

**RSPO PRINCIPLE AND CRITERIA
4th Annual Surveillance Assessment (ASA4_1)
Public Summary Report**

Kulim (Malaysia) Berhad
Head Office: K.B 705 80990 Johor Bahru Johor, Malaysia
Palong Cocoa Palm Oil Mill and supply base KB 504 85009 Segamat Johor, Malaysia

TABLE of CONTENTS	Page No
Section 1: Scope of the Certification Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Location(s) of Mill & Supply Bases	4
4. Description of Supply Base	4
5. Plantings & Cycle.....	4
6. Certified Tonnage of FFB (Own Certified Scope).....	5
7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable	5
8. Certified Tonnage	5
Section 2: Assessment Process	6
1. Assessment Program	7
Section 3: Assessment Findings	9
3.1 Details of audit results	9
3.2 Progress against Time Bound Plan.....	9
3.3 Details of findings	11
3.3.1 Status of Nonconformities Previously Identified and Observations	13
3.3.2 Summary of the Nonconformities and Status.....	15
Appendix A: Summary of Findings	17
Appendix B: Approved Time Bound Plan.....	65
Appendix C: Certification Unit RSPO Certificate Details.....	67
Appendix D: Assessment Plan.....	68
Appendix E: Stakeholders Contacted	70
Appendix F: CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Identity Preserved)	71
Appendix G: Location Map of Palong Cocoa Palm Oil Mill.....	75
Appendix H: Sepang Loi Estate Field Map	76
Appendix I: Kemedak Estate Field Map.....	77
Appendix J: List of Smallholder Sampled	78
Appendix K: GHG Reporting Executive Summary	79
Appendix L: List of Abbreviations Used.....	81

Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0080-09-000-00	Date	Member since: 15 June 2009
Company Name	Kulim (Malaysia) Berhad		
Address	Head office : Kulim (Malaysia) Berhad, K.B. 705 80990 Johor Bahru, Johor, Malaysia Certification unit : Palong Cocoa Palm Oil Mill, K.B. 504 85009 Segamat, Johor, Malaysia		
Subsidiary of (if applicable)	Johor Corporation		
Contact Name	Mrs Salasah Elias		
Website	www.kulim.com.my	E-mail	salasah@kulim.com.my
Telephone	07 8611611	Facsimile	07 8631084

2. Certification Information			
Certificate Number	RSPO 613087	Certificate Issued Date	23/01/2009
		Expiry Date	22/01/2019
Scope of Certification	Palm Oil and Palm Kernel Production from Palong Cocoa Palm Oil Mill and Supply Base (Palong, Mungka, Kemedak, Sepang Loi, UMAC and Labis Bahru Estate)		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MY-AR1816	ISO9001:2015	SIRIM QAS International Sdn Bhd	10/11/2020
A76502	MS1500:2009	JAKIM	15/06/2019

RSPO Public Summary Report Revision 4 (November / 2016)

3. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Longitude	Latitude
Palong Cocoa Palm Oil Mill	K.B. 504 85009 Segamat, Johor, Malaysia	102° 47' 06.04"	2° 42' 23.09"
Palong Estate	Segamat, Johor, Malaysia	102° 44' 55.53"	2° 44' 55.89"
Mungka Estate	Segamat, Johor, Malaysia	102° 47' 08.35"	2° 41' 15.44"
Kemedak Estate	Segamat, Johor, Malaysia	102° 46' 07.28"	2° 42' 47.03"
Sepang Loi Estate	Segamat, Johor, Malaysia	102° 49' 04.08"	2° 41' 32.09"
UMAC Estate	Bandar Tun Razak, Pahang, Malaysia	102° 48' 23.94"	2° 53' 03.31"
Labis Bahru Estate	Segamat, Johor, Malaysia	102° 52' 27.92"	2° 25' 49.29"

4. Description of Supply Base							
Estate	Mature (ha)	Immature (ha)	Infra & Other (ha)	HCV (ha)	Total Planted (ha)	Total Hectarage	% of Planted
Palong Estate	1,420.52	411.34	84.26	5.68	1,831.86	1,921.80	95.32
Mungka Estate	1,724.03	0	138.54	67.88	1,724.03	1,930.45	89.94
Kemedak Estate	1,692.32	0	85.86	15.06	1,692.32	1,793.24	94.37
Sepang Loi Estate	919.89	0	70.97	12.69	919.89	1,003.55	91.66
UMAC Estate	1,549.81	0	60.29	2.24	1,549.81	1,612.34	96.12
Labis Bahru Estate	1,719.89	247.69	129.33	14.53	1,967.58	2,111.44	93.19
Total	9,026.46	659.03	569.25	118.08	9,685.49	10,372.82	93.50

Note: Infra = infrastructure

5. Plantings & Cycle								
Estate	Age (Years)					Tonnage / Year		
	0 - 3*	4 - 10*	11 - 20	21 - 25	26 - 30	Estimated (Nov 16- Oct 17)	Actual (Nov 16- Oct 17)	Forecast (Nov17- Oct 18)
Palong Estate	411.34	1,420.52	0	0	0	26,541	30,383.28	28,496
Mungka Estate	0	1,417.06	306.97	0	0	30,310	31,684.76	31,264
Kemedak Estate	0	1,465.67	226.65	0	0	28,973	30,182.56	29,835
Sepang Loi Estate	0	137.09	782.80	0	0	19,245	20,242.46	19,151
UMAC Estate	0	478.57	1,048.56	22.68	0	26,349	33,819.05	31,996
Labis Bahru Estate	247.69	1,063.79	656.10	0	0	37,758	35,883.25	36,334
Total	659.03	5,982.70	3,021.08	22.68	0	169,176	182,195.36	177,076

RSPO Public Summary Report
Revision 4 (November /2016)

6. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (ASA4_1) (Nov 16-Oct 17)	Actual (ASA4_1) (Nov 16-Oct 17)	Forecast (RC) (Nov 17-Oct 18)
Palong Estate	26,541	30,383.28	28,496
Mungka Estate	30,310	31,684.76	31,264
Kemedak Estate	28,973	30,182.56	29,835
Sepang Loi Estate	19,245	20,242.46	19,151
UMAC Estate	26,349	33,819.05	31,996
Labis Bahru Estate	37,758	35,883.25	36,334
Total	169,176	182,195.36	177,076.00

7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (Nov 16-Oct 17)	Actual (Nov 16-Oct 17)	Forecast (Nov 17-Oct 18)
Eng Huat	6,516.01	3,048.97	0
Kim Ma	3,177.92	6,178.75	0
Unilease	403.42	0	0
Hong Bee	963.71	1,760.95	0
Makin Semarak	0	0	0
Guan Leng	112.96	0	0
Chandra Brosis	5,104.00	3,606.70	0
TOTAL	16,278.02	14,595.37	0

8. Certified Tonnage									
Mill	Estimated (Nov 16-Oct 17)			*Actual (Nov 16-Oct 17)			Forecast (Nov 17-Oct 18)		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Palong Cocoa Palm Oil Mill	169,176.00	35,696.00	8,526.47	182,195.36	36,101.00	8,654.28	177,076	37,330	8,853
*Volume Extension		506.68	170.23				-	-	-
Total		36,202.68	8,696.70	182,195.36	36,101.00	8,654.28	177,076	37,330	8,853
OER/KER %		21.10	5.04		19.80	4.75		21.08	5.00

*Extended volume

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: RSPO-ACC-19)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
Tel +603 2242 4211 Fax +603 2242 4218
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (RSPO-ACC-19) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia. BSI is accredited for RSPO Supply Chain Certification Systems (SCCS) and Principles & Criteria for Sustainable Palm Oil Production (P&C, Single Site & Group) certification Worldwide.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 1 – 3 November 2017. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates (Sepang Loi & Kemedak Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities. On-site verification on the upgrading of Supply Chain module from MB to IP was conducted on 17 November 2017.

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. RSPO Principles & Criteria 2013 (RSPO P&C MYNI-2014) and RSPO Supply Chain Certification Standard 2014 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 approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base. The estates sample were determined based on formula $N = 0.8\sqrt{y}$ where y is the number of estates while when applicable, the smallholders sample were determined following the RSPO Certification Requirement for Group Certification Standard 2016. The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix K (if applicable).

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

**RSPO Public Summary Report
Revision 4 (November /2016)**

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

All the previous nonconformities are remains closed. The assessment findings for the 4th Annual Surveillance Assessment are detailed in Section 3.3.

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

This report was internally reviewed by Internal Certification Reviewer.

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 / Supply Base)	Initial Certification	ASA1 (2014)	ASA2 (2015)	ASA3 (2016)	ASA4 (2017)
Palong Cocoa Palm Oil Mill	✓	✓	✓	✓	✓
Palong Estate	✓			✓	
Mungka Estate			✓		
Kemedak Estate		✓			✓
Sepang Loi Estate		✓			✓
UMAC Estate			✓		
Labis Bahru Estate	✓			✓	

Tentative Date of Next Visit: October 22, 2018 – October 25, 2018

Total No. of Mandays: 9 mandays

BSI Assessment Team:

Hafriazhar Mohd Mokhtar – Lead Auditor

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

**RSPO Public Summary Report
Revision 4 (November /2016)****Daniel a/I Francis - Team Member**

Daniel Francis is a fulltime employee with BSI Services Malaysia. He holds a Bachelor of Applied Science Degree in Food Science, graduated from Charles Sturt University, Australia. He has over 8 years of working experience in the oil and gas industry and 3 years in the food & beverage industry. He is an experienced auditor for several management system standards including ISO 9001, ISO 14001, OHSAS 18001 and Integrated Management System. He had completed the ISO 9001:2015 Lead Auditor Course and RSPO SCC Lead Auditor Course. He had been involved in the RSPO audits with various companies in Malaysia. During assessment, he covers the legal issues and occupational safety and health.

Mahzan Munap -Team Member

He holds a MBA from Ohio University and B Sc. in Petroleum Engineering from University of Missouri, USA. Collected over 370 days of auditing experience in OHSAS 18001 and MS 1722 OHSMS (72 days for palm oil milling and 8 days for oil palm plantation). CIMAH competent person with Malaysia Department of Occupational Safety and Health (DOSH) since 1997. An Occupational Safety and Health Trainer at INSTEP PETRONAS. Successfully completed RSPO Lead Assessor Course in 2008 and IRCA accredited Lead Assessor training for ISO 9001 and RABQSA/IRCA EMS Lead Assessor Course for ISO 14001 in 2008.

Accompanying Persons: -

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.

- Kulim (Malaysia) Berhad Time Bound Plan
- RSPO P&C MY-NIWG 2014 Checklist
- RSPO Supply Chain Certification Checklist November 2014

3.2 Progress against Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	<p><u>Malaysia</u></p> <p>The time bond plan includes all operating units in Malaysia.</p> <p>A total of 32 Kulim estate operating units under 6 mills successfully certified as of 2017.</p> <p><u>Indonesia (PT SSR and AMARA)</u></p> <p>For the Indonesia plantation have in preparation to undergo the RSPO Certification process is in progress. Now under rehabilitation for two years.</p>	Yes
<p>Is the time bound plan challenging?</p> <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	<p>Kulim (Malaysia) Berhad has in 2015 continued to operate in a dynamic and volatile environment, characterised by abundant of supplies and lower price of CPO globally.</p> <p>Being one of the lowest price for the commodity, this much affected to the plantation margins. The industry was also impacted by growing strength of US Dollar adding the downward pressure of the price</p> <p>The divestment from New Britain (NBPOL) was completed on 26 February 2016, operationally at the year ended as at October 2017, Kulim have plantation operations in Peninsular Malaysia and Indonesia for a total of 50 999 ha in Malaysia and 40,646 ha of land in Indonesia. The planting of new palm is ongoing albeit at a slower pace, Kulim have some 307 ha been planted.</p> <p>Age profile ranging from 0 – 23 years of age. The group remains committed to improving the age profile, during which a total of 1155 ha been</p>	Yes

**RSPO Public Summary Report
Revision 4 (November /2016)**

	replanted. Average age profile has improved to 11.72 years. The group has acquired Pasir Panjang Palm Oil Mill through Mahamurni Plantation Sdn Bhd in March 2015 and successfully RSPO Certified for 2017	
Have there been any changes since the last audit? Are they justified?	No changes	Yes
If there have been changes, what circumstances have occurred?	KULIM is now corporatized under Johor Corporation but at the same time both are still a members of RSPO.	Yes
Have there been any stakeholder comments?	So far there no comments received.	Yes
Have there been any newly acquired subsidiaries?	After successfully acquired PT Win in central Kalimantan, Kulim successfully acquired PT RAJ & PT TPR (SUMSEL) on 23 June 2016.	Yes
Have there been any isolated lapses in implementation of the plan?	There is no isolated lapse in Time Bound Plan except for smallholder proposed certification program that halted due to unstable supply to the mill.	Yes
Un-Certified Units or Holdings		Un-Certified Units or Holdings
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	RSPO internal audit assessment for all uncertified units been conducted and the report had been submitted to all unit for improvement plan. The report indicated no systematic failures to proceed with implementation that should be raised as major nonconformities.	Yes
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	So far no new planting that replaced primary forest.	Yes
Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	No new planting activities within all uncertified unit.	Yes
Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria	No land conflict within all uncertified units.	Yes

**RSPO Public Summary Report
Revision 4 (November / 2016)**

6.4, 7.5 and 7.6.		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	No labour dispute within all uncertified units.	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	RSPO internal audit assessment for all certified units been conducted and the report had been submitted to all unit for improvement plan.	Yes
Any Legal non- compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	No legal non-compliance within all uncertified units.	Complied

3.3 Details of findings

There was no non-conformity raised during the 4th Annual Surveillance Assessment. There's no

Non-Conformity		
NCR #	Description	Category (Major / Minor)
	<p>Requirements Indicator Nil</p> <p>Evidence of Nonconformity n/a</p> <p>Statement of Nonconformity n/a</p> <p>Corrective Action n/a</p> <p>Assessment Conclusion: n/a</p>	n/a

Opportunity for improvement	
OFI #	Description
1553863-201709-01	<p>Indicator 2.1.1</p> <p>1. The provision of CePSWaM at both Ledang Sepang Loi and Ladang Kemedak could be expedited not just relying on the timeline December 2020 to fulfil the compliance of Section 49A, EQ (Amendment 2012)</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

	2. Only one qualified MPOB FFB Grader was available at PCPOM. The number of MPOB FFB Grader at PCPOM could be increased to sufficiently cover if the only qualified Grader is away attending courses, on medical and annual leave to ensure qualified MPOB FFB grader available all the time in PCPOM.
1553863-201709-02	Indicator 2.2.2 Although some boundary stones or pegs were sighted at Ledang Sepang Loi and Ladang Kemedak, the visible markings could be maintained for ease of locating them.
1553863-201709-03	Indicator 4.1.2 The wearing of safety glass by harvesters at Ladang Sepang Loi could have been implemented by the Mandore concern or Field staff.
1553863-201709-04	Indicator 4.4.2 The markings of oil palm tree in riparian zone could be improved to closer spacing as the wooden pegs place at spacing of every five tree is too far to indicate whether a tree is in the buffer zone or otherwise especially for those trees planted before the introduction of RSPO MYNI:2014. Note, formerly the stream was small but over the years its bank has eroded and the width of the stream increases. Further the stream has meandered and the stream landscape has changed significantly.
1553863-201709-05	Indicator 4.7.5 <ul style="list-style-type: none"> • Contact phone number of EHA could have been kept by the Mandore for direct contact (help) instead of through the office staff for expediency purpose. • Refresher course could have been held periodically for the appointed First Aider. • Records of medication treatment and usage could be included in the first aid kit and filled up by the Mandore.
1553863-201709-06	Indicator 6.2.3 Identified stakeholders registered in the stakeholder to be accurately specified its category/representation to ensure sufficient relevant stakeholders consultation/engagement done.

Positive Findings	
PF #	Description
1	Stakeholder interview – positive feedbacks
2	Implementation of IDEAS attendance system
3	Good implementation of CSR & IPM programs

Issues raised by Stakeholders
<p>Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Palong Cocoa Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.</p> <p>Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. These have been incorporated into the assessment findings.</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

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

IS #	Description
1	Issues: OCS Balai Polis Buloh Kasap – Cattle owner who rear cattle within estate complaining on missing cattle but not officially reporting
	Management Responses: Company not allow any cattle rearing within estate field but there’s still some owner kept cattle within estate field without management’s consent. Management bear no responsibility for any missing cattle.
	Audit Team Findings: Records of engagement with cattle owners available. No further issue.
2	Issues: Village Chief - No issues or dispute related to estate’s field with villager’s farm.
	Management Responses: Acknowledged by management.
	Audit Team Findings: No further issue.
3	Issues: FFB Transporter – Good relationship with company since past 15 years of service
	Management Responses: Acknowledged by management.
	Audit Team Findings: No further issue.
4	Issues: Mechanical Contractor – Good relationship with company since past 10 years of service
	Management Responses: Acknowledged by management.
	Audit Team Findings: No further issue.
5	Issues: Grocery Store – Good relationship with company since past 10 years of occupying company’s premise.
	Management Responses: Acknowledged by management.
	Audit Team Findings: No further issue.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1410324M1	Requirements Indicator 6.9.2	Major

	<p>A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.</p>	
	<p>Evidence of Nonconformity No evidence of implementation and communication of policy to protect the reproductive rights of all, especially of women, to all levels of the workforce.</p>	
	<p>Statement of Nonconformity Policy to protect the reproductive rights of all, especially of women, was not implemented and communicated to all levels of the workforce.</p>	
	<p>Correction Review will be carried out to ensure the inclusion of reproductive right in the respective policy. Submission of improvement time line has been approved by KULIM 236 EXCO Meeting.</p> <p>Corrective Action The policy' review will be communicated to all OUs, Road show and training will be carried out to all level of employers and this will be included in our yearly training programme.</p> <p>Based on the submitted evidence, it was found that the NC is effectively closed with the sufficient evidence of implementation. On site major NC close ut is not required as the nature of NC is non-process related and can be verified with documented evidences. Effective implementation of the corrective action taken will be further verified in the next audit. Thus, the Major NC was closed on 16/1/17.</p>	
	<p>Assessment Conclusion: Visit during ASA 4_1 2017 confirmed that the policy has been established as a Policy of Right Of Employees; Dated 8/1/2017; Signed by Kulim (M) Bhd. Executive Director.</p> <p>Roadshow program has been conducted on 31 Mar – 1 April 2017 at Lotus Desaru Beach Resort. Sampled talk of the Rights of Employee sighted done at Kemedak Estate on 17/5/2017 attended by all male and female employee.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1410324N1	<p>Requirements Indicator 5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented</p> <p>Evidence of Nonconformity Labis Bahru and Palong Estate i) Waste and pollution management plan did not include rinsed/waste water generated from chemical mixing and rinsing activities. ii) Soak-away sump use to trap rinsed/waste water was found to be ineffective. Sump constructed was not fully concrete at the bottom which may leads to soil and water contamination.</p> <p>Statement of Nonconformity</p>	Minor

**RSPO Public Summary Report
Revision 4 (November /2016)**

	<p>Waste management and disposal plan was not effectively documented and implemented.</p> <p>Correction 1) All mixing of chemical has to be done in drip tray 2) Any contaminated water from spillage will be collected and reused back as premix 3) Estate to ensure the collection of contaminated water at the sump to be done at any time when the water reach $\frac{3}{4}$ level of sump capacity. 4) The water is to be used back as pre - mix</p> <p>Corrective Action Respective WI to be reviewed to cater for design improvement of soak away sump and has to be communicated to all OUs</p> <p>The corrective action is accepted. Effectiveness of corrective action taken will be further verified in the next audit.</p> <p>Assessment Conclusion: The corrective action is accepted. Effectiveness of corrective action taken will be further verified in the next audit.</p> <p>CLOSED - Corrective action was effectively implemented.</p> <p><u>Sepang Loi Estate</u> Sighted a new constructed soak away sump to collect all chemicals from mixing which is then recycled/re-used for mixing again.</p> <p><u>Kemedak Estate</u> All chemical collected during mixing are stored in the sump and pump-out for re-use/recycled for the next chemical mixing activity.</p> <p>Sighted letter of notification on the revised working instruction for pesticide store and chemical mixing area from Kulim (Malaysia) Berhad dated 27/12/2016 communicated to all estates and mills.</p> <p>Sighted also the revised work instruction (WI) for Pesticide Store 2nd issue dated December 2016 by SPO Team.</p>	
--	---	--



3.3.2 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
CR15	Major	12/12/2013	Closed on 06/02/2014
1135927M1	Major	12/12/2014	Closed on 15/01/2015
1264787M1 - 2.1.1	Major	13/11/2015	Closed on 05/01/2016
1264787M2 – 6.5.2	Major	13/11/2015	Closed on 05/01/2016
1410324M1 - 6.9.2	Major	24/11/2016	Closed on 16/01/2017
1410324N1 - 5.3.3	Minor	24/11/2016	Closed on 03/11/2017

**RSPO Public Summary Report
Revision 4 (November /2016)**

- Assessment Conclusion and Recommendation**

Based on the findings during the assessment of Palong Cocoa Palm Oil Mill Certification Unit and supply base complies with the RSPO P&C Malaysian National (MY-NI 2014) and the RSPO Supply Chain Certification Standard (Nov 2014) and CPO Mill. It is recommended that the certification of Palong Cocoa Palm Oil Mill Certification Unit is approved and continued.

Acknowledgement of Assessment Findings	Report Prepared by
Name : Madam Salasah Elias	Name : Mr Hafriazhar Mohd Mokhtar
Company name : Kulim (Malaysia) Berhad Palong Cocoa Palm Oil Mill	Company name : BSI Services Malaysia Sdn Bhd
Title : Head of Sustainability Department	Title : Lead auditor
Signature :  Date : 8/4/2018	Signature :  Date : 3/4/2018

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Commitment to Transparency			
Criterion 1.1:			
Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.</p> <p>- Minor compliance -</p>	<p>Adequate information, from Principle 1 to 8 of the RSPO P&C MYNI:2014 as required by this indicator are shared by the estate and palm oil mill managers for effective participation and decision making. The stakeholders sighted in the record include local community, kindergarten and primary school teachers, contractors, suppliers, eatery shop owner, sundry shop owner and local mosque officials.</p> <p>Requests for information from the Regulatory Department such as DOE (Online Environmental Reporting, ESWIS), and DOSH compliance visit were attended. Other request sighted from the kindergarten (to repair perimeter fencing and grass cutting at fortnightly interval), primary school teacher (maintenance of teacher quarter’s compound) and workers (house repair) were attended promptly. On the other hand, the Estate Manager requested that the involved school bus driver to inform estate management and the affected children parents whenever the driver could not send/collect the children from school.</p> <p>Other evidence can also be seen at the company website (http://www.kulim.com.my) include publicly available documents such as OSH plan, HCV documents, negotiation procedure, complaint records, sustainability handbook and report, EIA, Management Plans & Continuous Improvement Plans. Other sensitive information such as land title and etc. will be provided upon request.</p>	Complied
1.1.2	<p>Records of requests for information and responses shall be maintained.</p> <p>-Major compliance</p>	<p>The respective operating units visited maintained records of information request and response. The requests were attended promptly as sighted in the record and confirmed by stakeholders during interview.</p> <p>There was an occurrence on 1.7.2017 at Kulim Palong Cocoa POM where the discharge effluent BOD = 623mg/l exceeded the permissible limit 500mg/l. The auditor sighted the records that Mill Management visited the Muar DOE office, discuss action plan, presented historical effluent discharge records and the EPMC (Environmental Performance Management Committee) July, August and September 2017 Minutes of Meeting to mitigate from recurrence.</p>	Complied
Criterion 1.2:			
Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>1.2.1</p> <p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<ul style="list-style-type: none"> • Land titles sighted available kept at each individual operating units (as per indicator 2.2.1) • OSH plan sighted available at each individual operating units • Management documents of plans and impact assessments relating to environmental and social impacts were maintained available by the CU. • Pollution prevention plan management document pertaining continual improvement on environmental and social aspects were maintained available by the CU, as contained in the related environmental and social action plan. • HCV report (as per indicator 5.2.1) • Policy document as contained in Sustainability Handbook. • Details of complaints and grievance records maintained available by the CU • Negotiation procedures maintained available by the CU (as per indicator 6.3.1 & 6.3.2) • Continuous improvement plans maintained available by the CU • Public summary report maintained available by the CU • Human rights policy maintained available by the CU <p>Details of publicly available documents above were reported in respective criterion and indicators.</p>	<p>Complied</p>
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>		
<p>1.3.1</p> <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Policy committing to a code of ethical conduct and integrity established as ethical policy (dated 1/1/2008) no gift and entertainment policy (dated 1/2/2015). This has been documented and published in public notice boards as well as communicated among all employees.</p>	<p>Complied</p>
<p>Principle 2: Compliance with applicable laws and regulations</p>		
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>		

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance
<p>2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>Palong Cocoa certification unit has demonstrated evidence of compliance with relevant legal requirements.</p> <p>License and permit verified at the visited operating units as follow:</p> <p>Palong Cocoa POM:</p> <ol style="list-style-type: none"> 1. MPOB license: 578392004000 (validity period 01/12/2016 - 30/11/2017) for 192,000MT. 2. DOE License As.2-Pin.2/86 no. 004720 (validity period 01/07/2017 -30/06/2018). 3. DOE Compliance Schedule : AS(B)J31/152/000/057 Jld.4(SK06) (validity period 01/07/2017 - 30/06/2018) for 40mt/hr and method of POME discharge is land application with BOD final discharge limit <500mg/l. 4. Energy commission license no.: 2017/02950; serial no.: 24395 (validity period 01/11/2017 – 31/10/2018) for installation capacity limit <2170kW. 5. Schedule controlled item permit (Diesel) ref. no.: JH (SGT) 0012/88 PSK; serial no.: J029123 (validity period 15/05/2017 – 14/05/2018) for storage capacity of 20,000 liters. BLESS submission no: BL2017029157. 6. Fire Certificate Form II Sub-regulation 3(1) certificate no.: JBPM: JH/7/072/2015; serial no.: 306039 validity period: 23/08/2017 to 22/08/2018. 7. River water extraction license: 08/A/Sgt/011; Fail no: BAKAJ/334/300/5/6/8/9 (validity period until 31/12/2017) by Director of Water Resources Johor. 8. Certificate of Fitness for Unfired Pressure Vessels:- <ol style="list-style-type: none"> a. (JKT15-Pin. 1/87 PMT-JH/17 03040) – JH PMT 3617 (valid till 11/05/2018). b. (JKT15-Pin. 1/87 PMT-JH/17 11710) - JH PMT 27440 (valid till 06/08/2018). 9. Certified environmental professional (CePPOME/0061) - Certified waste management professional (CePSWaM/171343) 10. Only one MPOB Certified FFB Grader (Certificate No. 01051) 	<p>Complied</p>

RSP0 Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Sepang Loi Estate</p> <ol style="list-style-type: none"> 1. MPOB license: 501775302000 (01/05/2017 - 30/04/2018). 2. Diesel Permit # J022798, BLESS: BL2016002624 ref JH(SGT)00103/03 PSK (12/01/2017 - 11/01/2018) Quantity: 18,000 liter. 3. Certificate of Fitness for Unfired Pressure Vessels (JKT15-Pin. 1/87 PMT-JH 130353) - JH PMT 18012 (valid till 27/07/2018). <p>Kemedak Estate</p> <ol style="list-style-type: none"> 1. MPOB license: 570585002000 (01/04/2017 - 31/03/2018). 2. Diesel Permit # J023672, BLESS: BL2016016810 ref (16)JH(SGT)0012/88 PSK (24/03/2017 - 23/03/2018) Quantity: Diesel 10,000 liter & Petrol 400 litre. 3. Certificate of Fitness for Unfired Pressure Vessels (JKT15-Pin. 1/87 PMT-JH 128063) - JH PMT 21524 (valid till 28/08/2018). <p>In order to fully comply at all times at all Operating Units, the following OFI were raised:</p> <ul style="list-style-type: none"> • The provision of CePSwaM at both Ledang Sepang Loi and Kemedak Estate could be expedited not just relying on the timeline December 2020 to fulfil the compliance of Section 49A, EQ (Amendment 2012) while in the meantime the CU depends on the PCPOM CePSwaM person. • Only one qualified MPOB FFB Grader was available at PCPOM. The number of MPOB FFB Grader at PCPOM could be increased to sufficiently cover if the only qualified Grader is away attending courses, on medical and annual leave, etc. 	
2.1.2	<p>A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -</p> <p>The Kulim Palong Cocoa CU had documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment.</p> <ul style="list-style-type: none"> • Palong Cocoa POM – Palong Cocoa Palm Oil Mill LORR FY 2016/2017. • Sepang Loi Estate – Sepang Loi Estate LORR FY 2016/2017. • Kemedak Estate - Kemedak Estate LORR FY 2016/2017. <p>Documented procedure has been established and implemented; refer to Kulim Agricultural Manual, updated and revised in 2007, Rev.3 and Safe Operating Procedure, 18 May 2009, Rev. 1.</p>	Complied

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance
2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance -	Evaluation of legal requirements and compliance status with legal requirement is monitored by operating units, Sustainability Team, OHS Department and head office audit Department. An Executive from the Risk Department, Head Office has been appointed to ensure compliance with Legal and other requirements.	Complied
2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance -	Kulim (Malaysia) Berhad has centralised system for tracking any changes in the law. The changes, if any, are tracked and identified through head office, sustainability team and website information. The changes are then communicated from the Head Office to Sustainability Team and the Operating Units for implementation.	Complied
Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.		
2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land were sighted available during audit. Verified land titles and the visited estates: Sepang Loi Estate: Based on Summary of Area Statements for Commercial Survey for Sepang Loi Estate updated as on 13/7/2016, total area: 970.21 ha; Planted area: 928.22 ha; HCV area: 12.69 ha; Sepang Loi Estate Area Statement dated 27/10/2016; 42 land titles; Tenure: Freehold; Land use type: Agriculture; Total land area – Original: 1013.66 ha; Balance after acquisition: 1,011.88 ha (Land acquisition exercise by PTD Segamat for JKR in year 2014) Sample of land title sighted: i) Grant # 45484; lot # 1436; area: 20.11 ha; district: Segamat, Mukim Sermin ii) Grant # 45485, lot # 1437; area: 20.52 ha; district: Segamat Mukim Sermin Sighted the Debit Note (Internal); Ref. # CD2017008; Date: 8/5/2017 for the payment of Quit Rent 2017 Kemedak Estate Area Statement Listing Operating Unit Code: 83 - Kemedak Estate for Month: September 2017 4 land titles; Tenure: Leasehold; Land use type: Agriculture; Total land area –Balance after acquisition: 1738.80 ha (Land acquisition exercise by PTD Segamat for Sebaya Road Project) Sample of land title sighted: i) Grant # 52397; lot # 15677; area: 806.50 ha; district: Segamat, Mukim Buloh Kasap ii) Grant # 52398, lot # 15678; area: 3406 ha; district: Segamat Mukim Buloh Kasap Sighted the Debit Note (Internal); Ref. # CD20170819 Date: 3/5/2017 for the payment of Quit Rent 2017	Complied

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Legal boundaries are well maintain as observed in the field. Inspection of sample of the boundary stone at Block P03/01 next to wooden peg at Sepang Loi Estate bordering Makmur Plus Estate (N75685.21 W81213.11) confirmed that it was continuously maintained visibly. At Kemedak Estate the wooden boundary peg no. LK 8 bordering the Bukit Bujang Estate own by PPNJ (PERTUBUHAN PELADANG NEGERI JOHOR) was well maintained except the boundary stone could not be sighted. OFI: Although some boundary stones or pegs were sighted at Ledang Sepang Loi and Ladang Kemedak, the visible markings could be maintained for ease of locating them.	Complied
2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	Complied
2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	Complied
2.2.5 For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	Complied
2.2.6 To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	Complied
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.		
2.3.1 Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).. - Major compliance -	The estate lands are legally owned and leased by the company. The existing estates are not encumbered by any customary land rights. Interview with the surrounding communities and stakeholders confirm no disputes.	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

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

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
3.1.1 A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	<p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning.</p> <p>The business plan contains FFB yield, CPO, OER and KER, costs of production, etc.</p> <p>Sample of Palong Cocoa POM CAPEX for 2018 was sighted. Installation of a new CCTV system for online black smoke monitoring (DOE requirement). This is a new requirement by DOE for boiler and generator.</p> <p>Sepang Loi Estate Budget 2017 was sighted. Proposed new construction of probase road at estate.</p> <p>Kemedak Estate Budget 2017 was sighted.</p>	Complied
3.1.2 An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	<p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning.</p> <p>At Sepang Loi and Kemedak estates, there will be no replanting in next 5 years. Last replanting at Sepang Loi was 2008 and at Kemedak was 2012.</p>	Complied
Principle 4: Use of appropriate best practices by growers and millers		
Criterion 4.1:		
Operating procedures are appropriately documented, consistently implemented and monitored.		
4.1.1 Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	<p>Palm Mill holds SOP: Mill Operation Manual includes mill SOP and work instruction as a guidance document to operate the mill. Estates have a separate SOP and Estate Manual covers land preparation, planting material, upkeep, harvesting, transport and etc.</p> <p>Sample mill SOP sighted are for the Confined Space Management (Doc No. PCM/WI/36 Rev 0 Issue No. 0 Date 01/01/2015) and Appendix 3: Flow chart (Confined Space Entry Procedure) was verified.</p> <p>Additional documents available at mill are:-</p> <ul style="list-style-type: none"> i) Safety Work Permit (Maintenance) – Hot Work (Rev 0 Date 01/01/2016) ii) Safety Work Permit (Maintenance) – Working at Height (Rev 0 Date 01/01/2016) iii) Safety Work Permit (Maintenance) – SMAW (Stick Welding) (Rev 0 Date 01/01/2015) 	Complied

**RSP0 Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
4.1.2	<p>A mechanism to check consistent implementation of procedures shall be in place.</p> <p>- Minor compliance -</p>	Complied
	<p>Mill Advisor and Plantation Inspectorate make regular visit to evaluate the performance of the mill and estates.</p> <p>Latest visit by Mill Advisor was on 20/09/2017 (Ref. No.: MJAB/PCPOM/5/2017). The onsite managers develop Action Plans from the Advisory</p> <p>Sighted Palong Cocoa POM MI's report 5/2017 visited on 20/09/2017. The inspection carried out on the mill processed was found to be in order with the machinery running satisfactory and the mill achieved the maximum target processed.</p> <p>Sepang Loi Estate</p> <p>General Manager visits the estates on quarterly basis to review estate performance against Kulim Sustainability standard. Latest Plantation Inspectorate visit was on 23 & 24/10/2017 - (Report No.: 3/2017).</p> <p>Plantation Inspector appraisal - 1st: 80.50 2nd 82.50 3rd: 78.50 (i.e. the score given)</p> <p>Agronomist visit dated 14 & 15/02/2017 for the first half of 2017. Refer to report 01/17 dated 05/03/2017. 2nd visit was done on 30/11/2017.</p> <p>Kemedak Estate</p> <p>Latest (3rd) Plantation Inspectorate visit dated 30/7/17 was verified. Refer to SS/LKM/3/2017. Report No.: SS/LKM/3/2017). Plantation Inspector appraisal - 1st: 91% 2nd : 89% 3rd: 89%.</p> <p>Reports for improvement of the operations. Review of Advisory Reports, Action Plans and site inspections confirmed consistent records of implementation of SOPs.</p> <p>Agronomist visited estate on 16/05/2017 for the first half of 2017. Refer to report 01/17 dated 06/07/2017 and plan for 2nd visit on 11/12/2017</p> <p>OFI: The wearing of safety glass by harvesters at Ladang Sepang Loi could have been implemented by the Mandore concern or Field staff.</p>	

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance																
<p>4.1.3</p> <p>Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -</p>	<p>Records of monitoring and any actions were maintained.</p> <p>Sample of environmental monitoring records:</p> <ol style="list-style-type: none"> Storm water retention pond analysis (BOD analysis fortnightly). <p>Latest monitoring by UTCL Laboratory, dated 05/10/2017, report ref# EI/1710/0975-0977, BOD: 438 mg/l. Sampling date 24/09/2017.</p> <p>Latest monitoring by UTCL Laboratory, dated 19/09/2017, report ref# EI/1709/0891-0895, BOD: 493 mg/l. Sampling date 04/09/2017.</p> <ol style="list-style-type: none"> Quarterly return via Online Environmental Reporting (OER) and monthly effluent analysis. <p>Latest quarter, July – September 2017, submitted on 11/10/2017.</p> <p>Latest monitoring by UTCL Laboratory, dated 05/10/2017, report ref# Ei/1710/0975-0977. Sampling date 24/09/2017. 07 parameters tested (BOD, COD, AN, TN, SS, TS and pH) is within the regulatory limit under mill’s compliance schedule.</p> <p>Monitoring of upstream and downstream Sg Muar, once a year.</p> <p>Latest monitoring by UTCL Laboratory, dated 19/09/2017, report ref# Ei/1709/0896-0900. Sampling date 04/09/2017.</p> <ol style="list-style-type: none"> Stack monitoring, twice per year <p>Boiler #4: 13/06/2017, refer to report, PAC-AE-170608.</p> <table border="1" data-bbox="660 1301 1299 1453"> <thead> <tr> <th>Parameter</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>Solid particle, g/Nm3 @ 12% CO2</td> <td>0.38 - 0.39</td> </tr> <tr> <td>NOx emission, g/Nm3</td> <td>0.04 – 0.05 vs limit of 2</td> </tr> <tr> <td>SOx emission, g/Nm3</td> <td>- 0.01</td> </tr> </tbody> </table> <p>Boiler #3: 21/12/2016, refer to report, PAC-AE-161222</p> <table border="1" data-bbox="660 1543 1299 1695"> <thead> <tr> <th>Parameter</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>Solid particle, g/Nm3 @ 12% CO2</td> <td>0.14 – 0.17</td> </tr> <tr> <td>NOx emission, g/Nm3</td> <td>0.03 vs limit of 2</td> </tr> <tr> <td>SOx emission, g/Nm3</td> <td>0.01</td> </tr> </tbody> </table> <ol style="list-style-type: none"> Smoke density meter calibration certificate# 17013 by Scienotech. Calibration date: 06/07/2017 valid until 06/12/2017. Ambient Air (quarterly) Total Suspended Particulate, TSP (limit 24hr: 260 ug/m3, annual 90 ug/m3 as per Malaysian Recommended Air Quality Quidelines). 2 monitoring points were selected. 	Parameter	Result	Solid particle, g/Nm3 @ 12% CO2	0.38 - 0.39	NOx emission, g/Nm3	0.04 – 0.05 vs limit of 2	SOx emission, g/Nm3	- 0.01	Parameter	Result	Solid particle, g/Nm3 @ 12% CO2	0.14 – 0.17	NOx emission, g/Nm3	0.03 vs limit of 2	SOx emission, g/Nm3	0.01	<p>Complied</p>
Parameter	Result																	
Solid particle, g/Nm3 @ 12% CO2	0.38 - 0.39																	
NOx emission, g/Nm3	0.04 – 0.05 vs limit of 2																	
SOx emission, g/Nm3	- 0.01																	
Parameter	Result																	
Solid particle, g/Nm3 @ 12% CO2	0.14 – 0.17																	
NOx emission, g/Nm3	0.03 vs limit of 2																	
SOx emission, g/Nm3	0.01																	

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator		Assessment Findings	Compliance
		<p>i. PAC-AA-170910 (28 – 29/09/2017): A1-14, A2-11; ii. PAC-AA-170607 (12 - 13/06/2017): A1-37, A2-33; iii. PAC-AA-170370 (21 – 22/03/2017): A1-40, A2-32.</p> <p>6. Boundary noise monitoring, quarterly (night: 55 dBA, day: 65 dBA)</p> <p>Latest boundary noise monitoring for Q2 2017 by Kulim Engineering on 18 - 19/06/2017. 07 points selected for monitoring. Result is within 55 dBA (night) and 65 dBA (day)</p> <p>7. Scheduled waste reporting via E-Swis refer 5.3.2.</p> <p>8. 3rd party environmental compliance audit – every 6 monthly was conducted by EHS Alliance Sdn Bhd. Sighted report ref: KB-PCPOM/17-RCL-01 dated 25/07/2017. Compliance audit date: 16/07/2017 by Auditor reg #EA0067 and Cesswi Cert #3299. Sighted report audit notification and audit plan dated 03/07/2017 and audit findings dated 16/07/2017. Environmental Regulatory Compliance Audit (Final report) dated 25/07/2017.</p> <p>Kemedak Estate</p> <p>Department of Chemistry Malaysia water sampling report (ref: J(BT)01068/16 001 – LK 02, J(BT)01068/16 002 – LK 03 and J(BT)01068/16 003 – LK 01 dated 16/08/2016. Sighted letter from Dept of Chemistry (Johor Branch) dated 17/09/2017 for the collection of water sample. Results to be verified during the next visit.</p>	
4.1.4	<p>The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -</p>	<p>Palong Cocoa Palm Oil Mill only receives certified FFB starting from 1st November 2017. This is based on the termination contract for all outside crop production dated 1st Sept 2017 to Kim Ma Oil Palm, Eng Huat Latex Concentrate Sdn Bhd, Chandra Brosis Group Sdn Bhd and Hong Bee Agriculture Sdn Bhd. Palong Cocoa Mill also stop receive any FFB from Unilease Plantation Sdn Bhd and Guan Leng Trading Sdn Bhd in 2017 as per letter (FFB Purchase Contract Agreement 2017) dated 12.01.17.</p>	Complied
<p>Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
4.2.1	<p>There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -</p>	<p>Both Sepang Loi Estate and Kemedak Estate continued to use the Kulim (M) Berhad Agriculture Manual. There are 19 SOPs and 18 WI's covering all aspects of oil palm management including to ensure soil fertility is managed to a level that ensures optimal and sustained yield. The implementation of SOPs is checked during daily inspection by staff as well as by internal audits.</p>	Complied

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator		Assessment Findings	Compliance																		
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	Both Sepang Loi Estate and Kemedak continued to monitor their fertilizer inputs as recommended by their agronomist. The records of the fertiliser inputs were maintained. It showed the application date, filed number, dosage applied per palm, type of fertilizer and number of applicators.	Complied																		
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>The results of leaf analysis conducted annually and soil analysis at 5-yearly interval that shows the nutrient level was used as guidance for the fertilizer recommendation. Below are sampling dates conducted at the estates.</p> <p><u>Sepang Loi Estate</u></p> <table border="1"> <thead> <tr> <th>Foliar sampling date</th> <th>Report No.</th> </tr> </thead> <tbody> <tr> <td>13 – 21/09/2017</td> <td>LI/1710/LOI/1233-1242</td> </tr> <tr> <td>13 – 21/09/2017</td> <td>LI/1710/LOI/1243-1252</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Soil sampling date</th> <th>Report No.</th> </tr> </thead> <tbody> <tr> <td>13 – 21/09/2017</td> <td>LI/1710/LOI/1253-1258</td> </tr> </tbody> </table> <p><u>Kemedak Estate</u></p> <table border="1"> <thead> <tr> <th>Foliar sampling date</th> <th>Report No.</th> </tr> </thead> <tbody> <tr> <td>20/02/2017</td> <td>LI/1702/KMD10079-0088</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Soil sampling date</th> <th>Report No.</th> </tr> </thead> <tbody> <tr> <td>02/02/2017</td> <td>SI/1702/0017-0020</td> </tr> </tbody> </table>	Foliar sampling date	Report No.	13 – 21/09/2017	LI/1710/LOI/1233-1242	13 – 21/09/2017	LI/1710/LOI/1243-1252	Soil sampling date	Report No.	13 – 21/09/2017	LI/1710/LOI/1253-1258	Foliar sampling date	Report No.	20/02/2017	LI/1702/KMD10079-0088	Soil sampling date	Report No.	02/02/2017	SI/1702/0017-0020	Complied
Foliar sampling date	Report No.																				
13 – 21/09/2017	LI/1710/LOI/1233-1242																				
13 – 21/09/2017	LI/1710/LOI/1243-1252																				
Soil sampling date	Report No.																				
13 – 21/09/2017	LI/1710/LOI/1253-1258																				
Foliar sampling date	Report No.																				
20/02/2017	LI/1702/KMD10079-0088																				
Soil sampling date	Report No.																				
02/02/2017	SI/1702/0017-0020																				
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	EFB application only applied to selected fields. Average about 40 - 45mt/ha EFB applied. Bio Compost were also used at selected fields and rate 7mt/ha as advised by Agronomist. POME application was carried out at fields near to the mill.	Complied																		
Criterion 4.3:																					
Practices minimise and control erosion and degradation of soils.																					
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Sepang Loi Estate and Kemedak Estate hold copies of soil map. Soil maps and field visit confirm that there is no fragile soil on the estates.	Complied																		
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Planting terraces had been constructed where slope >10°. Field inspection showed groundcover with soft grass and soft weeds at both estates.	Complied																		
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Estates have implemented annual road maintenance programme. A sample of road maintenance programme checked at both Estate shows the map indicating location of road repairs and maintenance for the whole estate roads.	Complied																		

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance	
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at both estates.	Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	There is no peat soil.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at both estates.	Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.			
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	<p>Palong Cocoa certification units monitored water quality of outgoing waters to identify any adverse effect from the mill and estate activities.</p> <p>There is an Integrated Water Management Plan which has been implemented. The plan takes into account the efficient use of resources, ensure amongst other that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent.</p> <p>Water pollution – drinking water (partially test, monthly), Quarterly (full test), 6 monthly SPAN requirement.</p> <p>Water management plan dated September 2017.</p> <p>Palong Cocoa POM has maintained monitoring records of water usage which recorded every day and summarised on monthly basis including the monitoring of rainfall water, which has been an alternative source of water as mitigation plan during draught season.</p> <p>Rainfall average data for period from Jan to Oct 2017 recorded at 204.10mm. Rainfall average recorded for the whole year 2016 was 128.85mm.</p> <p>Rainfall data for Sepang Loi Estate period from Oct 2016 to Sept 2017 recorded at 204.46 mm.</p> <p>Rainfall data for Kemedak Estate period from Oct 2016 Sept 2017 recorded at 175.04 mm.</p>	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance																														
<p>4.4.2 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -</p>	<p>Based on the company's Agricultural Manual (Section A: Replanting, A17-Protection of Natural Water Courses, Updated on 1/7/2013), established river buffer zones as per MPOB's guideline:</p> <table border="1" data-bbox="662 533 1299 687"> <tr> <td>River width > 40m</td> <td>river buffer = 50m</td> </tr> <tr> <td>River width 20 - 40m</td> <td>river buffer = 40m</td> </tr> <tr> <td>River width 10 -20m</td> <td>river buffer = 20m</td> </tr> <tr> <td>River width 5 - 10m</td> <td>river buffer = 10m</td> </tr> <tr> <td>River width < 5m</td> <td>river buffer = 5m</td> </tr> </table> <p>Buffer zones had been maintained on both sides of rivers/streams in the estates as verified during on-site field inspection.</p> <p><u>Palong Cocoa POM</u> Monitoring of upstream and downstream Sg Muar, once a year. Latest monitoring by UTCL Laboratory, dated 19/09/2017, report ref# Ei/1709/0896-0900. Sampling date 04/09/2017. There was no evidence of spraying around palms marked as boundary for the buffer zones. There was also no construction of bunds/ weirs/dams across the main rivers or waterways passing through the estates. All the estates assessed has prepared map showing riparian buffer zones and demarcated the areas prior to replanting for all the estates. Field inspection confirmed that the buffer zone beside the stream has been demarcated clearly and maintained. The buffer zones were identified, signages were erected and maintained and no agriculture chemical-based activities were observed in the buffer zone. River water analysis was carried out every two months to check protection of water course within estates. Nitrogen, nitrate and phosphorus were tested.</p> <p><u>Sepang Loi Estate</u></p> <table border="1" data-bbox="662 1615 1289 1937"> <thead> <tr> <th>Name of river/stream</th> <th>Sampling date</th> <th>Report reference number</th> <th>Report date</th> </tr> </thead> <tbody> <tr> <td>WI-0807 I Coming-River</td> <td>23/08/2017</td> <td>WI/1709/0807</td> <td>05/09/2017</td> </tr> <tr> <td>WI-0808 Ou Going-River</td> <td>23/08/2017</td> <td>WI/1709/0808</td> <td>05/09/2017</td> </tr> <tr> <td>WI-1000 I Coming-River</td> <td>12/10/2017</td> <td>WI/1711/1000</td> <td>01/11/2017</td> </tr> <tr> <td>WI-1001 Ou Going-River</td> <td>12/10/2017</td> <td>WI/1711/1001</td> <td>01/11/2017</td> </tr> </tbody> </table>	River width > 40m	river buffer = 50m	River width 20 - 40m	river buffer = 40m	River width 10 -20m	river buffer = 20m	River width 5 - 10m	river buffer = 10m	River width < 5m	river buffer = 5m	Name of river/stream	Sampling date	Report reference number	Report date	WI-0807 I Coming-River	23/08/2017	WI/1709/0807	05/09/2017	WI-0808 Ou Going-River	23/08/2017	WI/1709/0808	05/09/2017	WI-1000 I Coming-River	12/10/2017	WI/1711/1000	01/11/2017	WI-1001 Ou Going-River	12/10/2017	WI/1711/1001	01/11/2017	<p>Complied</p>
River width > 40m	river buffer = 50m																															
River width 20 - 40m	river buffer = 40m																															
River width 10 -20m	river buffer = 20m																															
River width 5 - 10m	river buffer = 10m																															
River width < 5m	river buffer = 5m																															
Name of river/stream	Sampling date	Report reference number	Report date																													
WI-0807 I Coming-River	23/08/2017	WI/1709/0807	05/09/2017																													
WI-0808 Ou Going-River	23/08/2017	WI/1709/0808	05/09/2017																													
WI-1000 I Coming-River	12/10/2017	WI/1711/1000	01/11/2017																													
WI-1001 Ou Going-River	12/10/2017	WI/1711/1001	01/11/2017																													

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance												
	<p><u>Kemedak Estate</u></p> <table border="1" data-bbox="660 450 1289 685"> <thead> <tr> <th>Name of river/stream</th> <th>Sampling date</th> <th>Report reference number</th> <th>Report date</th> </tr> </thead> <tbody> <tr> <td>Main field drain (P08 & P09)</td> <td>19/10/2017</td> <td>W1/1711/1006-1009</td> <td>01/11/17</td> </tr> <tr> <td>Main field drain (P12)</td> <td>19/10/2017</td> <td>W1/1711/1010/1013</td> <td>01/11/17</td> </tr> </tbody> </table> <p>OFI: The markings of oil palm tree in riparian zone could be improved to closer spacing as the wooden pegs place at spacing of every five tree is too far to indicate whether a tree is in the buffer zone or otherwise especially for those trees planted before the introduction of RSPO MYNI:2014. Note, formerly the stream was small but over the years its bank has eroded and the width of the stream increases. Further the stream has meandered and the stream landscape has changed significantly.</p>	Name of river/stream	Sampling date	Report reference number	Report date	Main field drain (P08 & P09)	19/10/2017	W1/1711/1006-1009	01/11/17	Main field drain (P12)	19/10/2017	W1/1711/1010/1013	01/11/17	
Name of river/stream	Sampling date	Report reference number	Report date											
Main field drain (P08 & P09)	19/10/2017	W1/1711/1006-1009	01/11/17											
Main field drain (P12)	19/10/2017	W1/1711/1010/1013	01/11/17											
<p>4.4.3</p> <p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -</p>	<p>Treatment of mill effluent carried out as per SOP and DOE license requirements with regular monitoring of discharge quality; especially Biochemical Oxygen Demand (BOD) is monitored. Results of BOD monitoring as per stipulated frequency was in compliance as follows:</p> <ol style="list-style-type: none"> Storm water retention pond analysis (BOD analysis fortnightly). <p>Latest monitoring by UTCL Laboratory, dated 05/10/2017, report ref# EI/1710/0975-0977, BOD: 438 mg/l. Sampling date 24/09/2017.</p> <p>Latest monitoring by UTCL Laboratory, dated 19/09/2017, report ref# EI/1709/0891-0895, BOD: 493 mg/l. Sampling date 04/09/2017.</p> <ol style="list-style-type: none"> Quarterly return via Online Environmental Reporting (OER) and monthly effluent analysis. <p>Latest quarter, July – September 2017, submitted on 11/10/2017.</p> <p>Latest monitoring by UTCL Laboratory, dated 05/10/2017, report ref# Ei/1710/0975-0977. Sampling date 24/09/2017. 07 parameters tested (BOD, COD, AN, TN, SS, TS and pH) is within the regulatory limit under mill’s compliance schedule.</p>	<p>Complied</p>												
<p>4.4.4</p> <p>Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -</p>	<p>FFB processed with the average water usage of 1.27 m³ per tonne. FFB processed for the period from Jan to Sept 2017.</p>	<p>Complied</p>												
<p>Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>														

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator		Assessment Findings	Compliance															
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>IPM Plan includes the planting of beneficial plants and control of damage by rodents and leaf eating pest.</p> <p>Beneficial plants such as Turnera subulata and Cassia cobanensis are grown in the estates and their records of planting in new areas and maintenance of existing areas of beneficial plants and location maps are available. Rat damage and leaf-eating pest census was regularly carried out to obtain information about threshold level and action to be taken thereafter. The records of census and rat baiting were available for verification.</p> <p>Inspection at one random barn owl box showed that it is inhabited with bones and bird droppings sighted on the ground at the foot of the barn owl box pole.</p>	Complied															
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>IPM training is given by the Agronomist and plantation executives with qualification in agriculture. Interview with the staff confirm their understanding of the Kulim’s IPM practices.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Date conducted</th> <th>Training topic</th> <th>By</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Sepang Loi</td> <td>10/04/2017</td> <td>Keprihatinan terhadap tanaman bunga (Beneficial Plant)</td> <td>En Zainal</td> </tr> <tr> <td>16/07/2017</td> <td>Kebaikan pemeliharaan burung hantu dalam kawasan ladang</td> <td>En. Muhamad Fedzley</td> </tr> <tr> <td>Kemedak</td> <td>09/05/2017</td> <td>AASD (Agronomy Advisory and Service Department) field day on effective bagworm control</td> <td>AASD (KMB)</td> </tr> </tbody> </table>	Estate	Date conducted	Training topic	By	Sepang Loi	10/04/2017	Keprihatinan terhadap tanaman bunga (Beneficial Plant)	En Zainal	16/07/2017	Kebaikan pemeliharaan burung hantu dalam kawasan ladang	En. Muhamad Fedzley	Kemedak	09/05/2017	AASD (Agronomy Advisory and Service Department) field day on effective bagworm control	AASD (KMB)	Complied
Estate	Date conducted	Training topic	By															
Sepang Loi	10/04/2017	Keprihatinan terhadap tanaman bunga (Beneficial Plant)	En Zainal															
	16/07/2017	Kebaikan pemeliharaan burung hantu dalam kawasan ladang	En. Muhamad Fedzley															
Kemedak	09/05/2017	AASD (Agronomy Advisory and Service Department) field day on effective bagworm control	AASD (KMB)															
Criterion 4.6:																		
Pesticides are used in ways that do not endanger health or the environment																		
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	Justification of pesticides applied is available in the agriculture manual. Refer to agriculture manual 21/10/2015, H01:Justification of Chemical Use. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species	Complied															

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance																								
<p>4.6.2</p> <p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -</p>	<p>Records of pesticides used were available for verification. The latest records were as at September 2017, which includes the information about area treated, active ingredients (ai) per Ha, LD50 and number of application.</p> <table border="1" data-bbox="663 521 1303 911"> <thead> <tr> <th data-bbox="663 521 874 577">Agrochemicals</th> <th data-bbox="874 521 1082 577">Sepang Loi</th> <th data-bbox="1082 521 1303 577">Kemedak</th> </tr> <tr> <td></td> <th data-bbox="874 577 1082 633">a.i/ha</th> <th data-bbox="1082 577 1303 633">a.i/ha</th> </tr> </thead> <tbody> <tr> <td data-bbox="663 633 874 678">Ally</td> <td data-bbox="874 633 1082 678">0.37</td> <td data-bbox="1082 633 1303 678">0.060</td> </tr> <tr> <td data-bbox="663 678 874 723">Glyphosate</td> <td data-bbox="874 678 1082 723">0.11</td> <td data-bbox="1082 678 1303 723">0.822</td> </tr> <tr> <td data-bbox="663 723 874 768">Triclopyr</td> <td data-bbox="874 723 1082 768">0.005</td> <td data-bbox="1082 723 1303 768">0.492</td> </tr> <tr> <td data-bbox="663 768 874 813">Storm</td> <td data-bbox="874 768 1082 813">0.003</td> <td data-bbox="1082 768 1303 813">0.00045</td> </tr> <tr> <td data-bbox="663 813 874 857">Amine</td> <td data-bbox="874 813 1082 857">0.001</td> <td data-bbox="1082 813 1303 857">-</td> </tr> <tr> <td data-bbox="663 857 874 911">Multiphos</td> <td data-bbox="874 857 1082 911">0.002</td> <td data-bbox="1082 857 1303 911">0.01</td> </tr> </tbody> </table>	Agrochemicals	Sepang Loi	Kemedak		a.i/ha	a.i/ha	Ally	0.37	0.060	Glyphosate	0.11	0.822	Triclopyr	0.005	0.492	Storm	0.003	0.00045	Amine	0.001	-	Multiphos	0.002	0.01	<p>Complied</p>
Agrochemicals	Sepang Loi	Kemedak																								
	a.i/ha	a.i/ha																								
Ally	0.37	0.060																								
Glyphosate	0.11	0.822																								
Triclopyr	0.005	0.492																								
Storm	0.003	0.00045																								
Amine	0.001	-																								
Multiphos	0.002	0.01																								
<p>4.6.3</p> <p>Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in agriculture manual H01: Justification of Chemical Use.</p> <p>Noted, the triple rise washing of agrochemical containers were recovered and mix with new batch of pre-mixing for use in the field. The implementation in the field is consistent with the agriculture manual.</p>	<p>Complied</p>																								
<p>4.6.4</p> <p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -</p>	<p>Noted that there is no use of class 1A and 1B chemical or that listed in Stockholm/Rotterdam Conventions and paraquat at both estates.</p>	<p>Complied</p>																								

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance																								
<p>4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -</p>	<p>Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers.</p> <table border="1" data-bbox="662 577 1289 1400"> <thead> <tr> <th data-bbox="662 577 833 622">Estates</th> <th data-bbox="833 577 933 622">Date</th> <th data-bbox="933 577 1137 622">Training topic</th> <th data-bbox="1137 577 1289 622">Given by</th> </tr> </thead> <tbody> <tr> <td data-bbox="662 622 833 734">Sepang Loi</td> <td data-bbox="833 622 933 734">12/09 /2017</td> <td data-bbox="933 622 1137 734">Pesticide chemical handling</td> <td data-bbox="1137 622 1289 734">Zainal Bin Sani</td> </tr> <tr> <td data-bbox="662 734 833 1400" rowspan="5">Kemedak</td> <td data-bbox="833 734 933 869">02/05 /2017</td> <td data-bbox="933 734 1137 869">Latihan dan pengendalian racun kelas 1 (Bagworm).</td> <td data-bbox="1137 734 1289 869">Mohd Izzuddin Bin Usjah.</td> </tr> <tr> <td data-bbox="833 869 933 981">20/06 /2017</td> <td data-bbox="933 869 1137 981">Latihan meracun tikus.</td> <td data-bbox="1137 869 1289 981">Mohd Izzuddin Bin Usjah.</td> </tr> <tr> <td data-bbox="833 981 933 1137">08/08 /2017</td> <td data-bbox="933 981 1137 1137">Latihan pengendalian racun dengan selamat dan kelas racun.</td> <td data-bbox="1137 981 1289 1137">Mohd Izzuddin Bin Usjah.</td> </tr> <tr> <td data-bbox="833 1137 933 1249">15/09 /2017</td> <td data-bbox="933 1137 1137 1249">Latihan dan penerangan racun perosak.</td> <td data-bbox="1137 1137 1289 1249">Mohd Izzuddin Bin Usjah.</td> </tr> <tr> <td data-bbox="833 1249 933 1400">15/09 /2017</td> <td data-bbox="933 1249 1137 1400">Latihan dan penerangan tempat membancuh perosak.</td> <td data-bbox="1137 1249 1289 1400">Mohd Izzuddin Bin Usjah.</td> </tr> </tbody> </table>	Estates	Date	Training topic	Given by	Sepang Loi	12/09 /2017	Pesticide chemical handling	Zainal Bin Sani	Kemedak	02/05 /2017	Latihan dan pengendalian racun kelas 1 (Bagworm).	Mohd Izzuddin Bin Usjah.	20/06 /2017	Latihan meracun tikus.	Mohd Izzuddin Bin Usjah.	08/08 /2017	Latihan pengendalian racun dengan selamat dan kelas racun.	Mohd Izzuddin Bin Usjah.	15/09 /2017	Latihan dan penerangan racun perosak.	Mohd Izzuddin Bin Usjah.	15/09 /2017	Latihan dan penerangan tempat membancuh perosak.	Mohd Izzuddin Bin Usjah.	<p>Complied</p>
Estates	Date	Training topic	Given by																							
Sepang Loi	12/09 /2017	Pesticide chemical handling	Zainal Bin Sani																							
Kemedak	02/05 /2017	Latihan dan pengendalian racun kelas 1 (Bagworm).	Mohd Izzuddin Bin Usjah.																							
	20/06 /2017	Latihan meracun tikus.	Mohd Izzuddin Bin Usjah.																							
	08/08 /2017	Latihan pengendalian racun dengan selamat dan kelas racun.	Mohd Izzuddin Bin Usjah.																							
	15/09 /2017	Latihan dan penerangan racun perosak.	Mohd Izzuddin Bin Usjah.																							
	15/09 /2017	Latihan dan penerangan tempat membancuh perosak.	Mohd Izzuddin Bin Usjah.																							
<p>4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -</p>	<p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key.</p> <p>During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. Agrochemical containers recycled for premix agrochemical.</p>	<p>Complied</p>																								
<p>4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Agriculture Manual, Section I: Weeds Management. The implementation in the field is consistent with the Agriculture Manual</p>	<p>Complied</p>																								
<p>4.6.8 Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -</p>	<p>There was no aerial spraying sighted at both estates.</p>	<p>Complied</p>																								

**RSPO Public Summary Report
Revision 4 (November / 2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.9</p> <p>Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -</p>	<p>There was no purchase of FFB from smallholders and therefore there was no pesticide handling training for them. Employees demonstrate knowledge and skills on pesticide handling. SDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored. The SDS including appropriate PPE to be worn was used during training in addition to the Work Instruction on safe handling for easy understanding by the agrochemical handlers, that is, storekeeper, chemical mixer and sprayers.</p>	<p>Complied</p>
<p>4.6.10</p> <p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -</p>	<p>Proper disposal of waste material are carried out as per the company procedures. The procedures are fully understood by workers and managers.</p> <p>Workers interview reveal that they are aware of the zero burning policy including domestic waste are not allowed to be burned.</p> <p>Management dispose waste material as per regulation for schedule waste and domestic waste.</p>	<p>Complied</p>

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance																																				
<p>4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p>	<p>Palong Cocoa POM</p> <p>Medical surveillance carried out once a year for all chemical handlers. Last medical check-up was conducted on 12/03/2017 by DOSH Registered doctor No.: HQ/11/DOC/00/235 for 27 workers. 4 workers had undergone clinical features & biological monitoring (urine, 2, 5 hexanedione) and 27 workers had undergone blood spirometry/urine. All 27 workers were found fit based on the medical results.</p> <p>Likewise, medical surveillance and biological monitoring were carried out at LSepang Loi and Kemedak estates.</p> <table border="1" data-bbox="660 757 1289 1039"> <thead> <tr> <th>Estate</th> <th>Date conducted</th> <th>DOSH OHD Registrati on no.</th> <th>Report No.</th> </tr> </thead> <tbody> <tr> <td>Sepang Loi</td> <td>13.05.2017</td> <td>HQ/11/DOC/00/235</td> <td>KSTS/00160 SH/06/17</td> </tr> <tr> <td>Kemedak</td> <td>05/03/2017</td> <td>OGUK/2010/1577</td> <td>KSTS/00190 SH/06/17</td> </tr> </tbody> </table> <table border="1" data-bbox="660 1084 1289 1787"> <thead> <tr> <th>Estate</th> <th>Type of test</th> <th>No. of workers involved</th> <th>Results, Fit- yes/no</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Sepang Loi</td> <td>Biological monitoring</td> <td>45</td> <td>Yes</td> </tr> <tr> <td>X-ray (for fertilizer applicators)</td> <td>45</td> <td>Yes</td> </tr> <tr> <td>Spirometry/ lung function test</td> <td>45</td> <td>Yes</td> </tr> <tr> <td rowspan="3">Kemedak</td> <td>Biological monitoring</td> <td>51</td> <td>50 fit and 1 unfit Job placement devoid of pesticides fertilizer exposure (asthmatic)</td> </tr> <tr> <td>X-ray (for fertilizer applicators)</td> <td>51</td> <td>50 fit and 1 unfit Job placement devoid of pesticides fertilizer exposure (asthmatic)</td> </tr> <tr> <td>Spirometry/ lung function test</td> <td>51</td> <td>50 fit and 1 unfit Job placement devoid of pesticides fertilizer exposure (asthmatic)</td> </tr> </tbody> </table> <p>At the estates audited, all pesticides handling operators have been identified and their records of annual medical surveillance and documented action to treat related health conditions were available.</p>	Estate	Date conducted	DOSH OHD Registrati on no.	Report No.	Sepang Loi	13.05.2017	HQ/11/DOC/00/235	KSTS/00160 SH/06/17	Kemedak	05/03/2017	OGUK/2010/1577	KSTS/00190 SH/06/17	Estate	Type of test	No. of workers involved	Results, Fit- yes/no	Sepang Loi	Biological monitoring	45	Yes	X-ray (for fertilizer applicators)	45	Yes	Spirometry/ lung function test	45	Yes	Kemedak	Biological monitoring	51	50 fit and 1 unfit Job placement devoid of pesticides fertilizer exposure (asthmatic)	X-ray (for fertilizer applicators)	51	50 fit and 1 unfit Job placement devoid of pesticides fertilizer exposure (asthmatic)	Spirometry/ lung function test	51	50 fit and 1 unfit Job placement devoid of pesticides fertilizer exposure (asthmatic)	<p>Complied</p>
Estate	Date conducted	DOSH OHD Registrati on no.	Report No.																																			
Sepang Loi	13.05.2017	HQ/11/DOC/00/235	KSTS/00160 SH/06/17																																			
Kemedak	05/03/2017	OGUK/2010/1577	KSTS/00190 SH/06/17																																			
Estate	Type of test	No. of workers involved	Results, Fit- yes/no																																			
Sepang Loi	Biological monitoring	45	Yes																																			
	X-ray (for fertilizer applicators)	45	Yes																																			
	Spirometry/ lung function test	45	Yes																																			
Kemedak	Biological monitoring	51	50 fit and 1 unfit Job placement devoid of pesticides fertilizer exposure (asthmatic)																																			
	X-ray (for fertilizer applicators)	51	50 fit and 1 unfit Job placement devoid of pesticides fertilizer exposure (asthmatic)																																			
	Spirometry/ lung function test	51	50 fit and 1 unfit Job placement devoid of pesticides fertilizer exposure (asthmatic)																																			

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator		Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	No female pesticide operators were engaged to work.	Complied
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			

RSPO Public Summary Report
Revision 4 (November /2016)

<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>The Occupational Safety & Health Policy had been established and implemented. The policy was signed by the Managing Director of Kulim (Malaysia) Berhad on 1 January 2008 and is displayed prominently on notice boards in Bahasa Malaysia.</p> <p><u>PPOM – Annual & Baseline Audiometric Testing</u></p> <p>Annual audiometric testing completed on 20/11/2016 by Kulim Safety Training and Services Sdn Bhd, HQ/15/DOC/00/395. Total of 51 workers were sent for the annual testing. Baseline audiograms tested on 20 workers and Annual audiograms tested on 31 workers. 1 worker has standard threshold shift and 10 workers has hearing impairment.</p> <p>Most recent Audiometric test was conducted on 21/10/2017 for 542 workers. No results available. However, the result will be verified during the next audit.</p> <p><u>Chemical Health Risk Assessment (CHRA)</u></p> <p>Palong Cocoa POM - CHRA conducted on 07/03/2013 by registered assessor JKPP HIE 127/171-2(154). Based on the CHRA, a total of 17 findings/recommendations reported.</p> <p>Sepang Loi Estate - CHRA was conducted on 11-06/03/2013 by registered assessor JKPP HIE 127/171-2(154). Based on the CHRA, a total of 18 findings/recommendations reported.</p> <p>Kemedak Estate - CHRA was conducted on 04/03/2013 by registered assessor JKPP HIE 127/171-2(154). Based on the CHRA, a total of 19 findings/recommendations reported.</p> <p>The action plan was established through the recommendation from the assessor.</p> <p><u>Chemical Exposure Monitoring</u></p> <p>Palong Cocoa POM - The personal chemical exposure monitoring was conducted on 15/05/2017 (HIE 127/171-3/1(164) – 2017/010) by JKPP HIE 127/171-3/1(164) for the laboratory was observed.</p> <p>A total of 3 personal and 01 chemical exposure samplings were collected and the concentrations of the monitoring parameter are n-Hexane. Overall the control measures provided are adequate to control the airborne contaminants. The exposure levels based on 8hrs-TWA for all the monitored parameters did not exceed the permissible exposure limit.</p> <p>Sepang Loi Estate - The personal chemical exposure monitoring was conducted on 07/09/2016 (JH/CEM/1609/005) by JKPP HIE 127/171-3/1(164) at the bagging fertilizer was observed.</p> <p>The monitoring results for the exposure to Crystalline Silica (Quartz) from the fertilizer revealed that the exposure levels based on 8hrs-TWA for all the monitored parameters did not exceed the permissible exposure limit.</p>	<p>Complied</p>
--------------	---	---	-----------------

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Kemedak Estate - The personal chemical exposure monitoring was conducted on 13/07/2017 (HQ/17/JHI/00/00008 – 2017/003) by HQ/17/JHI/00/00008 was observed.</p> <p>A total of 08 personal chemical exposure sampling were collected and the monitoring results for the exposure to Crystalline Silica (Quartz) revealed that the exposure levels based on 8hrs-TWA for all the monitored parameters did not exceed the permissible exposure limit.</p> <p>The personal chemical exposure monitoring (Methamidophos) was conducted on 29/12/2016 (JHB/CEM/1701/001) by JKPP HIE 127/171-3/1 was observed.</p> <p>A total of 03 personal chemical exposure sampling were collected and the monitoring parameter was Methamidophos revealed that the exposure levels based on 20hrs-TWA for all the monitored parameters were found to be below the respective Acute Exposure Guideline Levels (AEGs).</p> <p>Sighted record book for medical check-up for sprayer bag worm at Kemedak Estate.</p>	

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	<p>Palong Cocoa Certification Unit had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRADC) records, as well as CHRA reports were verified during the assessment.</p> <p><u>Palong Cocoa POM</u></p> <p>CHRA conducted on 07/03/2013 by registered assessor JKPP HIE 127/171-2(154). Based on the CHRA, a total of 17 findings/recommendations reported.</p> <p>HIRARC was reviewed on 25/05/2017 and approved by the Asst Engineer In Charge. No addition or changes observed.</p> <p><u>Sepang Loi Estate</u></p> <p>CHRA was conducted on 11-06/03/2013 by registered assessor JKPP HIE 127/171-2(154). Based on the CHRA, a total of 18 findings/recommendations reported and acted upon.</p> <p>HIRARC was last reviewed on 16/10/2017, reviewed by Assistant Manager and approved by the Estate manager. Changes was made for the</p> <p><u>Kemedak Estate</u></p> <p>CHRA was conducted on 04/03/2013 by registered assessor JKPP HIE 127/171-2(154). Based on the CHRA, a total of 19 findings/recommendations reported and acted upon.</p> <p>HIRRAC was reviewed on 17/1/2017. Next review is scheduled for 25/11/2016 and will be verified during the next audit.</p> <p>Monitoring is carried out for all the best practices and checklists maintained to ensure the implementation and practicality.</p>	<p>Complied</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.3</p> <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Minor compliance -</p>	<p>Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE.</p> <ol style="list-style-type: none"> 1. Palong Cocoa POM Annual Training Program 2017 was established and approved. 2. Sepang Loi Estate Training Program 2017 and Awareness Program 2017 was established and approved by the Estate Manager. 3. Kemedak Estate – OHS Training Plan Year 2017 was established and approved by the Manager. <p>Suitable PPE has been provided to the workers based on the information in the MSDS and CHRA assessor’s recommendation.</p> <p>List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities.</p> <ol style="list-style-type: none"> i. Boiler/Engine operator – Safety Helmet, Semi leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff. ii. Field workers (sprayer, manure & harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover. <p>The chemical store was found to be adequately organized, properly labelled, secured and person in charge understands the OSH procedures. MSDS was placed at the chemical stores and is available. The person in charge understands the information written in MSDS.</p>	<p>Complied</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance										
<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>The OSH policy is well briefed to all workers. Interview with workers reveal that they understand the policy and the importance of safety at work.</p> <p><u>Palong Cocoa POM</u></p> <p>OSH/ESH meeting conducted on quarterly basis and last meeting conducted on 29/08/2017 attended by 16 persons.</p> <p>The work place inspection conducted on 24/08/2017 and review of accident record was discussed during the OSH meeting. No any unresolved safety and health issues noted.</p> <p><u>OSH Committee Members</u></p> <p>Chairman – Tuan Mohd Taufiq Bin Khalil (appointment letter dated 04/09/2016). Appointment letters for other OSH committee members dated 06/02/2017.</p> <p>OSH/EHS meeting: 29/08/2017, 12/05/2017 and 17/02/2017.</p> <p><u>Sepang Loi and Kemedak Estate</u></p> <p>OSH Committee meeting are conducted on quarterly basis as shown in the table below. Concerns of all parties about health, safety and welfare including review of accidents are discussed at these meetings, and any issues raised are recorded. No any unresolved safety and health issues noted.</p> <table border="1" data-bbox="663 1137 1137 1294"> <thead> <tr> <th>Sepang Loi Estate</th> <th>Kemedak Estate</th> </tr> </thead> <tbody> <tr> <td>29.11.2016</td> <td>28/11/2016</td> </tr> <tr> <td>24.02.2017</td> <td>05/02/2017</td> </tr> <tr> <td>16.05.2017</td> <td>04/05/2017</td> </tr> <tr> <td>15.08.2017</td> <td>15/8/2017</td> </tr> </tbody> </table> <p>Like the OSH Committee meeting, the work place inspection are conducted on quarterly basis as well.</p>	Sepang Loi Estate	Kemedak Estate	29.11.2016	28/11/2016	24.02.2017	05/02/2017	16.05.2017	04/05/2017	15.08.2017	15/8/2017	<p>Complied</p>
Sepang Loi Estate	Kemedak Estate											
29.11.2016	28/11/2016											
24.02.2017	05/02/2017											
16.05.2017	04/05/2017											
15.08.2017	15/8/2017											

**RSPO Public Summary Report
Revision 4 (November /2016)**

<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p>	<p>Accident and emergency procedures have been communicated to employees, contractors and visitors.</p> <ol style="list-style-type: none"> Palong Cocoa POM - Fire evacuation drill was last conducted on 30/08/2017 to test the state of readiness during emergency situation. Sepang Loi Estate – Fire evacuation drill was last conducted on 11/08/2017 to test the state of readiness during emergency situation. Kemedak Estate - Fire evacuation drill was last conducted on 28/08/2017 to test the state of readiness during emergency situation. <p>Accident and emergency procedures are in Bahasa Malaysia and this is understood by the responsible workers, staff or executives involved in the operation. Good understanding level observed among the workers.</p> <p>Emergency eye wash facility available at chemical store and laboratory. Both are in good working condition.</p> <p>Quarterly review on accident cases carried out during OSH quarterly meeting.</p> <p>OFI:</p> <ul style="list-style-type: none"> Contact phone number of EHA could have been kept by the Mandore for direct contact (help) instead of through the office staff for expediency purpose. Refresher course could have been held periodically for the appointed First Aider. Records of medication treatment and usage could be included in the first aid kit and filled up by the Mandore. <p>This has been raised as an OFI due to lack of evidence to raise NC.</p> <p><u>Palong Cocoa POM</u></p> <p>No accident reported. JKPP 6 was sent to DOSH on 14/07/2017. JKPP 8 was sent to DOSH on 22/01/2017.</p> <p>DOSH visits (07/08/2016) been recorded in the DOSH log book and comments highlighted by DOSH was noted and action taken accordingly. Action plan (31/10/2016) available.</p> <p><u>Sepang Loi Estate</u></p> <p>3 accidents reported. JKPP 6 was sent to DOSH on 20/03/2017. JKPP 8 was sent to DOSH on 17/01/2017.</p> <p>DOSH visits (07/05/2017) been recorded in the DOSH log book and comments highlighted by DOSH was noted and action taken accordingly.</p> <p><u>Kemedak Estate</u></p> <p>02 accidents reported. JKPP 6 not available. JKPP 8 was sent to DOSH on 20/01/2017.</p>	<p>Complied</p>
--------------	---	--	-----------------

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance																								
4.7.6 All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	<p>DOSH visits (08/10/2017) been recorded in the DOSH log book and noted comments highlighted by DOSH.</p> <p>Records review showed all workers are covered by the accident insurances. Malaysian workers are covered by SOCSO vide form 8A, "Jadual Caruman Bulanan" for October 2017 as follows:</p> <table border="1" data-bbox="660 595 1270 781"> <tr> <td>Site</td> <td>Payment advise ref. no.:</td> </tr> <tr> <td>Palong Cocoa POM</td> <td>17000664</td> </tr> <tr> <td>Sepang Loi Estate</td> <td>17000455</td> </tr> <tr> <td>Kemedak Estate</td> <td>17000521</td> </tr> </table> <p>while for foreign workers are covered by Foreign Workers Compensation Scheme Certificate of Insurance</p> <table border="1" data-bbox="660 900 1297 1319"> <tr> <td>Site</td> <td>Palong Cocoa POM</td> <td>Sepang Loi Estate</td> <td>Kemedak Estate</td> </tr> <tr> <td>Underwriter</td> <td>MSIG INSURANCE (MALAYSIA) SDN BHD</td> <td>Berjaya Sompo Insurance Berhad</td> <td>MSIG INSURANCE (MALAYSIA) SDN BHD</td> </tr> <tr> <td>Coverage period</td> <td>05/07/2017 – 04/07/2018</td> <td>25.01.2017 – 24.01.2018</td> <td>1/1/2017 – 31/12/2017</td> </tr> <tr> <td>Policy No.</td> <td>JB-09808658-FWC</td> <td>17DHQEW WCZ00787</td> <td>JB-09808538-FWC</td> </tr> </table>	Site	Payment advise ref. no.:	Palong Cocoa POM	17000664	Sepang Loi Estate	17000455	Kemedak Estate	17000521	Site	Palong Cocoa POM	Sepang Loi Estate	Kemedak Estate	Underwriter	MSIG INSURANCE (MALAYSIA) SDN BHD	Berjaya Sompo Insurance Berhad	MSIG INSURANCE (MALAYSIA) SDN BHD	Coverage period	05/07/2017 – 04/07/2018	25.01.2017 – 24.01.2018	1/1/2017 – 31/12/2017	Policy No.	JB-09808658-FWC	17DHQEW WCZ00787	JB-09808538-FWC	Complied
Site	Payment advise ref. no.:																									
Palong Cocoa POM	17000664																									
Sepang Loi Estate	17000455																									
Kemedak Estate	17000521																									
Site	Palong Cocoa POM	Sepang Loi Estate	Kemedak Estate																							
Underwriter	MSIG INSURANCE (MALAYSIA) SDN BHD	Berjaya Sompo Insurance Berhad	MSIG INSURANCE (MALAYSIA) SDN BHD																							
Coverage period	05/07/2017 – 04/07/2018	25.01.2017 – 24.01.2018	1/1/2017 – 31/12/2017																							
Policy No.	JB-09808658-FWC	17DHQEW WCZ00787	JB-09808538-FWC																							
4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>Accident records are found to be updated. All records on Lost Time Accident (LTA) metrics are maintained.</p> <p>Samples of accident statistic as shown below :</p> <table border="1" data-bbox="660 1453 1297 1603"> <thead> <tr> <th>Year (to-date)</th> <th>Palong Cocoa POM</th> <th>Sepang Loi Estate</th> <th>Kemedak Estate</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>0 (9 LTA)</td> <td>1 (1 LTA)</td> <td>3 (102 LTA)</td> </tr> <tr> <td>2017</td> <td>0 (0 LTA)</td> <td>3 (3 LTA)</td> <td>2 (4 LTA)</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days (MC) Palong Cocoa POM recorded LTI as at January 2017 – 240,000. Sepang Loi Estate recorded LTI as at January 2017 – 235,200. Kemedak Estate recorded LTI as at January 2017 – 458,400.</p>	Year (to-date)	Palong Cocoa POM	Sepang Loi Estate	Kemedak Estate	2016	0 (9 LTA)	1 (1 LTA)	3 (102 LTA)	2017	0 (0 LTA)	3 (3 LTA)	2 (4 LTA)	Complied												
Year (to-date)	Palong Cocoa POM	Sepang Loi Estate	Kemedak Estate																							
2016	0 (9 LTA)	1 (1 LTA)	3 (102 LTA)																							
2017	0 (0 LTA)	3 (3 LTA)	2 (4 LTA)																							
<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>																										

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>4.8.1</p> <p>A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -</p>	<p>Kulim (Malaysia) Berhad has established an annual training program that covers all aspects of the RSPO Principles and Criteria.</p> <ol style="list-style-type: none"> 1. Palong Cocoa POM – Annual Training Program 2017. Implementation is still on-going. 2. Sepang Loi Estate – Training Program 2017. Implementation is still on-going. 3. Kemedak Estate – RSPO/OSH Training. Implementation is still on-going. <p><u>Training Needs</u></p> <ol style="list-style-type: none"> i. 34 training needs/requirements for Palong Cocoa POM Annual Training Program 2017 identified for various categories of operating units. ii. 29 training needs/requirements Sepang Loi Estate – Training Program 2017 identified for various categories of operating units. iii. 22 training needs/requirements Kemedak Estate – RSPO/OSH Training identified for various categories of operating units. 	<p>Complied</p>

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance																																																																											
<p>4.8.2</p> <p>Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C requirement.</p> <p>Samples of training record for 2017 as follows:</p> <p>Palong Cocoa POM</p> <table border="1" data-bbox="659 580 1289 907"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Trainer</th> </tr> </thead> <tbody> <tr> <td>14/10/2017</td> <td>Fire Prevention at Housing</td> <td>Asst Manager</td> </tr> <tr> <td>09/10/2017</td> <td>Spectrophotometer Training</td> <td>Chemopharm</td> </tr> <tr> <td>07/10/2017</td> <td>Emergency Response Plan (Bund Rupture/Oil Spillage)</td> <td>Asst Manager</td> </tr> <tr> <td>05/10/2017</td> <td>Sludge Separator Alfa Laval Training</td> <td>Alfa Laval</td> </tr> <tr> <td>11/09/2017</td> <td>Chemical Handling & Chemical Spillage Training</td> <td>WACCO</td> </tr> </tbody> </table> <p>Sepang Loi Estate</p> <p>A total of 27 trainings to date were held since January 2017. Excerpt of some of the training dates are as follows:</p> <table border="1" data-bbox="659 992 1289 1942"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Trainer</th> </tr> </thead> <tbody> <tr> <td>12.01.2017</td> <td>Latihan Meracun Tikus</td> <td>En Zainal</td> </tr> <tr> <td>25.01.2017</td> <td>Pemakaian PPE, Teknik Meracun</td> <td>En Zainal</td> </tr> <tr> <td>16.02.2017</td> <td>Latihan Memotong Buah Sawit</td> <td>En Muhd Fedzley & Mohd Azmi</td> </tr> <tr> <td>20.02.2017</td> <td>Penggunaan Air Di Perumahan</td> <td>En Muhd Fedzley</td> </tr> <tr> <td>14.03.2017</td> <td>Scheduled Waste Store</td> <td>En Mohd Azmi</td> </tr> <tr> <td>27.03.2017</td> <td>Tempat Pembuangan Sampah</td> <td>En Muhd Fedzley</td> </tr> <tr> <td>10.04.2017</td> <td>Fogging Di Kawasan Perumahan</td> <td>En Muhd Fedzley</td> </tr> <tr> <td>24.04.2017</td> <td>Gangguan Seksual & Penyalahgunaan Dadah</td> <td>En Muhd Fedzley</td> </tr> <tr> <td>09.05.2017</td> <td>Latihan Bio-Compost</td> <td>En Zainal</td> </tr> <tr> <td>13.06.2017</td> <td>Latihan MB & Tractor</td> <td>Kulim Safety</td> </tr> <tr> <td>10.07.2017</td> <td>Hirarc Review</td> <td>Kulim Safety</td> </tr> <tr> <td>24.07.2017</td> <td>Water Treatment Plant/ Sampling</td> <td>En Jemadi</td> </tr> <tr> <td>07.08.2017</td> <td>Latihan ERP</td> <td>En Muhd Fedzley</td> </tr> <tr> <td>11.08.2017</td> <td>Larangan Pembakaran Terbuka</td> <td>En Muhd Fedzley</td> </tr> <tr> <td>08.09.2017</td> <td>Bagwarm Treatment / Krotopos</td> <td>En Mohd Azmi</td> </tr> <tr> <td>12.09.2017</td> <td>Chemical Handing</td> <td>En Mohd Azmi & En Zainal</td> </tr> <tr> <td>09.10.2017</td> <td>Bilas Tiga Kali</td> <td>En Mohd Azmi & En Zainal</td> </tr> <tr> <td>09.11.2017</td> <td>Menyimpan Alatan Kerja</td> <td>En Zainal</td> </tr> </tbody> </table>	Date	Training	Trainer	14/10/2017	Fire Prevention at Housing	Asst Manager	09/10/2017	Spectrophotometer Training	Chemopharm	07/10/2017	Emergency Response Plan (Bund Rupture/Oil Spillage)	Asst Manager	05/10/2017	Sludge Separator Alfa Laval Training	Alfa Laval	11/09/2017	Chemical Handling & Chemical Spillage Training	WACCO	Date	Training	Trainer	12.01.2017	Latihan Meracun Tikus	En Zainal	25.01.2017	Pemakaian PPE, Teknik Meracun	En Zainal	16.02.2017	Latihan Memotong Buah Sawit	En Muhd Fedzley & Mohd Azmi	20.02.2017	Penggunaan Air Di Perumahan	En Muhd Fedzley	14.03.2017	Scheduled Waste Store	En Mohd Azmi	27.03.2017	Tempat Pembuangan Sampah	En Muhd Fedzley	10.04.2017	Fogging Di Kawasan Perumahan	En Muhd Fedzley	24.04.2017	Gangguan Seksual & Penyalahgunaan Dadah	En Muhd Fedzley	09.05.2017	Latihan Bio-Compost	En Zainal	13.06.2017	Latihan MB & Tractor	Kulim Safety	10.07.2017	Hirarc Review	Kulim Safety	24.07.2017	Water Treatment Plant/ Sampling	En Jemadi	07.08.2017	Latihan ERP	En Muhd Fedzley	11.08.2017	Larangan Pembakaran Terbuka	En Muhd Fedzley	08.09.2017	Bagwarm Treatment / Krotopos	En Mohd Azmi	12.09.2017	Chemical Handing	En Mohd Azmi & En Zainal	09.10.2017	Bilas Tiga Kali	En Mohd Azmi & En Zainal	09.11.2017	Menyimpan Alatan Kerja	En Zainal	<p>Complied</p>
Date	Training	Trainer																																																																											
14/10/2017	Fire Prevention at Housing	Asst Manager																																																																											
09/10/2017	Spectrophotometer Training	Chemopharm																																																																											
07/10/2017	Emergency Response Plan (Bund Rupture/Oil Spillage)	Asst Manager																																																																											
05/10/2017	Sludge Separator Alfa Laval Training	Alfa Laval																																																																											
11/09/2017	Chemical Handling & Chemical Spillage Training	WACCO																																																																											
Date	Training	Trainer																																																																											
12.01.2017	Latihan Meracun Tikus	En Zainal																																																																											
25.01.2017	Pemakaian PPE, Teknik Meracun	En Zainal																																																																											
16.02.2017	Latihan Memotong Buah Sawit	En Muhd Fedzley & Mohd Azmi																																																																											
20.02.2017	Penggunaan Air Di Perumahan	En Muhd Fedzley																																																																											
14.03.2017	Scheduled Waste Store	En Mohd Azmi																																																																											
27.03.2017	Tempat Pembuangan Sampah	En Muhd Fedzley																																																																											
10.04.2017	Fogging Di Kawasan Perumahan	En Muhd Fedzley																																																																											
24.04.2017	Gangguan Seksual & Penyalahgunaan Dadah	En Muhd Fedzley																																																																											
09.05.2017	Latihan Bio-Compost	En Zainal																																																																											
13.06.2017	Latihan MB & Tractor	Kulim Safety																																																																											
10.07.2017	Hirarc Review	Kulim Safety																																																																											
24.07.2017	Water Treatment Plant/ Sampling	En Jemadi																																																																											
07.08.2017	Latihan ERP	En Muhd Fedzley																																																																											
11.08.2017	Larangan Pembakaran Terbuka	En Muhd Fedzley																																																																											
08.09.2017	Bagwarm Treatment / Krotopos	En Mohd Azmi																																																																											
12.09.2017	Chemical Handing	En Mohd Azmi & En Zainal																																																																											
09.10.2017	Bilas Tiga Kali	En Mohd Azmi & En Zainal																																																																											
09.11.2017	Menyimpan Alatan Kerja	En Zainal																																																																											

**RSPO Public Summary Report
Revision 4 (November /2016)**

		<p>Kemedak Estate A total of 27 trainings to date were held since January 2017. Excerpt of some of the training dates are as follows:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Trainer</th> </tr> </thead> <tbody> <tr> <td>10/01 /2017</td> <td>Penerangan Tentang Pemakaian PPE.</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>07/02 /2017</td> <td>Penerangan Tentang Penjagaan MB Dan Traktor Ladang.</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>15/02 /2017</td> <td>Penerangan Tentang Larangan Membuat Pembakaran Terbuka Dikawasan Perumahan Ladang.</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>08/03 /2017</td> <td>Penerangan Tentang Pematuhan Aspek RSPO Dan OSHA.</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>22/03 /2017</td> <td>Kebebasan Untuk Berpersatuan Dan Tentang Diskriminasi.</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>05/05 /2017</td> <td>Penerangan Tentang Gangguan Seksual Di Tempat Kerja.</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>17/05 /2017</td> <td>Penerangan Tentang 'Reproductive Right' Atau Human Right Policy.</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>17/08 /2017</td> <td>Ikrar integriti korporat (kontraktor & stakeholder)</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>17/08 /2017</td> <td>Penerangan tentang SOP dan Panduan Kerja Selamat di tempat kerja.</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>21/08 /2017</td> <td>Penerangan tentang 'Buffer Zone'</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>04/09 /2017</td> <td>Penerangan tentang larangan berdiri ditangga trailer penumpang.</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>07/09 /2017</td> <td>Penerangan tentang menggunakan alat pelindung keselamatan ke atas sabit atau pahat yang di bawa.</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>11/09 /2017</td> <td>Penerangan tentang biodiversity (HCV AREA).</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>13/09 /2017</td> <td>Penerangan tentang Kitar Semula.</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>19/09 /2017</td> <td>Penerangan Tentang Sustainability Policy.</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>20/10 /2017</td> <td>Penerangan Tentang Pengiraan Gaji.</td> <td>Suhaimi Bin Sidek</td> </tr> <tr> <td>15/09 /2017</td> <td>Latihan Dan Penerangan Tempat Membancuh Perosak.</td> <td>Mohd Izzuddin Bin Usjah</td> </tr> </tbody> </table>	Date	Training	Trainer	10/01 /2017	Penerangan Tentang Pemakaian PPE.	Suhaimi Bin Sidek	07/02 /2017	Penerangan Tentang Penjagaan MB Dan Traktor Ladang.	Suhaimi Bin Sidek	15/02 /2017	Penerangan Tentang Larangan Membuat Pembakaran Terbuka Dikawasan Perumahan Ladang.	Suhaimi Bin Sidek	08/03 /2017	Penerangan Tentang Pematuhan Aspek RSPO Dan OSHA.	Suhaimi Bin Sidek	22/03 /2017	Kebebasan Untuk Berpersatuan Dan Tentang Diskriminasi.	Suhaimi Bin Sidek	05/05 /2017	Penerangan Tentang Gangguan Seksual Di Tempat Kerja.	Suhaimi Bin Sidek	17/05 /2017	Penerangan Tentang 'Reproductive Right' Atau Human Right Policy.	Suhaimi Bin Sidek	17/08 /2017	Ikrar integriti korporat (kontraktor & stakeholder)	Suhaimi Bin Sidek	17/08 /2017	Penerangan tentang SOP dan Panduan Kerja Selamat di tempat kerja.	Suhaimi Bin Sidek	21/08 /2017	Penerangan tentang 'Buffer Zone'	Suhaimi Bin Sidek	04/09 /2017	Penerangan tentang larangan berdiri ditangga trailer penumpang.	Suhaimi Bin Sidek	07/09 /2017	Penerangan tentang menggunakan alat pelindung keselamatan ke atas sabit atau pahat yang di bawa.	Suhaimi Bin Sidek	11/09 /2017	Penerangan tentang biodiversity (HCV AREA).	Suhaimi Bin Sidek	13/09 /2017	Penerangan tentang Kitar Semula.	Suhaimi Bin Sidek	19/09 /2017	Penerangan Tentang Sustainability Policy.	Suhaimi Bin Sidek	20/10 /2017	Penerangan Tentang Pengiraan Gaji.	Suhaimi Bin Sidek	15/09 /2017	Latihan Dan Penerangan Tempat Membancuh Perosak.	Mohd Izzuddin Bin Usjah	
Date	Training	Trainer																																																							
10/01 /2017	Penerangan Tentang Pemakaian PPE.	Suhaimi Bin Sidek																																																							
07/02 /2017	Penerangan Tentang Penjagaan MB Dan Traktor Ladang.	Suhaimi Bin Sidek																																																							
15/02 /2017	Penerangan Tentang Larangan Membuat Pembakaran Terbuka Dikawasan Perumahan Ladang.	Suhaimi Bin Sidek																																																							
08/03 /2017	Penerangan Tentang Pematuhan Aspek RSPO Dan OSHA.	Suhaimi Bin Sidek																																																							
22/03 /2017	Kebebasan Untuk Berpersatuan Dan Tentang Diskriminasi.	Suhaimi Bin Sidek																																																							
05/05 /2017	Penerangan Tentang Gangguan Seksual Di Tempat Kerja.	Suhaimi Bin Sidek																																																							
17/05 /2017	Penerangan Tentang 'Reproductive Right' Atau Human Right Policy.	Suhaimi Bin Sidek																																																							
17/08 /2017	Ikrar integriti korporat (kontraktor & stakeholder)	Suhaimi Bin Sidek																																																							
17/08 /2017	Penerangan tentang SOP dan Panduan Kerja Selamat di tempat kerja.	Suhaimi Bin Sidek																																																							
21/08 /2017	Penerangan tentang 'Buffer Zone'	Suhaimi Bin Sidek																																																							
04/09 /2017	Penerangan tentang larangan berdiri ditangga trailer penumpang.	Suhaimi Bin Sidek																																																							
07/09 /2017	Penerangan tentang menggunakan alat pelindung keselamatan ke atas sabit atau pahat yang di bawa.	Suhaimi Bin Sidek																																																							
11/09 /2017	Penerangan tentang biodiversity (HCV AREA).	Suhaimi Bin Sidek																																																							
13/09 /2017	Penerangan tentang Kitar Semula.	Suhaimi Bin Sidek																																																							
19/09 /2017	Penerangan Tentang Sustainability Policy.	Suhaimi Bin Sidek																																																							
20/10 /2017	Penerangan Tentang Pengiraan Gaji.	Suhaimi Bin Sidek																																																							
15/09 /2017	Latihan Dan Penerangan Tempat Membancuh Perosak.	Mohd Izzuddin Bin Usjah																																																							

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator		Assessment Findings		Compliance
		20/10 /2017	Latihan Dan Penerangan Kimpalan Menggunakan Elektrik & Alat Pengandung Tidak Berapi.	Mohd Izzuddin Bin Usjah
Principle 5: Environmental responsibility and conservation of natural resources and biodiversity				
Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.				
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	At POM, Documented Environmental Aspects and Impacts Register (Form No.: epa-pppom-2016; Activity code: ER001-ER016; Rev. 1/2017) is available. The review was done on annual basis. Similar Documented Environmental Aspects and Impacts Register were sighted at Sepang Loi Estate and Kemedak Estate. They were reviewed annually, all in September 2017.		Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance																
<p>5.1.2</p> <p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -</p>	<p>At Palong Cocoa POM, environmental management plan with aspect/impact identification, risk assessment and risk control for different activity and area were sighted. For example, mitigation plan or records sighted include:</p> <table border="1" data-bbox="659 506 1289 1167"> <thead> <tr> <th data-bbox="659 506 719 580">No</th> <th data-bbox="719 506 930 580">Title of Environmental Plan</th> <th data-bbox="930 506 1062 580">Status</th> <th data-bbox="1062 506 1289 580">Monitoring parameters; if applicable</th> </tr> </thead> <tbody> <tr> <td data-bbox="659 580 719 815">1.</td> <td data-bbox="719 580 930 815">Installation Air Control Pollution system for Air Quality and CCTV for dark smoke monitoring at Boiler Station</td> <td data-bbox="930 580 1062 815">In Progress – target install on 2018</td> <td data-bbox="1062 580 1289 815">Opacity and particulate</td> </tr> <tr> <td data-bbox="659 815 719 987">2.</td> <td data-bbox="719 815 930 987">Disposal of waste to the land</td> <td data-bbox="930 815 1062 987">In progress - target completion by 2017 year end</td> <td data-bbox="1062 815 1289 987">To construct a compartment which can collect the leachate water from EFB and pump out to IETS.</td> </tr> <tr> <td data-bbox="659 987 719 1167">3.</td> <td data-bbox="719 987 930 1167">Contaminated water mixed with ashes spillage to the drain</td> <td data-bbox="930 987 1062 1167">In Progress – target on March 2018</td> <td data-bbox="1062 987 1289 1167">To build a compartment as a trap for boiler ash before passed through to main drain</td> </tr> </tbody> </table> <p>At Sepang Loi Estate and Kemedak Estate, the management plan established include:</p> <ul style="list-style-type: none"> • Road construction • Surface run-off • Protection of streams and quality of water source, and • monthly recording of waste generation (schedule waste and domestic waste) with aim to reduce, recycle and reuse, weekly inspection of compound and weekly inspection of domestic rubbish collection. <p>The responsible persons are Manager, Assistant Manager, staff in charge of line-site and Estate HA. It depends on the activities and area.</p>	No	Title of Environmental Plan	Status	Monitoring parameters; if applicable	1.	Installation Air Control Pollution system for Air Quality and CCTV for dark smoke monitoring at Boiler Station	In Progress – target install on 2018	Opacity and particulate	2.	Disposal of waste to the land	In progress - target completion by 2017 year end	To construct a compartment which can collect the leachate water from EFB and pump out to IETS.	3.	Contaminated water mixed with ashes spillage to the drain	In Progress – target on March 2018	To build a compartment as a trap for boiler ash before passed through to main drain	<p>Complied</p>
No	Title of Environmental Plan	Status	Monitoring parameters; if applicable															
1.	Installation Air Control Pollution system for Air Quality and CCTV for dark smoke monitoring at Boiler Station	In Progress – target install on 2018	Opacity and particulate															
2.	Disposal of waste to the land	In progress - target completion by 2017 year end	To construct a compartment which can collect the leachate water from EFB and pump out to IETS.															
3.	Contaminated water mixed with ashes spillage to the drain	In Progress – target on March 2018	To build a compartment as a trap for boiler ash before passed through to main drain															

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance	
5.1.3	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p>An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed annually to reflect the results of monitoring operational changes that may have positive and negative environmental impacts.</p> <p>Latest monitoring protocol introduced by Department of Environment via GSR (Guided Self Regulation) approach was seen. Online Environmental Reporting @ OER, E-sWis (scheduled waste online reporting) and CEMS (continuous emission monitoring system) were among the latest tools for the environmental compliance monitoring.</p> <p>At Palong Cocoa Palm Oil Mill: Monitoring plan was established based on DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling. Please see indicator 4.1.3 for results of monitoring.</p>	Complied
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>			
5.2.1	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p>	<p>The initial HCV assessment was conducted in 2009 by consultant. Report "Rapid Biodiversity Assessment of Oil Palm Plantations" – A.J.F.M Dekker Consultant, Biodiversity 2009.</p> <p>Re-assessment of HCV was done by Kulim Sustainability executives from 6 August to 11 September 2015. Re-classification of HCV areas within Palong Certification Unit incorporated in the report with the total 118.08 ha. Annual review of the HCV and management and monitoring plans are conducted as part of continual improvement activities. The last HCV review for the Sepang Loi Estate was conducted in November 2017 and for Kemedak Estate on 01 January 2017 (HCV 1 – HCV 8)</p> <p>There was no re-classification of HCV area at both estates.</p>	Complied
5.2.2	<p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>There were no RTE reported within the estate. Regular patrols within the operating unit estates were carried out and findings recorded by the respective Estate executives to monitor the Conservation / buffer zone areas. Mechanism for reporting the sightings of various types of wildlife, were found in place through AP patrol book.</p>	Complied
5.2.3	<p>There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance -</p>	<p>Kulim continue to support the Kulim Wildlife Defenders Program to detect illegal hunters and handing them to regulatory departments for further action. Programs include regular training and activities to educate the workforce on RTE.</p> <p>Signage as well as routine patrolling activities were utilised as part of creating awareness among employees and maintain HCVs.</p>	Complied

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance
5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	<p>Management plans are established and monitoring outcomes were reviewed by the estate managers. There is ongoing monitoring of the management plan on the status of HCV available. HCV monitoring of monthly record until November showed no RTE sighted in Palong Complex area. Further monitoring also being carried out together with wildlife department under Johor Wildlife Conservation project in case of any RTE presence in Palong Complex.</p> <p>The Auxilliary Police of the CU maintained patrolling the estate and its surroundings including the conservation area. However, there was no outcome that requires feedback and revision of action plan. All are in order and no encroachment reported.</p>	Complied
5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	There was no HCV set-aside that needs any negotiation process with the local communities.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		
5.3.1 All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p>Documented identification of all wastes was reflected in the Waste Management Plan</p> <p>PCPOM, Sepang Loi Estate and Kemedak Estate have established their respective Waste Management Action Plan FY 2016/2017. Among the type of waste identified were: Scheduled Waste, Domestic Waste and Industrial Waste.</p> <p>At the mill the source of these wastes were mainly located at mechanical/electrical workshop, chemical store, scheduled waste store, line site, office, mill effluent pond.</p> <p>Type of scheduled waste generated: SW102, SW110, SW305, SW306, SW307, SW409, SW410 and SW429.</p> <p><u>Sepang Loi Estate</u></p> <p>Notification of scheduled waste, 5th schedule. Refer to file ref# AS(B)J11/123/000/168, inventory #0108J41052141 102017 dated 31/10/2017.</p> <p><u>Kemedak Estate</u></p> <p>Notification of scheduled waste, 5th schedule. Refer to file ref# AS(B)J11/123/000/158, inventory #0108J41610321 112017 dated 02/11/2017.</p> <p>At the estates the sources are from line site, office, workshop and chemical premixing area.</p> <p>The Domestic waste are sent to own operated – landfill area; Non-hazardous – empty chemical container through DOA licensed contractor and Scheduled waste through DOE licensed contractor</p>	Complied

RSPO Public Summary Report
Revision 4 (November / 2016)

Criterion / Indicator	Assessment Findings	Compliance
5.3.2	<p>All chemicals and their containers shall be disposed of responsibly.</p> <p>- Major compliance -</p> <p>The CU continued to follow the company established Disposal procedure. Most of the agrochemical containers are recycled for pre-mixing agrochemicals. Recycling is only for the same purpose. As example, Sepang Loi Estate and Kemedak Estate practice triple rinsing and punctured of used chemical and disposed it through G-Planter Sdn. Bhd.</p> <p>Those containers identified as scheduled waste are disposed of in accordance with established procedure and EQ (Scheduled Waste) Regulation 2005.</p>	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance																																								
<p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>Scheduled waste is well managed with designated storage area at the mill and each of the estates not to exceed 180 days in accordance with the requirements of the Environmental Quality Act 1974 (Scheduled Wastes), Regulations, 2005. Disposal was through licensed collector.</p> <p>Disposal method at the mill are as follow:</p> <table border="1" data-bbox="660 595 1305 1402"> <thead> <tr> <th>No</th> <th>Waste identification</th> <th colspan="2">Disposal method</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Palm fiber</td> <td colspan="2">Boiler fuel</td> </tr> <tr> <td>2</td> <td>Palm shell</td> <td colspan="2">Boiler fuel</td> </tr> <tr> <td>3</td> <td>Empty Fruit Bunch</td> <td colspan="2">Mulching as used at owned estate</td> </tr> <tr> <td>4</td> <td>Boiler soot / ash</td> <td colspan="2">Landfill</td> </tr> <tr> <td>5</td> <td>Effluent water</td> <td colspan="2">ETP and polishing plant – discharge method land irrigation</td> </tr> <tr> <td>6</td> <td>Used hydraulic oil (SW 306)</td> <td>Disposed to Kualiti Alam Sdn Bhd</td> <td>E-consignment note: 20170402104QI WYW dated 2/4/2017</td> </tr> <tr> <td>7</td> <td>Used Oil Filter (SW 410)</td> <td>Disposed by Kualiti Alam Sdn Bhd</td> <td>2017101153G08 SU dated 12/10/2017</td> </tr> <tr> <td>8</td> <td>Decanter cake</td> <td colspan="2">Nutrient recycling for estate use</td> </tr> <tr> <td>9</td> <td>Sand and stone</td> <td colspan="2">Road patching</td> </tr> </tbody> </table> <p>Sepang Loi Estate and Kemedak Estate Most of the agrochemical containers are reused as premixing container for carrying to the field. The remainder empty chemical containers are first triple rinse, its bottom punch with holes and then dispose to recycle contractor.</p> <p>Domestic waste are collected from line site twice weekly by contractor and disposed at owned managed landfill area.</p> <p>Schedule waste are disposed to Kualiti Alam Sdn Bhd and transported away by them. The following are details of disposal at both estates.</p>	No	Waste identification	Disposal method		1	Palm fiber	Boiler fuel		2	Palm shell	Boiler fuel		3	Empty Fruit Bunch	Mulching as used at owned estate		4	Boiler soot / ash	Landfill		5	Effluent water	ETP and polishing plant – discharge method land irrigation		6	Used hydraulic oil (SW 306)	Disposed to Kualiti Alam Sdn Bhd	E-consignment note: 20170402104QI WYW dated 2/4/2017	7	Used Oil Filter (SW 410)	Disposed by Kualiti Alam Sdn Bhd	2017101153G08 SU dated 12/10/2017	8	Decanter cake	Nutrient recycling for estate use		9	Sand and stone	Road patching		<p>Complied</p>
No	Waste identification	Disposal method																																								
1	Palm fiber	Boiler fuel																																								
2	Palm shell	Boiler fuel																																								
3	Empty Fruit Bunch	Mulching as used at owned estate																																								
4	Boiler soot / ash	Landfill																																								
5	Effluent water	ETP and polishing plant – discharge method land irrigation																																								
6	Used hydraulic oil (SW 306)	Disposed to Kualiti Alam Sdn Bhd	E-consignment note: 20170402104QI WYW dated 2/4/2017																																							
7	Used Oil Filter (SW 410)	Disposed by Kualiti Alam Sdn Bhd	2017101153G08 SU dated 12/10/2017																																							
8	Decanter cake	Nutrient recycling for estate use																																								
9	Sand and stone	Road patching																																								

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance																																																									
	<p><u>Sepang Loi Estate</u></p> <table border="1" data-bbox="660 434 1289 833"> <thead> <tr> <th>Date Disposed</th> <th>E=Consignment note no.</th> <th>Waste code</th> </tr> </thead> <tbody> <tr><td>10/06/2017</td><td>091261-002/0003</td><td>SW 410</td></tr> <tr><td>10/06/2017</td><td>091261-006/0004</td><td>SW 305</td></tr> <tr><td>10/06/2017</td><td>091261-004/0005</td><td>SW 307</td></tr> <tr><td>10/06/2017</td><td>091261-005/0004</td><td>SW 408</td></tr> <tr><td>21/10/2017</td><td>091261-004/0006</td><td>SW 305</td></tr> <tr><td>21/10/2017</td><td>091261-006/0005</td><td>SW 307</td></tr> <tr><td>21/10/2017</td><td>091261-005/0005</td><td>SW 408</td></tr> </tbody> </table> <p><u>Kemedak Estate</u></p> <table border="1" data-bbox="660 907 1289 1433"> <thead> <tr> <th>Date disposed</th> <th>E=Consignment note no.</th> <th>Waste code</th> </tr> </thead> <tbody> <tr><td>22/04/2017</td><td>201704220761WQ3U</td><td>SW102</td></tr> <tr><td>22/04/2017</td><td>2017042208943AN0</td><td>SW305</td></tr> <tr><td>22/04/2017</td><td>2017042208SI25LU</td><td>SW307</td></tr> <tr><td>22/04/2017</td><td>2017042208108XSJ</td><td>SW410</td></tr> <tr><td>01/10/2017</td><td>2017100112QC4KY0</td><td>SW305</td></tr> <tr><td>01/10/2017</td><td>2017100112IP48GW</td><td>SW306</td></tr> <tr><td>01/10/2017</td><td>2017100112DC2WS7</td><td>SW307</td></tr> <tr><td>01/10/2017</td><td>2017100112UR8VX0</td><td>SW408</td></tr> <tr><td>01/10/2017</td><td>2017100112UKQH7F</td><td>SW410</td></tr> <tr><td>08/10/2017</td><td>2017100815FTONKX</td><td>SW404</td></tr> </tbody> </table>	Date Disposed	E=Consignment note no.	Waste code	10/06/2017	091261-002/0003	SW 410	10/06/2017	091261-006/0004	SW 305	10/06/2017	091261-004/0005	SW 307	10/06/2017	091261-005/0004	SW 408	21/10/2017	091261-004/0006	SW 305	21/10/2017	091261-006/0005	SW 307	21/10/2017	091261-005/0005	SW 408	Date disposed	E=Consignment note no.	Waste code	22/04/2017	201704220761WQ3U	SW102	22/04/2017	2017042208943AN0	SW305	22/04/2017	2017042208SI25LU	SW307	22/04/2017	2017042208108XSJ	SW410	01/10/2017	2017100112QC4KY0	SW305	01/10/2017	2017100112IP48GW	SW306	01/10/2017	2017100112DC2WS7	SW307	01/10/2017	2017100112UR8VX0	SW408	01/10/2017	2017100112UKQH7F	SW410	08/10/2017	2017100815FTONKX	SW404	
Date Disposed	E=Consignment note no.	Waste code																																																									
10/06/2017	091261-002/0003	SW 410																																																									
10/06/2017	091261-006/0004	SW 305																																																									
10/06/2017	091261-004/0005	SW 307																																																									
10/06/2017	091261-005/0004	SW 408																																																									
21/10/2017	091261-004/0006	SW 305																																																									
21/10/2017	091261-006/0005	SW 307																																																									
21/10/2017	091261-005/0005	SW 408																																																									
Date disposed	E=Consignment note no.	Waste code																																																									
22/04/2017	201704220761WQ3U	SW102																																																									
22/04/2017	2017042208943AN0	SW305																																																									
22/04/2017	2017042208SI25LU	SW307																																																									
22/04/2017	2017042208108XSJ	SW410																																																									
01/10/2017	2017100112QC4KY0	SW305																																																									
01/10/2017	2017100112IP48GW	SW306																																																									
01/10/2017	2017100112DC2WS7	SW307																																																									
01/10/2017	2017100112UR8VX0	SW408																																																									
01/10/2017	2017100112UKQH7F	SW410																																																									
08/10/2017	2017100815FTONKX	SW404																																																									

Criterion 5.4:

Efficiency of fossil fuel use and the use of renewable energy is optimised.

5.4.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -</p>	<p>The mill production output records and the renewable energy used were monitored monthly. The Mill monitors and reports energy usage monthly to head office through monthly report. The company has optimized the use of renewable energy.</p> <p>Power generation summary as follows:</p> <ol style="list-style-type: none"> 1. Diesel engine @ fossil fuel (240 kW) at 78,470 kWh (Jan – Aug 2017). 2. Steam turbine@ renewable energy (1.2 MW) at 2,052,800 kWh (Jan – Aug 2017). 3. Fossil fuel usage is 19.17% over the total power generation/consumption. 	Complied
-------	---	---	----------

Criterion 5.5:

Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
5.5.1	<p>There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>- Major compliance -</p>	Complied
5.5.2	<p>Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>- Minor compliance -</p>	Complied
<p>Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>		

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance																
<p>5.6.1</p> <p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -</p>	<p>At Palong Cocoa POM, Ambient Air quality monitoring and Air emission monitoring has been carried out as per required frequency stipulated in mill's compliance schedule. In addition, smoke density meters were calibrated consistently every 6 monthly.</p> <p>Results of monitoring as follows:</p> <p>Boiler #4: 13/06/2017, refer to report, PAC-AE-170608.</p> <table border="1" data-bbox="660 640 1299 853"> <thead> <tr> <th>Parameter</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>Solid particle, g/Nm3 @ 12% CO2</td> <td>0.38 - 0.39</td> </tr> <tr> <td>NOx emission, g/Nm3</td> <td>0.04 – 0.05 vs limit of 2</td> </tr> <tr> <td>SOx emission, g/Nm3</td> <td>- 0.01</td> </tr> </tbody> </table> <p>Boiler #3: 21/12/2016, refer to report, PAC-AE-161222</p> <table border="1" data-bbox="660 943 1299 1155"> <thead> <tr> <th>Parameter</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>Solid particle, g/Nm3 @ 12% CO2</td> <td>0.14 – 0.17</td> </tr> <tr> <td>NOx emission, g/Nm3</td> <td>0.03 vs limit of 2</td> </tr> <tr> <td>SOx emission, g/Nm3</td> <td>0.01</td> </tr> </tbody> </table> <p>Smoke density meter calibration certificate# 17013 by Scienotech. Calibration date: 06/07/2017 valid until 06/12/2017.</p> <p>Ambient Air (quarterly) Total Suspended Particulate, TSP (limit 24hr: 260 ug/m3, annual 90 ug/m3 as per Malaysian Recommended Air Quality Quidelines). 2 monitoring points were selected.</p> <ul style="list-style-type: none"> i. PAC-AA-170910 (28 – 29/09/2017): A1-14, A2-11; ii. PAC-AA-170607 (12 - 13/06/2017): A1-37, A2-33; iii. PAC-AA-170370 (21 – 22/03/2017): A1-40, A2-32. <p>Quarterly return via Online Environmental Reporting (OER) and monthly effluent analysis.</p> <p>Latest quarter, July – September 2017, submitted on 11/10/2017.</p> <p>Latest monitoring by UTCL Laboratory, dated 05/10/2017, report ref# Ei/1710/0975-0977. Sampling date 24/09/2017. 07 parameters tested (BOD, COD, AN, TN, SS, TS and pH) is within the regulatory limit under mill's compliance schedule.</p>	Parameter	Result	Solid particle, g/Nm3 @ 12% CO2	0.38 - 0.39	NOx emission, g/Nm3	0.04 – 0.05 vs limit of 2	SOx emission, g/Nm3	- 0.01	Parameter	Result	Solid particle, g/Nm3 @ 12% CO2	0.14 – 0.17	NOx emission, g/Nm3	0.03 vs limit of 2	SOx emission, g/Nm3	0.01	<p>Complied</p>
Parameter	Result																	
Solid particle, g/Nm3 @ 12% CO2	0.38 - 0.39																	
NOx emission, g/Nm3	0.04 – 0.05 vs limit of 2																	
SOx emission, g/Nm3	- 0.01																	
Parameter	Result																	
Solid particle, g/Nm3 @ 12% CO2	0.14 – 0.17																	
NOx emission, g/Nm3	0.03 vs limit of 2																	
SOx emission, g/Nm3	0.01																	

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance	
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Significant pollutants and greenhouse gas (GHG) emissions were identified includes methane from effluent, smoke and fertilizer usage have been documented. Implementation and monitoring of GHG emissions is carried out and submitted to RSPO. GHG report, using palm GHG version 3.1.4 was made available during audit.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Kulim has published Kulim (Malaysia) Berhad – Carbon Footprint Report 2014. Calculation was based on PalmGHG tools, version 3.1.1. Reporting date to RSPO dated 08/03/2016 was verified during audit. Noted that the next reporting will be done early 2018 to RSPO together with the Kulim (Malaysia) Berhad – Carbon Footprint Report 2016. Tools and systems used to monitor significant pollutants includes the DOE CEMS monitoring system for air emissions, water quality at discharge points as per DOE regulations and Scheduled Waste disposal as per the DOE requirements via E-Swis. POME is treated using aerobic and anaerobic ponds. Effluent waste-water samples were taken as per DOE requirement and quarterly reports sent to DOE via the latest "OER" @ Online Environmental Reporting.	Complied
<p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</p>			
<p>Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Evaluation of Impact Significant; Rekod Audit Sosial bagi Sepang Loi Estate 2017; Date: 14/5/2017 & 11/9/2017. Daftar Impak Sosial bagi Sepang Loi Estate 2017 dated 1/10/2017. Cadangan Penambahbaikan Sosial bagi Sepang Loi Estate dated 1/10/2017.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Assessment also covered Social Amenities, Environment, Road Users, Employee Changes, Safety and Health Issues, Surrounding Communities, Government Official, Police, Labour Department, Health Department, Contractors and Suppliers. Periodical stakeholder consultation meeting has been conducted, latest done on 25/8/2017. Kemedak Estate stakeholder meeting was done on 30/10/2017.	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	Based on the SIA findings and recommendation from the sustainability executives, a timetable with responsibilities for mitigation and monitoring of the social impacts were developed in consultation with affected parties and reviewed as necessary. The Assistant Manager is responsible for the social issues and communication with the stakeholders. Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	Annual SIA improvement plans reviewed yearly. The assessment was through meeting with the effected parties and stakeholders conducted by the Kulim Sustainability executives. Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder schemes at Palong Cocoa Certification Unit. Not applicable
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.		
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	Documented consultation and communication procedures "Communication and Consultation Management Guidelines" SOP as well as "Grievance Procedure" was established and available since 7/3/2008. Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	The responsibility to ensure effective implementation of the SOP is the respective Mill and Estate Managers assisted by assistant managers. These executives of the respective operating unit handle social issues of the mill and estates. It was also sighted a latest circular by HQ dated 26/10/2016 notifying that the Executive Regional Controller of each complex shall automatically appointed as Social Person In-Charge. Sample at Sepang Loi Estate sighted the appointment as Social Person In-Charge: Pn. Rozita Sarudot dated 2/1/2017. Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	List of Stakeholder 2017 updated on 1/10/2017 in both estates and mill includes relevant government departments, buyers company, association, union, corporation, contractors/suppliers, utilities providers, hospitals/clinics, bank institution, school, neighboring estate/smallholder and courier service. Local community or village was identified including smallholder from nearby village such as Kampung Gelang Cincin. Complied
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.		

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	A documented dispute resolution procedure is available in Mill and Estate which is effective, timely, and appropriate and open to any affected parties. The complaint and grievances is open to effected parties including internal and external stakeholders.
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance -	SOP to resolve social disputes established as SPO Grievance Procedure Program; Ref.: SPO-Grievance; Dated 7/3/2008 sighted available. Stakeholder meetings are held regularly to identify and give opportunity to stakeholders to complaint or raise disputes. Issues are discussed and consensual agreements reached during stakeholder meetings. Follow-up actions had timelines, responsibilities, and details of actions and monitored by managers for satisfactory conclusion. Minutes of meetings are maintained and reviewed.
Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	SOP to identify legal and customary rights as well as people entitled to compensation has been established. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP is as per reported in indicator 6.3.2 above include the calculation and distribution fair compensation which take into account the gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land.
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders to date.
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.		

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.1</p> <p>Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>Documentation of pay and conditions such as pay slips showed gross pay, net pay, leave, medical leave pay etc. are maintained by the company. Minimum wage is paid to workers and no complaint was received during interview with workers. Sample of payslip sighted as following:</p> <ul style="list-style-type: none"> i) Employee # 637060 – Indonesian – Palong Cocoa POM ii) Employee # 637141 – Malaysian – Palong Cocoa POM iii) Employee # 637140 – Indonesian – Palong Cocoa POM iv) Employee # 620188 – Malaysian – Sepang Loi Estate v) Employee # 620250 – Malaysian – Sepang Loi Estate vi) Employee # 620292 – Indonesian – Sepang Loi Estate vii) Employee # 620320 – Indonesian – Sepang Loi Estate viii) Employee # 636381 – Indonesian – Kemedak Estate ix) Employee # 636551 – Bangladeshi – Kemedak Estate x) Employee # 636551 – Indonesian – Kemedak Estate <p>Contractor’s workers sampled: Contract Lim Song Peng: i) Worker’s ID # AT 388523 ii) Worker’s ID # AT 388526</p> <p>Perusahaan Juta Cemerlang: i) Worker’s ID # B 5781276 ii) Worker’s ID # B 2110750</p>	<p>Complied</p>
<p>6.5.2</p> <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -</p>	<p>Extended employment contract for the following employees sighted available in:</p> <ul style="list-style-type: none"> i) Employee # 637060 – Indonesian – Palong Cocoa POM ii) Employee # 637141 – Malaysian – Palong Cocoa POM iii) Employee # 637140 – Indonesian – Palong Cocoa POM iv) Employee # 620188 – Malaysian – Sepang Loi Estate v) Employee # 620250 – Malaysian – Sepang Loi Estate vi) Employee # 620292 – Indonesian – Sepang Loi Estate vii) Employee # 620320 – Indonesian – Sepang Loi Estate viii) Employee # 636381 – Indonesian – Kemedak Estate ix) Employee # 636551 – Bangladeshi – Kemedak Estate x) Employee # 636551 – Indonesian – Kemedak Estate <p>Contractor’s workers sampled: Contract Lim Song Peng: i) Worker’s ID # AT 388523 ii) Worker’s ID # AT 388526</p> <p>Perusahaan Juta Cemerlang: i) Worker’s ID # B 5781276 ii) Worker’s ID # B 2110750</p> <p>Interview with sampled employees confirmed the they understood the contents of employment agreements which explained to them prior to signing.</p>	<p>Complied</p>
<p>6.5.3</p> <p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –</p>	<p>Palm Oil Mill and estates provide adequate housing, water supplies, medical, educational and welfare amenities in accordance with Workers’ Minimum Standard of Housing and Amenities Act 1990 (Act 446). The Mill has completed the new housing project for workers. Water is supplied to workers housing through piping. The water tanks are provided for storage purpose. Fortnightly inspection was done by HA on workers housing area as per record of inspection.</p>	<p>Complied</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator		Assessment Findings	Compliance
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	Accesses to food for the workers are considered adequately and sufficiently.	Complied
Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Statement was published in "Buku Panduan Pekerja-pekerja Buruh Am and "Buku Panduan Pengurusan Lestari, Simon Lord, June 2007.	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Sepang Loi Estate: No any Staff Union (AMESU) and Workers Union (NUPW) were formed by both staff and workers. There was a briefing session by representative from NUPW Kluang branch conducted on 27/9/2017 by Sepang Loi Estate on the membership of NUPW among estate workers. Kemedak Estate: No any Staff Union (AMESU) and Workers Union (NUPW) were formed by both staff and workers. Kemedak Estate management conducted meeting with worker's representative on periodical basis. Latest meeting was conducted on 30/10/2017.	Complied
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Based on records of employee lists, operating units are complied with the minimum age requirement. No employees below the age of 18.	Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	A human policy in combination of on equal opportunity available and displayed at all operating unit offices along with the other policies.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Migrant workers are recruited with 2 years contract. Local workers are on a long term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, water and electricity supplies, medical care are given to all employees without discrimination. All employees are aware of the grievance procedures through the various Committees such as Gender Committee for women, Foreign Workers Representation and Union Committee to highlight their concerns and grievances if any. No grievances were highlighted to the audit team by internal and external stakeholders.	Complied

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available in mill and estates. It was noted during the audit that there is no discrimination based on nationality, race, gender, age, etc. Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.		
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Policy on protection against Sexual Harassment and other forms of harassment available and implemented. There is no any reported case of harassment in the operating units. Gender committee namely "WOW" (Women Onwards) has been established in all operating units and guided by quality department from HQ. Latest meeting for WOW at Sepang Loi Estate was conducted on 30/10/2017. For Kemedak Estate, WOW meeting was conducted on 22/8/2017. Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	A Policy of Right of Employees also available stated that the company recognizes and respects the rights of employees of their rights and freedom relating to reproduction and reproductive health. SOP to protect the reproductive rights also established under SPO-Core Labour dated 04.09.17 which was communicated by the management of each operating units during WOW meetings and workers assembly meetings. Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	Existing grievance procedure to handle grievances from internal and external stakeholders contains flow chart and available in the local language. Grievances and complaints are treated as confidential and not discussed in public. This procedure was communicated by the management of each operating units during WOW meetings and workers assembly meetings. Complied
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.		
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Current and past prices paid for FFB was sighted publicly available at the mill. It was noted that Pricing mechanism for FFB is based on Malaysian Palm Oil Board pricing published in the MPOB website. Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	Palong Cocoa Palm Oil Mill only receives certified FFB starting from 1 st November 2017. This is based on the termination contract for all outside crop production dated 1 st Sept 2017 to Kim Ma Oil Palm, Eng Huat Latex Concentrate Sdn Bhd, Chandra Brosis Group Sdn Bhd and Hong Bee Agriculture Sdn Bhd. Palong Cocoa Mill will not receive any FFB from Unilease Plantation Sdn Bhd and Guan Leng Trading Sdn Bhd in 2017 as per letter (FFB Purchase Contract Agreement 2017) dated 12.01.17. Complied

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator		Assessment Findings	Compliance
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Evidence of previous sample FFB purchase contract prior to termination sighted as following: Title: Purchase of FFB; Vendor; Kim Ma Oil Palm (Transport) Sdn. Bhd.; Date: 15/11/2016 Agreement on Self-Billed Invoice; Vendor: Eng Huat Latex Concentrate Sdn. Bhd.; Date: 31/12/2016	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	All payments were made in timely manner based on interview with sampled vendor. Sample evidence of payment (Voucher) obtained as following: - Syarikat Chiseng Motor Sdn. Bhd.; Payment # 17000430; being payment for the supply of tractor/MB parts dated on 12/9/2017 - WH Electrical Engineering being payment for the supply of labour and materials of electrical motor servicing dated on 26/8/2016	Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	Contributions to local development made based on the results of consultation with local communities sighted as following sample: Enquiry Register Records Ref. # 05/2017: “Sumbangan Kewangan bagi Program Lawatan Sambil Belajar ke Pulau Pinang” for Sekolah Kebangsaan Kemedak dated 5/10/2017. Petty cash voucher # 17000079; dated 9/10/2017.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	No scheme smallholders involved within Palong Cocoa certification unit.	Not applicable
Criterion 6.12: No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	Workers, staff and stakeholder interview confirm that there is no any form of forced labour or trafficked labour in the operating units. All employees have employment contract and paid the agreed national minimum wages.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	No contract substitution was noted.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Equal opportunity and non-discriminatory policy is implemented. No temporary workers. Migrant workers are treated equally as per the locals.	Complied
Criterion 6.13: Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	The existing policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations.	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance	
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Indicator relevant to Sabah and Sarawak. Not applicable for Peninsular Malaysia.	Not applicable
<p>Principle 7: Responsible development of new plantings Palong Cocoa Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area.</p>			
<p>Principle 8: Commitment to continual improvement in key areas of activity</p>			
<p>Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.</p>			
8.1.1	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>Beyond The Benchmark; Plantation Sustainability Report 2014 – 2015</p> <ul style="list-style-type: none"> - 2% reduction in usage of glyphosate on 1-year old palms by 2020 - 5% reduction in Paraquat out of total herbicide usage by 2020 <p>Reduction in water usage to 1.2 m³/mt FFB processed</p> <p>Generally, the Palong Cocoa CU is committed to reduce the usage of pesticides by implementing IPM such as the increase in the planting of nectariferous beneficial plants such as <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, <i>Turnera sublata</i> and installation of additional barn owls cages.</p> <p>The Palong Cocoa Palm Oil Mill, Sepang Loi and Kemedak estates had established its Environmental Management Programme to reduce impacts to the environment as identified in their Environmental Aspect Impact Register. Proposed Completion date and Person In-Charge are assigned. The progress is being tracked and reported monthly.</p> <p>The CU had established its waste management plan to reduce waste that it had identified. At the respective estate visited the following were sighted evident:</p> <ul style="list-style-type: none"> • 100% EFB (mill wastes) were used as fertilizer input to the field; • empty agrochemical containers were disposed responsibly, and • the practice of 3R (Reduce, Reuse and Recycle) for office and household wastes (at line-site). <p>Mill approach to waste reduction were as follows:</p> <ul style="list-style-type: none"> • Fibre & shell were used as fuel in the boiler. • The practice of 3R for office wastes. 	Complied

Appendix B: Approved Time Bound Plan

Project	Estate	Plan
Indonesia: PT Wisea Inspirasi Nusantara (PT WIN)	PT Harapan Barito Sejahtera (PT HBS)	2019
	PT Sawit Sumber Rejo (PT SSR)	
	PT Wahana Semesta Karisma (PT WSK)	
Indonesia: PT Agro Maku Raya (PT AMARA)	PT Nusa Persada Indonesia (PT NPI)	To be included in TBP upon completion of acquisition (expected completion in 2019)
	PT Surya Panen Subur (PT SPS)	
	PT Tempirai Palm Resources (PT TPR)	
	PT Rambang Agro Jaya (PT RAJ)	
Malaysia Trader	Eng Lee Heng	2018

List of Estate Manage by Kulim (Malaysia) Berhad			
Mill Base	Kulim / Jcorp Estate	Estate	Status
Tereh Mill	Kulim Estate	Tereh Utara	Certified RSPO
		Tereh Selatan	
		Selai	
		Enggang	
		Mutiara	
		Sg Sembrong	
		Sg Tawing	
		Rengam	
Sedenak Mill		Sedenak	
		Basir Ismail	
Sindora Mill		Ulu Tiram	
		Kuala Kabong	
		REM/Pasak	
Palong Cocoa Mill		Sindora	
		Sungai Papan	
		Sepang Loi	
	UMAC		
	Labis Bahru		
	Mungka		
Kemedak			

**RSPO Public Summary Report
Revision 4 (November / 2016)**

		Palong	
Pasir Panjang Mill	Kulim Estate	Pasir Panjang	Certified RSPO
		Siang	
	Jcorp Estate	Bukit Kelompok	
		Tunjuk Laut	
		Pasir Logok	
		Bukit Payung	

Appendix C: Certification Unit RSPO Certificate Details

Kulim (Malaysia) Berhad
 Palong Cocoa Palm Oil Mill
 K.B. 504 85009 Segamat, Johor
 Malaysia

RSPO membership number: 1-0080-09-000-00

BSI RSPO Certificate No. : RSPO 613087

Date of Initial Certificate Issued: 23/01/2009

Date of Expiry: 22/01/2019

Applicable Standards: RSPO P&C MYNI-2014; RSPO Supply Chain Certification Standard November 2014 Module D – CPO Mills: Identity Preserved)

Palong Cocoa Palm Oil Mill and Supply Base						
Location Address		Palong Cocoa Palm Oil Mill, K.B. 504 85009 Segamat, Johor, Malaysia				
GPS Location		102° 47' 06.04" E ; 2° 42' 23.09" N				
CPO Tonnage Total		37,330.00 mt				
PK Tonnage Total		8,853.00 mt				
CPO Claimed for Certification*		37,330.00 mt				
PK Claimed for Certification *		8,853.00 mt				
Own estates FFB Tonnage		177,076.00 mt				
Scheme Smallholder FFB Tonnage		-				
Estates	Production Area		Infra & Other use (ha)	HCV (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)				
Palong Estate	1,420.52	411.34	84.26	5.68	1,921.80	28,496.00
Mungka Estate	1,724.03	0	138.54	67.88	1,930.45	31,264.00
Kemedak Estate	1,692.32	0	85.86	15.06	1,793.24	29,835.00
Sepang Loi Estate	919.89	0	70.97	12.69	1,003.55	19,151.00
UMAC Estate	1,549.81	0	60.29	2.24	1,612.34	31,996.00
Labis Bahru Estate	1,719.89	247.69	129.33	14.53	2,111.44	36,334.00
TOTAL	9,026.46	659.03	569.25	118.08	10,372.82	177,076.00

Appendix D: Assessment Plan

Date	Time	Subjects	Hafri	Daniel	Mahzan
Tuesday 31/10/2017	PM	Audit team travel to Segamat	✓	✓	✓
Wednesday 1/11/2017 Palong Cocoa Palm Oil Mill	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). 	✓	✓	✓
	09.00 – 12.00	Palong Cocoa Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	✓	✓	✓
	12.00 – 13.00	Lunch	✓	✓	✓
	13.00 – 16.30	Palong Cocoa Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	✓	✓	✓
	16.30-17.00	Interim Closing briefing.	✓	✓	✓
Thursday 2/11/2017 Sepang Loi Estate	08.30 – 12.00	Sepang Loi Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	-	✓	✓
	09.00 – 12.00	Meeting with stakeholders (Government, village rep, smallholders, Workers Leader, contractor etc.)	✓	-	-
	12.00 – 13.00	Lunch	✓	✓	✓
	13.00 – 16.30	Sepang Loi Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	✓	✓	✓
	16.30-17.00	Interim Closing Briefing	✓	✓	✓
Friday 3/11/2017 Kemedak Estate	8.30 – 12.00	Kemedak Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓
	12.00 – 13.00	Lunch	✓	✓	✓
	13.00 – 16.00	Kemedak Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	✓	✓	✓

**RSP0 Public Summary Report
Revision 4 (November /2016)**

Date	Time	Subjects	Hafri	Daniel	Mahzan
	16.00-17.00	Verify any outstanding issues and preparation for Closing Meeting	✓	✓	✓
	17.00-18.00	Closing Meeting	✓	✓	✓
Saturday 4/11/2017	AM	Audit team travel back to KL	✓	✓	✓

Appendix E: Stakeholders Contacted

<p>Internal Stakeholders</p> <p>Managers and Assistant Managers Staff and Clerks Foreign Workers Gender Committee Chairman Field workers NUPW representative</p>	<p>Vendor/Contractors</p> <p>Ikra Niaga (Mechanical Contractor) Syarikat Hong Leong Huat (FFB Transporter) Kedai Makan Norsiah</p>
<p>Government Departments</p> <p>Balai Polis Buloh Kasap</p>	<p>Local Communities</p> <p>Kampung Gelang Chinchin Village Chief</p>

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

Requirements	Compliance
D.1 Definition	
<p>D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.</p>	<p>Palong Cocoa Palm Oil Mill only receives certified FFB starting from 1st November 2017. This is based on the termination contract for all outside crop production dated 1st Sept 2017 to Kim Ma Oil Palm, Eng Huat Latex Concentrate Sdn Bhd, Chandra Brosis Group Sdn Bhd and Hong Bee Agriculture Sdn Bhd. Palong Cocoa Mill will not receive any FFB from Unilease Plantation Sdn Bhd and Guan Leng Trading Sdn Bhd in 2017 as per letter (FFB Purchase Contract Agreement 2017) dated 12.01.17. Therefore, Palong Cocoa POM qualifies for the Identity Preserved supply chain system and module. During the extension scope of mill, auditor has verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>
D.2 Explanation	
<p>D.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>D.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The mill has met all registration (member ID: RSPO_PO1000001265) and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p>
D.3 Documented procedures	
<p>Instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements in these requirements; b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.</p>	<p>Latest written documented procedures for IP were Palong Cocoa POM, Support Process Procedure – Product Identification & Traceability, Doc No: PCM/SOP/6.3, date 04.10.17 Rev 1, Issue No 2 and Palong Cocoa POM, Support Process Procedure – Product Handling & Storage, Doc No: PCM/SOP/6.5, date 04.10.17 Rev 2, Issue No 2. The IP model is used because only certified FFB from own supply base to be received and processed at Palong Cocoa POM starting November 2017.</p> <p>The Manager/Acting Manager able to demonstrate overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. Seen the appointment letter circulated on 01.09.17 and the effective date is on 15.09.17 by the Senior Manager, Engineering Department.</p>
<p>D.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Palong Cocoa POM has documented procedures (as per above in D.3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing of certified FFBs.</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

D.4 Purchasing and goods in	
D.4.1 The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.	<p>Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Seen the incoming and outgoing of outside crop maintained. The last OCP received was on 01.10.17 from Hong Bee Agriculture Sdn Bhd. Further sample document as below:</p> <p>Sample of documents below:</p> <ol style="list-style-type: none"> 1. Daily Mill Production Report, from 01-31.10.17 2. Weighbridge ticket: Receiving No: R082965, Date: 01.10.2017, Seller: Hong Bee Agriculture Sdn Bhd, Product: FFB, Volume: 3460 kg. 3. Segregation on Mass Balance CPO for IP Conversion table.
D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facilities aware of this procedure to inform the CB immediately if there is a projected overproduction of certified tonnage.
D.5 Record keeping	
D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.	<p>All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place. No PKO and Palm Kernel Cake at Palong Palm Oil mill. PK is sold to 3rd party Kernel Crushing Plant. Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the FFB received. Records of certified FFB received verified during annual surveillance. Records verified by internal and external audit.</p> <p>Sighted the Sustainable Product Monthly Movements for Palong Cocoa POM for year 2017 in 3 monthly basis was updated with FFB receiving, FFB processed, CPO production and PK production.</p>
D.6 Processing	
D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from noncertified material including during transport and storage.	<p>During this assessment it was confirmed that only certified source of FFB from own plantation. This ensures that there is no possibility of mixing during processing.</p> <p>In the daily and Monthly summary report, there are 2 process tanks (250 MT), 5 storage tanks (1500 MT) and 3 bunkers (150 MT). PT 1 and PT 2 has undergone the cleaning process on 08.10.17 and 4.10.17 respectively while PT 4 has been through the flushing procedure and flushed to PT 5 on 05.11.17, and PT 5 is planned to have the cleaning process with a dead stock of 22.23 MT on this November 2017. PT 3 and PT 6 has maintained empty for IP segregation. PT 7 has the deadlock of MB volume 10.88 MT as at 15.11.17 but seen the management decision to recommend the deadlock amounts to be disposed in October 2017 in letter dated 05.09.17 titled 'Verification of Tank Bottom CPO Stock'.</p> <p>Palong Cocoa POM will do the cleaning after disposed the deadlock amount in November 2017-(to follow up on the cleaning process for PT 5 and PT 7 before IP certified this November 2017).</p>
D.6.2 The objective is for 100 % segregated material to be reached.	<p>Processing and storage records can trace back to only certified segregated FFB and finish product (CPO and PK) through traceability records such as daily and monthly summary and weighbridge records.</p> <p>Palong Cocoa POM has the annual Tank Cleaning Program 2017 CPO Storage, Clarification/Oil Room and Water Treatment.</p> <p>This ensures that 100% segregated materials are reached.</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Actual Tonnage Certified Palm Production – 01 Nov 2016 – 31 Oct 2017

Mill	Capacity	CPO	PK
Palong Cocoa Palm Oil Mill	40 mt/hr	36,101.00	8,654.28

Actual Tonnage Sales of Certified Palm Products – 01 Nov 2016 – 31 Oct 2017

Mill	Certified CPO Sales	Certified PK Sales	Remarks
Palong Cocoa Palm Oil Mill	11,386.74	2,663.15	RSPO MB Scheme

Actual Tonnage Sales of Certified Palm Products (under other Scheme) - 01 Nov 2016 – 31 Oct 2017

Mill	Certified CPO Sales	Certified PK Sales	Remarks
Palong Cocoa Palm Oil Mill	679	0	ISCC Scheme

Actual Tonnage Sales of Conventional Palm Products - 01 Nov 2016 – 31 Oct 2017

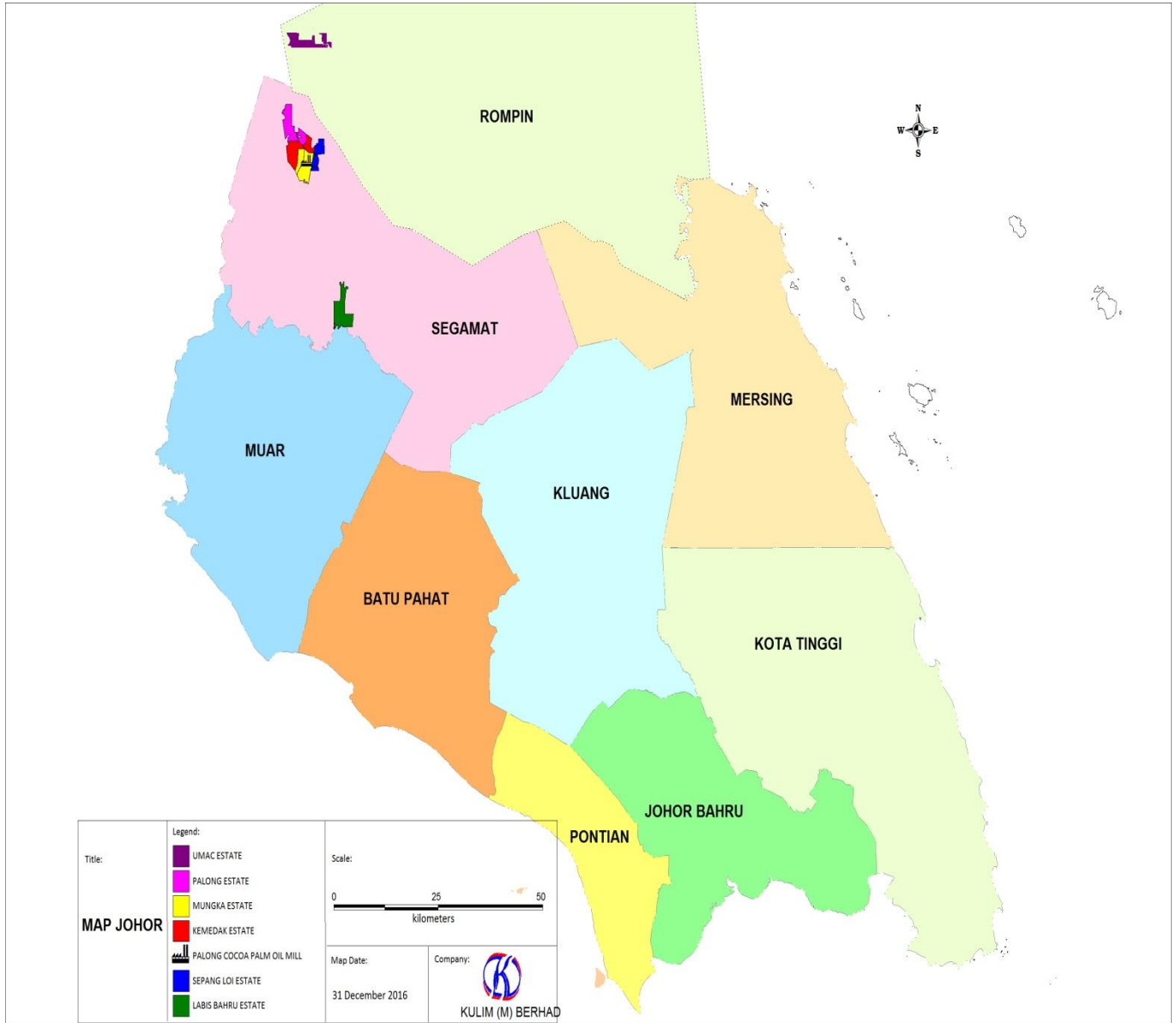
Mill	Conventional CPO Sales	Conventional PK Sales	Remarks
Palong Cocoa Palm Oil Mill	24,030.56	5,989.07	Conventional sales

**RSPO Public Summary Report
Revision 4 (November /2016)**

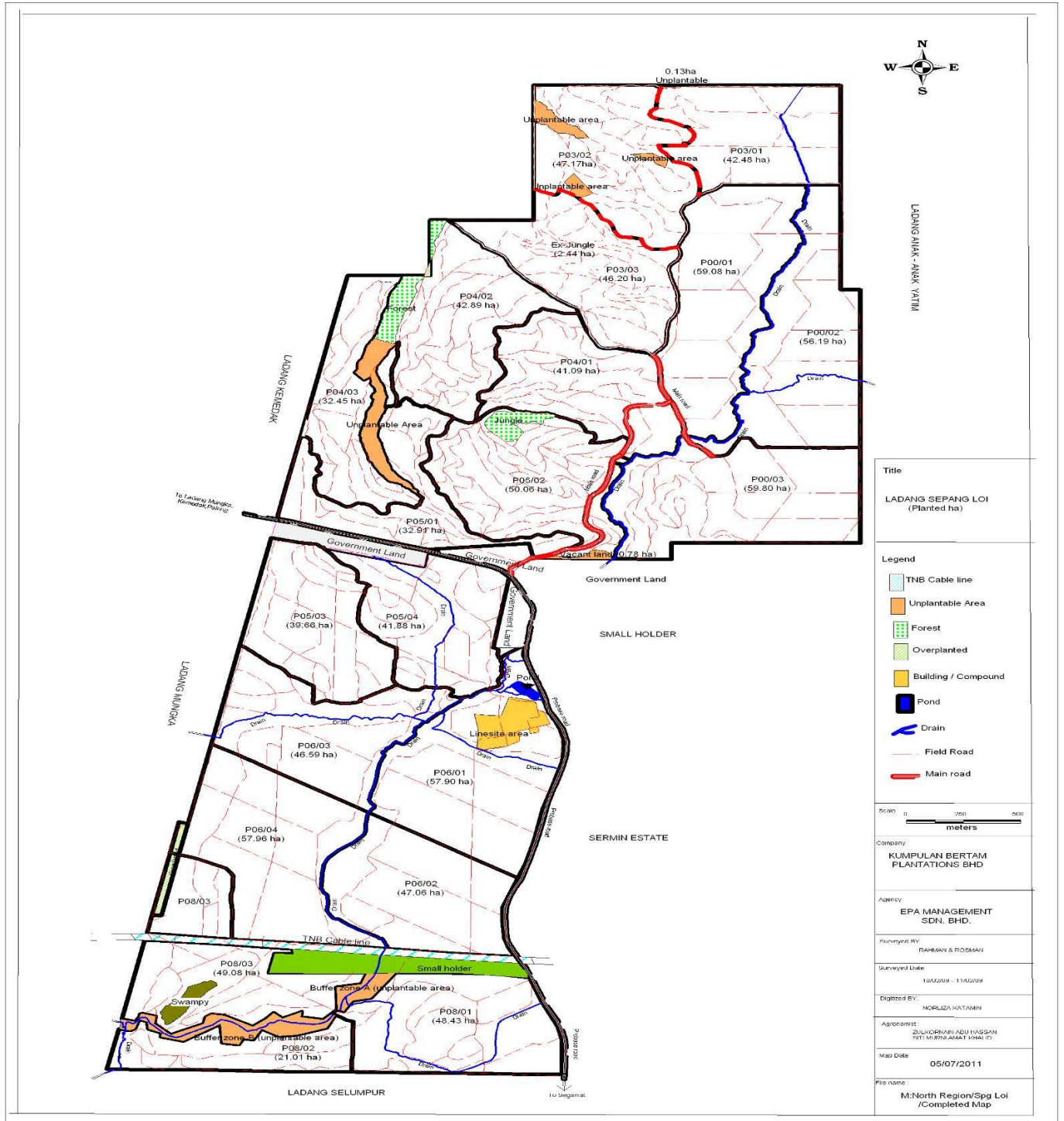
Actual Tonnage Certified FFB Received Monthly by the mill - 01 Nov 2016 – 31 Oct 2017

Month	Palong Estate	Mungka Estate	Kemedak Estate	Sepang Loi Estate	UMAC Estate	Labis Bahru Estate	Total FFB/Month (mt)
Nov 2016	2,158.50	3,308.57	2,642.49	2,196.54	3,674.61	3,631.17	17,611.88
Dec 2016	1,655.83	2,389.67	2,200.51	1,670.31	3,388.56	2,894.92	14,199.80
Jan 2017	1,078.64	1,512.41	1,590.35	1,356.82	2,248.53	2,138.86	9,925.61
Feb 2017	1,077.08	1,316.71	1,332.01	1,053.41	1,946.33	3,019.58	9,745.12
March 2017	1,391.90	1,377.78	1,654.49	1,144.85	2,270.81	2,857.08	10,696.91
April 2017	1,520.72	1,936.40	1,761.12	1,321.13	2,222.34	3,194.24	11,955.95
May 2017	1,925.74	1,841.42	1,803.01	1,409.90	1,934.75	2,503.47	11,418.29
June 2017	2,329.83	1,722.62	2,159.29	1,348.95	1,581.27	1,934.72	11,076.68
July 2017	3,595.37	2,598.95	3,041.41	1,744.44	2,906.82	2,152.22	16,039.21
Aug 2017	4,318.64	3,657.96	4,111.89	1,994.62	3,212.42	2,650.99	19,946.52
Sept 2017	4,230.69	4,566.01	3,876.18	2,345.48	4,323.38	3,945.36	23,287.10
Oct 2017	5,100.34	5,456.26	4,009.81	2,656.01	4,109.23	4,960.64	26,292.29
Total	30,383.28	31,684.76	30,182.56	20,242.46	33,819.05	35,883.25	182,195.36

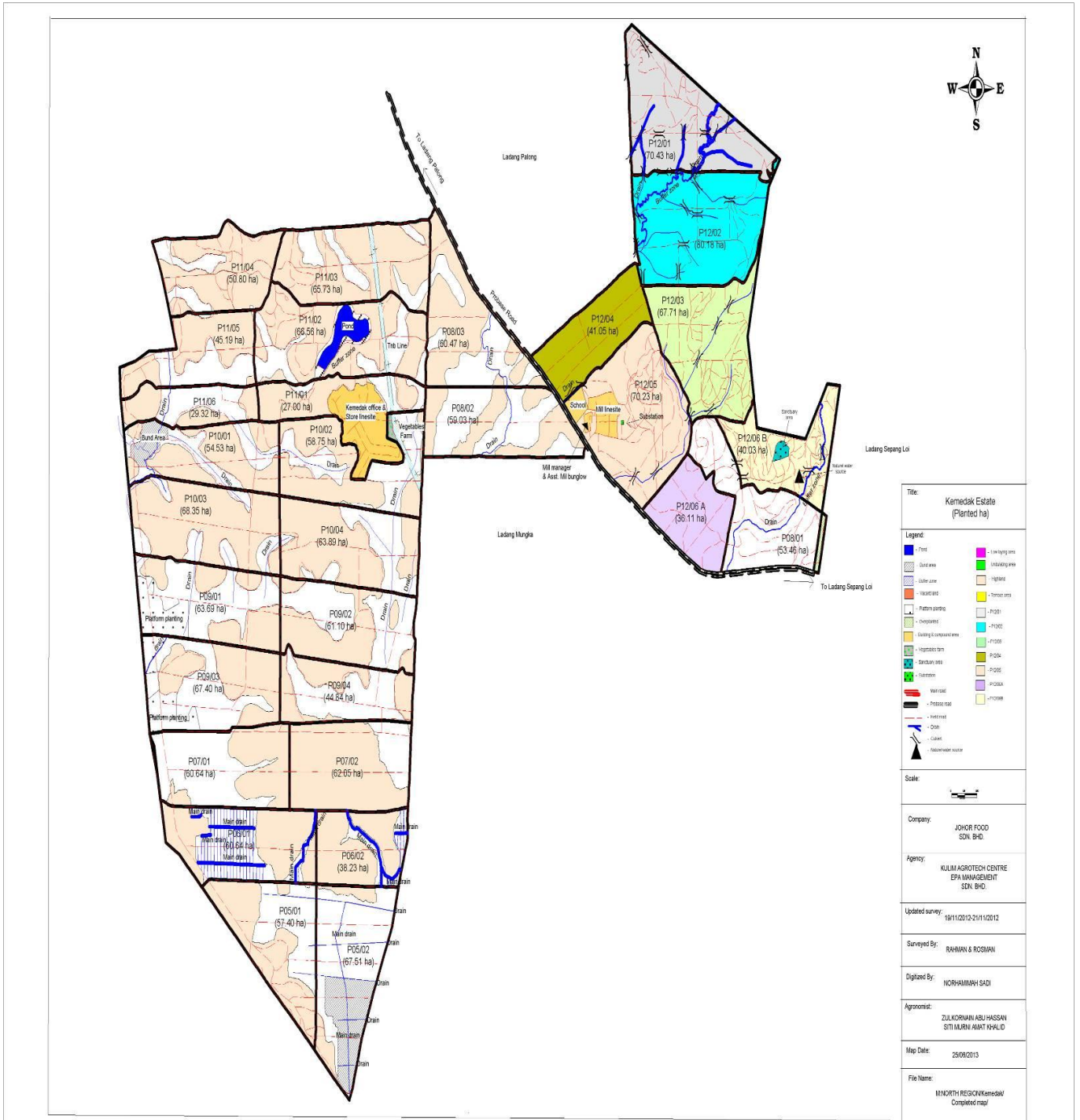
Appendix G: Location Map of Palong Cocoa Palm Oil Mill



Appendix H: Sepang Loi Estate Field Map



Appendix I: Kemedak Estate Field Map



Appendix J: List of Smallholder Sampled

(Not applicable)

Appendix K: GHG Reporting Executive Summary

The GHG emissions that were produced in 2016 for Palong Cocoa Palm Oil Mill and supply base was calculated using the GHGpalm Calculator version 3.0. The assessment team had verified the data input in the GHGpalm Calculator against operations records. Palm GHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in 2016 for Palong Cocoa Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	1.09	OER	18.50
PKO	1.09	KER	4.59

Production	t/yr	Land Use	Ha
FFB Process	171,606.97	OP Planted Area	9,690.15
CPO Produced	31,738.85	OP Planted on peat	0
PKO Produced	7,880.53	Conservation (forested)	0
		Conservation (non-forested)	118.08
		Total	9,808.23

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	95,517.02	0.58	0	0	22,919.00	2.75	118,436.02	3.33
CO ₂ Emission from fertilizer	2,260.14	0.01	0	0	920.47	0.11	3,180.61	0.12
NO ₂ Emmision	6,730.30	0.04	0	0	370.71	0.04	7,101.01	0.08
Fuel Consumption	1,457.42	0.01	0	0	717.41	0.09	2,174.83	0.10
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	(90,386.14)	(0.55)	0	0	(21,293.92)	(2.55)	(111,680.06)	(3.10)
Conservation Sequestration	(240.99)	0	0	0	0	0	(240.99)	0
Total	15,337.75	0.09	0	0	3,633.67	0.44	18,971.42	0.53

*Note: Includes estates

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	30,742.84	0.18
Fuel Consumption	249.04	0.00
Grid Electricity Utilisation	208.37	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-2,413.51	-0.01
Sales of EFB	0	0
Total	28,786.74	0.17

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix L: List of Abbreviations Used

ASA	Annual Surveillance Assessment
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CIP	Continual Improvement Plan
CPO	Crude Palm Oil
CU	Certification Unit
DOA	Department of Agriculture
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EIA	Environmental Impact Assessment
EHA	Estate Hospital Assistant
EMS	Environmental Management System
ERP	Emergency Response Plan
Etc.	<i>Et Cetera</i> (others)
FFB	Fresh Fruit Bunch
HA	Hospital Assistant
HCV	High Conservation Value
HIRARC	Hazard Identification, Risk Assessment and Risk Control
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
LOTO	Log Out Tag Out
MPOA	Malaysian Palm Oil Association
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
MPOB	Malaysia Palm Oil Board
MI	
MY-NI	Malaysian National Interpretation
NGO	Non-Governmental Organisation
OSH	Occupational Safety & Health
OU	Operating Unit
OFI	Opportunity for improvement
PEL	Permissible Exposure Limit
PK	Palm Kernel
PKO	Palm Kernel Oil
PCPOM	Palong Cocoa Palm Oil Mill
POM	Palm Oil Mill
PPE	Personal Protective Equipment
RED	Renewable Energy Directive
RSPO	P&C Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SHO	Safety and Health Officer
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SPAN	Suruhanjaya Perkhidmatan Air Negara
WTP	Water Treatment Plant
VMO	Visiting Medical Officer