

MALAYSIAN SUSTAINABLE PALM OIL
– INITIAL ASSESSMENT
Public Summary Report

TDM Plantation Sdn Bhd
Head Office: Level 3, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu Terengganu, Malaysia
Certification Unit: Sungai Tong Palm Oil Mill & Plantations including Jaya Estate, Fikri Estate, Tayor Estate, Pelung Estate, Jerangau Estate and Pinang Emas Estate Location of Certification Unit: Lot 7663, Batu 23, Jalan Kuala Terengganu – Kota Bharu 25100 Setiu, Terengganu, Malaysia

Report prepared by:
Mohd Hafiz B. Mat Hussain (Lead Auditor)

Report Number: 8846346

Assessment Conducted by:
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
MPOB License	Sungai Tong Palm Oil Mill : 500042704000 Jaya Estate : 5014497502000 Fikri Estate : 503379102000 Tayor Estate : 501496702000 Pelung Estate : 502826702000 Jerangau Estate : 502250102000 Pinang Emas Estate : 502606002000		
Company Name	TDM Plantation Sdn Bhd		
Address	Head Office: Level 3, Bangunan UMNO Terengganu, Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Terengganu, Malaysia Certification unit: Lot 7663, Batu 23, Jalan Kuala Terengganu – Kota Bharu 25100 Setiu, Terengganu, Malaysia		
Group name if applicable:	N/A		
Subsidiary of (if applicable)	N/A		
Contact Person Name	Tn Hj Hassan Bin Osman		
Website	www.tdmberhad.com.my	E-mail	Hassan.tdmp@tdmberhad.com.my
Telephone	09 – 620 4802 (Head Office) 09 – 824 7299 (Mill)	Facsimile	09 – 620 4803 (Head Office) 09 – 824 7298 (Mill)

1.2 Certification Information			
Certificate Number	Mill: MSPO 678754 Plantations: MSPO 686825		
Issue Date	27/12/2017	Expiry date	26/12/2022
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Stage 1 Date	N/A (The certification unit is RSPO certified)		
Stage 2 / Initial Assessment Visit Date (IAV)	24-25/09/2017		
Continuous Assessment Visit Date (CAV) 1	N/A		
Continuous Assessment Visit Date (CAV) 2	N/A		
Continuous Assessment Visit Date (CAV) 3	N/A		
Continuous Assessment Visit Date (CAV) 4	N/A		
Other Certifications			

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Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 595564	RSPO	BSI Services (M) Sdn Bhd	26/12/2018

1.3 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Longitude	Latitude
Sungai Tong Palm Oil Mill	Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu, Terengganu, Malaysia.	102° 54' 37.80"	5° 18' 29.88"
Jaya Estate	Ladang Jaya, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu, Terengganu, Malaysia.	102° 53' 2.40"	5° 23' 46.32"
Fikri Estate	Ladang Fikri, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu, Terengganu, Malaysia.	102° 53' 2.40"	5° 23' 46.32"
Tayor Estate	Ladang Tayor, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu, Terengganu, Malaysia.	102° 53' 25.80"	5° 15' 57.60"
Pelung Estate	Ladang Pelung, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu, Terengganu, Malaysia.	102° 49' 59.52"	5° 16' 55.56"
Jerangau Estate	Ladang Jerangau, Jalan Jerangau, 21810 Ajil, Hulu Terengganu, Terengganu, Malaysia.	103° 9' 46.79"	4° 57' 39.6"
Pinang Emas Estate	Ladang Pinang Emas, Bukit Besi, 23000 Dungun, Terengganu, Malaysia.	103° 7' 48.36"	4° 27' 39.60"

1.4 Plantings & Cycle

Estate	Age (Years) - ha				
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
Jaya Estate	-	-	2999.48	366.02	-
Fikri Estate	-	82.36	2113.00	985.83	17.66
Tayor Estate	-	35.50	1228.09	639.89	239.93
Pelung Estate	222.26	-	304.54	934.27	
Jerangau Estate	-	479.61	59.72	897.24	-
Pinang Emas Estate	705.52	92.86	1109.97	950.56	-

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1.5 FFB Production (Actual) and Projected (tonnage)			
Estate	Estimated (Previous Year)	Actual (This Year)	Forecast (Next Year)
Jaya Estate	76,200.00	71,085.57	76,800.00
Fikri Estate	54,800.00	42,135.73	63,400.00
Tayor Estate	46,800.00	40,389.92	40,950.00
Pelung Estate	24,260.00	10,281.78	12,000.00
Jerangau Estate	26,800.00	19,635.97	28,300.00
Pinang Emas Estate	44,970.00	41,480.68	40,670.00

1.6 Certified CPO / PK Tonnage						
Mill	Estimated (Previous Year) *		Actual (This Year) *		Forecast (Next Year)	
	CPO	PK	CPO	PK	CPO	PK
Sungai Tong Palm Oil Mill	53,692.00	14,076.00	38,008.99	9,731.52	55,458.00	14,465.00

Remark:

* The non-certified CPO and PK

1.7 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the Initial Certification Assessment of TDM Plantation Sdn Bhd – Sungai Tong Palm Oil Mill & estates located in Setiu, Terengganu, Malaysia comprising 6 estates, 1 palm oil mill and infrastructure. Sungai Tong POM is receiving crop from own supply bases.

The assessment was conducted onsite to assess the compliance of the certification unit against the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills and MSPO Guidance.

The onsite assessment was conducted on 24-25/09/2017

Based on the assessment result, TDM Plantation Sdn Bhd – Sg Tong Palm Oil & estates complies with the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills, MSPO Guidance and recommended for certification.

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 24-25/09/2017. The audit programme is included as Appendix A. The approach to the audit was to treat the mill or plantations as a 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. Prior to audit conducted, public consultation was made on 21/8/2017-23/9/2017; refer <https://www.bsigroup.com/en-MY/RSPO-MSPO-Certification/MSPO-clients-and-reports1/>.

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 and 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.

The estates or smallholders sample were determined based on formula $N = 1.0\sqrt{y}$ where y 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 $(1.0\sqrt{y}) \times (z)$; where 1.0 is the risk factor (may defers to 1.2 and 1.4 depending on risk), where y is total number of group members and where z is the multiplier defined by the risk assessment. 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.

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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 Reviewer 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)
Sungai Tong Palm Oil Mill	√	√	√	√	√
Jaya Estate	√		√		√
Fikri Estate	√		√		√
Tayor Estate	√		√		√
Pelung Estate		√		√	
Jerangau Estate		√		√	
Pinang Emas Estate		√		√	

Tentative Date of Next Visit: November 5, 2018 - November 7, 2018

Total No. of Mandays: 6

BSI Assessment Team:

Mohd Hafiz Mat Hussain – Lead Auditor

He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2014 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since May 2013 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation.

Mohamed Hidhir Zainal Abidin – Team Member

He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO

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auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.

Hu Ning Shing – Team Member

She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSP0 and RSPO in his previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages.

Section 3: Assessment Findings

3.1 Details of audit results

This assessment has been 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 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 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	The company has initiated the implementations of MSPO requirements. MSPO Policy has been established and signed by CEO of TDM Plantation Sdn Bhd dated 1/8/2017.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement.	The established policy has emphasized on the commitment to continual Improvement with the objective of improving the milling and estate operation.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
Criterion 4.1.2 – 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 -	Internal audit was conducted on September 2017 for all supply bases. Audit covered both documentation and field operation for the estate. However, the internal audit report was not available to review by BSI auditor. Thus, Major NC was raised.	Major nonconformance
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. - Major compliance -	Internal audit procedure was established accordingly. However, the latest internal audit report was not available to verify during this assessment. Refer to indicator 4.1.2.1	Major nonconformance
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Internal audit report was not available for management review. Refer to indicator 4.1.2.1	Major nonconformance
Criterion 4.1.3 – 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. - Major compliance -	Management Review procedure was established accordingly. However, the MRM minute was not available to verify during this assessment. Thus, Major NC was raised.	Major nonconformance

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 -	Sample of Continual Improvement for 2017 at all estate visited: i. workers quarters ii. P15 press iii. Scissor Lift iv. Motor sprader	Complied
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 -	The management has plan to implement mechanical spreader for manuring activity.	Complied
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 -	The management has plan to implement mechanical spreader for manuring activity.	Complied
4.2 Principle 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. - Major compliance -	All estate visited has maintained records of request and response, land titles, OSH plans and etc relating to environmental and social issues, plans for pollution prevention, complaints and grievances records that make available upon request.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>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.</p> <p>- Major compliance -</p>	<p>There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. Access to these documents is made available upon request. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available at notice boards. The company is in the progress to make available the documents on the company's website in the future.</p> <p>Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> • Good Agricultural Practices • Social Enhancement • Sustainability Management Programmes • Complaint and Grievances procedure. • Environmental Conservation <p>These documents highlight current TDM Plantations Sdn Bhd practices and their continual improvement plans. Besides the above document TDM Plantations Sdn Bhd policy on the followings are also available:</p> <ol style="list-style-type: none"> 1) Social 2) Quality 3) Freedom of Association 4) Occupational Safety, Health and Environment 5) Environment & Biodiversity 6) Protection of Children 7) Gender 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	TDM Plantation Sdn Bhd has developed a Communication Procedure with POM/ Estates and Flowchart to Handle Social Issue. Maximum 28 working days shall be taken to resolve the issues. All internal and external stakeholders were briefed on this procedure.	Complied
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	Manager of the Estates and Mill was appointed as officer responsible to handle any internal or external issues from stakeholders. The appointment letter dated 2/9/2014 (Sg Tong Mill and Fikri Estate) and 18/9/2017 (Tayor Estate) issued by Human Resource Department, Head Office was sighted.	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	Stakeholder list was developed where all the affected stakeholders were included into the list such as government authorities, local communities, contractors and supplier, neighbouring schools and etc for the sampled 3 estates. Stakeholder meeting was conducted on 27/7/2017 for the whole Sg. Tong Complex with the participation of internal and external stakeholders. Seen the meeting minutes and attendance list. No issue was raised during the meeting. Only questions and requests were raised and immediate replies from the management during the meeting. Seen the records of communication from the stakeholders. For eg: <ul style="list-style-type: none"> a. Headmaster from SK Fikri requested the estate to cut down the trees at the entrance to enter school which 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>might cause accident to teachers and students. The management has taken action to cut down the tress and seen the photo evident.</p> <p>b. SK Kg. Bukit Ulu Nerus has requested donation from the management for event on 19/1/2017. The management has approved and donated for the event. Seen the payment voucher for the donation.</p> <p>c. SK Kampong Tayor has requested for transport to send the students for sport activity on 17/5/2017. The management has approved and provided van to the school.</p> <p>Besides, interviewed with the stakeholders confirmed that the management has responded to all the requests from them and provided assistance whenever requested.</p>	
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	SOP on the traceability of the FFB has established and describe in the TDM Plantation Sdn Bhd-Standard Operating Procedure dated 21/8/2017. Assisstant Manager was responsible and the records were kept by harvesting supervisors.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Estate supervisor will verify the records related to the traceability of FFB. Sighted the harvesting record for the month of September 2017 for all estate.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system.	All the field and harvesting supervisors were responsible on the traceability.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Records of transportation of FFB to the mill were made available at estate. Sighted FFB despatch chit for the month of September 2017 for all estates.	Complied
4.3 Principle 3: Compliance to legal requirements			
Criterion 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 -	All estate has maintained the systems for documentation, checking and assessment of legal compliance with applicable laws and regulations. Inspection of records showed that the all estate has maintained legal compliance with statutory requirements.	Complied
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	Documented procedure has been established and implemented, TDM/STPOM/01 Revision STPOM-01/2012 dated 1/5/2012, the procedure for Legal and Other Requirements. List of applicable legal and other requirements was made available during the assessment.	Complied
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 -	Documented procedure has been established and implemented, TDM/STPOM/01 Revision STPOM-01/2012 dated 1/5/2012, the procedure for Legal and Other Requirements. List of applicable legal and other requirements was made available during the assessment and was update accordingly. The LORR was include: 1. OSHA 1994 2. OSH (NADOPOD) Regulations 2004	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		3. OSH (SHC) Regulations 1996 4. OSH (CLASS) Regulation 2014 5. OSH (SHO) Regulations 1997 6. OSH (USECHH) Regulations 2000 7. FMA 1967 8. FM (Fencing of Machinery and Safety) Reg 1970 9. FM (Notification, Certification of Fitness and inspection) Regulation 2004 10. FM(Person In Charge) Regulations 2014 11. FM (Noise Exposure) Reg 1989 12. FM (Steam Boiler and unfired pressure vessel) Regulation 13. Electrical Supply Act 1990 14. Fire Services Act 1988 15. Fire Services (Fire Certificate)Regulation 2001 16. EQA 1974 17. EQ (Sewage and Industrial Effluent) Regulations 1979 18. EQ (Clean Air) Regulations 2014 19. EQ (Scheduled Waste) Regulations 2005 20. Code of practice for safe working in a confined space, 2001 21. Akta Kerja 1955	
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	A system for tracking changes as per documented procedure has been implemented at all respective operating units. Group Legal Department, Plantation Coordinator and Plantation Advisor will notify new requirements if there are any changes of law as to date.	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm cultivation	The company has initiated the implementations of MSPO requirements. MSPO Policy has been established and signed by	Complied

Criterion / Indicator		Assessment Findings	Compliance
	activities do not diminish the land use rights of other users. - Major compliance -	Assistant General Manager dated January 2016. All the land title was sighted and it clearly stated for agricultural.	
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. - Major compliance -	<p>A) Ladang Fikri Luas hektar- 3,550.25Ha Total Title= 20 title</p> <ol style="list-style-type: none"> Grant Title: 6521 (Lot 7663) – 58.7685 Ha, Lease 99 years till 2071 Grant Title: 6003 (Lot 7251) – 536.0939 Ha, Lease 99 years till 2071 Grant Title: 13085 (Lot 8169) – 143.3369 Ha, Lease 99 years till 2071 Grant Title: 6004 (Lot 7253) – 224.2837 Ha, Lease 99 years till 2071 Grant Title: 6005 (Lot 7254) – 82.2783 Ha, Lease 99 years till 2071 <p>B) Ladang Fikri Luas hektar- 2,274.68Ha Total Title= 9 title</p> <ol style="list-style-type: none"> Grant Title: 764 (Lot 707 K) – 558.73 Ha, Lease 99 years till 2071 Grant Title: 16181 (Lot 10237) – 569.30 Ha, Hak Milik Asal Grant Title: 8684 (Lot 3040) – 12.64885 Ha, Hak Milik Asal Grant Title: 8685 (Lot 3041) – 1133.6485 Ha, Hak Milik Asal <p>C) Ladang Jaya Luas hektar- 3,159.41Ha Total Title= 3 title</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		1. Grant Title: 6247 (Lot 6743) – 84.9093 Ha, Lease 99 years till 2072 2. Grant Title: 6001 (Lot 6558) – 1661.4191 Ha, Lease 99 years till 2071 3. Grant Title: 12885 (Lot 7250) – 1413.08 Ha, Lease 99 years till 2071	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	All the perimeter boundaries were clearly marked as per SOP.	Complied
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). - Minor compliance -	There is no land dispute in the Sungai Tong Certification units at the time of audit. The land belongs to TDM and land ownership documents verified.	Complied
Criterion 4.3.3 – Customary rights			
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. - Major compliance -	There is no customary land or negotiated agreements at TDM Plantation Sdn Bhd's land	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	The right to use the land is not disputed and there were no customary land within the TDM Plantation Sdn Bhd.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	Not applicable for TDM Plantation Sdn Bhd as there was no negotiation has occurred.	Complied
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 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. - Minor compliance -	<p>Social impact assessment was conducted on 17/3-19/4/2012 by SRA Consultancy for the whole Sg. Tong Complex. The assessment has involved the participation of internal and external stakeholders. The assessment methodology was through field interview, site visit and document review. Attendance list of the involvement of stakeholders has been documented.</p> <p>Social Impact Assessment Action Plan 2017 was developed on 9/8/2017 in Fikri Estate, 15/3/2017 for Tayor Estate and 11/7/2017 for Jaya Estate. The plan has incorporated area of concerns, findings from SIA assessors, results of investigation and action plan as well as person in charge. For eg:</p> <ul style="list-style-type: none"> a. Poor crèche condition – Fikri Estate has constructed 1 unit of new crèche on Y2015. Seen the contract IP-11/15 for the construction of new crèche and the invoice from the contractor dated 28/9/2015 was sighted. Besides, seen the photo evident of the progress of the construction of new crèche. b. No evidence of annual medical surveillance for sprayer and anybody related to the chemical in Fikri Estate – Half-yearly of monitoring of health condition by the HA for sprayers and seen the records of monitoring. The last monitoring was conducted on 17/9/2017. 	Minor nonconformance

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		<p>c. Poor facilities and infrastructure (drainage) – The management has upgraded the drainage system at housing area by reviewed the Work Order Agreement No. IP 57/14 dated 25/1/2015.</p> <p>However, specific timetable for mitigating the negative impacts and promotion of positive impacts was not included into the action plan for the 3 sampled estates.</p> <p>Thus, Minor NC was raised.</p>	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has developed a Flowchart on handling social issue and Complaint/ Grievance Procedure. The management has to discuss the issue raised by stakeholders within 2 weeks for the first meeting and issues have to be resolved within 28 working days.</p>	Complied
4.4.2.2	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p>- Major compliance -</p>	<p>The Complaint Logbook has recorded all the complaints and action that resolved in Fikri Estate. Seen the evidence of repair work such as Work Order and payment application to purchase the replacement goods. Signatures by Officer, Assistant Manager and Manager were sighted.</p> <p>Housing Repair Complaint Form was implemented in Tayor Estate and Jaya Estate. All the complaints were filed properly. Sampled of complaints as below:</p> <p>a. House No. 10 – Roof of house was broken which lodged complaint on 19/8/2017. The management has taken action to replace the roof. Seen the tax invoice that purchase the material of roofing supporting structure.</p>	Major nonconformance

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		<p>b. LJYK04B16078/79 – Wall and flooring of house was broken reported on 11/3/2017. Seen the Check Roll book that the worker has repaired the respective damage. However, no evidence of acceptance by the complainants after the action has been taken to resolve the complaints in Fikri Estate and Tayor Estate.</p> <p>Thus, Major NC was raised.</p>	
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p>	<p>Complaint Logbook for Linesite Repair and Complaint/ Request form was established and implemented. No external stakeholders were recorded related on complaint and grievances.</p>	Complied
4.4.2.4	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p>- Minor compliance -</p>	<p>Interviewed with the internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure and they were briefed by the management during stakeholder meeting.</p>	Complied
4.4.2.5	<p>Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	<p>Seen the complaint records from January 2014 – August 2017 were still properly maintained and kept in the complaint logbook/ complaint file.</p>	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<p>Growers should contribute to local development in consultation with the local communities.</p>	<p>The management has made contribution to the stakeholders such as provided transport assistance to school to send students for UPSR camp, machinery assistance to the local village to repair the</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	fencing in the graveyard, donation to school for field trip to Kuala Lumpur and Selangor and etc. Seen the relevant letter of requests and evidence of payment vouchers and photos. Besides, interviewed with stakeholders such as school's representatives, local communities and etc confirmed that contributions were made to them by the management.	
Criterion 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 -	TDM Plantation Sdn Bhd has been established safety and health policy that has been communicated to the staff and workers. On site supervisors and Mill assistant managers ensure the implementation of it. Sample of OSH activities carried out were: i. CHRA was conducted on 21/6/2017 (Tayor Estate) by Occumed Consultancy & Services Sdn Bhd (JKKP HIE 127/171/2(8)). All the action plan has been established as per CHRA recommendation. ii. Medical Surveillance was conducted on 19/4/2017 by Klinik Bestari Sdn Bhd (HQ/08/DOC/00/352). Sighted records: Ramlah (Manuring), Azrie (store keeper), Wan Zaiton (Sprayer); Comments from OHD: Still in the same job using PPE.(Fit to work)	Complied
4.4.4.2	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and	a) Policy for Occupational Safety & Health was established which sign by CEO of TDM Plantation Sdn Bhd on 1/9/2017. The policy was communicated through briefing to the employee and displayed at notice board. b) SOP for HIRARC was established. The technique was described accordingly in the SOP. The HIRARC was reviewed on 26/4/2017 (Tayor Estate), 5/2/2017 (Jaya Estate) to	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied <p>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).</p> <p>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.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting</p>	<p>include all the activities in the estate including harvesting, manuring, weeding etc.</p> <p>c) A formal training programme on all aspects of RSPO principle and Criteria has been established and implemented. The training program for 2017 includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to workers eg; harvesters, pesticides operators, manurers and etc</p> <p>d) Observed at manuring activities, harvesting activities and spraying activities, adequate and appropriate protective equipment was provided.</p> <p>e) SOP for chemical management was established. Register of Chemical was sighted to include the entire chemical used in the mill such as Ally 20DF, Tri Ester, Glyphosate and etc. The form was prepared by OSH coordinator, dated on 23/3/2017 (Tayor Estate).</p> <p>f) At all estate visited, there are OSH Coordinator who are responsible for organising safety training, meetings and investigation and reporting of accidents and Incidents. SHC Organization – Chairman : Estate Manager, SHC secretary: OSH coordinator Records were available confirming that quarterly OSH meetings had been held at the Mill. Refer OHS meeting minutes (Tayor Estate)– #3: dated 14/8/2017, #2: dated 23/5/17, #1: dated 19/3/17 Refer OHS meeting minutes (Jaya Estate)– #3: dated 13/9/2017, #2: dated 15/6/17, #1: dated 27/3/17</p> <p>g) The Estates has site specific Plans including ERP for accident, ERP for Fire, ERP for chemical spillage, ERP for Flood at Estate, maps showing assembly areas and up-to-date lists</p>	

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Criterion / Indicator		Assessment Findings	Compliance
	<p>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.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>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.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>of emergency contacts with training conducted to communicate the Plan. Latest fire drill was conducted on 16/1/2017 (Tayor Estate). Interviews of Mill staff and workers confirmed understanding of emergency response procedures.</p> <p>h) First Aid Kits are give to the head of gang for each activities (eg: harvesting, spraying, manuring) and inspection confirmed these had been appropriately stocked.</p> <p>i) All accidents are investigated and reported to Head Office. For 2016, there is no accident happened at Tayor Estate. All the records related to accident were available at Estate office.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has developed Human Rights Policy dated 1/6/2017 and Social Policy dated 1/6/2017 which signed by CEO. Briefing of the policies were provided to the workers and contractors. Seen the training records dated 17-18/9/2017 for contractors, workers and staffs. The policy was developed in Bahasa Malaysia. Besides, the policies were displayed at the notice board outside the office.</p>	Complied
4.4.5.2	<p>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.</p>	<p>TDM Plantation Sdn Bhd has developed Human Rights Policy dated 1/6/2017 and Social Policy dated 1/6/2017 which signed by CEO. These policies have stated that the management was committed to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality, gender and etc Interviewed with workers confirmed that no</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	discrimination was practice by the management. Besides, document reviewed on the pay slips and housing inspection found that no any issues related to discrimination was identified.	
4.4.5.3	<p>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.</p> <p>- Major compliance -</p>	<p>There was contract agreement for staff and workers including foreign workers. Pay and conditions are documented and are above the Minimum Wage Order 2016. Sampled of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Sampled of payslip for October 2016, February 2017 and July 2017 as below:</p> <ul style="list-style-type: none"> a. Employee ID: TY1100514 b. Employee ID: TY1100500 c. Employee ID: TY1100620 d. Employee ID: TY0900222 e. Employee ID: JY1600800 f. Employee ID: JY1400718 g. Employee ID: JY1500791 h. Employee ID: JY1200651 	Complied
4.4.5.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Sampled the payslip for contract workers as below:</p> <ul style="list-style-type: none"> a. Name: Samsudin (Tayor Estate – March – August 2017) b. I/C No.: 810201-11-5635 (Tayor Estate – March – August 2017) c. Name: Mohd Azmi (Jaya Estate – June – August 2017) d. Name: Mohd Hafizi (Jaya Estate – June – August 2017) e. Name: Mohd Rosli bin Husin (Jaya Estate – June – August 2017) f. Name: Rosli b. Isa (Jaya Estate – June – August 2017) <p>The contractor has complied with the Minimum Wage Order 2016 of RM 1000/ month.</p>	Minor nonconformance

Criterion / Indicator		Assessment Findings	Compliance
		<p>In Tayor Estate, contract piece-rated worker (Passport No.: B2941926) did not achieve Minimum Wage Order 2016 where the pay for the sampled month are listed as below:</p> <ul style="list-style-type: none"> a. August 2017 – RM 725.79 b. July 2017 – RM 847.81 c. June 2017 – RM 482.69 d. May 2017 – RM 821.13 e. April 2017 – RM 706.42 f. March 2017 – RM 556.01 g. February 2017 – RM 654.58 <p><u>Tayor Estate and Jaya Estate:</u> Employment contracts for the contract workers that agreed between the contractor and the employees were not available.</p> <p>Thus, Minor NC was raised.</p>	
4.4.5.5	<p>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.</p> <p>- Major compliance -</p>	<p>All the personal details such as full name, gender, date of birth, job description and etc which can access through the system of Employee Details and Personal File for check-rolled workers and offer contract for the contract's workers.</p> <p>However, personal details for the contract workers were not available in Tayor Estate and Jaya Estate.</p> <p>Thus, Major NC was raised.</p>	Major nonconformance
4.4.5.6	<p>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</p>	<p>All the employees that working in estates consisted of local and foreign workers. All of them have signed on the employment contracts prior to work. Duration of contract/ probation period, position offered, wages, annual leave and etc was stated in the</p>	Complied

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	<p>indicated in the employment records.</p> <p>- Major compliance -</p>	<p>employment contracts. Sampled of employment contracts/ extension contracts as below:</p> <ul style="list-style-type: none"> a. Employee ID: TY1100620 b. Employee ID: TY0900222 c. Employee ID: TY1100650 d. Employee ID: TY1100638 e. Employee ID: JY0900315 f. Employee ID: JY1500783 g. Employee ID: JY1500791 h. Employee ID: JY1400718 	
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>All the daily attendance were recorded in the check roll logbook on monthly basis and overtime was recorded in the individual Overtime Form. Sampled overtime form and work order to cross check with the payment as below: Employee ID: FK00005 who has replaced 2 units of stop cocks, 1 piece of float at the water tank, 3 units of pipes and 1 main pipe on August 2017 which recorded in the Overtime Form. Seen the Work Order 489/17 for August 2017 was sighted and the amount of replacement work was correct according to the overtime form.</p>	Complied
4.4.5.8	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p> <p>- Major compliance -</p>	<p>Interview with workers and document reviewed on the check roll logbook as well as payslip shown that the overtime payments are in accordance to law and workers are not forced to work overtimes.</p>	Complied
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective</p>	<p>Documented payslip was distributed to individual workers on the day of payment. Wages and overtime were paid according to the</p>	Complied

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<p>agreements.</p> <p>- Major compliance -</p>	<p>"check roll record book". Total hours of overtime and daily attendance has recorded in the "check roll record book". Sampled the payslip based on the crop summary for February 2017 (lowest crop), October 2016 (highest crop) and July 2017 (medium crop) as below:</p> <ul style="list-style-type: none"> a. Employee ID: TY1100514 b. Employee ID: TY1100500 c. Employee ID: TY1100620 d. Employee ID: TY0900222 e. Employee ID: JY1600800 f. Employee ID: JY1400718 g. Employee ID: JY1500791 h. Employee ID: JY1200651 i. <p>All of them above have achieved the Minimum Wage Order 2016 for RM 1000/ month or RM 38.46/ day. Hours of overtime has recorded in the payslip as well.</p>	
<p>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.</p> <p>- Minor compliance -</p>	<p>The management has provided contribution of RM 200/ worker during Hari Raya Festival. Besides, medical facilities such as clinic was provided to all the workers without any charges. Interviewed with the workers confirmed that the management has made contribution to them during festive season.</p>	Complied
<p>4.4.5.11 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.</p>	<p>All the residents in the company have access to facilities established by the company, such as clinic, sports field, crèche, places of worship and etc.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.4.5.12	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has developed Gender Policy and Reproductive Policy dated 1/6/2017 which signed by CEO. The management will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment, religious, gender, country of origin and etc. They will ensure that the rights of women will be protected.</p> <p>Besides, the management has established Gender Committee to monitor and provide assistance to all the female employees for any sexual harassment or violence cases. Interviewed with the Gender Committee Representatives found that no case of sexual harassment or violence was report so far.</p>	Complied
4.4.5.13	<p>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 discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established Freedom of Association Policy dated 1/6/2017 which signed by CEO. All the workers are allowed to join or form any association that comply with labour law. Interviewed with the workers confirmed that they are allowed to join any association without any restriction.</p>	Complied
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national</p>	<p>TDM Plantation Sdn Bhd has developed Child Protection Policy dated 1/6/2017 which signed by CEO. The company will not recruit or exploit any individual less than 16 years old to work in</p>	Complied

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	<p>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.</p> <p>- Major compliance -</p>	<p>the company. Seen the employee master list confirmed that all the workers were above 18 years old. Besides, interviewed with workers and stakeholders confirmed that TDM Plantation Sdn Bhd did not recruit any workers less than 18 years old.</p>																													
Criterion 4.4.6: Training and competency																															
4.4.6.1	<p>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.</p> <p>- Major compliance -</p>	<p>Training programme planned for year 2017 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to harvesters, pesticides operators, manurers and etc.</p> <p>Sample training checked:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr><td>2/8/17</td><td>Chemical handling</td></tr> <tr><td>4/3/17</td><td>Manuring</td></tr> <tr><td>5/4/17</td><td>Handling tractor</td></tr> <tr><td>7/4/17</td><td>Loading of FFB</td></tr> <tr><td>2/8/17</td><td>Harvesting</td></tr> <tr><td>19/9/17</td><td>First Aid by BOMBA</td></tr> <tr><td>11/9/17</td><td>Chemical handling</td></tr> <tr><td>20/8/17</td><td>Buffer zone/Scheduled waste</td></tr> <tr><td>9/7/17</td><td>Accident investigation</td></tr> <tr><td>26/7/17</td><td>Manuring</td></tr> <tr><td>24/7/17</td><td>P&D</td></tr> <tr><td>4/4/17</td><td>Workshop</td></tr> <tr><td>2/4/17</td><td>Harvesting</td></tr> </tbody> </table>	Date	Training	2/8/17	Chemical handling	4/3/17	Manuring	5/4/17	Handling tractor	7/4/17	Loading of FFB	2/8/17	Harvesting	19/9/17	First Aid by BOMBA	11/9/17	Chemical handling	20/8/17	Buffer zone/Scheduled waste	9/7/17	Accident investigation	26/7/17	Manuring	24/7/17	P&D	4/4/17	Workshop	2/4/17	Harvesting	Complied
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4.4.6.2	<p>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.</p> <p>- Major compliance -</p>	<p>Training needs of individual employees has been 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. Sighted OSH plan, training matrix and training schedule 2017/2018 at all estate visited. All the executives, staff, workers and contractors were include in the training needs.</p>	Complied																												
4.4.6.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Training programme planned for year 2017 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to harvesters, pesticides operators, manurers and etc.</p> <p>Sample training checked:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr><td>2/8/17</td><td>Chemical handling</td></tr> <tr><td>4/3/17</td><td>Manuring</td></tr> <tr><td>5/4/17</td><td>Handling tractor</td></tr> <tr><td>7/4/17</td><td>Loading of FFB</td></tr> <tr><td>2/8/17</td><td>Harvesting</td></tr> <tr><td>19/9/17</td><td>First Aid by BOMBA</td></tr> <tr><td>11/9/17</td><td>Chemical handling</td></tr> <tr><td>20/8/17</td><td>Buffer zone/Scheduled waste</td></tr> <tr><td>9/7/17</td><td>Accident investigation</td></tr> <tr><td>26/7/17</td><td>Manuring</td></tr> <tr><td>24/7/17</td><td>P&D</td></tr> <tr><td>4/4/17</td><td>Workshop</td></tr> <tr><td>2/4/17</td><td>Harvesting</td></tr> </tbody> </table>	Date	Training	2/8/17	Chemical handling	4/3/17	Manuring	5/4/17	Handling tractor	7/4/17	Loading of FFB	2/8/17	Harvesting	19/9/17	First Aid by BOMBA	11/9/17	Chemical handling	20/8/17	Buffer zone/Scheduled waste	9/7/17	Accident investigation	26/7/17	Manuring	24/7/17	P&D	4/4/17	Workshop	2/4/17	Harvesting	Complied
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Criterion / Indicator	Assessment Findings	Compliance	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
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 -	TDM Plantations has established Biodiversity and Environmental policy that has been signed by the CEO, dated 1 September 2017 and environmental management plan with relevant to the applicable laws and regulations. Interviews of staff and workers found that the policy has been communicated and implemented.	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. - Major compliance -	The established environmental management plan has covered the environmental aspects and impacts based on activities; refer Environmental Aspect/Impact Identification Form, FIKRI/5.2/EAI and Environmental Impact Evaluation Form, ref# EAI/2017/01-01 for 2017. Main estate activities such as herbicides spraying, P&D spraying, manuring, harvesting and pruning, EFB mulching, harvesting and loose fruit collection, chemical mixing, chemical storage and handling, replanting and nursery management was documented in the procedure. At Taylor Estate, the same sets of documents were verified; Environmental Aspect and Impact Identification form, EAI/2017/02-01 dated 22/3/17.	Complied

Criterion / Indicator		Assessment Findings	Compliance																		
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>Environmental improvement plan was derived from identified significant environmental aspect and impact from the estates operation. Among environment management plan established:</p> <table border="1"> <thead> <tr> <th>Environmental aspect</th> <th>Action Plan</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Used of chemical (paraquat, warfarin)</td> <td>i)Alternative for systemic chemical. i.e Glyphosate ii) IPM – Barn owl box iii)No open burning policy iv)Triple rinse and recycle</td> <td>On-going</td> </tr> <tr> <td>Workshop & parking</td> <td>2nd containment tray at parking bay/ under repair</td> <td>On-going</td> </tr> <tr> <td>Soil Erosion</td> <td>Cover crop establishment Gabian wall construction Protection of buffer zone (no spraying policy)</td> <td>On-going</td> </tr> <tr> <td>Disposal waste</td> <td>Segregation and 3R policy</td> <td>On-going</td> </tr> <tr> <td>Rinsed waste</td> <td>Recycle for pre-mix water</td> <td>On-going</td> </tr> </tbody> </table>	Environmental aspect	Action Plan	Status	Used of chemical (paraquat, warfarin)	i)Alternative for systemic chemical. i.e Glyphosate ii) IPM – Barn owl box iii)No open burning policy iv)Triple rinse and recycle	On-going	Workshop & parking	2 nd containment tray at parking bay/ under repair	On-going	Soil Erosion	Cover crop establishment Gabian wall construction Protection of buffer zone (no spraying policy)	On-going	Disposal waste	Segregation and 3R policy	On-going	Rinsed waste	Recycle for pre-mix water	On-going	Complied
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4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>TDM plantation estate’s environmental improvement programme also includes continual improvement plans. Verified continuous improvement programme for rain harvesting system in the estate.</p>	Complied																		
4.5.1.5	<p>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</p>	<p>Annual training programme of the estate includes environmental awareness and compliance related trainings to the executives, staffs and workers.</p>	Complied																		

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Criterion / Indicator		Assessment Findings	Compliance
	improvement plans and are working towards achieving the objectives. - Major compliance -		
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Environmental related matters were discussed during morning briefing and safety meeting. Workers interview reveal that they are free and encouraged to discuss environmental issues with the management. In addition, quarterly environmental meeting was last conducted on 16/7/17. All pertinent environmental matters were discussed during the meeting.	Complied
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
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 -	Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Monitored diesel/mt FFB, commentary given target 1.5 ratio.	Complied
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.	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets.	Complied

Criterion / Indicator		Assessment Findings	Compliance															
	- Major compliance -																	
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	There was no opportunity to use renewable energy in both Estates.	Complied															
Criterion 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 -	<p>All waste and pollution are identified and documented in the Waste Management Action Plan. The compilation for Financial Year 2017/2018 was made as per complex level. Details of waste generated from the estates and mill operations among others are shown below;</p> <table border="1"> <thead> <tr> <th>Type of waste</th> <th>Location</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>Domestic waste rubbish</td> <td>Linesites, office, workshop, store,</td> <td>Collection/disposal 2 to 3x /week at designated landfill</td> </tr> <tr> <td>Industrial waste-fertiliser bags</td> <td>Empty bags store</td> <td>Inventory of bags, reuse for LF collection, sell to appointed contractor</td> </tr> <tr> <td>Scrap metal</td> <td>workshop</td> <td>Inventory maintained, tender at zone level for sale to licensed contractor.</td> </tr> <tr> <td>SW 404 Clinical</td> <td>clinic</td> <td>Inventory maintained.</td> </tr> </tbody> </table>	Type of waste	Location	Action to be taken	Domestic waste rubbish	Linesites, office, workshop, store,	Collection/disposal 2 to 3x /week at designated landfill	Industrial waste-fertiliser bags	Empty bags store	Inventory of bags, reuse for LF collection, sell to appointed contractor	Scrap metal	workshop	Inventory maintained, tender at zone level for sale to licensed contractor.	SW 404 Clinical	clinic	Inventory maintained.	Complied
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SW 404 Clinical	clinic	Inventory maintained.																

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Criterion / Indicator		Assessment Findings			Compliance
		waste		Storage in sharp bin in clinic. Disposal through VMO clinic.	
		SW rags, plastics, filters	workshop	Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor.	
		Spent lubricant & hydraulic oil	workshop	Collection by DOE licensed contractor	
		Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,	Scheduled waste store	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by authorized vendor.	
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <ul style="list-style-type: none"> a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products <p>- Major compliance -</p>	Details of the types and management plan is shown in 4.5.3.1 above.			Complied

Criterion / Indicator		Assessment Findings	Compliance
4.5.3.3	<p>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.</p> <p>- Major compliance -</p>	<p>Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 has been established Refer to SOP, B9: Scheduled Waste, rev:1 dated 1/5/17. The procedure has include scheduled waste management from identification/notification/generation and up to disposal of waste to ensure proper and safe handling, storage and disposal.</p>	Complied
4.5.3.4	<p>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.</p> <p>- Major compliance -</p>	<p>Empty chemical container disposed as scheduled waste. Latest disposal was made by DOE licensed contractor, Pentas Flora Sdn Bhd. Verified license# 004873 and found valid until 30/4/18.</p> <p>Latest disposal was done on 23/9/17. 6 types of scheduled waste disposed were:</p> <ul style="list-style-type: none"> i) SW305 – 0.2 mt (used oil/lubricant) ii) SW306 – 0.1 mt (used hydraulic) iii) SW409 – 0.1 mt (empty chemical container) iv) SW410 – 0.1 mt (oil filter) v) SW410 – 0.1 mt (cotton rags) vi) SW417 – 0.1 mt (waste paint) 	Complied
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	<p>Domestic waste disposal is collected by local municipal council, "Majlis Daerah Setiu". Schedule of collection is twice per week. Collection centre for estate is located at field 98A2.</p>	Complied
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid</p>	<p>TDM Plantation has done environmental impact and aspect identification involving all the activities within the estate.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance												
	wastes and effluent. - Major compliance -	Assessment of polluting activities such as scheduled waste and solid waste disposal has been incorporated in the environmental aspect impact register.													
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Pollution prevention plan (PPP) has include assessment of all polluting activities within the estate operation such as waste, air emissions and water discharges. PPP for 2017 was made available for review.	Complied												
Criterion 4.5.5: Natural water resources															
4.5.5.1	<p>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:</p> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. 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.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. 	<p>Water management plan is developed based on rainfall data and trend during high rainfall and dry season. Below is the summary of rainfall recorded at Ladang Fikri and Ladang Tayor:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Rainfall (mm)</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>2892</td> </tr> <tr> <td>2017 to date</td> <td>1775</td> </tr> </tbody> </table> <p>Water management plan was developed based on the previous dry spell season in the last 3 years. Verified contingency plan for water shortage for 2017.</p> <p>a) Water usage trend Fikri Estate</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Consumption (litre/tonne)</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>8.85 l/tonne</td> </tr> <tr> <td>2017 to date (Aug)</td> <td>5.27 l/tonne</td> </tr> </tbody> </table>	Year	Rainfall (mm)	2016	2892	2017 to date	1775	Year	Consumption (litre/tonne)	2016	8.85 l/tonne	2017 to date (Aug)	5.27 l/tonne	Complied
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Criterion / Indicator	Assessment Findings	Compliance						
<p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<p>Tayor Estate</p> <table border="1" data-bbox="1037 480 1639 584"> <thead> <tr> <th>Year</th> <th>Consumption (litre/tonne)</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>2.88 l/tonne</td> </tr> <tr> <td>2017 to date (Aug)</td> <td>3.69 l/tonne</td> </tr> </tbody> </table> <p>b)Monitoring of outgoing water</p> <p><u>Fikri Estate</u> River water monitoring taken at upstream and downstream of Sg Kulim, Sg Tong, Sg Goga and Sg Pok Bidin. Frequency of water analysis is once a year. Latest sampling was done by 3rd party lab, ERALAB (KT) Sdn Bhd on 10/7/17. Refer to report ref# ERAKT/TDM/FIKRI/17/07-08 dated 21/7/2017. Based on the report, all parameter measured for river water were in compliance with the limit stated in Class IIA/IIB of National Water Quality Standards for Malaysia (NWQSM)</p> <p><u>Tayor Estate</u> River water monitoring taken at upstream and downstream of Sg Tayor Sg and Sg Balo. Frequency of water analysis is once a year. Latest sampling was done by 3rd party lab, ERALAB (KT) Sdn Bhd on 9/5/17. Refer to report ref# ERAKT/TDM/TAYOR/17/05-02 dated 8/6/2017. Based on the report, all parameter measured for river water were in compliance with the limit stated in Class IIA/IIB of National Water Quality Standards for Malaysia (NWQSM)</p> <p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before</p>	Year	Consumption (litre/tonne)	2016	2.88 l/tonne	2017 to date (Aug)	3.69 l/tonne	
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Criterion / Indicator		Assessment Findings	Compliance
		<p>planting or replanting, along all natural waterways within the estate was sighted. Buffer zone along Sg Kulim and Sg Tong was maintained and conserved. No evidence of disturbance/encroachment noted.</p> <p>Water supply is from government body (SATU) and no bore well is being used for water supply in the estate.</p>	
4.5.5.2	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	No evidence construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	Complied
4.5.5.3	<p>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).</p> <p>- Minor compliance -</p>	Road site pit was constructed at hilly area diverted to nearby outlet directed and stored in conservation terraces and various natural receptacles. New directive from agronomist, silt-pit must be constructed at terrace area (8-25°)	Complied
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
4.5.6.1	<p>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:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN)</p>	TDM Plantation has engaged a consultant SRA Consultancy in 2012 to conduct a biodiversity assessment for Sg Tong Complex as well as preparation of site-specific short-term and long-term HCV Management Plans. From the report, it was noted that HCV 6 was identified as worship area (Masjid Ladang Fikri). Noted that there were Endangered, Rare and Threatened (ERT) species by IUCN recorded during the survey. Among the species recorded are elephant (<i>Elephas Maximus</i>), Malayan Tiger (<i>Panthera Tigris Corbett</i>), Malayan Tapir (<i>tapirus indicus</i>) and boar.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>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.</p> <p>- Major compliance -</p>	<p>For Ladang Tayor, HCV 4 and 6 were identified within the estate, eg:river buffer zone and graveyard.</p>	
4.5.6.2	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>Based on the report, there were HCV and rare, threatened, or endangered (ERT) species being identified within the estate area.</p> <p>No illegal hunting signages are prominently erected at the estate entrance and other strategic area and awareness training has been given to workers and other stakeholders</p>	Complied
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>Biodiversity and HCV management plan based on recommendation by assessor. The management plan has incorporated specific monitoring plan, time frame and person in-charge in the latest plan. Animal sighting recorded on weekly basis based on patrolling records. Latest record dated 18/9/17 available for review. No sighting of ERT recorded based on the latest patrolling record.</p>	Complied
<p>Criterion 4.5.7: Zero burning practices</p>			

Criterion / Indicator		Assessment Findings	Compliance
4.5.7.1	<p>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.</p> <p>- Major compliance -</p>	<p>Fikri Estate Last replanting was completed in 2009 by contractor, Rangkaian Mahir Interprise. Refer to letter award IP15/08 dated 24/8/08. Total of 103 ha has been replanting. Scope of work (felling, chipping, inter row cleaning, road construction [main road, field road], drain platform and terrace construction.</p> <p>No replanting programme for the last 10 years at Tayor Estate</p>	Complied
4.5.7.2	<p>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.</p> <p>- Major compliance -</p>	<p>No special approval granted for crop phyto-sanitation from DOE as to date.</p>	Complied
4.5.7.3	<p>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.</p> <p>- Major compliance -</p>	<p>No special approval granted for phyto-sanitation from DOE as to date.</p>	Complied
4.5.7.4	<p>Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.</p> <p>- Minor compliance -</p>	<p>Fikri Estate No latest replanting at Fikri Estate. Last replanting was in 2008. Method of land preparation verified in letter award (LA) and confirmed that old OP felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.</p> <p>No replanting programme for the last 10 years at Tayor Estate</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance	
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	TDM Plantation Sdn Bhd has established management systems for monitoring and control of best practice implementation at its estate including the establishment of SOP's (TDMP/OD/07/60.01 dated 21/8/2017) for all activities, eg: Replanting, Drainage, Soil Conservation, Water Management, Manuring, Weeding, Pruning, Harvesting etc. This includes the programme of regular internal audits by External PA for monitoring, maintaining and improving the production. Fertilizer recommendation for 2017 was made available. Date of the last visit as follows: External PA visit: April 2017 (period Jan-Dec 16) Agronomist visit: 4-5/10/16	Complied
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. - Major compliance -	All estates visited has overlain a topographic map on the soil map to identify areas of potential erosion risk. The estate has identified steep areas for setting aside as conservation areas. Inspection of field conditions at estate showed well established and maintained groundcover vegetation.	Complied
4.6.1.3	A visual identification or reference system shall be established for each field.	Inspection of field conditions at sloping areas and terraces, found stacking of pruned fronds along the contour for protection against soil erosion was relatively consistent.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
Criterion 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 -	Annual business plan in the form of annual budget and the projection for 5 years (2018-2022) was prepared as guidance for future planning. The business plan contains Hactarage statement, FFB yield per Ha, CPO yield per Ha, PK yield per Ha, Mature area expenditures, Immature area expenditures, Capital Expenditures.	Complied
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. - Major compliance -	Long range replanting programme was established (2017-2023) at all estate visited. There is replanting at Tayor Estate on 2018 for 198.10 Ha, however for Jaya Estate and Fikri Estate, no replanting had been plan for 2018.	Complied
4.6.2.3	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB d) Price forecast e) e) Financial indicators : cost benefit, discounted cash flow, return on investment - Major compliance -	Annual business plan in the form of annual budget and the projection for 5 years (2018-2022) was prepared as guidance for future planning. The business plan contains Hactarage statement, FFB yield per Ha, CPO yield per Ha, PK yield per Ha, Mature area expenditures, Immature area expenditures, Capital Expenditures including crop projection for 2018, Cost of production/mt, gross P&L and etc.	Complied

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Criterion / Indicator		Assessment Findings	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. - Major compliance -	TDM Plantation Sdn Bhd monitored the estate performance against the targets. It also recommends changes to the plans if necessary.	Complied
Criterion 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 contractors have signed on the Work Order Agreement prior to provide services. The agreement has detailed the pricing mechanism for the service offered. Sampled of Work Order Agreement as below: <ul style="list-style-type: none"> a. Order No.: LT – 04/17 for transporting FFB from field to bin and send the workers from house to field which valid until 31/12/2017. b. Order No.: LT – 07/17 for cleaning drainage by using excavator which valid until 30/10/2017. c. Order No.: 001/17 for renting backhoe to carry out upgrading work in the field which valid until 31/12/2017. 	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	The payment was made by Head Office after the mill has sent the invoice to Head Office. Interviewed with the contractors confirmed that the payment was made promptly.	Complied
Criterion 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.	Additional requirements such as MSPO for the contractors to comply were stamped on the Work Order Agreement and it was signed by the contractors. Interviewed with the contractors confirmed that MSPO requirements and policies were explained to	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	them.	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	The contractors have signed on the Work Order Agreement prior to provide services. Seen the Work Order Agreement and details refer to Criterion 3, Indicator 1.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	TDM Plantation Sdn Bhd has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Complied
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. - Major compliance -	The contractor will issued the working chit for every work done on daily basis as stated in the contract agreement. During the month end, the contractor will issued the tax invoice to the company for all the work done to proceed for payment.	Complied
<p>4.7 Principle 7: Development of new planting</p> <p>Sungai Tong Palm Oil Mill & Estates did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.</p>			

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	The company has initiated the implementations of MSPO requirements. MSPO Policy has been established and signed by CEO of TDM Plantation Sdn Bhd dated 1/8/2017.	Complied
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 established policy has emphasized on the commitment to continual Improvement with the objective of improving the milling and estate operation.	Complied
Criterion 4.1.2 – 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 -	Internal audit was conducted on September 2017 for all supply bases. Audit covered both documentation and field operation for the estate. However, the internal audit report was not available to review by BSI auditor. Thus, Major NC was raised.	Major nonconformance
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.	Internal audit procedure was established accordingly. However, the latest internal audit report was not available to verify during this assessment. Refer to indicator 4.1.2.1	Major nonconformance

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	Internal audit report was not available for management review. Refer to indicator 4.1.2.1	Major nonconformance
Criterion 4.1.3 – 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. - Major compliance -	Management Review procedure was established accordingly. However, the MRM minute was not available to verify during this assessment. Thus, Major NC was raised.	Major nonconformance
Criterion 4.1.4 – Continual Improvement			
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 -	Sample of Continual Improvement for 2017 at Sg Tong POM: <ul style="list-style-type: none"> i. workers quarters ii. P15 press iii. 80MT weighbridge iv. EFB Conveyor v. Wet Kernel Elevator vi. Double Thresher Project vii. Raw Water Pump 	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.1.4.2	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p>- Major compliance -</p>	<p>The management had plan to construct new Biogas plant on 2018.</p>	<p>Complied</p>
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>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.</p> <p>- Major compliance -</p>	<p>Sg Tong POM has maintained records of request and response, land titles, OSH plans and etc relating to environmental and social issues, plans for pollution prevention, complaints and grievances records that make available upon request.</p>	<p>Complied</p>
4.2.1.2	<p>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.</p> <p>- Major compliance -</p>	<p>There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. Access to these documents is made available upon request. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available at notice boards. The company is in the progress to make available the documents on the company’s website in the future.</p> <p>Among the documents that were made available for viewing</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		<p>are:</p> <ul style="list-style-type: none"> • Good Agricultural Practices • Social Enhancement • Sustainability Management Programmes • Complaint and Grievances procedure. • Environmental Conservation <p>These documents highlight current TDM Plantations Sdn Bhd practices and their continual improvement plans. Besides the above document TDM Plantations Sdn Bhd policy on the followings are also available:</p> <ol style="list-style-type: none"> 1) Social 2) Quality 3) Freedom of Association 4) Occupational Safety, Health and Environment 5) Environment & Biodiversity 6) Protection of Children 7) Gender 	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	TDM Plantation Sdn Bhd has developed a Communication Procedure with POM/ Estates and Flowchart to Handle Social Issue. Maximum 28 working days shall be taken to resolve the issues. All internal and external stakeholders were briefed on this procedure.	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> .	Manager was appointed as an officer to handle social issue by Human Resource Department, Head Office. Appointment letter, dated 2/9/2014 was sighted.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
4.2.2.3	<p>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.</p> <p>- Major compliance -</p>	<p>Stakeholder meeting was conducted on 27/7/2017 for the whole Sg. Tong Complex with the participation of internal and external stakeholders. Seen the meeting minutes and attendance list. No issue was raised during the meeting. Only questions and requests were raised and immediate replies from the management during the meeting.</p> <p>Stakeholder list was developed which has included local communities, suppliers and contractors, government authorities and etc into the list.</p> <p>Records of Communication with Stakeholders were sighted. The stakeholders have requested through written letter and responded by the management. For eg:</p> <ul style="list-style-type: none"> a. Police Sg. Tong has requested organic fertilizer from the mill on 21/9/2017 and the management has approved. <p>SMK Bukit Nenas has requested for transport to send the students to tuition programme. The management has approved the request and provided transport on the request date.</p>	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	<p>The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.</p> <p>- Major compliance -</p>	<p>Procedures are controlled documents and controlled and updated by STPOM (MSPO Traceability SOP, TDM/STPOM/01 dated 1/8/2017). These procedures are current and include all elements of the traceability for controlling the receipt, sale and</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		dispatch of palm products	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	STPOM has conducted internal inspections on compliance with the traceability system.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The Mill Manager has an overall responsibility for the traceability activities, eg: planning and executing sales of CPO & PK, aspects of FFB receipts, processing and shipping of palm products. Interview with the Mill Manager confirmed his knowledge of the MSPO traceability requirements.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Inspection of records confirmed these were updated daily basis . There were procedures on the record keeping which applicable to MSPO in the future.	Complied
4.3 Principle 3: Compliance to legal requirements			
Criterion 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. - Major compliance -	Sg Tong POM has maintained the systems for documentation, checking and assessment of legal compliance with applicable laws and regulations. Inspection of records showed that the Sg Tong POM has complied with legal and statutory requirements. Permit and license sighted as per below: i) DOE license and "Jadual Pematuhan" @ compliance schedule #002385; validity 1-Jul-2017 to 30-Jun-2018 for 60 MT FFB/hr and method of POME discharge on waterways. Limit of BOD is	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p><100 mg/l.</p> <p>ii) Diesel license, serial# T012518, ref# KPDNKK/BST/800-1/8/23/14 (SK/D), quantity: 20,000 litre valid until 3/6/18</p> <p>iii) MPOB license # 500042704000; validity period 01- April 2017 to 31-Mar-2018 for 300,000 mt</p> <p>iii) Mill inspection: 15/1/17 (Unfired Pressure Vessel and Steam Boiler inspection) Certificate of fitness checked: Boiler: TG PMD 61 valid until 4/4/18 Boiler: TG PMD 424 valid until 2/7/18 Back pressure receiver: TG PMT 5357 valid until 14/4/18 Steam Dryer: TG PMT 7024 valid until 2/7/18 Steam Header: TG PMT 7023 valid until 2/7/18</p> <p>iv) Electrical Installation license, Form F, serial# 19372, license# 2016/02803, capacity 3545 kW valid until 18/1/17.</p> <p>vi) Permit to purchase, store and use of Sodium Hydroxide, permit#036584 register# TC 0040/2017 valid until 31/12/17</p>	
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. Refer to legal register for 2017. Sustainability and compliance department have reviewed and updated the applicable and relevant legal such as:</p> <p>i) Minimum wages order 2016</p> <p>ii) OHSA 1994 – USECHH 2000, SHC 1996, NADOPOD 2004, CLASS Regulation 2013</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		iii) FMA, Noise Exposure Regulations 1989 iv) ICOP, Confined Space 2010 v) FMA, Person In Charge Regulation (amendment)2014 vi) FMA (Exemption of Certificate of Fitness for Unfired Pressure Vessel) Order 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 -	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law been well implemented. E.g. regular notification by Head Office and regular updates from the DOE/DOSH website as well as from government gazette website. Documented procedure has been established and implemented, TDM/STPOM/01 Revision STPOM-01/2012 dated 1/5/2012, the procedure for Legal and Other Requirements. List of applicable legal and other requirements was made available during the assessment and was update accordingly. The LORR was include: 1. OSHA 1994 2. OSH (NADOPOD) Regulations 2004 3. OSH (SHC) Regulations 1996 4. OSH (CLASS) Regulation 2014 5. OSH (SHO) Regulations 1997 6. OSH (USECHH) Regulations 2000 7. FMA 1967 8. FM (Fencing of Machinery and Safety) Reg 1970	Complied

Criterion / Indicator		Assessment Findings	Compliance
		9. FM (Notification, Certification of Fitness and inspection) Regulation 2004 10. FM(Person In Charge) Regulations 2014 11. FM (Noise Exposure) Reg 1989 12. FM (Steam Boiler and unfired pressure vessel) Regulation 13. Electrical Supply Act 1990 14. Fire Services Act 1988 15. Fire Services (Fire Certificate)Regulation 2001 16. EQA 1974 17. EQ (Sewage and Industrial Effluent) Regulations 1979 18. EQ (Clean Air) Regulations 2014 19. EQ (Scheduled Waste) Regulations 2005 20. Code of practice for safe working in a confined space, 2001 21. Akta Kerja 1955	
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 -	The mill management will identify all legal and other requirements that are applicable to the Mill operations. Person responsible is compliance executive on site, Puan Norwati Mamat. All the requirements will be evaluated once a year. A system for tracking changes as per documented procedure has been implemented at all respective operating units. Group Legal Department, Plantation Coordinator and Plantation Advisor will notify new requirements if there are any changes of law as to date.	Complied
Criterion 4.3.2 – 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.	Not applicable. STPOM was located inside the estate where the land title was kept by the estate.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
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 -	Not applicable. STPOM was located inside the estate where the land title was kept by the estate.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Not applicable. STPOM was located inside the estate where the land title was kept by the estate.	Complied
4.3.2.4	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 -	Not applicable. STPOM was located inside the estate where the land title was kept by the estate.	Complied
Criterion 4.3.3 – Customary rights			
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. - Major compliance -	The mill was located on the land of Fikri Estate and verified the map of location. There is no land dispute in the mill at the time of audit. The land belongs to TDM Plantation Sdn Bhd and land ownership documents verified. Interviewed with the local communities confirmed that no encroachment of land was reported.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized	There was no customary land at Sg. Tong complex, TDM	Complied

Criterion / Indicator		Assessment Findings	Compliance
	customary rights shall be made available. - Minor compliance -	Plantation Sdn Bhd.	
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	Not applicable as there was no customary land at Sg. Tong complex, TDM Plantation Sdn Bhd. No encroachment of land from the management to local communities was sighted.	Complied
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 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 -	<p>Social impact assessment was conducted on 17/3-19/4/2012 by SRA Consultancy for the whole Sg. Tong Complex. The assessment has involved the participation of internal and external stakeholders. The assessment methodology was through field interview, site visit and document review. Attendance list of the involvement of stakeholders has been documented.</p> <p>Social Impact Assessment Action Plan Revision 2017/2018 was developed on 18/9/2017. The plan has incorporated area of concerns, findings from SIA assessors, action plan status, remarks as well as person in charge. For eg:</p> <ul style="list-style-type: none"> a. Proper fogging to avoid aedes – The management has invited personnel from Ladang Air Putih to carry out propoer fogging. Seen the memorandum dated 11/9/2017 to inform that the fogging activity will be conducted on 16/9/2017. b. Headmistress of SK Tayor has requested to have Solat 	Minor nonconformance

Criterion / Indicator		Assessment Findings	Compliance
		<p>Hajat Perdana for all schools in estate area as for UPSR preparation – The event has been conducted on 29/8/2017 and interviewed with the relevant Headmistress confirmed that the management has organized such activity as per request.</p> <p>However, no specific timeline to mitigate the negative impacts and promotion of positive impacts was not available in the action plan.</p> <p>Thus, Minor NC was raised.</p>	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has developed a Flowchart on handling social issue and Complaint/ Grievance Procedure. The management has to discuss the issue raised by stakeholders within 2 weeks for the first meeting and issues have to be resolved within 28 working days.</p>	Complied
4.4.2.2	<p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.</p> <p>- Major compliance -</p>	<p>The mill has implemented Linesite Repair Report. Any complaints related to housing repair will be recorded in the report. Evidence of action taken was sighted. However, no acknowledgement by the complainants to show that they were accepted with the actions taken.</p> <p>Thus, Major NC was raised.</p>	Major nonconformance
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.</p>	<p>Complaint Logbook for Linesite Repair and Complaint/ Request form was established and implemented. Interviewed with the stakeholders found that they were aware of the complaint</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	procedure.	
4.4.2.4	<p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.</p> <p>- Minor compliance -</p>	Interviewed with the internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure and they were briefed by the management during stakeholder meeting.	Complied
4.4.2.5	<p>Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	Records of all the complaints from January 2014 – August 2017 were still maintained.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<p>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.</p> <p>- Minor compliance -</p>	The mill management has provided contribution and donation to the local communities and stakeholders upon request from them. For eg: PIBG SK Sg. Las has requested assistance and support from the management after heavy flood.	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>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.</p>	STPOM has been established safety and health policy that has been communicated to the staff and workers. On site supervisors and Mill assistant managers ensure the implementation of it.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>- Major compliance -</p>	<p>Sample of OSH activities carried out were:</p> <ul style="list-style-type: none"> i. CHRA was conducted on 24/8/2015 by Occumed Consultancy & Services Sdn Bad (JKKP IH 127/171-2(08)). All the action plan has been established as per CHRA recommendation. ii. Medical Surveillance was conducted on 19/4/2017 by Klinik Ibra (Dr Samsuri Ismail-HQ/08/DOC/00/272. Sighted records: Nadzian B. Mohd (WTP), Mohd Hafizan (Workshop), Zainal Mat Amin (Boiler), Amezi Abdullah, Che Mat Riffin, Mohd Sofian (Lab), Comments from OHD: Still in the same job using PPE. iii. LEV inspection by IHT2 was conducted on 23/3/2017 (JKKP HIE 127/171-3/2(202). From the inspection, it found that the fume hood is generally safe and acceptable to be used by lab workers. iv. Annual Audiometric Test was conducted on 2/5/2017 by SI Energy Sdn Bhd. Total attendance for the audiometric test was 101 persons. 8 persons were found temporary STS. Retest for audiometric for those 8 persons was conducted on 15/8/2017. Out of 8 persons, none of them are found to have permanent standard threshold shift. 	
<p>4.4.4.2 The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals 	<ul style="list-style-type: none"> a) Policy for Occupational Safety & Health was established which sign by CEO of TDM Plantation Sdn Bhd on 1/9/2017. The policy was communicated through briefing to the employee on 20/8/2017 and displayed at notice board. b) SOP for HIRARC was established. The technique was described accordingly in the SOP. The HIRARC was reviewed on 1/4/2017 to include all the activities in the mill. c) A formal training programme on all aspects of RSPO 	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>used at the palm oil mill:</p> <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; <p>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).</p> <p>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 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication 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 and the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p>	<p>principle and Criteria has been established and implemented. The training program for 2017 includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to workers exposed to machinery and high noise levels, workers working in confined space, harvesters, pesticides operators, manurers and etc.</p> <p>d) Observed at Sterilizer station, press station, oil room, boiler station, adequate and appropriate protective equipment was provided.</p> <p>e) SOP for chemical management was established. Register of Chemical was sighted to include the entire chemical used in the mill such as Sodium carbonate, Alluminium Sulphate, Natrium hydroxide, natrium sulfate and etc. The form was prepared by OSH coordinator, dated on 2/3/2017.</p> <p>f) At the Mill, there is a OSH Coordinator who is responsible for organising safety training, meetings and investigation and reporting of accidents and Incidents. SHC Organization – Chairman : Mill Manager, SHC secretary: OSH coordinator</p> <p>g) Records were available confirming that quarterly OSH meetings had been held at the Mill. Refer OHS meeting minutes : OHS meeting – #3:dated 18/9/17, #2: dated 21/6/17, #1: dated 20/3/17</p> <p>h) The Mill has site specific Plans including ERP for accident, ERP for Fire, ERP for chemical spillage, ERP for Flood at Estate, maps showing assembly areas and up-to-date lists of emergency contacts with training conducted to communicate the Plan. Latest fire drill was conducted on</p>	

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Criterion / Indicator		Assessment Findings	Compliance
	i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. - Major compliance -	24/7/2017. Interviews of Mill staff and workers confirmed understanding of emergency response procedures. i) First Aid Kits are installed at various work stations at the Mill (boiler and sterilizer station). j) All accidents are investigated and reported to Head Office. Accident statistics found that for Sg Tong POM, as todate Sept 2017 there was 1 accident happened with 6 days (LTI). For 2016, there is no accident happened. All the records related to accident were available at POM office.	
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees. - Major compliance -	TDM Plantation Sdn Bhd has developed Human Rights Policy dated 1/6/2017 and Social Policy dated 1/6/2017 which signed by CEO. Briefing of the policies were provided to the workers on 20/8/2017. The policies were displayed at the notice board outside the office.	Complied
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 -	TDM Plantation Sdn Bhd has developed Human Rights Policy dated 1/6/2017 and Social Policy dated 1/6/2017 which signed by CEO. These policies have stated that the management was committed to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality, gender and etc. Interviewed with workers confirmed that no discrimination was practice by the management. Briefing of the policies were provided to the workers on 20/8/2017. The policies were displayed at the notice board outside the office.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.3	<p>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.</p> <p>- Major compliance -</p>	<p>There was contract agreement for staff and workers as well as contract workers. Pay and conditions are documented and are above the Minimum Wage Order 2016. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Sampled of payslip for October 2016, February 2017 and July 2017 as below:</p> <ul style="list-style-type: none"> a. Employee ID: SM00071 b. Employee ID: SM0900122 c. Employee ID: SM00018 d. Employee ID: SM0900210 	Complied
4.4.5.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Sampled the payslip based on the crop summary for February 2017 (lowest crop), October 2016 (highest crop) and July 2017 (medium crop) for contract workers as below:</p> <ul style="list-style-type: none"> a. I/C No.: 900715-11-5021 b. I/C No.: 921028-11-5405 c. I/C No.: 960103-11-5467 <p>The contractor has complied with the Minimum Wage Order 2016 where the rate per day is RM 38.46. The daily rate of the wage was stated in the offer letter signed by the contract workers.</p> <p>Employment contracts for the contract workers were sighted and acknowledged by the workers.</p>	Complied
4.4.5.5	<p>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</p>	<p>All the personal details such as full name, gender, date of birth, job description and etc which can access through the system of Employee Details for check-rolled workers and offer contract for</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>the contract's workers.</p>	
4.4.5.6	<p>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.</p> <p>- Major compliance -</p>	<p>All the employees that working in the mill are local. There are direct employment and contract workers. All of them have signed on the offer date prior to work. Duration of contract/ probation period, position offered, wages, annual leave and etc was stated in the offer letter. Sampled of offer letter as below:</p> <ul style="list-style-type: none"> a. Employee ID: SM00071 b. Employee ID: SM0900122 c. Employee ID: SM00018 d. Employee ID: SM0900210 	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	<p>All the daily attendance were recorded in the check roll logbook on monthly basis and overtime was recorded in the individual Overtime Form.</p>	Complied
4.4.5.8	<p>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.</p> <p>- Major compliance -</p>	<p>Interview with workers and document reviewed on the check roll logbook as well as payslip shown that the overtime payments are in accordance to law and workers are not forced to work overtimes.</p>	Complied
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p>	<p>Documented payslip was distributed to individual workers on the day of payment. Wages and overtime were paid according to the "check roll record book". Total hours of overtime and daily attendance has recorded in the "check roll record book".</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>- Major compliance -</p>	<p>Sampled the payslip based on the crop summary for February 2017 (lowest crop), October 2016 (highest crop) and July 2017 (medium crop) as below:</p> <ul style="list-style-type: none"> a. Employee ID: SM0900122 b. Employee ID: SM00018 c. Employee ID: SM0900210 d. Employee ID: SM00071 <p>All of them above have achieved the Minimum Wage Order 2016 for RM 1000/ month or RM 38.46/ day.</p> <p>Hours of overtime has recorded in the payslip as well.</p>	
<p>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.</p> <p>- Minor compliance -</p>	<p>The management has provided contribution of RM 200/ worker during Hari Raya Festival. Besides, medical facilities such as clinic was provided to all the workers without any charges. Interviewed with the workers confirmed that the management has made contribution to them during festive season. On-job training was provided as well.</p>	<p>Complied</p>
<p>4.4.5.11 In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p>- Major compliance -</p>	<p>All the residents in the company have access to facilities established by the company, such as clinic, sports field, crèche, places of worship and etc.</p>	<p>Complied</p>
<p>4.4.5.12 The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has developed Gender Policy and Reproductive Policy dated 1/6/2017 which signed by CEO. The management will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment,</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		religious, gender, country of origin and etc. They will ensure that the rights of women will be protected.	
4.4.5.13	<p>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 should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	TDM Plantation Sdn Bhd has developed Gender Policy and Reproductive Policy dated 1/6/2017 which signed by CEO. The management will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment, religious, gender, country of origin and etc. They will ensure that the rights of women will be protected.	Complied
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p>	TDM Plantation Sdn Bhd has developed Child Protection Policy dated 1/6/2017 which signed by CEO. The company will not recruit or exploit any individual less than 16 years old to work in the company. Seen the employee master list confirmed that all the workers were above 18 years old. Besides, interviewed with workers and stakeholders confirmed that TDM Plantation Sdn Bhd did not recruit any workers less than 18 years old.	Complied
Criterion 4.4.6: Training and competency			

Criterion / Indicator		Assessment Findings	Compliance																				
<p>4.4.6.1</p>	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p>- Major compliance -</p>	<p>Training programme planned for year 2017 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to workers exposed to machinery and high noise levels, workers working in confined space and etc.</p> <p>Sample training checked:</p> <table border="1" data-bbox="1070 703 1789 1042"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>30/1/2017</td> <td>Oil Room</td> <td rowspan="9">STPOM</td> </tr> <tr> <td>19/2/2017</td> <td>SOP-Boiler</td> </tr> <tr> <td>19/3/2017</td> <td>AESP</td> </tr> <tr> <td>25/7/17</td> <td>Turbine</td> </tr> <tr> <td>14/9/17</td> <td>OSHA</td> </tr> <tr> <td>12/9/2017</td> <td>Chemical handling</td> </tr> <tr> <td>25/7/17</td> <td>Operation</td> </tr> <tr> <td>20/8/2017</td> <td>MSPO Awareness-workers & contractor</td> </tr> </tbody> </table>	Date	Training	Remark	30/1/2017	Oil Room	STPOM	19/2/2017	SOP-Boiler	19/3/2017	AESP	25/7/17	Turbine	14/9/17	OSHA	12/9/2017	Chemical handling	25/7/17	Operation	20/8/2017	MSPO Awareness-workers & contractor	<p>Complied</p>
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<p>4.4.6.2</p>	<p>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.</p> <p>- Major compliance -</p>		<p>Training needs of individual employees has been 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. Sighted OSH plan, training matrix and training schedule 2017/2018 at Sg Tong POM. All the executives, staff, workers and contractors were include in the training needs.</p>	<p>Complied</p>																			

Criterion / Indicator		Assessment Findings	Compliance																			
<p>4.4.6.3</p> <p>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.</p> <p>- Minor compliance -</p>	<p>Training programme planned for year 2017 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to workers exposed to machinery and high noise levels, workers working in confined space and etc.</p> <p>Sample training checked:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>30/1/2017</td> <td>Oil Room</td> <td rowspan="8">STPOM</td> </tr> <tr> <td>19/2/2017</td> <td>SOP-Boiler</td> </tr> <tr> <td>19/3/2017</td> <td>AESP</td> </tr> <tr> <td>25/7/17</td> <td>Turbine</td> </tr> <tr> <td>14/9/17</td> <td>OSHA</td> </tr> <tr> <td>12/9/2017</td> <td>Chemical handling</td> </tr> <tr> <td>25/7/17</td> <td>Operation</td> </tr> <tr> <td>20/8/2017</td> <td>MSPO Awareness-workers & contractor</td> </tr> </tbody> </table>	Date	Training	Remark	30/1/2017	Oil Room	STPOM	19/2/2017	SOP-Boiler	19/3/2017	AESP	25/7/17	Turbine	14/9/17	OSHA	12/9/2017	Chemical handling	25/7/17	Operation	20/8/2017	MSPO Awareness-workers & contractor	<p>Complied</p>
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<p>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</p>																						
<p>Criterion 4.5.1: Environmental Management Plan</p>																						
<p>4.5.1.1</p> <p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>TDM Plantations Sdn Bhd has established an environmental policy with relevant to the applicable laws and regulations. Policy was signed by Chief Executive Director on 1st September 2017 based on current DOE initiative on "Guided Self-Regulation"</p>	<p>Complied</p>																				

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Criterion / Indicator		Assessment Findings	Compliance
		The policy has been displayed at the notice board in front of office and canteen area. The workers also been briefed on the policy during morning muster. Interviews of staff and workers found that the policy has been communicated and implemented.	
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations</p> <p>- Major compliance -</p>	<p>The established environmental improvement plan/ pollution prevention plan FY2017/2018 has covered all the environmental issue, mitigating measure, action PIC, time frame and status.</p> <p>TDM Plantations Sdn Bhd has established an environmental policy with relevant to the applicable laws and regulations. Policy was signed by Chief Executive Director on 1st September 2017.</p> <p>Environmental Aspect and Impact Identification and evaluation form FY2017/2-18 has identify the environmental aspects related to its activities, products or services, and to evaluate the significance of the associated environmental impacts. List of environmental aspect as per the following:</p> <ol style="list-style-type: none"> 1) Reception area 2) Continuous Sterilizer 3) Threshing and Press Station 4) Incinerator 5) Clarification Station 6) Nut and Kernel Station 7) Raw and treated effluent plant 8) Boiler house operation 9) Power house 10) Raw water treatment plant 11) Product Storage 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		12) Laboratory System 13) Bio-compost plant 14) Workshop 15) Construction site 16) Store System 17) Canteen/cafeteria Besides, the applicable law & regulation also incorporated into the evaluation form and part of the evaluation criteria for significant environmental aspect.	
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 -	The established environmental improvement plan/pollution prevention plan FY2017/2018 has covered all the environmental issue, mitigating measure, action PIC, time frame and status. Results of the programs that were monitored will determine operational changes whether have positive or negative environmental impacts. List for environmental improvement plan as such: <ul style="list-style-type: none"> a. River water quality monitoring b. Waste management c. Noise pollution d. CEMS and Stack monitoring e. Spillage and overflow to monsoon drain f. Leakages and spillage (chemical, oil & lubricant, diesel g. GHG emission from ETP (anaerobic process) Stack emission <150mg/m3 as per EQA Clean Air Regulations 2014.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>Sg Tong POM environmental improvement programme also includes continual improvement plans.</p> <p>Biogas plant will be completed by 2018 in collaboration with technology provider under Build-Own-Operate-Transfer (BOOT) concept. 4 technology providers were selected and still under evaluation. Progress of project will be further verified in the next assessment.</p> <p>For biomass waste management, EFB will be send to Bio-compost plant for composting which managed by mill management. The ratio of POME to composting is 20:80.</p>	Complied
4.5.1.5	<p>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.</p> <p>- Major compliance -</p>	<p>Annual training programme of the mill includes environmental awareness and compliance related trainings to the executives, staffs and workers. The latest training conducted on 14 August 2017 for all the workers during every Tuesday morning muster.</p>	Complied
4.5.1.6	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>Environmental Performance Monitoring Committee (EPMC) established since 1 January 2017 for ensuring the environmental monitoring tools implemented effectively.</p> <p>Environmental related matters such as policy, law & regulations, CEMS, effluent and etc were discussed during the meeting. Workers interview reveal that they are encouraged to discuss environmental issues with the management. Self-compliance declaration, based on premise checklist (PYDT KKS/KG/BT), submitted to DOE on 30/8/17 by on-site compliance executive, Puan Norwati Mamat.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		In addition, quarterly environmental meeting was last conducted on 19/09/17. All pertinent environmental matters were discussed during the meeting. Records of meeting no.2 (18/7/17) and no.1 (29/3/17) was made available for viewing.	
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
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 - Major compliance -	Sg Tong POM maintains records of energy usage, which is reported on monthly to Energy Commission (EC).The use of the steam turbine for electricity generation has been optimised in order to reduce the dependence on diesel fossil fuel.	Complied
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 -	The mill recorded the following data and tabulated the ratio against the FFB processed and CPO produced to determine the efficiency of their operations; 1. All the diesel used (non-renewable) for the mill operations. 2. Fibre/shell used (renewable). In this relation, the following data were sighted and verified: 1. Non-renewable energy usage for 2017 for month of January to September 2017. Ratio mt diesel/mt CPO produced ranges from 0.00017 to 0.00077. 2. Renewable energy usage for 2017 for month of January to September 2017. ratio shell/fibre mt /mt CPO varies from 4.5 to 5.2.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Utilization of fossil fuels (diesel for genset) was monitored and control through stores stocks and materials checking reported on monthly basis. Effective maintenance plan and productive operation plan for genset including regular servicing of gensets as well as efficient operation of FFB process to fully utilize the free source of fuel i.e. biomass (fiber and shell) were implemented. The quantity of biomass also monitored to achieve the expected percentage of fiber (60 – 70%) and shell (3%) quantities being consumed.	Complied
Criterion 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 -	All waste and pollution are identified and documented in the Waste Management Plan for Financial Year 2017/2018. The waste generated from the mill operations as shown below; Domestic waste – rubbish from the mill complex and employees quarters (disposed by estate management) Recycled waste – Fibre, palm kernel shell, boiler ash, scrap iron Scheduled waste – Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries The source of mill pollution generated from the mill is the smoke from the boiler are monitored from the stack emission during the entire operations. These reports are reviewed by the mill and submitted to DOE. There was no major issue	Complied
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: a) Identifying and monitoring sources of waste and pollution.	The Waste Management Plan for Financial Year 2017/2018 is available and sighted. The plan listed the waste generated from the mill operations as shown below; Domestic waste – rubbish from the mill complex and employees quarters (disposed by estate management)	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>Action to be taken;</p> <ul style="list-style-type: none"> • Allocate landfill area 3km min away from residential area/watercourse. • To provide adequate dustbins at mill & linesites. • Establish collection SOP & schedule • Create awareness on hygiene • Regular monitoring on cleanliness & hygiene. • Recycled waste – Fibre, palm kernel shell, boiler ash, scrap iron • Shell & fibre - Sell through registered customer • Scrap iron – sell through registered buyers • SW – Dispose through DOE licensed contractor • Scheduled waste – Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries. <p>Action to be taken;</p> <ul style="list-style-type: none"> • Comply to procedure stipulated MQMS SOP Handling of scheduled waste. • Comply to Environmental Quality Regulations 2005 • Establish list of SW/Notify DOE for all SW generated/appropriate SW labelling 	
<p>4.5.3.3</p> <p>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)</p>	<p>The SOP on Scheduled Waste disposal is established and implemented. The inventory of the waste generated is recorded using the "eswis" inventory system. The last update on the eswis was on August 2017. Refer to the latest inventory ref# 1107T1237615182017 submitted on 30/8/17.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance								
	Regulations, 2005 - Major compliance -										
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	Method of handling the domestic/general wastes are segregation at the collection point from offices and housing area before being disposed to the designated landfill within Sg Tong complex.	Complied								
Criterion 4.5.4: 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 -	Based on the assessment of all polluting activities in the environmental aspect and impact, the identified source was boiler and incinerator chimney. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler and incinerator stack monitoring of dust particulate. Particulate sampling results reported as per the following: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Stack Sampling</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>Boiler no.1 (TG PMD 424) 2nd half 2016 (15/9/16)</td> <td>Report ref# L-GB-TC1608CSN-0604 0.3712 @ 12% CO2 vs 0.4</td> </tr> <tr> <td>Boiler no.1 (TG PMD 424) 1st half 2017 (6/6/17)</td> <td>Report ref# L-GB-TC1705CSN-0530 0.3466 @ 12% CO2 vs 0.4</td> </tr> <tr> <td>Boiler no.2 (TG PMD 61) 2nd half 2016 (6/1/17)</td> <td>Report ref# L-GB-TC1612CSN-0291 (A) 0.3466 @ 12% CO2 vs 0.4</td> </tr> </tbody> </table>	Stack Sampling	Result	Boiler no.1 (TG PMD 424) 2nd half 2016 (15/9/16)	Report ref# L-GB-TC1608CSN-0604 0.3712 @ 12% CO2 vs 0.4	Boiler no.1 (TG PMD 424) 1st half 2017 (6/6/17)	Report ref# L-GB-TC1705CSN-0530 0.3466 @ 12% CO2 vs 0.4	Boiler no.2 (TG PMD 61) 2nd half 2016 (6/1/17)	Report ref# L-GB-TC1612CSN-0291 (A) 0.3466 @ 12% CO2 vs 0.4	Complied
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Criterion / Indicator		Assessment Findings	Compliance
4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	<p>Palmgroup pollution prevention plan has been integrated into environmental improvement plan which is being reviewed on yearly basis. Based on pollution prevention plan for 2017, main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH₄) emission through POME treatment. The company are in process of obtaining proposals to construct methane capture facilities in POME treatment pond. Other less significant GHG emissions identified including CO_x, SO_x and NO from various sources including fossil fuel, chemical and fertilizer consumptions. GHG emission calculated using and RSPO approved calculator, Palm GHG version 3.0.1.</p>	Complied
4.5.4.3	<p>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.</p> <p>- Major compliance -</p>	<p>Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system where the licensed limit for final discharge BOD is 100mg/l for latest compliance schedule. Regular monitoring was conducted by the mill by taking the sample of waste water in final discharge point.</p> <p>Effluent final discharge analysis was monitored on monthly basis by accredited 3rd party laboratory (ERALab KT Sdn Bhd). Refer to the latest analysis dated 6/8/17, ref# 17/07/W646. BOD3 recorded at 49 mg/l and comply with the limit stipulated in mill's compliance schedule.</p> <p>In addition, Sg Tong POM also required to submit Quarterly Return Report to DOE. Latest quarter (April - June 2017) was verified. Refer to report dated 11/7/17</p>	Complied
<p>Criterion 4.5.5: Natural water resources</p>			

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Criterion / Indicator		Assessment Findings	Compliance
4.5.5.1	<p>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:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>Water management plan FY2017/2018 includes water consumption management and availability of water for mill processing and domestic use. The rainfall data collected to monitor the availability of water</p> <p>Water consumption were monitored and measured individually for mill processing, boiler, firefighting and housing. Average consumption to date for 2017 =1.4 m3/FFB processed</p>	Complied
4.5.5.2	<p>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.</p> <p>- Major compliance -</p>	<p>Based on DOE license, ref: 002385; validity 1-Jul-2017 to 30-Jun-2018, method of POME discharge is water course and the BOD limit is below 100 ppm. Quarterly report submitted via OER "Online Environmental Reporting and checked for the latest quarter April to June 2017.</p>	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>TDM has prepared Agriculture Policy Standard Operating Procedures (SOPs) for mills and estate covering all the relevant operations. There is a separate SOP on safe working practices for mill and estates. The safe operating procedure for the estates includes pesticide application. Sungai Tong Palm Oil Mill</p>	Complied

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		has its own SOP for safe working practices covering all the work stations. SOP dated 1/5/2011, edition TDM/OSH/STPOM/01. There is a SOP covering spraying management at the riparian area and cover crops. Inspection to the field and mill confirm that the SOPs are implemented. Assistant Managers and staff monitor the implementation. At mill, SOP dated 1 May 2011 edition TDM/STPOM/01 Revision – 01/2011 covering all work station is displayed at each work station in Bahasa Malaysia.	
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	The management engaged External Mill Advisor (Visiting Engineer) to inspect and report on the operations on annual basis. The last visit was carried out on 2-3/5/2017 by Dr Hj Zulkifli from SDSAS Sdn Bhd. Review of Visiting Engineer Visit Reports and site inspections confirmed consistent records of implementation of SOPs. This to ensure that performance is on track and best practices being consistently implemented.	Complied
Criterion 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 -	Annual business plan in the form of annual budget and the projection for 5 years (2018-2022) was prepared as guidance for future planning. The business plan contains FFB production, CPO, OER, and KER, general charges, mill maintenance, process shift labour, general services, total processing cost etc. It also includes environment, social (workers and staffs welfare), and health and safety component. Sample of CAPEX for 2017: <ul style="list-style-type: none"> i. P15 press ii. workers quarters iii. 80MT weighbridge 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> iv. EFB Conveyor v. Wet Kernel Elevator vi. Double Thresher Project vii. Raw Water Pump 	
Criterion 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 contractors have signed on the service agreement or Work Order Agreement prior to provide services. The agreement has detailed the pricing mechanism for the service offered. Sampled of Work Order Agreement as below: <ul style="list-style-type: none"> a. Order No.: STOM: 246/17 for providing site maintenance and calibration of CEMS with certificate valid until 30/9/2017. b. Order No.: STOM: 250/17 for providing labour, materials, transport and etc to repair the monsoon drain in the office which valid until 30/9/2017. 	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	The payment was made by Head Office after the mill has sent the invoice to Head Office. Interviewed with the contractors confirmed that the payment was made promptly.	Complied
Criterion 4.6.4: 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.	Additional requirements such as MSPO for the contractors to comply were stamped on the Work Order Agreement and it was signed by the contractors. Interviewed with the contractors confirmed that MSPO requirements and policies were explained	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	to them. Seen the training record for the briefing of MSPO conducted on 23/8/2017 with the contractors. Besides, the management has emailed the relevant MSPO requirements to the contractors on 10-13/9/2017.	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	The contractors have signed on the Work Order Agreement on monthly basis prior to provide services. Seen the Work Order Agreement and details refer to Criterion 3, Indicator 1.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	TDM Plantation Sdn Bhd has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Complied

3.3 Details of Nonconformities and Opportunity for improvement

Major Nonconformance		
Ref	Area/Process	Clause
1530255-201709-M1	MS 2530-1:2013, MS 2530-3:2013, MS 2530-4:2013	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders - 4.1.2.1, 4.1.2.2, 4.1.2.3
Details:	The internal audit reports for 3 estates visited were not available.	
Requirements:	1. Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. 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. 3. Report shall be made available to the management for their review.	
Objective Evidence:	Internal audit was conducted on September 2017 for all supply bases. However, the internal audit report was not available to review by BSI auditor. 1. Fikri Estate 2. Tayor Estate 3. Jaya Estate	
Close Out Evidence:	Correction: The internal audit reports will be attached together within the 60 days of closing timeframe. All the internal audit reports will be ready by two weeks' time. Corrective Action: All internal audits will be scheduled in a timely manner which is once a month based on the needs of the operation unit. The whole schedule for next year will be attached.	
Audit team conclusion:	All the evidence submitted were found adequate. Thus, the Major NC raised was closed on 28/11/2017.	

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Major Nonconformance		
Ref	Area/Process	Clause
1530255-201709-M2	MS 2530-1:2013, MS 2530-3:2013, MS 2530-4:2013	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders - 4.1.3.1
Details:	The minute for last MRM was not available.	
Requirements:	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.	
Objective Evidence:	Management Review procedure was established accordingly. However, the minute for last MRM was not available to verify by BSI auditor during this assessment.	
Close Out Evidence:	<p>Correction: The MRM will be held after all the pending reports are ready to be presented. The MRM is planned to be held in October 2017 so that the minutes can be attached together with the Corrective Action Report.</p> <p>Corrective Action: MRM will be held at least once a year so that all the audit reports can be presented during the meeting and minutes recorded. For this NCR, the minutes of the October 2017's MRM will be attached together with the Corrective Action Report.</p>	
Audit team conclusion:	All the evidence submitted were found adequate. Thus, the Major NC raised was closed on 28/11/2017.	

Major Nonconformance		
Ref	Area/Process	Clause
1530255-201709-M3	MS 2530-1:2013, MS 2530-3:2013, MS 2530-4:2013	Part 4: General Principles for Palm Oil Mills - 4.1.2.1, 4.1.2.2, 4.1.2.3
Details:	The internal audit report for Sg Tong POM was not available.	
Requirements:	<ol style="list-style-type: none"> 1. Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. 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. 3. Report shall be made available to the management for their review. 	
Objective Evidence:	Internal audit was conducted on September 2017 for Sg Tong POM. However, the internal audit report was not available to review by BSI auditor.	
Close Out Evidence:	<p>Correction: The internal audit reports will be attached together within the 60 days of closing timeframe. All the internal audit reports will be ready by two weeks' time.</p> <p>Corrective Action: All internal audits will be scheduled in a timely manner which is once a month based on the needs of the operation unit. The whole schedule for next year will be attached.</p>	
Audit team	All the evidence submitted were found adequate. Thus, the Major NC raised was	

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conclusion:	closed on 28/11/2017.	
Major Nonconformance		
Ref	Area/Process	Clause
1530255-201709-M4	MS 2530-1:2013, MS 2530-3:2013, MS 2530-4:2013	Part 4: General Principles for Palm Oil Mills - 4.1.3.1
Details:	The minute for last MRM was not available.	
Requirements:	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.	
Objective Evidence:	Management Review procedure was established accordingly. However, the minute for last MRM was not available to verify by BSI auditor during this assessment.	
Close Out Evidence:	<p>Correction: The MRM will be held after all the pending reports are ready to be presented. The MRM is planned to be held in October 2017 so that the minutes can be attached together with the Corrective Action Report.</p> <p>Corrective Action: MRM will be held at least once a year so that all the audit reports can be presented during the meeting and minutes recorded. For this NCR, the minutes of the October 2017's MRM will be attached together with the Corrective Action Report.</p>	
Audit team conclusion:	All the evidence submitted were found adequate. Thus, the Major NC raised was closed on 28/11/2017.	

Major Nonconformance		
Ref	Area/Process	Clause
1530255-201709-M5	MS 2530-1:2013, MS 2530-3:2013, MS 2530-4:2013	Part 4: General Principles for Palm Oil Mills - 4.4.2.2
Details:	No evidence to show that the complainants were accepted for the action taken to resolve their complaints.	
Requirements:	The system shall be able to resolves disputes in an effective, timely and appropriate manner, which is accepted by all parties.	
Objective Evidence:	The mill has implemented Linesite Repair Report. Any complaints related to housing repair will be recorded in the report. Evidence of action taken was sighted. However, no acknowledgement by the complainants once the complaint has resolved to show that he accepted.	
Close Out Evidence:	<p>Correction: The complainant has to sign and comment (if any) after the housing repair works.</p> <p>Corrective Action: Linesite Officer has to make sure that every complaint which already taken into action must be acknowledge back by the complainants.</p>	
Audit team conclusion:	All the evidence submitted were found adequate. Thus, the Major NC raised was closed on 28/11/2017.	

Major Nonconformance		
Ref	Area/Process	Clause
1530255-201709-M6	MS 2530-1:2013, MS 2530-3:2013, MS 2530-4:2013	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders - 4.4.2.2
Details:	No evidence to show that the complainants were accepted for the action taken to rectify their complaints.	
Requirements:	The system shall be able to resolves disputes in an effective, timely and appropriate manner, which is accepted by all parties.	
Objective Evidence:	Housing Repair Complaint Form was implemented in Tayor Estate and Jaya Estate. All the complaints were filed properly. However, no evidence of acknowledgement by the complainants after the repair work was completed sighted in Fikri Estate and Tayor Estate.	
Close Out Evidence:	<p>Correction: The complainant has to sign and comment (if any) after the housing repair works.</p> <p>Corrective Action: Linesite Officer has to make sure that every complaint which already taken into action must be acknowledge back by the complainants.</p>	
Audit team conclusion:	All the evidence submitted were found adequate. Thus, the Major NC raised was closed on 28/11/2017.	

Major Nonconformance		
Ref	Area/Process	Clause
1530255-201709-M7	MS 2530-1:2013, MS 2530-3:2013, MS 2530-4:2013	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders - 4.4.5.5
Details:	Records that contain full names, gender, and date of birth, date of entry, a job description, wage and the period of employment were not available for contract workers.	
Requirements:	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 full names, gender, and date of birth, date of entry, a job description, wage and the period of employment.	
Objective Evidence:	Personal details for the contract workers were not available in Tayor Estate and Jaya Estate.	
Close Out Evidence:	<p>Correction: Started from October 2017, all estate has to keep contractor employees personal details, employment contract and update the data for any changes.</p> <p>Corrective Action: PIC has to make sure all contractors submit their employee personal details and offer letter to the estate their working with.</p>	
Audit team conclusion:	All the evidence submitted were found adequate. Thus, the Major NC raised was closed on 28/11/2017.	

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Minor Nonconformance		
Ref	Area/Process	Clause
1530255-201709-N1	MS 2530-1:2013, MS 2530-3:2013, MS 2530-4:2013	Part 4: General Principles for Palm Oil Mills - 4.4.1.1
Details:	No specific timeline to mitigate the negative impacts and promotion of positive impacts was not available in the action plan.	
Requirements:	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.	
Objective Evidence:	Social Impact Assessment Action Plan Revision 2017/2018 was developed on 18/9/2017. The plan has incorporated area of concerns, findings from SIA assessors, action plan status, remarks as well as person in charge. However, no specific timeline to mitigate the negative impacts and promotion of positive impacts was not available in the action plan.	
Close Out Evidence:	<p>Correction: To add new column for timeline and positive impact into Action Plan for Sg. Tong POM FY 2017/2018 Reviewed on 4/10/2017</p> <p>Corrective Action: New Action Plan for Sg. Tong POM FY 2017/2018 mentioned the implementation date of Area of Concern as well as Positive Impact for each issues arise</p>	
Audit team conclusion:	The CAP was accepted on 29/10/2017. However, the effectiveness of the corrective action will be verify during next assessment.	

Minor Nonconformance		
Ref	Area/Process	Clause
1530255-201709-N2	MS 2530-1:2013, MS 2530-3:2013, MS 2530-4:2013	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders - 4.4.1.1
Details:	No specific timeline to mitigate the negative impacts and promotion of positive impacts was not available in the action plan.	
Requirements:	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.	
Objective Evidence:	Social Impact Assessment Action Plan Revision 2017/2018 was developed on 18/9/2017. The plan has incorporated area of concerns, findings from SIA assessors, action plan status, remarks as well as person in charge. However, no specific timeline to mitigate the negative impacts and promotion of positive impacts was not available in the action plan.	
Close Out Evidence:	<p>Correction: To add new column for timeline and positive impact into Action Plan for Sg. Tong POM FY 2017/2018 Reviewed on 4/10/2017</p> <p>Corrective Action: New Action Plan for Sg. Tong POM FY 2017/2018 mentioned the implementation date of Area of Concern as well as Positive Impact for each issues arise</p>	
Audit team conclusion:	The CAP was accepted on 29/10/2017. However, the effectiveness of the corrective action will be verify during next assessment.	

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Minor Nonconformance		
Ref	Area/Process	Clause
1530255-201709-N3	MS 2530-1:2013, MS 2530-3:2013, MS 2530-4:2013	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders - 4.4.5.4
Details:	Employment contracts for the contract workers were not available and contract worker was not paid according to minimum standards.	
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:	<p>In Taylor Estate, contract piece-rated worker (Passport No.: B2941926) did not achieve Minimum Wage Order 2016 where the pay for the sampled month are listed as below:</p> <ul style="list-style-type: none"> a. August 2017 – RM 725.79 b. July 2017 – RM 847.81 c. June 2017 – RM 482.69 d. May 2017 – RM 821.13 e. April 2017 – RM 706.42 f. March 2017 – RM 556.01 g. February 2017 – RM 654.58 <p>Taylor Estate and Jaya Estate: Employment contracts for the contract workers that agreed between the contractor and the employees were not available.</p>	
Close Out Evidence:	<p>Correction: All contractors need to make sure all of their workers achieve the Minimum Wages Order 2016 and Work Agreement between contractors and their employees</p> <p>Corrective Action: Contractor had submitted all employee (Passport No.:B2941926) salary details and achieved Minimum Wages Order 2016 and Agreement Letter</p>	
Audit team conclusion:	The CAP was accepted on 29/10/2017. However, the effectiveness of the corrective action will be verify during next assessment.	

Noteworthy Positive Comments	
1	Safety signs are continuously maintained well and clearly marked with walkways.
2	Sg Tong POM and supply bases maintain good relationship with stakeholders.

3.4 Status of Nonconformities Previously Identified and OFI

-Not Applicable-

3.5 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues: DOE, Kuala Terengganu - She explained that Sg Tong POM and supply bases were comply with applicable legal and act related to environment.</p> <p>Management Responses: The management will continue to comply with the legal requirement.</p> <p>Audit Team Findings: Verified DOE Logbook, there is no issue was raised.</p>
2	<p>Issues: DOSH, Kuala Terengganu - He explained that Sg Tong POM and supply bases were comply with OSHA, FMA and other requirement. During the last visit by DOSH, no major issue was raised.</p> <p>Management Responses: The management will continue to comply with the legal requirement.</p> <p>Audit Team Findings: Verified DOSH Logbook, there is no issue was raised.</p>
3	<p>Issues: JTK, Kuala Terengganu - She explained that Sg Tong POM and supply bases were comply with applicable legal requirement. No major issue was raised.</p> <p>Management Responses: The management will continue to comply with the legal requirement.</p> <p>Audit Team Findings: No other issue.</p>
4	<p>Issues: Workers' Representative – The workers were satisfied with the management. They were treated equally among all different nationalities. Their salary were paid according to Minimum Wage Order 2016.</p> <p>Management Responses: The management will continue to ensure they are comply with legal requirements.</p> <p>Audit Team Findings: No further issue.</p>
5	<p>Issues: Gender Committee Representatives – They reported that no sexual harassment and violence case was happened in the workplace. They were treated equally with no discrimination based on gender.</p> <p>Management Responses: The management will respect all the workers with no discrimination based on their gender or nationalities.</p> <p>Audit Team Findings: No other issue.</p>
6	<p>Issues: Local Communities (Bukit Nenas, JKK Tayor) – They have good relationship with the management. The management will provide assistance whenever they requested</p> <p>Management Responses: The management will continue to support and provide assistance to the local communities whenever requested.</p> <p>Audit Team Findings: No further issue.</p>
7	<p>Issues: School Representatives (SK Kg Tayor, SK Kg. Jaya) – The teachers informed that the management</p>



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	has given supports and assistance whenever needed. They are very happy with the management.
	Management Responses: The management will continue to help the school whenever they needed.
	Audit Team Findings: No other issues.
8	Issues: Contractors – They informed that the payment was made promptly. Agreement was signed prior to work.
	Management Responses: The management will made the payment promptly according to the agreement.
	Audit Team Findings: No other issue.

3.6 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1530255-201709-M1	Major	25/09/2017	Closed on 28/11/2017
1530255-201709-M2	Major	25/09/2017	Closed on 28/11/2017
1530255-201709-M3	Major	25/09/2017	Closed on 28/11/2017
1530255-201709-M4	Major	25/09/2017	Closed on 28/11/2017
1530255-201709-M5	Major	25/09/2017	Closed on 28/11/2017
1530255-201709-M6	Major	25/09/2017	Closed on 28/11/2017
1530255-201709-M7	Major	25/09/2017	Closed on 28/11/2017
1530255-201709-N1	Minor	25/09/2017	"open"
1530255-201709-N2	Minor	25/09/2017	"open"

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Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment Sungai Tong Palm Oil Mill and Estates Certification Unit complies with the MS 2530-3:2013 or MS 2530-4:2013. It is recommended that the certification of Sungai Tong Palm Oil Mill Palm Oil Mill and Estates Certification Unit is approved.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Mohd Izwan Hafez B Che Azmi	Name: Mohd Hafiz Mat Hussain
Company name: TDM Plantation Sdn Bhd Sungai Tong Palm Oil Mill	Company name: BSI Services Malaysia Sdn Bhd
Title: Safety & Health Officer	Title: Lead Auditor
Signature: 	Signature: 
Date: 12 th December 2017	Date: 12 th December 2017

Appendix A: Assessment Plan

Date	Time	Subjects	Hafiz	Hidhir	Ning Shing
Saturday 23/09/2017	PM	Audit team travelling to Terengganu	√	√	√
Sunday 24/09/2017 Sg Tong Palm Oil Mill & Ladang Fikri	08:30-09:00	Opening meeting (Sungai Tong POM): <ul style="list-style-type: none"> • Presentation by Sg Tong CU Team • Presentation by BSI Lead Auditor - introduction of team members and assessment agenda • Confirmation of assessment scope and finalize Audit plan 	√	√	√
	09:00-12:30	Ladang Fikri: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Document review P1 – P6 (part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting	√	√	√
	10:00-12:30	Stakeholder interviews (combined with estate’s Stakeholders) and External stakeholder meeting (government agencies at Kuala Terengganu) DOE, DOSH, Labor Department.	-	-	√
	12:30-13:30	Lunch	√	√	√
	13:30-16:30	Sg Tong Palm Oil Mill: Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc. Document Review (part 4), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices	√	√	√
	16:30-17:00	Interim Closing briefing.	√	√	√

Monday 25/09/2017 Ladang Tayor & Ladang Jaya	08:30-12:30	Ladang Tayor: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Document review P1 – P6 (part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting	√	√	√
	12:30-13:30	Lunch	√	√	√
	13:30-16:30	Ladang Jaya: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Document review P1 – P6 (part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting	√	√	√
	16:00-16:30	Verify any outstanding issues & Preparation for closing Meeting	√	√	√
	16:30-17:30	Closing Meeting	√	√	√

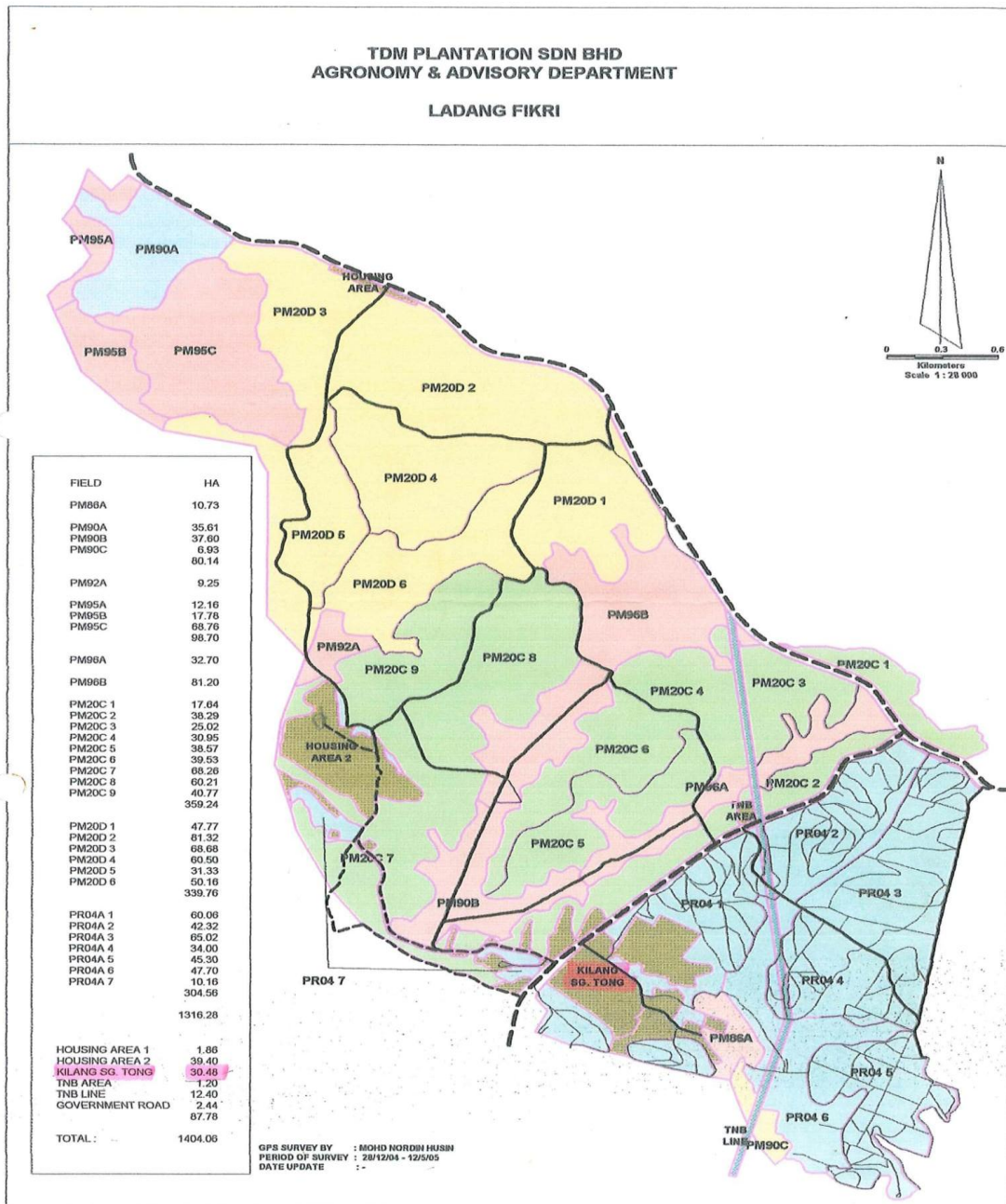
Appendix B: List of Stakeholders Contacted

1. DOSH, Kuala Terengganu
2. DOE, Kuala Terengganu
3. JTK, Kuala Terengganu
4. Workers' Representative
5. Gender Committee Representatives
6. Local Communities (Bukit Nenas, JKK Tayor)
7. School Representatives (SK Kg Tayor, SK Kg. Jaya)
8. Contractors

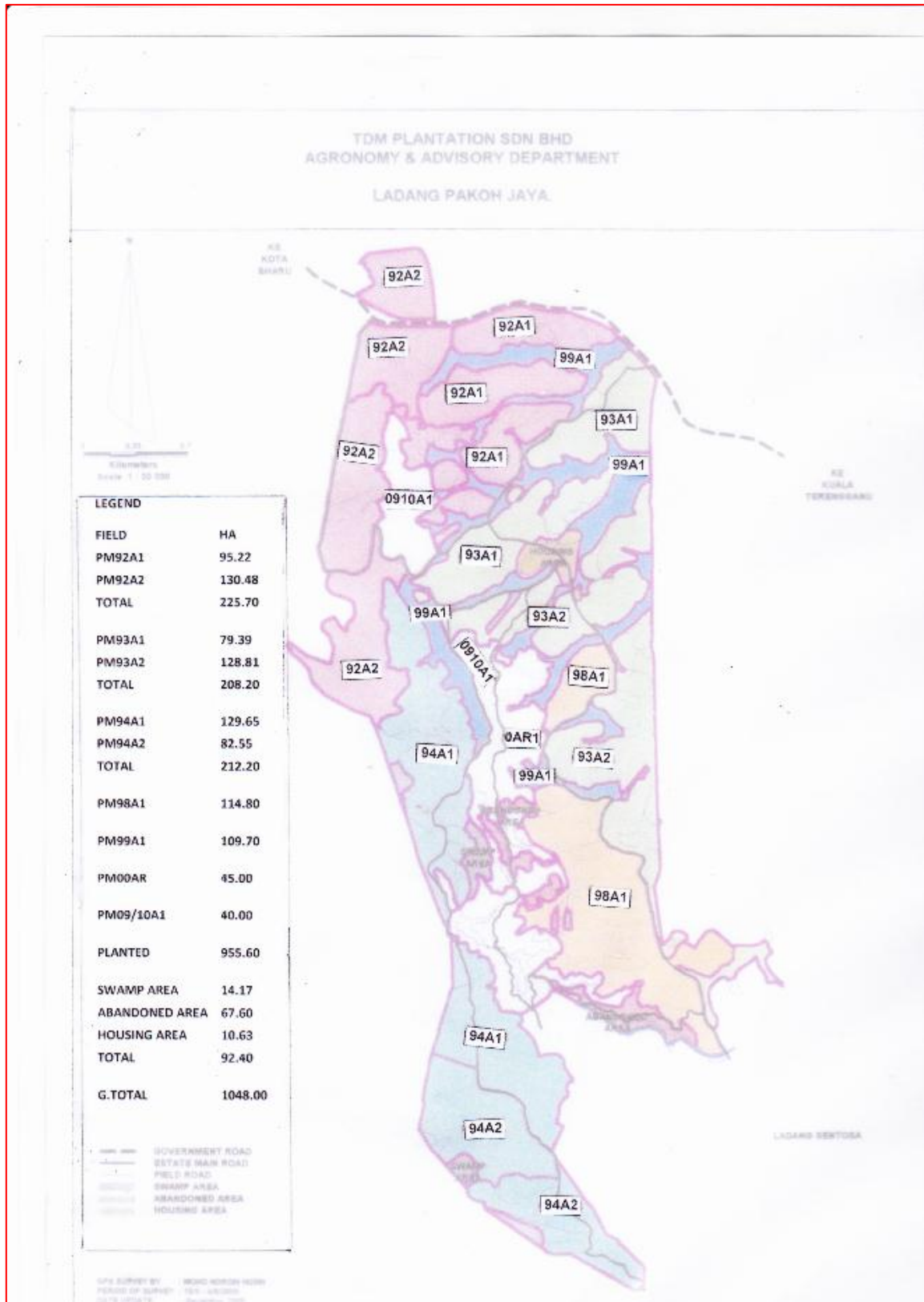
Appendix C: Smallholder Member Details

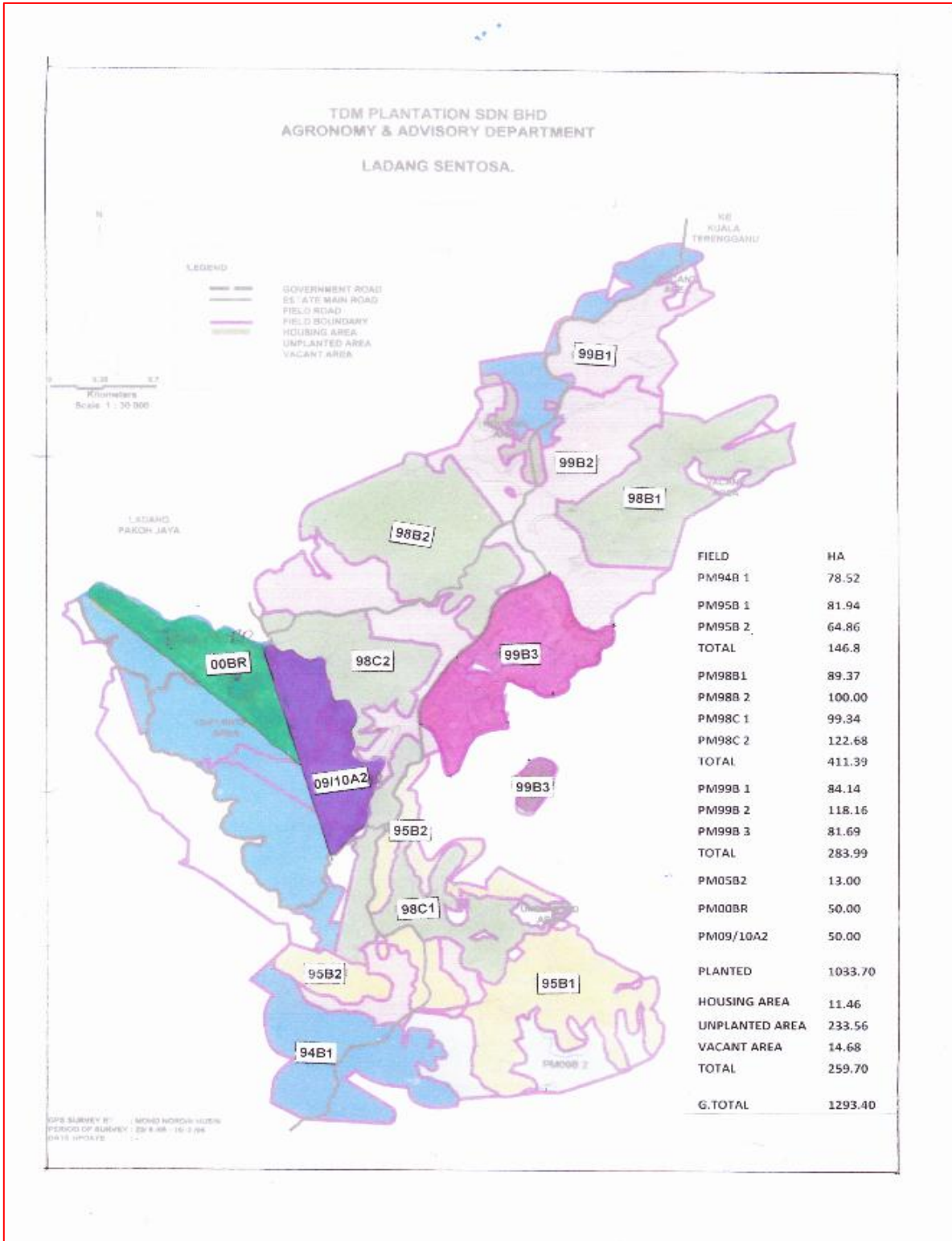
No	Name of smallholder	Year Planted	Land Area (ha)	Forecast FFB (Mt/ha/year)
1	Not applicable			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
TOTAL				

Appendix D (i): Location and Field Map (Sg Tong POM, Ladang Fikri including Div Fikri, Div Pakoh Jaya and Div Sentosa)

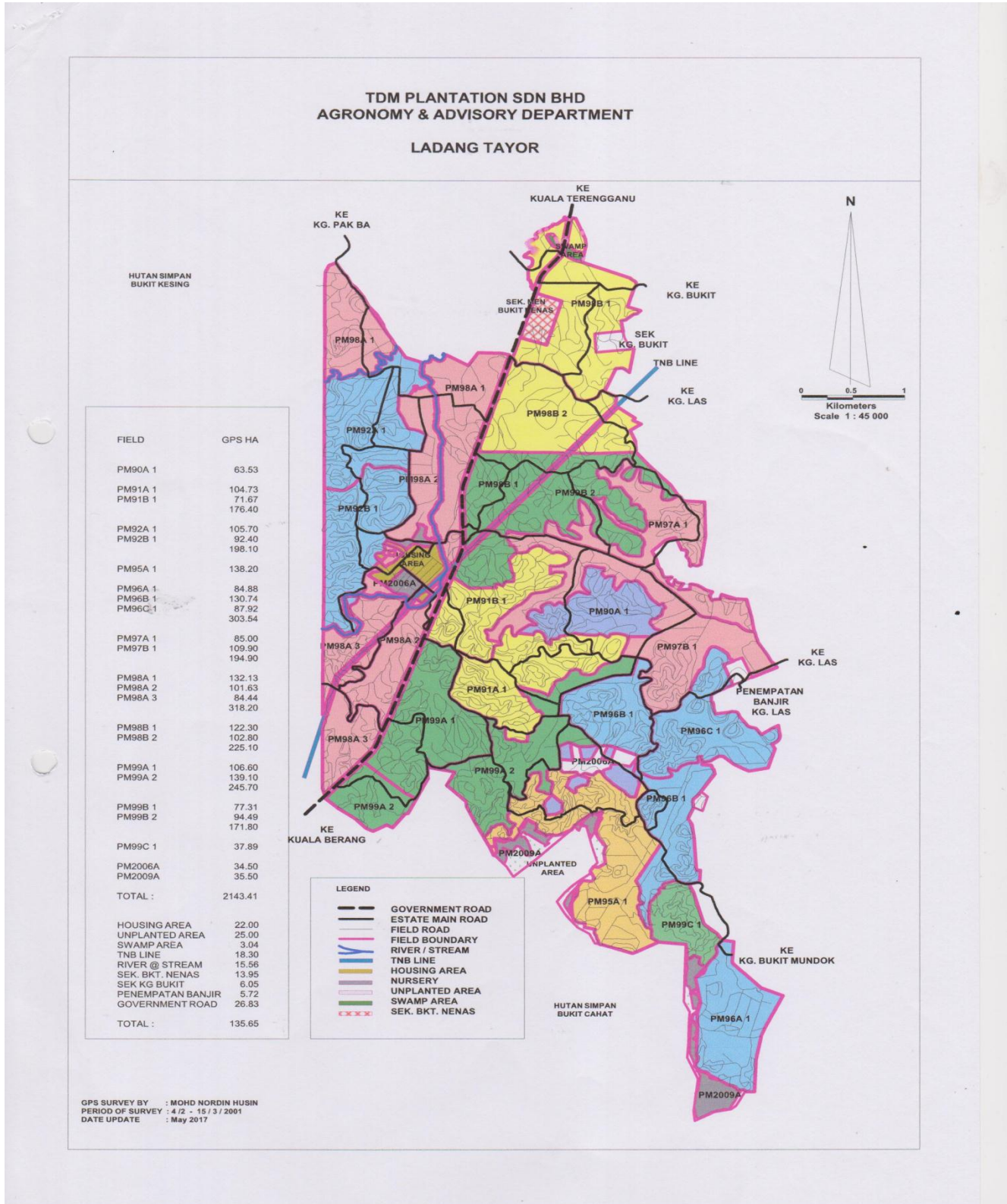


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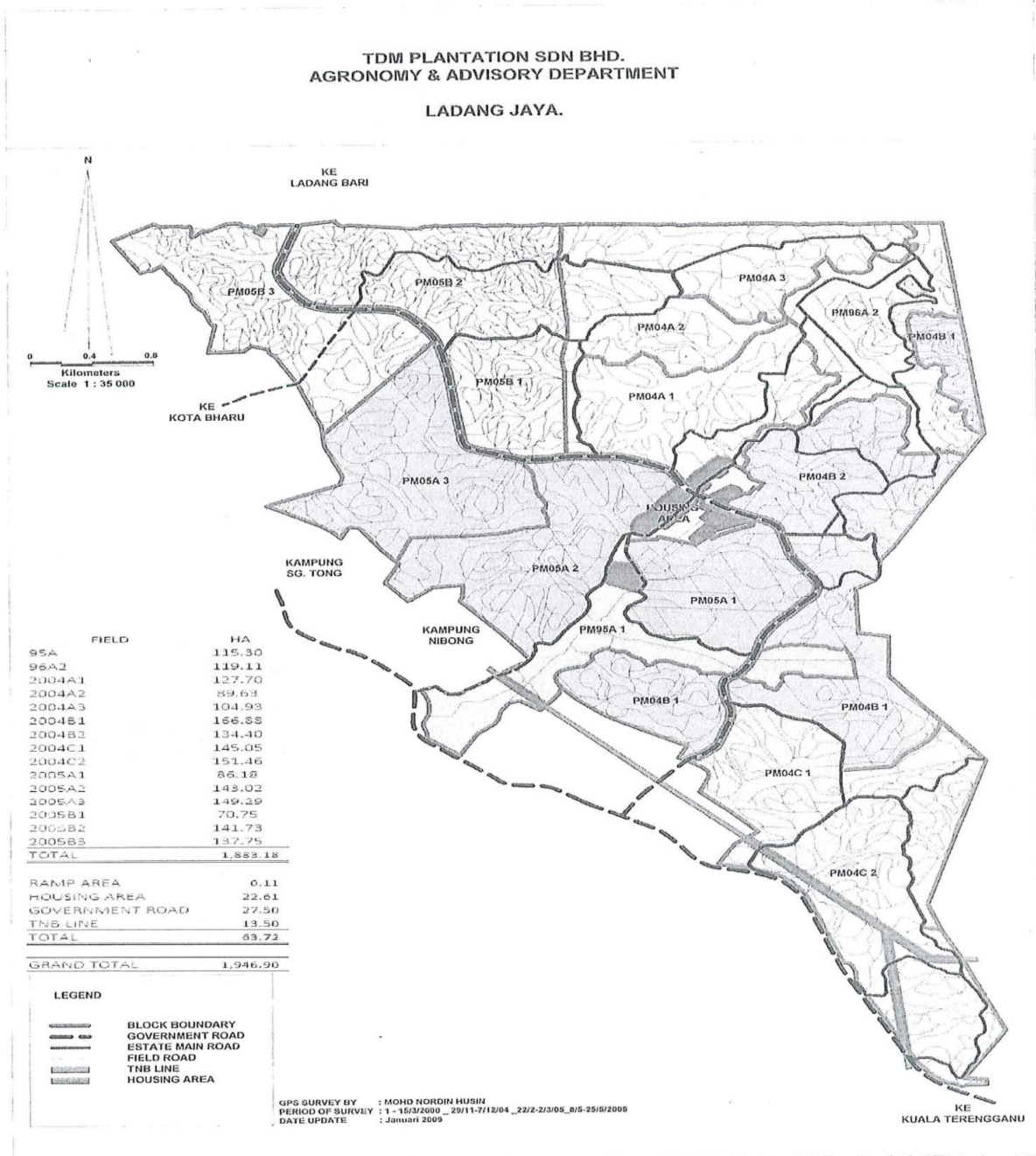




Appendix D (ii): Location and Field Map (Ladang Tayor)



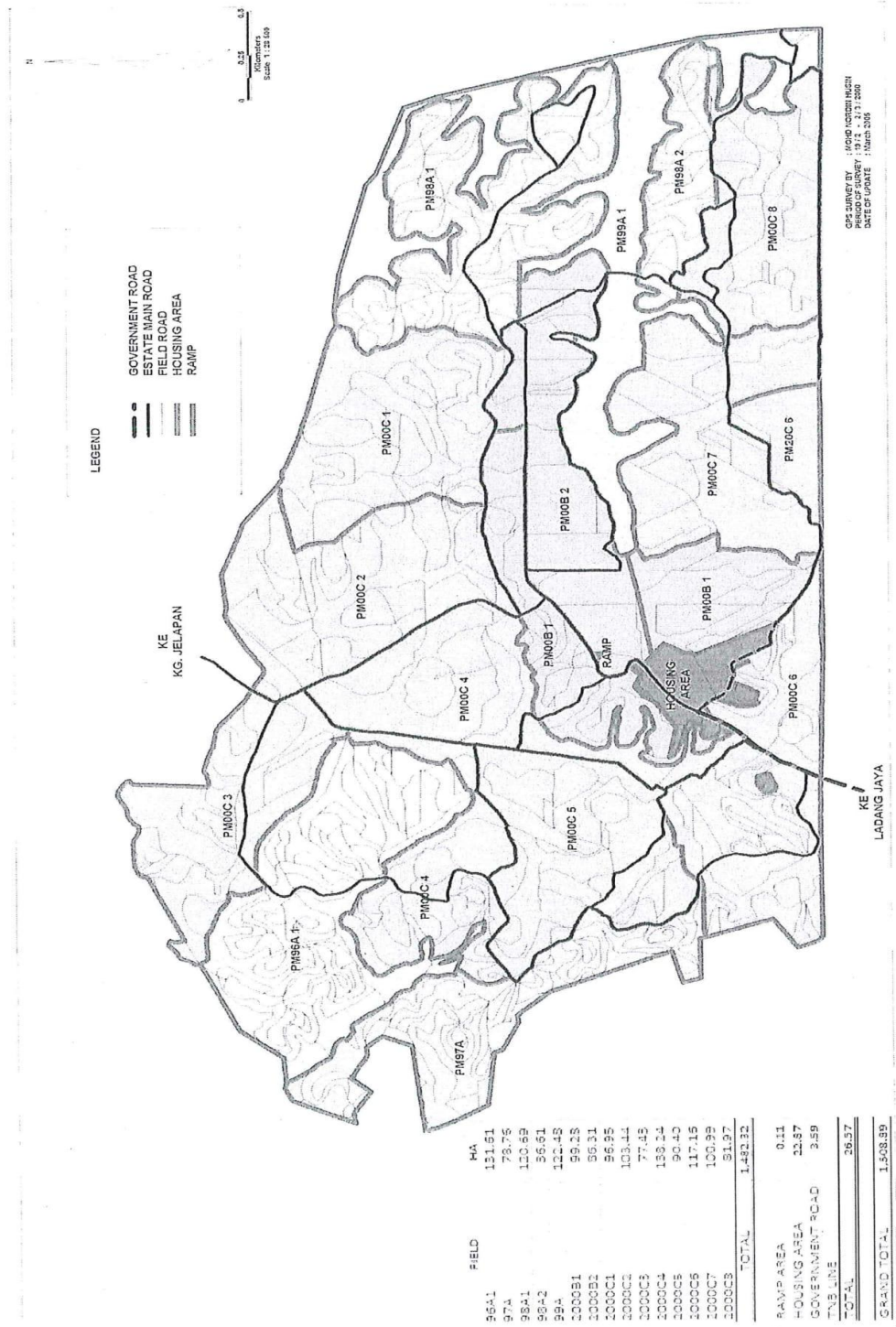
Appendix D (iii): Location and Field Map (Ladang Jaya including Bari Div)



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TDM PLANTATION SDN. BHD.
 AGRONOMY & ADVISORY DEPARTMENT.

LADANG JAYA. BARI DIV



Appendix E: List of Abbreviations Used

AN	Ammoniacal Nitrogen
ANPN	National Park Agency Gabon
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DGEPN	Environmental Protection Agency Gabon
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
GMP	Good Manufacturing Practice
HCV	High Conservation Value
IAV	Initial Assessment Visit
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
MSDS	Material Safety Data Sheet
MSP0	Malaysian Sustainable Palm Oil
O&G	Oil and Grease
PK	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	Suspended Solids
TN	Total Nitrogen
TS	Total Solids
VFA	Volatile Fatty Acids