN006, monthly meetings and visits by COO & other HQ visiting executive and by internal and external audits.	Yes
		The business plan was reviewed by management team at least annually.	
Criterio	<b>1 4.6.3:</b> Transparent and fair price dealing		
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented Major compliance -	In Rompin Estate, the pricing mechanism of product were mentioned clearly in the agreement which was signed and accepted. Example seen are between Seong Thye Plantations Sdn Bhd and Lim Wee Yang, Contract no: LR/FC/03/19 valid from 01.01.2019 until 31.12.2019.	Yes
		In Padang Estate, there are 5 contractors hired in harvesting, weeding road maintenance, manuring and general works. Verified the agreement between Seong Thye Plantations Sdn Bhd and Lee Kian Giap, Doc no: LP/FC/01/19 dated 01.01.2019 for harvesting FFB,	

...making excellence a habit.<sup>™</sup>

## MSPO Public Summary Report Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
		loading and transport FFB to Oil Mill Ramp or Company appointed oil mill, pruning, etc.	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Contract signed between contractor and Seong Thye Plantations Sdn Bhd and Lim Yang Enterprise has the agreed payment as per contract in 4.6.3.1. Due to the confidential data, auditor has made verification on the cash payment voucher for May 2019 dated 08.05.2019.	Yes
Criterio	n 4.6.4: Contractor		
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	In Rompin Estate, there are 2 contractors used in Rompin Estate namely Lim Yang Enterprise and Koh Sing Huat Enterprise for harvesting and weeding. Rompin Estate has conducted the meeting with contractor on the safety and MSPO requirement on 11.04.2019. In Padang Estate, there are 5 contractors hired in harvesting, weeding road maintenance, manuring and general works. In Padang Estate, the contractor has signed the control points for contractors on 09.04.2019 which need to comply with MSPO requirements.	Yes
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor Major compliance -	In Rompin Mill, verified the contract signed between contractor and Seong Thye Plantations Sdn Bhd and Lim Yang Enterprise and also between Koh Sing Huat has the agreed payment as per contract in 4.6.3.1. In Padang Estate, verified the agreement between Seong Thye Plantations Sdn Bhd and Lee Kian Giap, Doc no: LP/FC/01/19 dated 01.01.2019 for harvesting FFB, loading and transport FFB to Oil Mill Ramp or Company appointed oil mill, pruning, etc.	Yes

# MSPO Public Summary Report

### Revision 0 (Aug 2017)

Criterio	on / Indicator	Assessment Findings	Compliance
		Due to the confidential data, auditor has made verification on the cash payment voucher for May 2019 dated 08.05.2019 (Rompin Estate) and cash payment voucher dated 08.02.2019, check no: MBB 358164 amounted RM 122,045.79(Padang Estate).	
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.	There is no objection by the management to accept MSPO approved auditors to verify the assessments through a physical inspection, if required.	Yes
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.	In Rompin Estate, the management has the harvesting round book and contractor's weeding program and board to monitor the work progress for payment verification. This is being done by Assistant Manager and Field staff in daily basis.	Yes
	- Major compliance -	In Padang Estate, the monitoring on work progress are through daily muster chit, harvesting bunch list and monthly overtime report by field conductor and escalated to the upper level for approval.	
4.7 Prin	ciple 7: Development of new planting		
Criterio	n 4.7.1: High biodiversity value		
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation.	There is no development of new planting at both visited estates.	Yes
	- Major compliance -		
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical	There is no development of new planting at both visited estates.	Yes



Criterio	n / Indicator	Assessment Findings	Compliance
	<ul> <li>Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required.</li> <li>- Major compliance -</li> </ul>		
Criterior	<b>1 4.7.2:</b> Peat Land		
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	There is no development of new planting at both visited estates.	Yes
Criterior	<b>1 4.7.3</b> : Social and Environmental Impact Assessment (SEIA	)	
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	There is no development of new planting at both visited estates.	NA
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders.	There is no development of new planting at both visited estates.	NA



Criterio	on / Indicator	Assessment Findings	Compliance
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.	There is no development of new planting at both visited estates.	NA
	- Major compliance -		
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed.	There is no development of new planting at both visited estates.	NA
	- Minor compliance -		
Criterio	n 4.7.4: Soil and topographic information		
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.	There is no development of new planting at both visited estates.	NA
	- Major compliance -		
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure.	There is no development of new planting at both visited estates.	NA
	- Major compliance -		
Criterio	<b>n 4.7.5</b> : Planting on steep terrain, marginal and fragile soils	·	
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national	There is no development of new planting at both visited estates.	NA



Criterio	n / Indicator	Assessment Findings	Compliance
	laws. - Major compliance -		
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	There is no development of new planting at both visited estates.	NA
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion.	There is no development of new planting at both visited estates.	NA
	- Major compliance -		
Criterion	4.7.6: Customary land		
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	There is no development of new planting at both visited estates.	NA
	- Major compliance -		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.	There is no development of new planting at both visited estates.	NA
	- Minor compliance -		



Criterio	on / Indicator	Assessment Findings	Compliance
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available.	There is no development of new planting at both visited estates.	NA
	- Major compliance -		
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement.	There is no development of new planting at both visited estates.	NA
	- Major compliance -		
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented.	There is no development of new planting at both visited estates.	NA
	- Major compliance -		
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented.	There is no development of new planting at both visited estates.	NA
	- Major compliance -		
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available.	There is no development of new planting at both visited estates.	NA
	- Major compliance -		



Criterio	on / Indicator	Assessment Findings	Compliance
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	There is no development of new planting at both visited estates.	NA



### MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill.

Criterio	on / Indicator	Assessment Findings	Compliance
4.1 Prin	ciple 1: Management commitment & responsibility		
Criterio	<b>1 4.1.1 –</b> Malaysian Sustainable Palm Oil (MSPO) Policy		
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	The sustainability policy for Seong Thye Plantations Sdn Bhd is available and published in office, clinic and laboratory. The policy was signed by Mr Goh Wei Lei, Executive Chairman dated 02.01.2019.	Yes
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation Major compliance -	The policy has emphasize to continuously review and improve operations with respect to social, environmental and economic sustainability, guided by the principles of MSPO and best practices referenced by our industry.	Yes
Criterio	<b>1 4.1.2 –</b> Internal Audit		
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	The internal audit has been planned annually as per MSPO Internal Audit Procedure MSPO-P1-C2, revisions 1.01, STM Sdn Bhd dated 30.08.2018. The audit planned for Rompin Estate and POM were 14 <sup>th</sup> March 2019 (all principles) and 13 <sup>th</sup> March (Safety & Health). For Padang Estate & Mill, the internal audit has been conducted on 20-22 March 2019.	Yes
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to	MSPO Internal Audit Procedure MSPO-P1-C2, revisions 1.01, STM Sdn Bhd dated 30.08.2018 was available.	Yes

...making excellence a habit.<sup>™</sup>



# MSPO Public Summary Report

### Revision 0 (Aug 2017)

4.1.2.3	<ul> <li>implement the necessary corrective action.</li> <li>- Major compliance -</li> <li>Reports shall be made available to the management for their review.</li> <li>- Major compliance -</li> </ul>	Internal audit report is available during the audit as below: 1. Rompin Estate and POM were 14 <sup>th</sup> March 2019 (all principles) and 13 <sup>th</sup> March (Safety & Health). 2. Padang Estate and POM the internal audit has been	Yes
Criterio	<b>n 4.1.3 —</b> Management Review	conducted on 20-22 March 2019 .	
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The MSPO Procedure for Management Review is available for initial release with procedure explanation from preparation of Management Review Meeting, submission of Management Review Agenda until end. Management review is planned annually. The management review was conducted for MSPO in both Rompin Mill & Estate (11.01.2019 attended by 18 people) and Padang Mill & Estate (23.02.2019 attended by 7 people). Since this is the first management review meeting, all issues on MSPO requirement were	Yes
Criterio	<b>n 4.1.4 –</b> Continual Improvement	discussed.	
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	The continuous improvement plan is covering the social and environmental aspect as below: 1. Building community house 15m X 30m as per non critical (Rompin Mill)	Yes

# MSPO Public Summary Report

### Revision 0 (Aug 2017)

		<ol> <li>Sport day on 1<sup>st</sup> May 2019 (Rompin Mill).</li> <li>Installation of Air Pollution Control System-APCS (Padang Mill).</li> <li>Methane Capture – Biogas Capturing System (Padang Mill).</li> </ol>	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	In Rompin Mill, there is plan to use the Electrostatic Precipitator (ESP) for very high collection efficiencies even for very small particles to be used in 2019. This is as per Latest Technology and Systems, Standards and Practices, ref No: MSPO-P1-2, version 1 dated 01.01.2019. In Padang Mill, the new project in progressing is Online Measurement of Opacity and TPM to reduce reliance on labour as well as improve productivity on labour.	Yes
4.2 Prin	ciple 2: Transparency		
Criterion	4.2.1 – Transparency of information and documents relevant to	MSPO requirements	
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	The management has communicated the information to the stakeholder through the invitation to join the stakeholder meeting on 16 April 2019. The stakeholders attended are from various background, which are MPOB, Orang Asli representative, contractors & suppliers, neighbouring estates, etc. (24 attendees). In Padang Mill and Estate, the stakeholder meeting has been conducted on 26.03.2019 (internal stakeholder) attended by 18 attendees and 18.04.2019 (external stakeholder) attended by 23 attendees.	Yes

### **MSPO Public Summary Report**

4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	<ul> <li>3. How does palm oil mill ensure that the mill waste is not polluting the environment?</li> <li>Request to fix the outside road.</li> <li>Management has made the documents public as per List of Public Documents available for MSPO Stakeholder Inspection, Doc No: MSPO-P2-C1 Version Control 1 dated 01 January 2019.</li> <li>Among the public document shared are: <ol> <li>All MSPO policies and licenses</li> <li>Safety and health plan</li> <li>Plans and impact assessment relating to social impact</li> </ol> </li> </ul>	Yes
Criterio	<b>n 4.2.2</b> – Transparent method of communication and consultati	on	
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	The Stakeholder Communication & Consultation Procedure is available and refer to the document: REF No: MSPO-03, Revision 0 dated 01.07.2018. The SOP is covering from inform, consult, engage the stakeholders and resolution. The information could be disseminated through: 1. Fact sheet 2. Verbal communication e.g.: phone call, door knocks 3. Letter 4. Email 5. Brochures	Yes
4.2.2.2	The management shall nominate management officials at the	In Rompin Mill, the appointed person in charge for internal and external (transparency) MSPO committee officer, Ja'far Bin Nayan	Yes

...making excellence a habit."



### MSPO Public Summary Report

### Revision 0 (Aug 2017)

	operating unit responsible for issues related to <i>indicator 1</i> Minor compliance -	dated 01 January 2019 and in Padang Mill, the person appointed is Mr. Pang Hau Chin as per appointment letter dated 01.01.2019 signed by Estate manager.	
4.2.2.3	<ul> <li>A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.</li> <li>Major compliance -</li> </ul>	Stakeholder list for both estates is available from various background, which are MPOB, Orang Asli representative, contractors & suppliers, neighbouring estates, etc. The list is updated as at 15 April 2019 (Rompin Mill) and 18 April 2019 (Padang Mill).	Yes
Criterio	<b>n 4.2.3 –</b> Traceability		
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.	The Traceability procedure namely Survey of Workflow for Traceability, version 1, revision 1.01 dated 30.08.2018 is available from planting to CPO/PK dispatch.	Yes
	- Major compliance -	The following information is available in the weighbridge ticket and/or DO for FFB supplied by third party [sampled NSOP Bhd's Ibam Estate, dealer Bukit Serong Trading (LRPOM), Hebat Menawan and Magical Wealth Sdn Bhd (LPPOM)]:	
		<ul> <li>Date of weighing</li> <li>Gross/tare/net weight</li> <li>Contract no. (e.g. Long Term 05/19)</li> <li>Weighbridge ticket no.</li> <li>Description of content (CPO or PK)</li> <li>Vehicle no.</li> <li>Name of driver (in DO)</li> <li>Time in &amp; out</li> <li>Seal No.</li> <li>MPOB form (ref. To seal No. and DO no.)</li> </ul>	

### **MSPO Public Summary Report**

### Revision 0 (Aug 2017)

		<ul> <li>The following information is available in the weighbridge ticket and/or DO for CPO and PK delivered to buyers (sampled: PGEO, Hup Lee, Mewaholeo and Hok Huat Oil Mill)</li> <li>Date of weighing</li> <li>gross/tare/net weight</li> <li>Supplier's name or code</li> <li>weighbridge ticket No.</li> <li>Delivery order No.</li> <li>Description of content (product description i.e. FFB)</li> <li>Vehicle No.</li> <li>Time in &amp; out</li> <li>Customer and transporter names</li> <li>Load number</li> <li>Seal No.</li> <li>Contract No. (e.g. STPO/023/19, STPK/014/19)</li> </ul>	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	For Rompin Mill & Padang Mill, the management has made the check on the traceability from planting to CPO/PK dispatch. Sighted the check conducted on 05.09.2018 by the respective Estate Managers cum Mill Engineers .	Yes
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	<ul> <li>The traceability MSPO Committee Officer is Ms Kanageswary on 01.01.2019 (Rompin Mill) and Mr Choong Jing Hui (Padang Mill) on 01.01.2019. Among the roles and responsibility are:</li> <li>1. Keep abreast of changes to relevant MSPO requirement</li> <li>2. Review relevant MSPO requirement.</li> <li>3. Review compliance in fact and in documentation</li> </ul>	Yes



**MSPO Public Summary Report** 

### Revision 0 (Aug 2017)

	Records of storage, sales, delivery or transportation of crude palm		
4.2.3.4	oil and palm kernel shall be maintained.	Rompin Mill & Padang Mill has keep the record of the storage, sales and delivery of CPO and PK. Sighted the document below:	Yes
	- Major compliance -	1. Palm Oil Contract: STOP/R/026/19, Ref: 130408 dated 30.04.2019 (Rompin Mill).	
		<ol> <li>Invoice no: RE/19/122 dated 30/4/2019, CPO: 101.61 MT, price: RM 207,284.40 (Rompin Mill).</li> </ol>	
		<ol> <li>Palm Kernel Sale Contract: STPK/R/008/19 (1<sup>st</sup>), Ref: dated 24.04.2019 (Rompin Mill).</li> </ol>	
		4. Invoice no: RE/19/116 dated 24/4/2019, Palm Kernel: 50 MT, price: RM 61,000.00 (Rompin Mill).	
		<ol> <li>Palm Oil Sale Contract No: STOP/01019 dated 16.01.2019 for Musim Mastika Oils &amp; Fats Sdn Bhd for RM 2020/mt (Padang Mill).</li> </ol>	
		6. Palm Kernel Contract No: STPK/004/19 dated 16.01.2019 for PGEO Oil Mill Sdn Bhd for RM 1490/mt (Padang Mill).	
4.3 Prin	ciple 3: Compliance to legal requirements		
Criterio	n 4.3.1 – Regulatory requirements		
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.	A mechanism to ensure compliance to legal and other requirement has been documented in Law enforcement File & Compliance to Legal Requirements – Updates on Legal Matters Doc: MSPO-P3-C1.	Yes
	- Major compliance -	Sample of licenses or permit viewed were: Rompin Palm Oil Mill:	
		i) MPOB license: 500216104000 (validity period 23/10/2018 - 30/05/2019) for 144,000 tons. (Renewed	

...making excellence a habit."
MSPO Public Summary Report

		_ 01/04	5/2019 -31.05.2020).	]
		ii) DOE Lic (validity	ense: JP/KKS/2018/2019/004158 – No. 004158 / period 01.07.2018 – 30.06.2109) for 40MT/hr thod of POME discharge is water course.	
		iii) Diesel PHG/RF	Permit, seral number: P (C000004-RPN), ref# PN/043/95 SK D for 15,000 litre and valid until 020. (Shared with Estate).	
		,	to Extract water – Ref: SWUL/LPSA/95/2019 htil 31.12. 2019.	
		Padang Palm Oil Mi	I	
		v) MPOB	license: 500014104000 (validity period 019-31.03.2020 for 96,000 Tons	
			cense: AS(B)J31/152/000/027Jid.4(SK07) – No.	
			(validity period 01.07.2018 - 30.06.2109) for	
			r and method of POME discharge is land tion (Furrow system abd slurry application).	
			& Petrol Permit, seral number: J035918, ref#	
		, BPGKJH	I(KLU) 6662 SK for 22,500 (Diesel) 450 (Petrol) d valid until 18.07.2019. (Shared with Estate)	
		viii) Permit	to Extract water – Ref:	
			334/300/05/07/08/10 valid until 31.12. 2019.	
			Bagi Mengutip Tol-tol valid from 17.02.2019 .12.2019.	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register.	Mill combined with	of both Rompin Palm Oil Mill & Padang Palm Oil their respective Estates had a list, each, of	Yes
	- Major compliance -		e to their operations in a legal requirement	
			ressed in "Register of Laws and List of Relevant Regulations" [MSPO-P3-C1, ver. 1, dated]	
			ined information on Acts and was available in	

...making excellence a habit.<sup>™</sup>



## Revision 0 (Aug 2017)

4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	The legal requirements register on both Rompin Palm Oil Mill & Padang Palm Oil Mill had been updated as and when there are any new amendments or any new regulations coming into force based on the Document: – Updates on Legal Matters Doc: MSPO-P3-C1.	Yes
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	Seong Thye Plantations Sdn Bhd had established a SOP to update legal register- "Updates on Legal Matters" procedure [MSPO-P3-C1, ver. 1, dated 1/1/2019. The person responsible to track and update changes was (Mr. Chua Kok Siang, Chief Administrator) from the Head Quarters at KL. Methods used were:	Yes
		<ul> <li>Circulars from MAPA</li> <li>Seminars/training courses participation</li> <li>Other public sources – government, stakeholders, etc.</li> <li>PIC to monitor status of compliance – Mr Lim (Legal Officer). The legal register was used as the document to monitor on compliance on legal requirements.</li> </ul>	
Criterio	<b>1 4.3.2 —</b> Lands use rights		
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	There is a valid land title belonged to Seong Thye Plantations Sdn Bhd. The palm oil mill did not diminish the land use rights of other users.	Yes
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	The management of both Mills had photocopies of documents showing legal ownership or lease and the actual use of the land. The original documents were kept in the Headquarters. They were:	Yes

## **MSPO Public Summary Report**

## Revision 0 (Aug 2017)

	Rompin Palm Oil Mill is within the Estate Leasehold grant No. Hakmilik 5330, Lot 5082, 2,428 Ha – occupying 17.12 Ha. Period of Lease hold is up to 11.11.2090	
	Padang Palm Oil Mill is within Padang Estate's freehold land Grant No. Hakmilik 37218 - Lot No. 3222 - 2,226 Ha – Lease hold until 04.11.2074, occupying 17 Ha.	
Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	Both Rompin POM and Padang POM being within the respective land of the estates were demarcated with perimeter fencing.	Yes
- Major compliance -		
Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC).	NA. Land issues is handled by the estates. See Indicator 4.3.2.4 of Part 3.	Yes
- Minor compliance -		
<b>4.3.3</b> – Customary rights		
Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.	NA. Land issues is handled by the estates. See Indicator 4.3.2.4 of Part 3.	Yes
- Major compliance -		
Maps of an appropriate scale showing extent of recognized customary rights shall be made available.	NA. Land issues is handled by the estates. See Indicator 4.3.2.4 of Part 3.	Yes
- Minor compliance -		
Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.	NA. Land issues is handled by the estates. See Indicator 4.3.2.4 of Part 3.	Yes
	and visibly maintained on the ground where practicable. - Major compliance - Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance - 4.3.3 – Customary rights Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance - Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance - Negotiation and FPIC shall be recorded and copies of the relevant	Hakmilik 5330, Lot 5082, 2,428 Ha – occupying 17.12 Ha. Period of Lease hold is up to 11.11.2090         Padang Palm Oil Mill is within Padang Estate's freehold land Grant No. Hakmilik 37218 - Lot No. 3222 - 2,226 Ha – Lease hold until 04.11.2074, occupying 17 Ha.         Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.       Both Rompin POM and Padang POM being within the respective land of the estates were demarcated with perimeter fencing.         • Major compliance -       NA. Land issues is handled by the estates. See Indicator 4.3.2.4 of Part 3.         • Minor compliance -       NA. Land issues is handled by the estates. See Indicator 4.3.2.4 of Part 3.         • Major compliance -       NA. Land issues is handled by the estates. See Indicator 4.3.2.4 of Part 3.         • Minor compliance -       NA. Land issues is handled by the estates. See Indicator 4.3.2.4 of Part 3.         • Major compliance -       NA. Land issues is handled by the estates. See Indicator 4.3.2.4 of Part 3.         • Major compliance -       NA. Land issues is handled by the estates. See Indicator 4.3.2.4 of Part 3.         • Major compliance -       NA. Land issues is handled by the estates. See Indicator 4.3.2.4 of Part 3.         • Major compliance -       NA. Land issues is handled by the estates. See Indicator 4.3.2.4 of Part 3.         • Major compliance -       NA. Land issues is handled by the estates. See Indicator 4.3.2.4 of Part 3.         • Major compliance -       NA. Land issues is handled by the estates. See Indicat

...making excellence a habit.<sup>™</sup>



	- Major compliance -		
4.4 Prin	ciple 4: Social responsibility, health, safety and employn	nent condition	
Criterio	n 4.4.1: Social Impact Assessment (SIA)		
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	<ul> <li>Social Impact Assessment has been conducted in April &amp; May 2019, which participated by both internal and external stakeholders. Among the stakeholders consulted were workers, MPOB, contractors, surrounding villages, neighbouring estates &amp; smallholders, suppliers. The method of assessment was by conducting a stakeholders meeting and utilization of SIA Questionnaires. Thereafter, the impacts identified were registered in the "Stakeholder Concerns and Resolution Matrix" for establishment of resolution/action. However, some of the concerns raised by the stakeholders through the questionnaire such as:</li> <li><i>Adakah pendatang asing membawa penyakit dari luar negara?</i></li> <li><i>Adakah pekerja asing syarikat membawa budaya tak baik seperti pakaian tak senonoh?</i></li> <li><i>Adakah peluang pekerjaan/berniaga bertambah dengan kewujudan syarikat?</i></li> <li><i>Secara am, kewujudan syarikat mendatangkan manfaat kepada kawasan Rompin – Muadzam Shah,</i></li> <li>were not addressed (mitigated or promoted) through the utilization of the "Stakeholder Concerns and Resolution Matrix" established by the organization. There was also no information of which</li> </ul>	Non- conformance



## Revision 0 (Aug 2017)

		stakeholders filled in the questionnaire. Thus, a non-conformity report was assigned due to this lapse.	
Criterio	1 4.4.2: Complaints and grievances		
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	There is procedure for Grievance & Complaints Handling Procedure Version control 1.00, revisions: 1.01 dared 26 August 2018 revised 08 may 2019 available and implemented.	Yes
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	According with the procedure as in 4.4.2.1, the timeframe to close the complaint is based on criticality table and will settled not more than 14 days. Based on the complaint form records, there were 7 from internal and 0 from external for LRE LRPOM. All the complaints were addressed in timely manner and acknowledged by the complainants.	Yes
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Grievances/complaint form available in office. Sighted the complaint record are related to housing repairs. Apart from that, there is also a request from smallholder to use estate road on 13.02.2019 (Rompin Mill) while in Padang Mill, the complaint is raised through the external stakeholder meeting.	Yes
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	There is a box called "Peti Cadangan dan Aduan" (suggestion and complaint box) placed at security post for stakeholder to lodge any complaint. There is also visitor book and grievances/complaint form available in office.	Yes
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.	Complaints are resolved and available since 2018.	Yes



	· · · ·		
	- Major compliance -		
Criterior	<b>4.4.3:</b> Commitment to contribute to local sustainable developm	nent	
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	Rompin Mill & Estate has contributed to the local community (i.e): Sports Day Fund to SK Muadzam Jaya for RM 200 on 28.02.2019 and Estate Football Field on 01.05.2019. In Padang Mill & Estate, the mill has contributed to SK Ladang Mutiara for PIBG and annual sports day 2019 for RM 200 on 19.02.2019, food aids on flood time for employees on Feb 2018.	Yes
Criterior	<b>4.4.4:</b> Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance -	Seong Thye Plantations Sdn Bhd had established and documented an occupational safety and health policy. The policy, in both English and Bahasa Malaysia, dated 02.01.2019 was signed by the Executive Chairman (Mr. Goh Wei Lei). In the policy it was stated "This safety and health policy is a commitment and shall guide all workers, contractors, third parties and stakeholders within the organization towards practices which shall achieve a safe and healthy work culture". The policy was displayed at notice boards, roll call areas, offices, clinics & line-sites and communicated to workers via safe briefings at muster and training and to stakeholders via stakeholder meetings. <u>Rompin POM</u> - Stakeholder meetings 16/4/2019	Yes

...making excellence a habit.<sup>™</sup>

## **MSPO Public Summary Report**

## Revision 0 (Aug 2017)

		<ul> <li>trainings – e.g. on 23/11/2018, training title: "Latihan Pengenalan Polisi Keselamatan dan Kesihatan Pekerjaan"</li> <li><u>Padang POM</u></li> <li>Internal Stakeholder meeting was conducted on 26/3/2019 whereas external stakeholder meeting was on 18/4/2019. Internal for workers &amp; contractors, external – surrounding estates, villages, schools &amp; suppliers.</li> <li>Communicated to workers on 15/5/2019 by mill supervisors – for 83 Mill Employees and 49 Estate employees – sighted attendance and training materials.</li> </ul>	
4.4.4.2	<ul> <li>The occupational safety and health plan should cover the following:</li> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risk of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul> <li>i. All employees involved are adequately trained on safe working practices;</li> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul> </li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997</li> </ul>	<ul> <li>a) The policy was exhibited at notice boards, roll call area, office, clinics &amp; line-sites and communicated to workers via safe briefings at muster and training and to stakeholders via stakeholder meetings. It was implemented and monitored via Occupational Safety and Health Plans.</li> <li>b) Rompin POM: HIRARC dated 19/2/2019 – covering all stations such as weighbridge, loading ramp, sterilizer, capstan, tresher, press station, depricarping, kernel plant, boiler and clarification room. Guideline used: "Garis Panduan bagi Pengenalpastian Hazard, Penaksiran Risiko dan Kaw alan Risiko (HIRARC), by DOSH, 2008, JKKP DP 127/788/4-47</li> <li>Padang POM: HIRARC dated 18/1/2019 – covering all stations such as weighbridge, loading ramp, sterilizer, capstan, thresher, press station, kernel plant, boiler, lab, confined space, workshop, roof repair/maintenance, electrical maintenance and oil conveyor station, depricarping, oil room, Effluent treatment plant. Engine room, etc. Guideline used: "Garis Panduan bagi</li> </ul>	Yes

## MSPO Public Summary Report

## Revision 0 (Aug 2017)

Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.	Pengenalpastian Hazard, Penaksiran Risiko dan Kawalan Risiko (HIRARC)", by DOSH, 2008, JKKP DP 127/788/4-47
f) The management shall appoint responsible person(s) for	Rompin Palm Oil Mill:
workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations	CHRA conducted on 31/7/2015.
and collective agreements. g) The management shall conduct regular two-way communication	Padang Palm Oil Mill: CHRA conducted together with Padang Estate on 26/6/2015.
with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept	Both the CHRA was conducted by Mr. Wong Tai Chen - JKKP IH 127/171-2(51) of Industrial Safety Management Services.
<ul><li>ant the concerns of employees and any remedial actions taken shall be recorded.</li><li>h) Accident and emergency procedures shall exist and instructions</li></ul>	c) Awareness and training programme which included safe working practices and on observation of precautions had been established on both Rompin & Padang POMs.
shall be clearly understood by all employees.	SOP addressed in Sin Thye Management Sdn Bhd's "Standard
<ul> <li>Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</li> </ul>	Operations Procedures for Palm Oil Mills", ver. 3.0, dated 2019 and addressed in "Manual Keselamatan & Kesihatan Pekerjaan" Chapter 9, 18,19 & 51.
j) Records shall be kept of all accidents and be reviewed periodically at guarterly intervals.	
- Major compliance -	d) Records showed that the management of both Rompin & Padang Estates had provided the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control, Hazard Identification, Risk Assessment and Risk Control (HIRARC) and CHRA.
	PPE issue books were verified.
	e) Seong Thye Plantations had established Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labelling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of

...making excellence a habit.<sup>™</sup>

## **MSPO Public Summary Report**



## MSPO Public Summary Report

## Revision 0 (Aug 2017)

On Rompin Estate/Mill the Committee consisted of Chairman (Estate Manager Cum Mill Engineer), Safety & Health Officer, Secretary (Lab Assistant), 7 Management and 7 Workers Representatives each.
On Padang POM the Committee consisted of Chairman (Mill Engineer) Vice Chairman (Asst Mill Engineer), Safety & Health Officer, Secretary, 4 Management and 15 Workers Representatives each.
Records from these OSH meetings were kept and the concerns of the employees and any remedial actions taken were recorded. Minutes of these meetings verified were held on:
Rompin Estate/Mill: 08.04.2019, 01.12.2018, 05.09.2018, 30.07.2018 and 24.02.2018.
Padang Palm Oil Mill: 15.02.2019, 26.12.2018, 12.09.2018, 28.06.2018 and 01.03.2018.
h) Seong Thye Plantations Sdn Bhd had established and documented common Emergency Response Plans (ERP)for both Estates and Mills.
Emergency situations that had been identified included:
<ul> <li>Major spillage Chemical, CPO, Fuel, lubricants</li> <li>Fire</li> <li>Accident</li> <li>Flood</li> <li>Explosion</li> <li>Effluent over flow/ bund breakage</li> </ul>

## **MSPO Public Summary Report** Revision 0 (Aug 2017)

<ul> <li>j) Records of all accidents had been kept by the Hospital Assistants and Safety ad health Supervisors. The accidents were recorded in the JKKP 6, 7 &amp; 8 as per OSHA format. JKKP 8 form submitted by both Estates/Mills to DOSH in January 2019 showed</li> </ul>	
•	



## Revision 0 (Aug 2017)

4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	The Social and Human Rights Policy is available in the office notice board signed by Mr. Goh Wei Lei, Executive Chairman dated 02.01.2019. It has mentioned that the company will not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.	Yes
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	All pay and condition are meet the Minimum Wage Order 2018. Sighted the worker's pay slip for month of April 2019, February 2019 and December 2018 as below: i. Worker ID: 02131 (Rompin Mill) ii. Worker ID: 02178 (Rompin Mill) iii. Worker ID: 02179 (Rompin Mill) iv. Worker ID: 02279 (Rompin Mill) v. Worker ID: 02253 (Rompin Mill) v. Worker ID: 02241 (Rompin Mill) vi. Worker ID: 02241 (Rompin Mill) vii. Passport ID: B5791427 (Padang Mill) viii. Passport ID: 09242679 (Padang Mill) ix. Local worker: Nurul Nadiah Bt Zainal (Padang Mill)	Yes
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	There are no contractor workers in Rompin Mill. However, in Padang Mill, there is 2 contractor workers hired. Sampled one of them, Emdadul Haque (Passport no: BK0938417) pay slip on April 2019, Feb 2019 and Dec 2018 are paid according to the Minimum wage order 2018.	Yes
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain	The overtime records in the punch card and there is monthly overtime report for each worker. The records of the worker details	Yes

...making excellence a habit."



## Revision 0 (Aug 2017)

	<ul> <li>full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</li> <li>- Major compliance -</li> </ul>	such as full name, gender and other information available in employee register kept in individual file and in the master list.	
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.	<ul> <li>The employment contract is available and signed by both employee and employer. Sampled of below worker's document: <ol> <li>Worker ID: 02131 (Rompin Mill)</li> <li>Worker ID: 02178 (Rompin Mill)</li> <li>Worker ID: 02179 (Rompin Mill)</li> <li>Worker ID: 02280 (Rompin Mill)</li> <li>Worker ID: 02253 (Rompin Mill)</li> <li>Worker ID: 02241 (Rompin Mill)</li> <li>Passport ID: B5791427 (Padang Mill)</li> <li>Passport ID: 09242679 (Padang Mill)</li> <li>Local worker: Nurul Nadiah Bt Zainal (Padang Mill)</li> </ol> </li> </ul>	Yes
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	Rompin Mill has established the working hours and overtime as per employment contract as below: Working days and working hours: 8 hours and 6 days per week Overtime: According to Malaysia Labour Law as follows: On normal days: salary X 1.5 On Sunday/rest days: salary X 2.0	Yes

## **MSPO Public Summary Report** Revision 0 (Aug 2017)

		On Public Holidays: salary X 3.0	
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. - Major compliance -	<ul> <li>The overtime given to the workers are within the legal standards which are not more than 104 hours/month.</li> <li>Sampled of below worker's document: <ol> <li>Worker ID: 02131 (Rompin Mill)</li> <li>Worker ID: 02178 (Rompin Mill)</li> <li>Worker ID: 02179 (Rompin Mill)</li> <li>Worker ID: 02280 (Rompin Mill)</li> <li>Worker ID: 02253 (Rompin Mill)</li> <li>Worker ID: 02241 (Rompin Mill)</li> <li>Worker ID: 02241 (Rompin Mill)</li> <li>Passport ID: B5791427 (Padang Mill)</li> <li>Passport ID: 09242679 (Padang Mill)</li> <li>Local worker: Nurul Nadiah Bt Zainal (Padang Mill)</li> </ol> </li> </ul>	Yes
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Wages and overtime was paid according to the Malaysian Labour Law and employment contract.	Yes
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. - Minor compliance -	Employer has provided the free accommodation, electricity and water supply, medical care in estate, transportation for worker's children to go to school.	Yes

## MSPO Public Summary Report Revision 0 (Aug 2017)

4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	The workers are provided with free housing and electricity and water supply. The line site inspection was provided by the Medical Assistant, Muhammad Fazrul Abdul Razak with VMO (Rompin Mill) and Hospital Assistant, Mr. Latchmanan with VMO (Padang Mill). The inspection was done on weekly basis. Both Rompin Mill and Padang Mill also has conducted the water analysis for drinking water on 04.04.2019 (date sampled for Rompin Mill) and on 04.08.2019 (date sampled for Padang Mill & Estate). Result showed that the total coliforms and e-coli is <1 MPN/100mL which is accordance with WHO 2017 and absent. Both Rompin Mill and Padang Mill also has conducted the water analysis for drinking water on 04.08.2019 (date sampled for Rompin Mill) and on 04.08.2019 (date sampled for Rompin Mill and Padang Mill also has conducted the water analysis for drinking water on 04.04.2019 (date sampled for Rompin Mill and Padang Mill also has conducted the water analysis for drinking water on 04.04.2019 (date sampled for Rompin Mill and Padang Mill also has conducted the water analysis for drinking water on 04.04.2019 (date sampled for Rompin Mill) and on 04.08.2019 (date sampled for Padang Mill & Estate). Result showed that the total coliforms and e-coli is <1 MPN/100mL which is accordance with WHO 2017 and absent. The treated water is used to supply the labour quarters.	Yes
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Seong Thye Plantations Sdn Bhd has the Social and Human rights Policy, signed by Executive Chairman on 02.01.2019 which mention that they will provide workplace free of violence and sexual harassment whether directly or indirectly against all employees and stakeholders.	Yes
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right	There is no restriction of worker to form any trade union or workers committee but none of them join any union.	Yes



	should not be discriminated against or suffer repercussions. - Major compliance -		
4.4.5.14		Seong Thye Plantations Sdn Bhd has the Social and Human Rights Policy, signed by Executive Chairman on 02.01.2019 which mention that management will prohibit employment by coercion. Children and young persons shall not be employed or exploited, the minimum age shall comply with local, state and national legislation. However, based on the employee database record, it was found that the following person was recruited at Ladang Padang Palm Oil	Non- conformity
		Mill (LPPOM): i) Siti Zulaifah, date of birth: 19/5/2000, date of join: 1/3/2018	
		Thus, a non-conformity report was assigned due to this lapse.	
Criterio	n 4.4.6: Training and competency		
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	The management of both Estates had planned, established and documented trainings which were to be carried out internally throughout the year 2019. The training was all employees, contractors and their employees. The trainings were on Safety and on SOP like Vehicle maintenance, SOP by Stations, Tool Box, Working at Heights, working in Confined Space, Chemical handing, etc.	Yes
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.	Training identification was done through Training Needs Analysis (TNA) form. From the results of the evaluation, training programs were generated.	Yes
	- Major compliance -		

	•
DS	51.

## Revision 0 (Aug 2017)

	-	-	
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. - Minor compliance -	On both Mills continuous training programme had been planned to ensure that all employees were well trained in their job function and responsibility. Training matrix for 2019 were sighted. Some of the records on the latest trainings verified were: Rompin Estate & Mill:	Yes
		Riding Motor Bike – on 22.01.2019 for 17 employees	
		Chemical handling - on 24.01.2019 for 13 employees Tractor Driving - on 14.02.2019 for 21 employees	
		On Policies - on 20.03.2019 for 209 employees	
		Fire Drill – on 25.95.2019 for 105 employees.	
		Padang POM:	
		Tractor Driving - on 15.03.2019 for 1 employee	
		On Policies - on 26.03, 18.04 & 15.05.2019 for 89 employees	
		Capstan & Thresher on 15.01.2019 for 2 employees	
		Sterilizer on 21.02.2019 for 2 employees.	
		Loading Ramp on 15.05.2019 for 3 employees.	
4.5 Prin	ciple 5: Environment, natural resources, biodiversity and	d ecosystem services	
Criterio	n 4.5.1: Environmental Management Plan		
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be	Seong Thye Plantations Sdn Bhd had established and documented an Environmental Policy dated 02.10.2019 signed by Executive Chairman (Mr. Goh Wei Lei). The policy was available both English	Yes
	n	naking excellence a habit. <sup>™</sup>	

...making excellence a habit.

## MSPO Public Summary Report

## Revision 0 (Aug 2017)

	established, effectively communicated and implemented Major compliance -	and Bahasa Malaysia. The policy ensures commitment to comply with legal requirements, pollution reduction and continuous improvement. Communications to the employees were through training sessions and briefings at muster grounds. The latest trainings in relation to environment were conducted on 01.04.2019 for 209 participants (Rompin Estate/Mill) and on 26.03, 18.04 & 15.05.2019 for 89 participants (Padang Estate/Mill). It was also communicated to internal and external stakeholders via	
4.5.1.2	The environmental management plan shall cover the following:	<ul> <li>Stakeholder meetings 16/4/2019</li> <li>displayed at notice boards, roll call area, office, clinic &amp; line-site</li> <li>quarterly JKKP meetings</li> <li>Rompin Palm Oil Mill had established its environmental aspects/impacts register associated with their activities. The</li> </ul>	Non-
	<ul> <li>a) An environmental policy and objectives;</li> <li>b) The aspects and impacts analysis of all operations</li> <li>- Major compliance -</li> </ul>	<ul> <li>aspects and impacts evaluation were guided by "MSPO Procedure: Environmental Management Plan (EMP)", rev. 0, dated 2/1/2019. The procedure used to do the EAI Assessment.</li> <li>It had environmental Aspect, Env. Impact, Scoring, Mitigation measure and Monitoring Program. The environmental aspect and impact (EAI) covered mill operations, all activities from FFB Handling, Sterilization, Threshing, Effluent Treatment, Power generation, etc.</li> </ul>	conformance
		However, on Padang Palm Oil Mill the aspects and impacts analysis did not indicate which operation it was for. EAI Assessment did not have which operation was assessed. The plan only had environmental Aspect, Env. Impact, Scoring, Mitigation measure and Monitoring Program. Thus, a non-conformity report was assigned due to this lapse.	



## Revision 0 (Aug 2017)

4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	<ul> <li>Both Mills have implemented its environmental action plans, which was developed to mitigate negative impacts and improve positive impacts. The plans specify the responsible persons. Among the related plans were: <ul> <li>"Environmental Improvement Plan / Pollution Prevention Plan, FY 2019",</li> <li>"Waste Management Action Plan 2019".</li> </ul> </li> <li>The plans generally included the control and monitoring of wastes, including scheduled wastes and domestic wastes.</li> </ul>	Yes
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - <b>Minor compliance</b> -	Programmes to promote positive impacts had been included in the continual improvement plan of both Mills.	Yes
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	Communications to the employees were through training sessions and briefings at muster grounds. The latest trainings in relation to environment were conducted on 01.04.2019 for 209 participants (Rompin Estate/Mill) and on 26.03, 18.04 & 15.05.2019 for 89 participants (Padang Estate/Mill) It was also disseminated to internal and stakeholders via - Stakeholder meetings 16/4/2019	Yes
4.5.1.6	The management shall organize regular meetings with workers	<ul> <li>displayed at notice boards, roll call area, office, clinic &amp; line-site</li> <li>quarterly JKKP meetings</li> <li>Both Mills had conducted regular meetings with employees where</li> </ul>	Yes
	where concerns of workers about the environmental quality are discussed Major compliance -	their concerns about environmental quality was discussed. On both Mills, the OSH committee was responsible for Environmental Quality. The meetings were held along with the quarterly OSH committee meetings. Minutes of the latest meeting verified was held on 08.04.2019 (Rompin Estate/Mill) and on 15.02.2019 (Padang POM).	

...making excellence a habit."

4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period	Consumption of non-renewable energy, Diesel, Petrol & Electricity, was monitored by both Estates. Records of diesel, petrol and electricity utilized were maintained and monitored. The consumption figures recorded were in combination with that of the mills. Consumption by contractors e.g. Teo Tuan Kwee Sdn Bhd (CPO Transporter), Kilang Minyak Sri Kembangan (CPO				
	- Major compliance -	Transporter) w On Rompin Es being collated average consu future. Padang Estat consumption b established wa Records of cor Rompin Estate	vere also inclustate/Mill, as I no baseline Imption for 20 te/Mill had based on the as 2.16 litres/ hsumption (Li	uded. this is an in a values had 019 will be us established 2018 data. Fo ton FFB.	itial year who been estat sed as the ba a baseline or 2019, the b	ere data was blished. The seline for the for Diesel baseline value
		-	Jan	Feb	Mar	Apr
		Total Diesel Total FFB	23,463	19,442	20,959	19,998
		Litres/Ton	8,837 2.66	<u>11,002.76</u> 1.77	8,896.43 2.36	9,140.94 2.19
		Padang Estate	/Mill			
			Jan	Feb	Mar	Apr
		Total Diesel	13,759.20	9,172.80	11,466.00	11,466.00
		Total FFB	14,338.42	12,281.54	12,194.95	11.589.95
		Litres/Ton	0.96	0.75	0.94	1.0
		Total Petrol	387.00	258.00	322.50	322.50
		Litres/Ton	0.03	0.02	0.03	0.03

## **MSPO Public Summary Report**

## Revision 0 (Aug 2017)

4.5.2.2	The oil palm premises shall estimate the direct usage of non- renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and	Consumption of non-renewable energy, Diesel, Petrol & Electricity, was monitored by both Estates/Mills. On Rompin Estate/Mill, as this is an initial year where data was		ata was	Yes
	machinery operations.		ne values had been established 2019 will be used as the baseline		
	- Major compliance -	future.			
			l established a baseline for e 2018 data. For 2019, the baselin s/ton FFB.		
		• •	ors e.g. Teo Tuan Kwee Sdn Bł yak Sri Kembangan (CPO Tran	•	
4.5.2.3	The use of renewable energy should be applied where possible.	On Both Mills Fibre (from mesocarp & shredded EFB) & shell was used as boiler fuel to reduce diesel usage.		hell was	Yes
			o-gas plant is under construct sioned in October 2019 – to g boiler operation.		
Criterio	n 4.5.3: Waste management and disposal				
4.5.3.1	All waste products and sources of pollution shall be identified and documented Major compliance -	Guided by MSPO Procedure: Waste Management – wastes products and source of generation were listed in "List of Waste Identified" covering both mill and estate. Identification normally done using EAI evaluation. Listed in the "List of Wastes" as at 1/1/2019:			
		Waste	Source		
		Food Waste	Workers/Staff Quarters		

...making excellence a habit."

## PF824 **MSPO Public Summary Report** Revision 0 (Aug 2017)

		Plastic	Workers/Staff Quarters		
		Paper	Workers/Staff Quarters/Office		
		Scrap Iron	Workshops		
		Effluent	Mills		
		Decanter Cake	Mills		
		EFB	Mills		
		Fibre	Mills		
		Palm Shell	Mills		
		SW 305 (Spent Lubricants)	Workshops		
		SW 306 (Spent hydraulic Oil)	Workshops		
		SW 409 (Empty Chemical Containers)	Spraying		
		SW 410 (Oil Filter, Rags)	Workshops		
4.5.3.2	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:	pollution was addressed	n management plan to avoid or in the "Waste Management Plan Ye (non-scheduled wastes)" and S	ear 2019	Yes
	a) Identifying and monitoring sources of waste and pollution.	Waste, Industrial and So	lid Waste.		
	b) Improving the efficiency and recycling potential of mill by- products by converting them into value-added products.	Domestic waste was co quarters and disposed at	bllected weekly from staff and landfills.	workers	
	- Major compliance -		products Palm Shell and Palm Fit EFB was used for Mulching Oil Pa		

## MSPO Public Summary Report Revision 0 (Aug 2017)

		On Rompin Mill affluent is discharged to waterways (Sg Petoh). On Padang Mill the Effluent was used for Land application (furrow method) over 30 Acres in Blk TK2. Records showed that the following quantity of Effluent had been applied in 2019 – January 15,344 m3, February 8,713 m3 and in March 10,401 m3. Scheduled wastes observed labelled with relevant information and hazard sign, and disposed to valid licensed party.	
4.5.3.3	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005 - <b>Major compliance -</b>	Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal had been addressed in the Procedure <i>Stor Penyimpanan Barang Terjadual</i> and in "Waste Management Plan Year 2019. Records showed that Schedule Waste, SW 305, Sw409 & SW410 were disposed to the licensed company OLST Petro Chemical Sdn Bhd on 22.03.2019.	Yes
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse Minor compliance -	Domestic waste was collected weekly from staff and workers quarters and disposed at landfills. The landfills were in Block K4 (Rompin Estate/Mill and at Block K3 (Padang Estate/Mill).	Yes
Criterior	<b>14.5.4:</b> Reduction of pollution and emission		
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	An assessment of all polluting activities has been conducted through environmental impact assessment. These assessment has also included greenhouse gas emissions, scheduled wastes and solid wastes.	Yes



## Revision 0 (Aug 2017)

4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The "Environmental Aspect & Impact Assessment Identification" had included plans to reduce identified significant pollutants and emissions.	Yes
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations. - <b>Major compliance</b> -	In both Mills effluent produced is treated biologically in anaerobic and aerobic retention ponds before being discharged as required by law. It was discharged as per the <i>Jadual Pematuhan</i> at BOD limit of 100 ppm. Weekly monitoring of BOD levels was carried with quarterly reporting to DOE. On Rompin Mill affluent is discharged to waterways (Sg Petoh). On Padang Mill the Effluent was used for Land application (furrow method) over 30 Acres in Blk TK2. Records showed that the following quantity of Effluent had been applied in 2019 – January 15,344 m3, February 8,713 m3 and in March 10,401 m3.	Yes
Criterio	4.5.5: Natural water resources		
4.5.5.1	<ul> <li>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</li> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> </ul>	<ul> <li>A water management plan to maintain the quality and availability of natural water resources had been addressed in Water Management Plan for Estate &amp; Mill. Among the plans:</li> <li>a) Recording of water usage – however consumption can be further improved by taking consideration of the previous year's actual consumption</li> <li>b) Monitoring through Geylang River water quality – 1 sampling</li> </ul>	Yes
	<ul> <li>c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application,</li> </ul>	point (outlet) – guided by Water Quality Assessment Report [MSPO-P5-3] – parameters: AN, BOD, COD, DO, pH, TSS & WQI	



## Revision 0 (Aug 2017)

4.5.5.2	<ul> <li>maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> <li>Major compliance -</li> <li>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</li> <li>Major compliance -</li> </ul>	<ul> <li>c) To optimize water &amp; nutrient usage – repair broken pipes, educate workers, etc.</li> <li>On Rompin Mill affluent is discharged in compliance with the law as stated in <i>Jadual Pematuhan</i> at BOD limit of 100 ppm to waterways (Sg Petoh).</li> <li>On Padang Mill the Effluent was not discharged into water courses but was used for Land application (furrow method) over 30 Acres in Blk TK2.</li> </ul>	Yes
4.6 Prin	ciple 6: Best Practices		
Criterio	n 4.6.1: Mill Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Seong Thye Plantations Sdn Bhd had established and documented the Standard Operations Procedures for Palm Oil Mills, ver. 3.0, dated 2019. The Sections covered were: i) Mill Processing Operations. ii) Operations of Process Machinery & Equipment iii) Mill Maintenance & Upkeeping iv) Chemicals Safety Section A covered 7 Chapters – From Starting of milling process to Oil/Kernel extraction losses & control limits. Section B covered 15 chapters: - Reception - FFB handling - Sterilization	Yes

...making excellence a habit.<sup>™</sup>

## MSPO Public Summary Report Revision 0 (Aug 2017)

4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	<ul> <li>Threshing Station</li> <li>Pressing station</li> <li>Oil clarification</li> <li>Depericarping</li> <li>Kernel station</li> <li>Power generation</li> <li>Boiler station</li> <li>WTP</li> <li>Oil recovery</li> <li>ETP</li> <li>workshop</li> <li>Products storage &amp; dispatch</li> </ul> Section C covered 6 chapters – From Mill maintenance practice to Work – Height work procedures. Section D dealt with Scheduled Waste Management. The SOPs were consistently implemented and monitored via monthly progress & production reports, report accounts and by visits by Chief Operating Officer & Chief Engineer. Both Rompin Palm Oil Mill and Padang Oil Palm Mill had implemented best practices as per SOPs.	Yes
Criterion	<b>4.6.2:</b> Economic and financial viability plan		
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.	Documented Business plan/budget were available on both Mills for 2019 and projections until 2024. The documented business plan/budget included capital expenditure (CAPEX) and revenue expenditure. Attention was given to crop projection, cost of production, cost per ton and per hectare. The cost of production	Yes

...making excellence a habit."



## Revision 0 (Aug 2017)

	- Major compliance -	was reviewed and compared against expenditure each year with projections in place for future years.	
Criterio	1 4.6.3: Transparent and fair price dealing		
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented Major compliance -	The monthly prices of Palm Oil Products traded in monthly (RM/tonne) is available and in accordance with MPOB. Sighted for April 2019, the price of FFB sold is following the MPOB monthly OER and KER price.	Yes
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Rompin Mill & Padang Mill received the FFB from outside crop. Verified the FFB Purchase offer letter to Nilam Livestock Sdn Bhd, dated 25 January 2019 where the OER and KER are flexible and subject to grading and the credit note no: FFB/689 dated 30.04.2019.	Yes
		In Padang Mill, the sampled the Hup Aik Oil Palm Sdn Bhd Offer to Purchase FFB dated 01.01.2019 – 31.12.2019 and cash payment voucher No Dr: 11/5 dated 03.05.2019.	
Criterio	<b>1 4.6.4:</b> Contractor		
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.	There is one contractor in Rompin Mill which is transporter, Teo Tuan Kwee Sdn Bhd. Rompin mill has conducted the meeting with contractor on the safety and MSPO requirement on 11.04.2019.	Yes
	- Major compliance -	In Padang Mill, sampled the contractor's agreement: MHE-Demag Logistics Malaysia Sdn Bhd, Doc No: 16943943 dated 16.03.2018 for machine service.	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor.	The agreement between Teo Tuan Kwee Sdn Bhd and Rompin Mill is available signed on 01.01.2019 for one year.	Yes



## Revision 0 (Aug 2017)

	- Major compliance -	In Padang Mill, the agreement signed by both parties on 16.03.2018.	
4.6.4.3	assessments through a physical inspection, if required.	There is no objection by the management to accept MSPO approved auditors to verify the assessments through a physical inspection, if required.	Yes

### 4.0 Assessment Conclusion and Recommendation:

Acknowledgement of Internal Responsibil	ity and Formal Sign-off of Assessment Findings
	Thye Plantations Sdn Bhd Certification Units comply with the aded that the certification of Seong Thye Plantations Sdn Bho
Acknowledgement of Assessment Findings	Report Prepared by
Name:	Name: Valence Shem
Company name: Ng Yeen Chern Chief Operating Officer SEONG THYE PLANTATIONS SDN. BHD	Company name: BSI Services Malaysia Sdn Bhd
Title:	Title: Lead Auditor
Mad	Hotay .
Date: 20/06/2019	Date: 19/6/2019

## **MSPO Public Summary Report** Revision 0 (Aug 2017)

### Appendix A: Assessment Plan

Date	Time	Subjects	STK	VSH
	0845-0900	<ul> <li>Opening meeting:</li> <li>Opening presentation by audit team leader</li> <li>Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation)</li> </ul>	✓	~
	0900-1200	<b>Ladang Rompin POM</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.	$\checkmark$	V
Tuesday 28/5/2019	1000-1200	<b>Stakeholder consultations:</b> Consultation with stakeholders such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.		~
	1200-1300	Lunch break		
	1300-1630	<b>Ladang Rompin POM</b> Document Review P1 – P6 (MSPO Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	~
	1630-1700	Interim closing briefing	$\checkmark$	~
	0900-1200	<b>Ladang Rompin 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, Scheduled wastes management, worker housing, clinic, Landfill, , etc.	✓	V
	1200-1300	Lunch break		
Wednesday 29/5/2019	1300-1600	Ladang Rompin Estate Document review P1 – P7 (MSPO Part 3): 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.	✓	~
	1600-1630	Audit team discussion & preparation for closing meeting	$\checkmark$	✓
	1630-1700	Closing meeting	$\checkmark$	~
	1700	Auditors travel to Kahang (Hotel 128)	$\checkmark$	~
	0845-0900	<ul> <li>Opening meeting:</li> <li>Opening presentation by audit team leader</li> <li>Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation)</li> </ul>	√	V
Thursday 30/5/2019	0900-1200	<b>Ladang Padang POM</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.	$\checkmark$	~
	1000-1200	Stakeholder consultations:		~

## MSPO Public Summary Report Revision 0 (Aug 2017)

		Consultation with stakeholders such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.		
	1200-1300	Lunch break		
	1300-1630	<b>Ladang Padang POM</b> Document Review P1 – P6 (MSPO Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	~
	1630-1700	Interim closing briefing	$\checkmark$	✓
	0900-1200	Ladang Padang Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, , etc.	✓	✓
	1200-1300	Lunch break		
Friday 31/5/2019	1300-1600	Ladang Padang Estate Document review P1 – P7 (MSPO Part 3): 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.	√	✓
	1600-1630	Audit team discussion & preparation for closing meeting	$\checkmark$	~
	1630-1700	Closing meeting	$\checkmark$	~

### **Appendix B: List of Stakeholders Contacted**

List of Stakeholders Contacted		
Internal Stakeholders	Union/Contractors/Local Communities	
Managers and Assistants Mill & Estate Male Mill Staff/ Workers Female Mill Staff/Workers Foreign Workers Male and Female Estate workers Workers Representatives Gender Committee	Contractors Neighbouring estates Surrounding village	
Government Departments	NGO	
Nil	Nil	



### **Appendix C: Smallholder Member Details**

N/A



### Appendix D: Location Maps of Palm Oil Mills and Supply bases

### Ladang Rompin



## MSPO Public Summary Report Revision 0 (Aug 2017)



### Gayung Division (Ladang Rompin)

...making excellence a habit." Page 107 of 111



### Ladang Rompin POM



...making excellence a habit.<sup>™</sup> Page 108 of 111



Ladang Padang





### Ladang Padang POM



...making excellence a habit." Page 110 of 111

## PF824 MSPO Public Summary Report Revision 0 (Aug 2017)

### **Appendix E: List of Abbreviations**

AN BOD CHRA CPO DOSH	Ammoniacal Nitrogen Biological Oxygen Demand Chemical Health Risk Assessment Crude Palm Oil Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
GMP	Good Manufacturing Practice
HCV IAV	High Conservation Value Initial Assessment Visit
IPM	Integrated Pest Management
ISCC	Integrated rest Management International Sustainable Carbon Certification
LPE	Ladang Padang estate
LPPOM	Ladang Padang Palm Oil Mill
LRE	Ladang Rompin estate
LRPOM	Ladang Rompin Palm Oil Mill
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
O&G	Oil and Grease
РК	Palm Kernel
PPE	Personal Protective Equipment
PSQM	Plantation Sustainability and Quality Management
PQR	Performance Quality Rating
RC	Re-Certification
RED	Renewable Energy Directive
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SOU	Strategic Operating Unit
SS TN	Suspended Solids
TS	Total Nitrogen Total Solids
VFA	Volatile Fatty Acids
VI A	Volatile Fatty Aclus