

**RSPO PRINCIPLE AND CRITERIA
4th Annual Surveillance Assessment (ASA4)
Public Summary Report**

TDM Plantation Sdn Bhd
Head Office: Level 3, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu Terengganu, Malaysia
Sungai Tong Palm Oil Mill Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu 21500 Setiu Terengganu, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0095-11-000-00	Date	Member since: 28 February 2011
Company Name	TDM Plantation Sdn Bhd		
Address	Level 3, Bangunan UMNO Terengganu, Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Terengganu, Malaysia Certification unit : Sungai Tong Palm Oil Mill, Lot 7663, batu 23, Jalan Kuala Terengganu-Kota Bharu 21500 Setiu, Terengganu, Malaysia		
Subsidiary of (if applicable)	-		
Contact Name	Tn Hj Hassan Bin Osman (Mill)		
Website	-	E-mail	hassan.tdmp@tdmberhad.com.my ksst.tdmp@tdmberhad.com.my
Telephone	09 – 620 4802 (Head Office) 09 – 824 7299 (Mill)	Facsimile	09 – 620 4803 (Head Office) 09 – 824 7298 (Mill)

2. Certification Information			
Certificate Number	RSPO 595564	Certificate Issued Date	27/12/2013
		Expiry Date	26/12/2018
Scope of Certification	Palm Oil and Palm Kernel Production from Sg Tong Palm Oil Mill and Supply Base (Jaya, Fikri, Tayor, Pelong, Jerangau & Pinang Emas Estate)		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
CoP/ET/0021-1 (Pinang Emas Estate)	Code of Good Agricultural Practice for Oil Palm Estates and Smallholdings	MPOB	18/3/2018
CoP/ET/0027-1 (Jaya Estate)	Code of Good Agricultural Practice for Oil Palm Estates and Smallholdings	MPOB	17/12/2017

3. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Longitude	Latitude
Sungai Tong Palm Oil Mill	Lot 7663, Batu 23, Jalan Kuala Terengganu – Kota Bharu, 21500 Setiu, Terengganu, Malaysia	102° 54' 37.80"	5° 18' 29.88"
Jaya Estate	Jalan Kuala Terengganu – Kota Bharu, 21500 Setiu, Terengganu, Malaysia	102° 53' 2.40"	5° 23' 46.32"

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Fikri Estate	Jalan Kuala Terengganu – Kota Bharu, 21500 Setiu, Terengganu, Malaysia	102° 53' 2.40"	5° 23' 46.32"
Tayor Estate	Jalan Kuala Terengganu – Kota Bharu, 21500 Setiu, Terengganu, Malaysia	102° 53' 25.80"	5° 15' 57.60"
Pelong Estate	Jalan Kuala Terengganu – Kota Bharu, 21500 Setiu, Terengganu, Malaysia	102° 49' 59.52"	5° 16' 55.56"
Jerangau Estate	Jalan Jerangau, 21810 Ajil, Hulu Terengganu, Terengganu, Malaysia	103° 9' 46.79"	4° 57' 39.60"
Pinang Emas Estate	Bukit Besi, 23000 Dungun, Terengganu, Malaysia	103° 13' 00.75"	4° 47' 20.27"

4. Description of Supply Base

Estate	Mature (ha)	Immature (ha)	Infras & Other (ha)	HCV (ha)	Total Planted (ha)	Total Hectarage	% of Planted
Jaya Estate	3,365.50	-	90.29	-	3,365.50	3,455.79	97.39
Fikri Estate	3,198.85	-	512.20	-	3,198.85	3,711.05	86.20
Tayor Estate	2,143.41	-	128.77	2.50	2,143.41	2,274.68	98.00
Pelong Estate	1,238.81	222.26	1,250.25	305.88	1,461.07	3,017.20	48.43
Jerangau Estate	1,436.57	-	44.36	-	1,436.57	1,480.93	97.00
Pinang Emas Estate	2,153.39	705.52	812.01	-	2,858.91	3,670.92	77.88
Total	13,536.53	927.78	2,837.88	308.38	14,464.31	17,610.57	82.13

*Note: Infras = infrastructure; *Other area including conserved (abandoned) area due to water log & steep*
Note: Resurvey was conducted for all estate. Therefore the land area is different with ASA3. While, there is no trace of new land development as the total planted area has reduced compared to ASA3.

5. Plantings & Cycle

Estate	Age (Years)					Tonnage / Year		
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Estimated (ASA3) Sept 16 – Aug 17	Actual (ASA3) Sept 16 – Aug 17	Forecast (ASA4) Sept 17 – Aug 18
Jaya Estate	-	-	2,999.48	366.02	-	76,200.00	71,085.57	76,800.00
Fikri Estate	-	15.11	2,180.25	985.83	17.66	54,800.00	42,135.73	63,400.00
Tayor Estate	-	35.50	1,228.09	639.89	239.93	46,800.00	40,389.92	40,950.00
Pelong Estate	222.26	-	304.54	934.27	-	24,260.00	10,281.78	12,000.00
Jerangau Estate	-	479.61	59.72	897.24	-	26,800.00	19,635.97	28,300.00
Pinang Emas Estate	705.52	92.86	1,109.97	950.56	-	44,970.00	41,480.68	40,670.00
Total						273,830.00	225,009.65	262,120.00

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6. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (ASA3) Sept 16 – Aug 17	Actual (ASA3) Sept 16 – Aug 17	Forecast (ASA4) Sept 17 – Aug 18
N.A	NIL	NIL	NIL

7. Certified Tonnage									
Mill	Estimated (ASA3) Sept 16 – Aug 17			Actual (ASA3) Sept 16 – Aug 17			Forecast (ASA4) Sept 17 – Aug 18		
	FFB	CPO OER %	PK KER %	FFB	CPO OER %	PK KER %	FFB	CPO OER %	PK KER %
Sungai Tong Palm Oil Mill	273,830	56,217.29 @ 20.53%	14,737.1 @ 5.38%	225,010	42,506.82 @ 18.89%	10,883.11 @ 4.84%	262,120	55,457.90 @ 21.16%	14,416.60 @ 5.5%

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 26-28/09/2017. 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 (Taylor & Jerangau Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families 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 I.

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.

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

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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 externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

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

1. Assessment Program					
Name (Mill / Supply Base)	Initial Certification (2013)	ASA1 (2014)	ASA2 (2015)	ASA3 (2016)	ASA4 (2017)
Sg Tong Palm Oil Mill	√	√	√	√	√
Jaya Estate			√		
Fikri Estate	√			√	
Tayor Estate		√			√
Pelong Estate	√			√	
Jerangau Estate		√			√
Pinang Emas Estate			√		

Tentative Date of Next Visit: September 24, 2018 – September 26, 2018

Total No. of Mandays: 9 mandays

BSI Assessment Team:

Nicholas Cheong– Lead Auditor

He holds Master of Environmental Management from the University Putra Malaysia and Bachelor of Science (Food Science) from Charles Sturt University Australia. He has more than 5 years of working experience in sustainability auditing and carbon emissions accounting. He has also 2 years of working experience in wastewater treatment construction and operations. He has completed the ISO9001, ISO14001 and RSPO P&C Lead Auditor course and MSPO Awareness Training. In his previous certification body he is a Assessor for Clean Development Mechanism and ISCC. He had been involved in Sustainable Palm Oil auditing for more than 2 years. During this assessment, he assessed on the environmental aspect, legal requirements, land legality and stakeholders consultation. He is fluent in Bahasa Malaysia and English languages

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

Mohd Hafiz Mat Hussain -Team Member

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

Accompanying Persons: Azrul Azwar Wan Azizan & Mohamed Hidhir Zainal Abidin

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.

- TDM Plantations Sdn Bhd Time Bound Plan
- RSPO P&C MY-NIWG 2014 Checklist
- RSPO Supply Chain Certification Checklist November 2014

3.2 Progress against Time Bound Plan

TDM Plantations Sdn Bhd owns two palm oil mills (certification units) located in Kemaman District and Sungai Tong District, State of Terengganu, Peninsular Malaysia. TDM Plantation has achieved RSPO Certification for the two certification units in 2013. TDM Plantation Sdn Bhd has completed its time bound plan to certify both certification units that exist during this assessment. The time bound plan for the existing mills has been completed.

PT Rafi Kamajaya Abadi (PT Rafi) is not part of TDM Plantations Sdn Bhd who holds the RSPO membership. PT Rafi is a subsidiary of TDM Bhd who is a separate entity of TDM Plantations Sdn Bhd. Hence, PT Rafi is not relevant to the TDM Plantation Sdn Bhd RSPO certification.

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	TDM Plantations Sdn Bhd is operating 2 mills. The mills are Sungai Tong Palm Oil Mill and Kemaman Palm Oil Mill. Each of the mill have 6 estates as their supply base. Please refer to Appendix B for the name of the supply base. All estates and mills of TDM Plantations Sdn Bhd has been certified.	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	All estates and mills of TDM Plantations Sdn Bhd has been certified. At the time of the assessment there is no new acquisition or taking over new land for development.	Yes
Have there been any changes since the last audit? Are they justified?	There are no changes since the last audit. All estates and mills of TDM Plantations Sdn Bhd has been certified.	Yes
If there have been changes, what circumstances have occurred?	There are no changes since the last audit. All estates and mills of TDM Plantations Sdn Bhd has been certified.	Yes

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Have there been any stakeholder comments?	Through media search and RSPO complaints panel notification, there is no stakeholder comments / complaints recorded with regards to both the certification of Sungai Tong POM & Supply Base and Kemamam POM & Supply Base.	Yes
Have there been any newly acquired subsidiaries?	At the time of the assessment there is no new acquisition or taking over new land for development.	Yes
Have there been any isolated lapses in implementation of the plan?	All estates and mills of TDM Plantations Sdn Bhd has been certified. Therefore there is no lapses	Yes
Un-Certified Units or Holdings		
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	There is no uncertified unit. All estates and mills of TDM Plantations Sdn Bhd has been certified.	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. 	There is no new planting at the time of the assessment.	Yes
Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	There is no new planting at the time of the assessment. There is an area at Pelong Estate which TDM Plantation Sdn Bhd was not plant since obtaining the land. TDM has interest to proceed with planting. At the time of the assessment there was no development observed. TDM is conducting NPP for this area.	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 6.4, 7.5 and 7.6.	There's no land conflicts reported against the company.	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	To-date, no complaints on labour disputes received by the company.	Yes
Any Legal non- compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	To-date, no stakeholder comments or complaints received.	Yes

3.3 Details of findings

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

During the 4th Annual Surveillance Assessment there were eight (8) Major & seven (7) Minor nonconformities raised. The Sg Tong Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for it effectiveness and closed accordingly.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1532946-201709-M1	Requirements Indicator 2.1.1 Evidence of compliance with relevant legal requirements shall be available.	Major
	Evidence of Nonconformity <ol style="list-style-type: none"> i. In Jerangau Estate, there are no up to date inventory records of the waste and scheduled waste generated. The inventory shall be minimum following 5th Schedule of the EQA Act 1974 – Environmental Quality (Scheduled Waste) Regulations 2005. ii. In Tayor Estate, the inventory of the scheduled wastes are not categories as required by 5th Schedule of the EQA Act 1974 – Environmental Quality (Scheduled Waste) Regulations 2005. iii. The scheduled waste storage at Tayor Estate have not been identified as according to the scheduled waste categories. The segregation of the scheduled waste are not able to identify the type of schedule waste generated. iv. The Scheduled Wastes for POM, Jerangau and Tayor are not recorded when is first generated and the wastes are disposed according to the EQA Act 1974 Section 9 (5) where the waste shall be disposed 180 days from its first generated. 	
	Statement of Nonconformity The disposal of schedule waste is not according to the EQA 1974	
	Root Cause For Mill and Estate, schedule waste management not properly monitored by Competent Person as per DOE requirement.	
	Correction <ol style="list-style-type: none"> i) SW Form with the details of SW first generated, name of SW and categories was developed. ii) Eswiss was registered for Tayor Estate and Jerangau Estate 	
	Corrective Action <ol style="list-style-type: none"> i) SW Form will be filled up by the Storekeeper or his assistant once SW is generated. ii) Estate and Mill to update scheduled waste records by end of month for every month into eswiss. Estate and Mill management will hire Pentas Flora 	

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	<p>(Terengganu) Sdn. Bhd to make sure the disposal time of scheduled waste are not more than 180 days.</p> <p>iii) The management have sent five (5) personnel to attend the Schedule Waste Management Course (CePSWAM) in August 2017. There will be a competent person in each mill and one in each complex which are Kemaman Complex, Bukit Besi Complex and Sungai Tong Complex. The competent person for the estates will represent 4 estates in each complex.</p> <p>Assessment Conclusion: Major NC close out verification:</p> <ul style="list-style-type: none"> i) Latest 5th schedule/inventory for Sg Tong POM, Ladang Tayor and Ladang Jerangau ii) Latest disposal records/6th schedule for Jerangau Estate. No latest disposal records for Sg Tong POM and Tayor Estate iii) CePSWaM competent certificates for Sg Tong POM, SgTong complex (Fikri Estate) and Bukit Besi complex (Jerangau Estate) <p>Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment.</p>	
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Non-Conformity		
NCR #	Description	Category (Major / Minor)
1532946-201709-M2	<p>Requirements Indicator 2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.</p> <p>Evidence of Nonconformity Referring to the agreement between TDM Bhd and Kumpulan Ladang-Ladang Terengganu Sdn Bhd. not all the lands are included in the Agreement (e.g. Lot 406 at Jerangau Estate).</p> <p>Referring to the land titles at Tayor Estate e.g. Lot 1141, 1140, 97, 94, 54 at Tayor) and Jerangau Estate (e.g. Lot 406), the ownership is Perbadanan Kemajuan Iktisad Negeri Terengganu. There is no evidence available that TDM Plantations Sdn Bhd has the legal rights to use the land.</p> <p>Statement of Nonconformity The land use right by TDMP is not available.</p> <p>Root Cause TDM Plantations Sdn Bhd is undergoing the official process to transfer the land title from Kumpulan Ladang-Ladang Terengganu Sdn. Bhd. and Perbadanan Memajuan Iktisad Negeri Terengganu.</p> <p>Appropriate documentation is not provided by the Head Quarters to the certification units.</p> <p>Correction Perbadanan Memajuan Iktisad Negeri Terengganu had issued an official letter to BSI Services Malaysia Sdn Bhd to inform that authorization has been given to TDM Plantation Sdn Bhd to manage the land that are belong to Kumpulan Ladang-Ladang Terengganu Sdn. Bhd. and Perbadanan Memajuan Iktisad Negeri Terengganu.</p>	Major

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	<p>Corrective Action All the estate's proper Land Use Rights documentations is made available at the operation sites for reference.</p>	
	<p>Assessment Conclusion: Major NC close out verification: Verified letter from PMINT, ref# PMIN.TR.100/PB dated 12 November 2017 to confirm that PMINT land was leased to KLLT and managed by TDM Plantation Sdn Bhd. Lease agreement is still in the progress and will be further verified in the next assessment. Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based on-site verification and supported with sufficient documented evidence. Continuous implementation and verification will be further verified in the assessment</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1532946-201709-M3	<p>Requirements Indicator 5.1.1 An environmental impact assessment (EIA) shall be documented.</p>	Major
	<p>Evidence of Nonconformity As per indicator 5.1.1 an EIA is required for parameter drain construction (e.g. Putting in drainage or irrigation systems). The drain construction was observed in Taylor Estate.</p>	
	<p>Statement of Nonconformity EIA was not conducted for significant environmental impacting operation.</p>	
	<p>Root Cause EIA that Estate and Mill established are not sufficiently enough as per RSPO requirement. The operation team was lacking in training and exposure on EIA.</p>	
	<p>Correction EIA for drain construction for the plantation was included into the EAI.</p>	
	<p>Corrective Action Training has been provided by SRA to the all assistant managers and compliance clerk. Training plan was developed by TDMP for continuous improvement for ensuring environmental compliances.</p>	
	<p>Assessment Conclusion: Major NC close out verification: i) Environmental aspect impact, EAI/2017/02-02 for drain construction. ii) SRA EIA training records dated 19/11/17. Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)

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1532946-201709-M4	Requirements Indicator 4.6.12 No work with pesticides shall be undertaken by pregnant or breast-feeding women.	Major
	Evidence of Nonconformity Jerangau Estate 1. I/C No: 840919-03-5260, diagnose pregnant 3 months on May 17 (Letter notification for reassignment of work on 18/5/17). 2. I/C No: 830109-03-5294, diagnose pregnant 3 months on July 17 (Letter notification for reassignment of work on 23/7/17).	
	Statement of Nonconformity There is no monitoring system established to identify pregnant workers especially for spraying activity.	
	Root Cause The female workers were not aware of their own pregnancies and continued working with chemical.	
	Correction Immediately shift their current job to the gardener and sweeper.	
	Corrective Action The female workers are not allowed to conduct activities which related to chemicals handling. If the need for female workers in the chemical handling area are critical, the management will assign assistant HA to check the worker's menstrual period by monthly. Training has been provided to females workers regarding reproductive.	
	Assessment Conclusion: Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment. Major NC close out verification : i) Internal training for reproductive was done on 22/10/2017 ii) Based on latest check roll record and workers master list, no female sprayer at Jerangau and Tayor Estate.	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1532946-201709-M5	Requirements Indicator 4.7.2 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
	Evidence of Nonconformity The new activity was not adequately identified in HIRARC: 1. Construction of new pump house (BOMBA) at STPOM 2. New nursery at Tayor Estate (filling soil into polybags, culling activity, p&d activity)	
	Statement of Nonconformity HIRARC was not adequately identify on the new activity involved in the mill/estate.	

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	<p>Root Cause The estate and mill operation management did not have sufficient communication with the Safety and Health Officer and HIRARC Committee to review the new activities.</p>	
	<p>Correction The Roofing Works has been added in the HIRARC under Process Activity for HIRARC-Construction Site.</p> <p>The filling soil into polybags, culling activity and P&D activity has been added in the HIRARC under Process Activity for HIRARC-Nursery.</p>	
	<p>Corrective Action RSPO Sustainability and Standardization Audit email communication by SHO dated 25/11/2017 requesting all Operating Unit to update the SHO for any new and or unusual activities to in order the Safety & Health Committee to revise the HIRARC.</p>	
	<p>Assessment Conclusion: Major NC close out verification: The above evidences were check and verified. Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1532946-201709-M6	<p>Requirements Indicator 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.</p>	Major
	<p>Evidence of Nonconformity Sg. Tong POM, Jerangau Estate and Tayor Estate: Social Impact Assessment Action Plan Revision 2017/2018 was developed on 18/9/2017 in Mill, September 2017 for Jerangau Estate and 15/3/2017 for Tayor Estate. The plan has incorporated area of concerns, findings from SIA assessors, action plan status, remarks as well as person in charge. However, specific timeline to mitigate the negative impacts and promotion of positive impacts was not available in the action plan.</p>	
	<p>Statement of Nonconformity No specific timeline to mitigate the negative impacts and promotion of positive impacts was not available in the action plan.</p>	
	<p>Root Cause The timeline was not included due to miscommunication of the management. The company's standardization was not implemented properly.</p>	
	<p>Correction New column for implementation timeline and positive impact is included in the Action Plan for Sg. Tong POM, Jerangau Estate and Tayor Estate FY 2017/2018. The review was conducted on 18/9/2017.</p>	

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	<p>Corrective Action The Standardized template has been distributed to all the operating units. The SHO/ Sustainability Executive had communicated on 25/11/2017 to all the operating units that the standardized template shall be utilized.</p>	
	<p>Assessment Conclusion: Major NC close out verification: The latest revision has been updated and included all positive impact. Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1532946-201709-M7	<p>Requirements Indicator 6.12.1 There shall be evidence that no forms of forced or trafficked labour are used.</p>	Major
	<p>Evidence of Nonconformity Interviewed with the foreign workers sampled below found that they are not allowed to take their passport whenever they intended to leave the estates during off day or annual leave. Photocopied of passport and letter of travelling issued by the management were only given to the workers. Besides, the workers did not know what the purpose of keeping passport by the employers even though they have signed on the consent letters dated 1/2/2017 in Tayor Estate and employment contracts for the safe keeping of passport by the management. Sampled of workers as below: a. Employee No.: JR1102968 (Jerangau Estate) b. Employee No.: JR1202992 (Jerangau Estate) c. Employee No.: JR1102972 (Jerangau Estate) d. Employee No.: TY1100616 (Tayor Estate) e. Employee No.: TY1100418 (Tayor Estate) f. Employee No.: TY1100567 (Tayor Estate)</p>	
	<p>Statement of Nonconformity No evidence to show that no forms of forced or trafficked labour are used.</p>	
	<p>Root Cause The new batch workers did not clearly understand why the management had to safekeep their passport even though they have signed the letter of consent. The explanation by the operating units' management were not conducted effectively.</p>	
	<p>Correction The respective operating units had explained to the workers regarding the purpose and importance of passport being kept by the management.</p>	
	<p>Corrective Action TDMP HQ has issued a memo to all operating units in making sure that every management team is required to explain and ensure that all foreign workers understood the safekeeping reason of their passport.</p>	
	<p>Assessment Conclusion: Major NC close out verification: During the major NC onsite close out on 27/11/2017, interview was conducted with foreign workers to confirm about their understanding on the passport safekeeping.</p>	

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	<p>The assessment team had confirmed that the sampled workers had voluntarily surrender their passport to TDMP.</p> <p>The assessment team had interviewed the operating units' management team to confirmed that the corrective action to ensure all new foreign workers is to be briefed in detail on the reason of passport keeping is being implemented. The management team is able to inform the assessment team about the item to be briefed and the documentation/records required to conform with the TDMP HQ memo. At the time of the onsite closure, there were no new foreign workers identified. Hence the continuous implementation will be further verified in the assessment.</p>	
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Non-Conformity		
NCR #	Description	Category (Major / Minor)
1532946-201709-M8	<p>Requirements RSPO SCCS E2.2 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>Evidence of Nonconformity Transactions for the Contract No. PO 170605, PO 170706 and PO 170811 has yet to be announced and confirmed in the Palm Trace system.</p> <p>Statement of Nonconformity The organization has yet to make shipping announcement and confirmations on the RSPO IT platform for the completed shipment.</p> <p>Root Cause There was a technical error in the palmtrace system whereby the buyers can confirm the announcement made and the confirmed quantity will be transferred into the buyer's stock but the status of the announcement will not change and this process will repeat every time the buyer made a confirmation of the same announcement. This issue was acknowledged by the e-trace support team as evidenced from the plamtrace email sent by Mr Vincent Michael.</p> <p>Correction The palmtrace technical support team had responded to TDMP that the palmtrace team is resolving the error.</p> <p>Corrective Action Daily monitoring for every transaction either for PK and CPO.</p> <p>Assessment Conclusion: Major NC close out verification: Daily monitoring for every transaction for PK and CPO were verified. Corrective action is found to be effective, thus the major NC was closed on 27/11/17 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment.</p>	Major

Non-Conformity		
NCR #	Description	Category (Major / Minor)

1532946-201709-N1	Requirements Indicator 1.1.1 There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.	Minor
	Evidence of Nonconformity No SOP is available in describing the process for accessing of information in POM, Jerangau and Taylor Estate.	
	Statement of Nonconformity There is no SOP for describing the process for accessing of information.	
	Root Cause The company is using a Standard Communication Flowchart for reference but the flowchart was found too simple and insufficient on the timeline for every negotiation steps.	
	Correction The existing Standard Communication Flowchart is revised to include the time taken for every negotiation steps.	
	Corrective Action Continous upgrading and improving the existing Standard Communication Flowchart suitable with the current situation and issues.	
	Assessment Conclusion: Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1532946-201709-N2	Requirements Indicator 2.1.3 A mechanism for ensuring compliance shall be implemented.	Minor
	Evidence of Nonconformity There were no records of internal audit conducted to ensure all Operating units are in compliance with the relevant legal requirements applicable to the operation.	
	Statement of Nonconformity Internal audit for legal compliance was not conducted annually and documented	
	Root Cause Internal Audit was conducted by TDMP Head Quarter personnel before the date of the ASA4 but the report was not ready yet due to time constraint and short of staff.	
	Correction A one year plan/schedule of the Internal Sustainability Audit have been made and followed by the internal auditor.	
	Corrective Action The Internal Sustainability Audit plan was developed to ensure the internal audit is conducted at least annually at all operation units to make sure their compliance with the certification requirements are monitored.	
	Assessment Conclusion:	

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	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit	
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Non-Conformity		
NCR #	Description	Category (Major / Minor)
1532946-201709-N3	Requirements Indicator 5.1.2 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
	Evidence of Nonconformity All the management plans (for POM, Jerangau and Taylor) had not considered all the impact that were identified in the Aspect & Impact Evaluation. Furthermore, the current management plan did not include responsible person, timetable and mitigation measures.	
	Statement of Nonconformity Management plan is not available.	
	Root Cause The management plan that Estate and Mill established are not sufficiently enough as per RSPO requirement.	
	Correction The existing management plan has included the responsible person, timetable and mitigation measures.	
	Corrective Action Revised management plan has included all the high impact that was identified in the Aspect & Impact Evaluation (AIE) and will be ready to be inspected for the next audit.	
	Assessment Conclusion: Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1532946-201709-N4	Requirements Indicator 5.1.3 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.	Minor
	Evidence of Nonconformity The monitoring plan provided in POM, Jerangau and Taylor had not considered all the impacts identified in the Aspect & Impact Evaluation.	
	Statement of Nonconformity The monitoring is not available.	

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	<p>Root Cause The management plan that Estate and Mill established are not sufficiently enough as per RSPO requirement.</p>	
	<p>Correction The management plan has revised to include all the impacts identified in the Aspect & Impact Evaluation.</p>	
	<p>Corrective Action New monitoring plan had included all the high impact that was identified in the Aspect & Impact Evaluation (AIE).</p>	
	<p>Assessment Conclusion: Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1532946-201709-N5	<p>Requirements Indicator 4.7.3 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>	Minor
	<p>Evidence of Nonconformity Jerangau Estate: 1. Hand gloves was not provided to loose fruit collector 2. PPE was not provided appropriately to workers especially harvester and manuring gang since they need to buy on their own. Tayor Estate: 1. PPE was not provided appropriately to workers especially harvester and l/f collector gang since they need to buy on their own.</p>	
	<p>Statement of Nonconformity Adequate and appropriate protective equipment was not made available to the workers at workplace to cover all potentially hazardous operations.</p>	
	<p>Root Cause The workers failed to inform the management due to lack of consciousness in safety and health for themselves even though management had already conducted many training to arise and increase the awareness of safety and health for the workers.</p>	
	<p>Correction Workers are required to return the old PPE to the estate management and they have acquires new ones.</p>	
	<p>Corrective Action Daily PPE checking will be conducted before start working. When a PPE is found damaged and need to be replaced, the management will take the old PPE for disposal and provide a new one for the worker. The training will be continued and improve from time to time to ensure all workers are aware and realize the importance of safety and health to them.</p>	

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	Assessment Conclusion: Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit	
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Non-Conformity		
NCR #	Description	Category (Major / Minor)
1532946-201709-N6	Requirements Indicator 4.7.5 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
	Evidence of Nonconformity Sg Tong POM: - Ramp (yellow iodine expired on July 17) - CS station (yellow iodine expired on May 17 and antiseptic cream was not available) - Boiler (antiseptic cream expired on March 17) Jerangau Estate: - Harvesting (Eye Mo was not available) - Creche (Antiseptic cream was not available)	
	Statement of Nonconformity The emergency procedure is not implemented effectively.	
	Root Cause First Aid Kit records were checked by storekeeper assistance and not by Estate Health Assistant or First Aider.	
	Correction i) All expired item in First Aid Kit were replaced with the new one. ii) New antiseptic cream at CS Station as well as other location such as Workshop Station, Office, Supervisor Room was replaced. iii) Eye Mo and Antiseptic Cream at harvesting and crèche was added.	
	Corrective Action Monthly First Aid Kit records and checking must be conducted by Estate Health Assistant (HA) or First Aider especially their expiry date to make sure they are ready to be used in a case of an emergency.	
	Assessment Conclusion: Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1532946-201709-N7	Requirements Indicator 6.5.3	Minor

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	<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.</p>	
	<p>Evidence of Nonconformity Jerangau Estate: During linesite visit found that the perimeter drain behind House No. 16 and 18 was stagnant with water that caused the water could not properly flow. In addition, spraying at the linesite was sighted at House No. 16.</p> <p>Taylor Estate: Linesite inspection was carried out by Assistant on weekly basis. The inspection was covered the cleanliness and condition of the housing area and any burning sign noted. The last inspection was conducted on 17-23/9/2017. In the inspection record mentioned that rubbish was scattered behind the houses. Briefing to the workers was conducted during morning roll-call. However, linesite visit during audit found that the rubbish was not properly disposed where it scattered under the wooden houses and behind the houses.</p>	
	<p>Statement of Nonconformity The condition of the housing area was not satisfied.</p>	
	<p>Root Cause There are other conditions that need to repair immediately which is electricity and leaking roof problem occurred at one of the workers house.</p>	
	<p>Correction The drain was repaired while the rubbish was cleaned.</p>	
	<p>Corrective Action The linesite inspection is conducted weekly by Field Assistant (FA) and monitored by Assistant Manager. Linesite inspection will zoom more to rubbish behind the house. The housing inspection checklist has been revised to include the checking on cleanliness at the house backyard and spraying.</p>	
	<p>Assessment Conclusion: Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit</p>	

Observation	
OBS #	Description
1	Sungai Tong Palm Oil Mill is in planning phase to install a biogas plant. If the plan will be realized, as per indicator 5.1.1, if there is any Management of mill effluents, an EIA is required.

Positive Findings	
PF #	Description
1	Good commitment and participation from stakeholders
2	Continuous improvement program to improve workers housing

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 Sg Tong Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.</p> <p>Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. These have been incorporated into the assessment findings.</p> <p>Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix E.</p>	
IS #	Description
1	<p>Issues: Workers' Representative – The workers were satisfied with the management. They were treated equally among all different nationalities. Their salary were paid according to Minimum Wage Order 2016.</p> <p>Management Responses: The management will continue to ensure they are comply with legal requirements.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Issues: Gender Committee Representatives – They reported that no sexual harassment and violence case was happened in the workplace. They were treated equally with no discrimination based on gender.</p> <p>Management Responses: The management will respect all the workers with no discrimination based on their gender or nationalities.</p> <p>Audit Team Findings: No other issue.</p>
3	<p>Issues: Local Communities (Bukit Nenas, JKK Tayor) – They have good relationship with the management. The management will provide assistance whenever they requested</p> <p>Management Responses: The management will continue to support and provide assistance to the local communities whenever requested.</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Issues: School Representatives (SK Kg Tayor, SK Kg. Jaya) – The teachers informed that the management has given supports and assistance whenever needed. They are very happy with the management.</p> <p>Management Responses: The management will continue to help the school whenever they needed.</p> <p>Audit Team Findings: No other issues.</p>
	<p>Issues:</p>

5	Contractors – They informed that the payment was made promptly. Agreement was signed prior to work.
	Management Responses: The management will made the payment promptly according to the agreement.
	Audit Team Findings: No other issue.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1393358M1	<p>Requirements Indicator 6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>Evidence of Nonconformity Fikri and Pelong Estate: The offer letter signed by the workers were in old version where the public holiday entitlement was 12 days instead of 13 days. Sampled offer letters as below: a) Employee No.: FK1600974 b) Employee No.: FK1100660 c) Employee No.: FK1600975 d) Employee No.: 04235 (Pelong Estate) e) Employee No.: 00213 (Pelong Estate) f) Employee No.: 00078 (Pelong Estate) g) Employee No.: 4839 (Pelong Estate)</p> <p>Pelong Estate: A sampled of offer letter for worker with Employee No.: PL1100821 had found with public holiday entitlement of 14 days instead of 13 days.</p> <p>Fikri Estate: According to MAPA/NUPW Circular No. 22/2015 dated 4/8/2015, the employer required to fully subsidize RM 3.00 per month for each of the members of NUPW as premium towards NUPW/AIA Personal Accident Group Scheme. However, the management has yet to subsidize and deducted RM 11.00 from sampled workers below: a) Employee No.: FK1300722 b) Employee No.: FK1400839 c) Employee No.: FK1100626 d) Employee No.: FK1500892</p> <p>Statement of Nonconformity 1) Worker's offer letter of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday</p>	Major

	<p>entitlement, maternity leave, reasons for dismissal, period of notice, etc.) were not implemented effectively. 2) The management did not comply with the MAPA/NUPW Circular No. 22/2015.</p> <p>Corrective Action</p> <p>1a. All workers concerned has been identified and new offer letter were issued. 1b. Human Resource Department (HR) to prepare relevant Standard Operating Procedure (SOP). 2. Deduction will only be made for RM 8.00/worker/month as per MAPA/NUPW Circular No. 22/2015. TDM has been subsidizing RM 3.00/worker/month since enforcement date. Starting October 2016 deduction of RM 8.00/worker/month will take effect.</p> <p>1. New offer letter to identified workers were provided as evidence. 2. The SOP were distributed to all estate / mill for immediate execution. Copy of payslip were provided as evidence. Major nonconformity has been closed on 4/11/2016 as per evidence provided.</p> <p>Assessment Conclusion</p> <p>For Evidence 1: The SOP were distributed to all estate / mill for immediate execution.</p> <p>For Evidence 2: Sungai Tong management units have identified that there were no proper guideline for the foreign workers contract extension. The management units had a meeting with TDM Human Resources department on the 25/10/2015 to discuss and address the issue. It was decided to issue separate extension contract for foreign workers when they extend their service of employment after expiry of the initial contact period and revised SOP for foreign workers recruitment and extension has been finalized. "Perjanjian Kerja (Lanjutan)" Extended employment contract of the workers.</p> <p>Status during ASA4: 1) Seen the employment letters signed by the workers where their public holiday entitlement was 13 days as per MAPA/ NUPW agreement. Sampled of employment contracts as below: a. Employee No.: SM0900231 (STPOM) b. Employee No.: SM0900232 (STPOM) c. Employee No.: SM0900168 (STPOM) d. Employee No.: SM0900161 (STPOM) e. Employee No.: JR1503191 (Jerangau Estate) f. Employee No.: JR1503208 (Jerangau Estate) g. Employee No.: JR1102968 (Jerangau Estate) h. Employee No.: JR0500166 (Jerangau Estate) i. Employee No.: TY1100606 (Tayor Estate) j. Employee No.: TY1100638 (Tayor Estate) k. I/C No.: 560616-03-5179 (Contract Worker in Tayor Estate) l. I/C No.: 810201-11-5635 (Contract Worker in Tayor Estate)</p> <p>Besides, Human Resource Department has circulated a memorandum with Ref. No. TDMP/SMP/3/07.01 dated 6/12/2016 regarding the public holiday entitlement for all the workers. All the workers are entitled with 13 days of public holiday for a year.</p>	
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	<p>Interviewed with the workers confirmed that they were entitled 13 days of public holiday for Y2017.</p> <p>2) Sampled the payslips for October 2016, November 2016, December 2016 and August 2016 for workers who joined Union and found that the Union fees deducted by the company was RM 8 as below:</p> <ul style="list-style-type: none"> a. Employee No.: TY0900262 (Tayor Estate) b. Employee No.: TY00045 (Tayor Estate) c. Employee No.: TY1100378 (Tayor Estate) d. Employee No.: TY00009 (Tayor Estate) e. Employee No.: TY1100514 (Tayor Estate) <p>3) Extension contracts were sighted for the foreign workers who have worked more than 2 years. The terms stated in the extension contract was similar to their original signed contracts. Sampled of extension contracts as below:</p> <ul style="list-style-type: none"> a. Employee No.: TY1100500 (Tayor Estate) b. Employee No.: TY1100586 (Tayor Estate) c. Employee No.: TY1100589 (Tayor Estate) d. Employee No.: TY1100465 (Tayor Estate) e. Employee No.: TY1000299 (Tayor Estate) <p>Thus, the implementation of the corrective action was effective. Therefore, the major NC is remained closed.</p>	
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Non-Conformity		
NCR #	Description	Category (Major / Minor)
1393358M2	<p>Requirements Indicator 2.1.1 Evidence of compliance with relevant legal requirements shall be available.</p> <p>1. Workers' Minimum Standards of Housing and Amenities Act 1990, section 23 sub-section (2) "It shall be the duty of the employer to ensure that all buildings used for the housing of workers, nurseries or community halls are visited and inspected weekly by an estate hospital assistant registered under the Estate Hospital Assistants (Registration) Act 1965 [Act 435] or any other responsible person authorized by the employer..."</p> <p>2. Workers' Minimum Standards of Housing and Amenities Act 1990, section 23 sub-section (3) "The findings of thdxee estate hospital assistant or any other authorized person shall be recorded in a book kept at the place of employment and be made available to the Director General or Medical Officer of Health for inspection."</p> <p>3. FACTORIES AND MACHINERY (NOISE EXPOSURE) REGULATIONS 1989 Regulation 23. Retest.</p> <p>If the registered medical practitioner, after reviewing the annual and baseline audiograms of the employe and after taking into consideration the effect of temporary threshold shift, is of an opinion that a standard threshold shift has</p>	Major

	<p>occurred, he shall notify the occupier and the occupier shall retest the employee within three months from the date of the last audiometric test.</p> <p>Evidence of Nonconformity Pelong Estate: Linesite inspection was carried out on monthly basis where it did not comply with the requirement.</p> <p>Fikri Estate: Through interview with Hospital Assistant found that he has carried out linesite inspection. However, documented evidence was not available.</p> <p>Sungai Tong POM: Annual audiometric testing was conducted on 6/3/2016 by OHD, HQ/08/DOC/00/272 under SI Energy Enterprise. However the repeat test for 11 workers (Temporary Standard Threshold Shift) was not carried out accordingly as per recommendation by competent assessor.</p> <p>Statement of Nonconformity 1) and 2) The management has yet to comply with the Workers' Minimum Standards of Housing and Amenities Act 1990. 3) Repeat audiometric for workers who get TSTS (Temporary Standard Threshold Shift) was not conducted accordingly as per recommendation by competent assessor.</p> <p>Corrective Action 1. Inspection roster were produced. 2. The inspection were recorded weekly and checked by supervisor. Audiometric retest for 11 workers were conducted as recommended by competent assessor. Inspection roster and record book were provided as evidence. Audiometric test was done on 20/10/2016 for 11 workers concerned. Evidence of test were provided. Major nonconformity has been closed on 4/11/2016 as per evidence provided.</p> <p>Assessment Conclusion Inspection roster and record book are provided in all operating units. Status during ASA 4: For evidence 2 Linesite inspection was done on weekly basis in Jerangau Estate where 7/9/2017, 14/9/2017, 21/9/2017 and 26/9/2017 in Landas Div. and 24/8/2017, 7/9/2017, 14/9/2017 and 21/9/2017 at Jerangau Div. Seen the linesite inspection records with acknowledgement of checker, staff, assistant manager and manager. Linesite inspection was carried out by Assistant in Taylor Estate on weekly basis. The inspection was covered the cleanliness and condition of the housing area and any burning sign. The last inspection was conducted on 17-23/9/2017. For evidence 3 Annual Audiometric Test was conducted on 2/5/2017 by SI Energy Sdn Bhd. Total attendance for the audiometric test was 101 persons. 8 persons were found temporary STS. Retest for audiometric for those 8 persons was conducted on</p>	
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	<p>15/8/2017.Out of 8 persons, none of them are found to have permanent standard threshold shift.</p> <p>The evidence from previous assessment major non-conformance remained closed. However new evidence was raised during ASA 4 for indicator 2.1.1.</p>	
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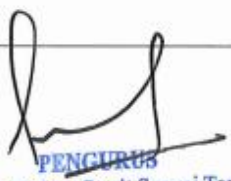


Non-Conformity		
NCR #	Description	Category (Major / Minor)
1393358M3	<p>Requirements Indicator 4.7.4 The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>Evidence of Nonconformity Safety & Health committee meeting minutes 1. Fikri Estate dated 25/9/2016, 23/06/2016 and 23/03/2016 2. Pelong Estatic dated 14/9/2016, 13/7/2016 and 7/3/2016</p> <p>Statement of Nonconformity The coverage discussed during Safety Committee Meeting was not sufficient. Issue related to workplace inspection, accident investigation and training related to OSH were not discussed</p> <p>Corrective Action TDMP Safety Health Officer (SHO), provided a standardized format/agendas for the OSH quarterly meeting. Minutes of meeting were provided as evidence. Major nonconformity has been closed on 4/11/2016 as per evidence provided.</p> <p>Assessment Conclusion The standardized format/agendas for the OSH quarterly meeting has been distributed to all operation units for use. Status during ASA 4: During ASA4, the auditor verified the OSH meeting minute and found that all the agenda were discussed accordingly. 1. OHS meeting at STPOM – #3:dated 18/9/17, #2: dated 21/6/17, #1: dated 20/3/17. All the agenda was discussed accordingly during OHS meeting, eg: workplace inspection, accident statistic, OSH issue including training. 2. OHS meeting at Jerangau Estate – #3:dated 12/9/17, #2: dated 23/5/17, #1: dated 28/3/17. All the agenda was discussed accordingly during OHS meeting, eg: workplace inspection, accident statistic, welfare, OSH issue including training. 3. OHS meeting at Taylor Estate – #3: dated 14/8/2017, #2: dated 23/5/17, #1: dated 19/3/17. All the agenda was discussed accordingly during OHS meeting, eg: workplace inspection, accident statistic, welfare, OSH issue including training.</p> <p>Thus, the major non-conformance was remain closed.</p>	Major

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
924589N0	Minor	23/5/2013	Closed on 12/5/2014
924589N1	Minor	23/5/2013	Upgraded to Major (Ref: 1047142M0)
1047142M0	Major	15/5/2014	Closed on 10/7/2014
1047142N1	Minor	15/5/2014	Closed on 29/9/2015
1243852M1	Major	29/9/2015	Closed on 23/11/2015
1393358M1	Major	20/10/2016	Closed on 4/11/2016
1393358M2	Major	20/10/2016	Closed on 4/11/2016
1393358M3	Major	20/10/2016	Closed on 4/11/2016
1532946-201709-M1 – 2.1.1	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M2 – 2.2.1	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M3 – 5.1.1	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M4 – 4.6.12	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M5 – 4.7.2	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M6 – 6.1.3	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M7 – 6.12.1	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-M8 – SC E2.2	Major	28/09/2017	Closed out on 27/11/2017
1532946-201709-N1 – 1.1.1	Minor	28/09/2017	"Open"
1532946-201709-N2 – 2.1.3	Minor	28/09/2017	"Open"
1532946-201709-N3 – 5.1.2	Minor	28/09/2017	"Open"
1532946-201709-N4 – 5.1.3	Minor	28/09/2017	"Open"
1532946-201709-N5 – 4.7.3	Minor	28/09/2017	"Open"
1532946-201709-N6 – 4.7.5	Minor	28/09/2017	"Open"
1532946-201709-N7 – 6.5.3	Minor	28/09/2017	"Open"

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Assessment Conclusion and Recommendation:

Based on the findings during Sungai Tong Palm Oil Mill Certification Unit and supply bases complies with the RSPO P&C 2013 (MY-NI 2014), and the RSPO Supply Chain Certification Standard (Nov 2014) for CPO Mill. It is recommended that the certification of Sungai Tong Palm Oil Mill Certification Unit is approved and continued.	
Acknowledgement of assessment findings	Report prepared by
Name: Tn Hj Hassan Bin Osman	Name: Mr Nicholas Cheong
Company name: TDM Plantation Sdn Bhd Sungai Tong Palm Oil Mill	Company name: BSI Services Malaysia Sdn Bhd
Title: Mill Manager	Title: Lead auditor
Signature: 	Signature: 
Date: 	Date: 26/02/2018

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	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	The latest stakeholder list dated 2017 for Jerangau estate was sighted. The list of stakeholders includes local communities (nearby villagers), contractors, suppliers, government agencies, schools and hospital. The overall responsible person in providing the information is the Estate Manager. The information will be provided as per request. It was recorded in Jerangau Estate that the most recent request for information is from an Electrical Contractor. The information requested was land grant. There is no SOP for describing the process for accessing of information.	Minor nonconformance
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	The request for information are handle adequately. Any information requested will be handled by the clerks and estate/mill manager. The response of the request will be immediately.	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.			
1.2.1	Publicly available documents shall include, but are not necessary limited to: • 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). - Major compliance –	All documents are available at the operating sites and head office. There are no restriction reported by the stakeholders regarding obtaining of information or documents. The access of any relevant documentation is made available upon request. Procedure for complaints and grievance which includes the information request is available at notice boards of the estates and mill vicinity. The company is in progress to make the public information available at their website. The company’s polices is made available at notice boards of the estates and mill vicinity.	Complied
Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.			

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Criterion / Indicator	Assessment Findings	Compliance
1.3.1	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. -Minor compliance	TDM Plantation Sdn Bhd has developed Code of Ethical Conduct Policy dated 1/8/2017 which signed by CEO. The policy has stated that the company will operating with ethic and will not receive any bribe and gifts. The policy was displayed on the notice board outside the office. Besides, briefing of the policy was conducted during induction training and morning roll-call. Complied
Principle 2: Compliance with applicable laws and regulations		
Criterion 2.1:		
There is compliance with all applicable local, national and ratified international laws and regulations.		
2.1.1	Evidence of compliance with relevant legal requirements shall be available. - Major compliance -	The latest Legal register is 2017. The hard copies of legal requirements are available in all operating units. The list of Legal register has not completely considered the relevant Legal Regulation stated in the NI. There are no up to date inventory records of the waste and scheduled waste generated. The inventory shall be minimum following 5 th Schedule of the EQA Act 1974 – Environmental Quality (Scheduled Waste) Regulations 2005. The inventory records are by yearly. The inventory shall be minimum following 5 th Schedule of the EQA Act 1974 – Environmental Quality (Scheduled Waste) Regulations 2005. The waste source from the Tayor operations have not been identified. The segregation of the scheduled waste are not able to identify the type of schedule waste generated. The Scheduled Wastes are not disposed according to the EQA Act 1974 Section 9 (5) where the waste shall be disposed 180days from its first generated. Major nonconformance
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	The responsible & accountability personnel for each of the regulations is provided in the Legal register. As identified by the SOP (TDM/STPOM/01 dated 01/2012) the responsible personnel to manage the Legal Register is the Group legal Department, Plantation Coordinator and Plantation Advisor. The legal register is available in all the OUs. The Laws and Regulation applicable to the operations are available at each OU. Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	There is no internal audit conducted. Example there is no internal audit conducted if the OUs’ activities are compliance to the relevant regulations. Minor nonconformance
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	As identified by the SOP (TDM/STPOM/01 dated 01/2012) the responsible personnel to manage and track the changes is the Group Legal Department, Plantation Coordinator and Plantation Advisor. 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 -	The original concession is belongs Kumpulan Ladang-Ladang Terengganu Sdn Bhd. Kumpulan Ladang-Ladang Terengganu Sdn Bhd had an Management Agreement with Major nonconformance

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Criterion / Indicator	Assessment Findings	Compliance	
	<p>TDM Berhad on 01/09/2012 to manage, develop, supervise conceptualized and implement oil palm development.</p> <p>TDM Plantations Sdn Bhd is a subsidiary of TDM Bhd. The consent of oil palm development has been given by TDM Bhd to TDM Plantations through the Management Agreement. The Management Agreement is renewed every 5 years. The latest agreement was agreed on 20/07/2016.</p> <p>The land grant for POM, Jerangau Estate (3 lots) and Taylor Estate (9 lots) was sighted. Attached with the grants, the maps were provided by the Terengganu State government. The maps are as per the original concession received by Kumpulan Ladang-Ladang Terengganu Sdn Bhd. from the Terengganu State Government.</p> <p>The land grants lots and area size are according to the Management Agreement between TDM Bhd and Kumpulan Ladang-Ladang Terengganu Sdn Bhd.</p> <p>Referring to the agreement between TDM Bhd and Kumpulan Ladang-Ladang Terengganu Sdn Bhd. not all the lands are included in the Agreement (e.g. Lot 406 at Jerangau Estate). Furthermore there are land titles that stated the ownership is to Perbadanan Kemajuan Iktisad Negeri Terengganu (e.g. Lot 1141, 1140, 97, 94, 54 at Taylor). However the transfer of ownership from Perbadanan Kemajuan Iktisad Negeri Terengganu to Kumpulan Ladang-Ladang Terengganu Sdn Bhd. is not available.</p>		
2.2.2	<p>Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -</p>	<p>The POM map provided by the State Government had identify the boundary and coordinates.</p> <p>The Jerangau maps are provide by the State Government had identify the coordinates of the boundary.</p> <p>The Taylor maps are provide by the State Government had identify the coordinates of the boundary.</p> <p>The SOP for Boundary Marking (rev May 2017) defines the procedure for marking the boundaries.</p> <p>During the field assessment, the sample of boundary marking are observed.</p>	Complied
2.2.3	<p>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 -</p>	<p>In this assessment there were no land disputes identified. The concession that is developed by TDM Plantations are all sub-lease land of Kumpulan Ladang-Ladang Terengganu Sdn Bhd. through a leasing agreement of TDM Bhd and Kumpulan Ladang-Ladang Terengganu Sdn Bhd.</p> <p>In case of any land dispute, it will be handle according to the Land Encroachment Process Flow.</p>	Complied
2.2.4	<p>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</p>	<p>In this assessment there were no land disputes identified. It has been confirmed by interviewing surrounding stakeholders.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
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	In this assessment there were no land disputes identified. It has been confirmed by interviewing surrounding stakeholders. 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	In this assessment there were no land disputes identified. It has been confirmed by interviewing surrounding stakeholders. 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 -	There is no land dispute at the Sungai Tong operating units at the time of audit. No Customary land was identified. Complied
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	There is no land dispute at the Sungai Tong operating units at the time of audit. No Customary land was identified. Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of	There is no land dispute at the Sungai Tong operating units at the time of audit. No Customary land was identified. Complied

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Criterion / Indicator	Assessment Findings	Compliance
	impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	
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	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.		
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 -	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 -	Complied
Principle 4: Use of appropriate best practices by growers and millers		
Criterion 4.1:		
Operating procedures are appropriately documented, consistently implemented and monitored.		

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Criterion / Indicator	Assessment Findings	Compliance
4.1.1 Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	TDM has prepared Standard Operating Procedures (SOPs) for mills and estate covering all the relevant operations. There is a separate SOP on safe working practices for mill and estates. The safe operating procedure for the estates includes pesticide application, manuring and harvesting. Sungai Tong Palm Oil Mill has its own SOP for safe working practices covering all the work stations (Doc No: TDM/OSH/STPOM/01. There is a SOP covering spraying management at the riparian area and cover crops. Inspection to the field and mill confirm that the SOPs are implemented. Assistant Managers and staff monitor the implementation.	Complied
4.1.2 A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	The management engaged External Mill Advisor (Visiting Engineer) and External Agronomist from Sime Darby Seeds and Agriculture Services Sdn Bd visited estates and mill to inspect and report on the operations on annual basis. The last visit was carried out on 2-3/5/2017 (STPOM) and on April 2017 (Jerangau Estate and Tayor Estate) by Dr Hj Zulkifli from SDSAS Sdn Bhd. Review of Visiting Engineer/Agronomist Visit Reports and site inspections confirmed consistent records of implementation of SOPs. This to ensure that performance is on track and best practices being consistently implemented. 1. Permit to work – SNZ Fire Enterprise (contractor), type of work: install new piping and construct new pump house (BOMBA) on 14/6/2017 at STPOM (STPOM/27/17). 2. Permit to work in confined space – internal workers, type of work: maintenance of boiler on 10/1/2017. Gas test was conducted by AGT (HQ/15/AGTES/01/00169) and the gas reading was found within the specification.	Complied
4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	Visiting Engineer Visit Reports which was conducted on 2-3/5/2017 by Dr Hj Zulkifli from SDSAS Sdn Bhd. was available at Sg Tong POM office. Jerangau Estate and Tayor Estate - External Agronomist visit report from Sime Darby Seeds and Agriculture Services Sdn Bhd visited estates on 11-12/4/2017 [Report No. 1/2017].	Complied
4.1.4 The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Sungai Tong mill maintains a daily record of all FFB received. The records includes showing the origin, weight and transporters details. The FFB is received from certified own supply base and as weighing station to receive outsider crops.	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.		

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Criterion / Indicator	Assessment Findings	Compliance												
4.2.1 There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	<p>TDM Plantation Sdn Bad-Standard Operating Procedure has established covers mature upkeep (water management, weeding, bunch census, thinning, P&D, pruning, raking), Immature upkeep, , manuring mature and immature oil palm, harvesting and collection, workshop, roads bridges and culverts, chemical control of common oil palm, use of beneficial plants and use of barn owls. The SOP covering all aspects of oil palm management including safety. The related SOP, namely Leaf and Soil Sampling Notes procedure was sighted.</p> <p>All estates operate in accordance with the standard operating procedures. The practices consistently monitored by estate operation management and estate inspectorate. The recommendations for improvements are given to maintain the sustainable practices.</p> <p>The specific SOP on managing soil fertility was describe in the SOP-Mature Upkeep, page 38.The foliar analysis was conducted to determine the nutrient level of the palm and subsequently formulate an integrated manuring programme.</p>	Complied												
4.2.2 Records of fertiliser inputs shall be maintained. - Minor compliance -	<p>Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. All the records were maintained and available at estate office i.e. field 12A1 of Jerangau Estate applied with RRP fertilizer, start on August 2017 at the rate of 2kg/palm.</p>	Complied												
4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>External Agronomist from Sime Darby Seeds and Agriculture Services Sdn Bhd visited estates on 11-12/4/2017 to carry out physical observation prior to the fertilizer recommendation for 2018 [Report No. 1/2017]. The foliar sampling exercise was conducted on April 2017. The visual analysis and the leaf analysis result which shows the nutrient level was used as guidance for the fertilizer recommendation. The foliar analysis result dated 16/8/2017 from Applied Agricultural Resources Sdn Bhd was sighted. Soil sampling was carried out in on January 2016 and is scheduled to be repeated every 5 years. Sighted the Soil Test Report dated 31/1/2016 which was tested by UTCL Laboratory.</p>	Complied												
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 -	<p>All palm by-products including fronds, EFB, shell and fibre were recycled. The compost fertiliser which is process from EFB is applied at the rate of 10kg/palm. Sighted the records for dispatch of EFB and compost by Sg Tong POM:</p> <table border="1" data-bbox="659 1675 1310 1800"> <thead> <tr> <th>Month</th> <th>EFB</th> <th>Compost</th> </tr> </thead> <tbody> <tr> <td>June 17</td> <td>180.89 mt</td> <td>2325.68 mt</td> </tr> <tr> <td>July 17</td> <td>244.41 mt</td> <td>3142.42 mt</td> </tr> <tr> <td>Aug 17</td> <td>293.15 mt</td> <td>3769.08 mt</td> </tr> </tbody> </table>	Month	EFB	Compost	June 17	180.89 mt	2325.68 mt	July 17	244.41 mt	3142.42 mt	Aug 17	293.15 mt	3769.08 mt	Complied
Month	EFB	Compost												
June 17	180.89 mt	2325.68 mt												
July 17	244.41 mt	3142.42 mt												
Aug 17	293.15 mt	3769.08 mt												
Criterion 4.3: Practices minimise and control erosion and degradation of soils.														

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Criterion / Indicator		Assessment Findings	Compliance																										
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Soil series map available for both estates visited. No other soil categorised as problematic or fragile soil: <table border="1"> <thead> <tr> <th>No</th> <th>Type of Soil</th> </tr> </thead> <tbody> <tr><td>1</td><td>Siri Bungor</td></tr> <tr><td>2</td><td>Kesatuan Binjai-Lubok Itik</td></tr> <tr><td>3</td><td>Siri Batu Lapan</td></tr> <tr><td>4</td><td>Siri Bukit Tuku</td></tr> <tr><td>5</td><td>Siri Gali</td></tr> <tr><td>6</td><td>Siri Jerangau</td></tr> <tr><td>7</td><td>Siri Kechor</td></tr> <tr><td>8</td><td>Siri Rengam</td></tr> <tr><td>9</td><td>Siri Sg Buluh</td></tr> <tr><td>10</td><td>Siri Awang</td></tr> <tr><td>11</td><td>Siri Batang Merbau</td></tr> <tr><td>12</td><td>Siri Gondang</td></tr> </tbody> </table>	No	Type of Soil	1	Siri Bungor	2	Kesatuan Binjai-Lubok Itik	3	Siri Batu Lapan	4	Siri Bukit Tuku	5	Siri Gali	6	Siri Jerangau	7	Siri Kechor	8	Siri Rengam	9	Siri Sg Buluh	10	Siri Awang	11	Siri Batang Merbau	12	Siri Gondang	Complied
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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 -	There is no area >25° at Jerangau Estate. However at Taylor Estate, the management has identified steep areas for setting aside as conservation areas. Inspection of field conditions at estate showed well established and maintained groundcover vegetation.	Complied																										
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Estates has implemented annual road maintenance programme. Example of programme checked at Jerangau and Taylor estates shows the map indicating road repairs and maintenance for the whole estate roads includes grading, compacting and stone application to strengthen the road surface, Culvert maintenance and bridge maintenance.	Complied																										
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 were no peat soils at both visited 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 were no peat soils at both visited estates.	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 were no problematic soils at both visited estates.	Complied																										
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.																													

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Criterion / Indicator	Assessment Findings	Compliance												
<p>4.4.1</p> <p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p>Water Management Plan was established, latest reviewed on 14/6/2017. Sg. Tong POM: Rainfall 2016: 3804ml Rainfall 2017 (as at Aug) : 3904ml</p> <p>Water management plan: Contingency during water shortage FY2015/2016:</p> <ol style="list-style-type: none"> 1. Water shortage/Dry Spell : To purchase water supply from JBA, To obtain water supply from nearby estate and to train staff/workers to take necessary steps to conserve water 2. Severe Water pollution: To purchase water supply from JBA and to perform treatment of polluted water. <p>Action plan for reduction of water usage FY2017/2018:</p> <ol style="list-style-type: none"> 1. Rainwater collection 2. Air conditioner water collection 3. Steam turbine – excess water discharge into monsoon drain 4. Main water pipe line 5. Separator using too much water <p>Taylor Estate River water quality monitoring report was conducted on 9/5/2017 by ERALab (KT) Sdn Bhd. The parameter was followed with National Water Quality Standards for Malaysia (NWQSM). All the parameters were compliance with NWQSM.</p>	<p>Complied</p>												
<p>4.4.2</p> <p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -</p>	<p>Documented as a Slope Protection & River Buffer Zone Policy established as following:</p> <table border="1" data-bbox="660 1290 1300 1469"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>< 5 meters</td> <td>5meters</td> </tr> <tr> <td>5– 10 meters</td> <td>10meters</td> </tr> <tr> <td>10 - 20 meters</td> <td>20meters</td> </tr> <tr> <td>20– 40 meters</td> <td>40meters</td> </tr> <tr> <td>>40 meters</td> <td>50meters</td> </tr> </tbody> </table> <p>At Jerangau Estate, there is no buffer zone.</p>	River width	Buffer zone	< 5 meters	5meters	5– 10 meters	10meters	10 - 20 meters	20meters	20– 40 meters	40meters	>40 meters	50meters	<p>Complied</p>
River width	Buffer zone													
< 5 meters	5meters													
5– 10 meters	10meters													
10 - 20 meters	20meters													
20– 40 meters	40meters													
>40 meters	50meters													
<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>Sg. Tong POM: STPOM implemented outgoing water monitoring, for the final discharge. Sampled analysis report done by ERALab Sdn. Bhd. for water sample certificate of analysis, lab report no. 17/07/W646 (dated 6/8/2017 for sample taken on 26/7/2017) and lab report no. 17/06/W542 (dated 4/7/2017 for sample taken on 20/6/2017) sighted available. Analysis was done against Standard B Acceptable Conditions For Discharge of Industrial or Mixed Effluent of Standards A and B. Parameters analysed were pH, BOD, TSS, AN, O&G and TN. Report shown result was in compliance against the standard tested.</p>	<p>Complied</p>												

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Criterion / Indicator		Assessment Findings	Compliance												
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	STPOM monitored its water consumption on monthly basis for the source of water supply for its mill process usage. <table border="1"> <thead> <tr> <th>Year</th> <th>Water consumption/mt FFB</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>2.56 m³</td> </tr> <tr> <td>2016</td> <td>2.70 m³</td> </tr> <tr> <td>2017 (todate Aug 17)</td> <td>2.60 m³</td> </tr> </tbody> </table>	Year	Water consumption/mt FFB	2015	2.56 m ³	2016	2.70 m ³	2017 (todate Aug 17)	2.60 m ³	Complied				
Year	Water consumption/mt FFB														
2015	2.56 m ³														
2016	2.70 m ³														
2017 (todate Aug 17)	2.60 m ³														
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.															
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	IPM Manual includes the planting of beneficial plants and control of damage by rodents, leaf-eaters, orytes and natural enemies. Beneficial plants such as Turnera subulata, Antigonon Leptopus and Cassia Cobanensis are grown in the estates although there is no outbreak of pest. Records of planting of new areas and maintenance of existing areas of beneficial plants, location maps and barn owl census are available. The occupancy rate for Barn owl box on Aug 2017. <table border="1"> <thead> <tr> <th></th> <th>Occupancy rate</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Barn owl</td> <td>32.64%</td> <td>Jerangau Estate</td> </tr> <tr> <td>85%</td> <td>Taylor Estate</td> </tr> </tbody> </table>		Occupancy rate	Estate	Barn owl	32.64%	Jerangau Estate	85%	Taylor Estate	Complied				
	Occupancy rate	Estate													
Barn owl	32.64%	Jerangau Estate													
	85%	Taylor Estate													
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Training for both estates was conducted accordingly. <table border="1"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>2/8/17</td> <td>Spraying</td> <td>External</td> <td>Jerangau Estate</td> </tr> <tr> <td>24/7/17</td> <td>IPM (Rat)</td> <td>Internal</td> <td>Taylor Estate</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	2/8/17	Spraying	External	Jerangau Estate	24/7/17	IPM (Rat)	Internal	Taylor Estate	Complied
Date	Training Topic	Trainer	Remarks												
2/8/17	Spraying	External	Jerangau Estate												
24/7/17	IPM (Rat)	Internal	Taylor Estate												
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 TDM agriculture policy. Refer to agriculture policy no 05.02-05.03:weed control for immature & mature oil palm. For pest and disease control, refer to 09.01 – 09.08. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species.	Complied												
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained. <table border="1"> <thead> <tr> <th></th> <th>July 2017</th> <th>Aug 2017</th> </tr> </thead> <tbody> <tr> <td>Jerangau Estate</td> <td>1.43 % a.i./ha</td> <td>0.08 % a.i./ha</td> </tr> <tr> <td>Taylor Estate</td> <td>0.052 % a.i./ha</td> <td>0.009 % a.i./ha</td> </tr> </tbody> </table>		July 2017	Aug 2017	Jerangau Estate	1.43 % a.i./ha	0.08 % a.i./ha	Taylor Estate	0.052 % a.i./ha	0.009 % a.i./ha	Complied			
	July 2017	Aug 2017													
Jerangau Estate	1.43 % a.i./ha	0.08 % a.i./ha													
Taylor Estate	0.052 % a.i./ha	0.009 % a.i./ha													
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest	The quantity of agrochemicals required for various field conditions are documented and justified in TDM agriculture	Complied												

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	policy 09-01 to 09-08. The implementation in the field is consistent with the TDM agriculture policy.														
4.6.4	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 -	There was no pesticides that are categorised as World Health Organisation Class 1A or 1B was used or store at Chemical Store.	Complied												
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>Training for both estates was conducted accordingly.</p> <table border="1" data-bbox="660 943 1297 1066"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>2/8/17</td> <td>Spraying</td> <td>External</td> <td>Jerangau Estate</td> </tr> <tr> <td>24/7/17</td> <td>IPM (Rat)</td> <td>Internal</td> <td>Taylor Estate</td> </tr> </tbody> </table> <p>During the field assessment it was observed that the workers had used the appropriate PPE identified by the company and/or the pestiside supplier.</p> <p>The records of the PPE distribution was sighted. Interview was conducted with workers to confirmed their understanding and requirement on PPE usage.</p>	Date	Training Topic	Trainer	Remarks	2/8/17	Spraying	External	Jerangau Estate	24/7/17	IPM (Rat)	Internal	Taylor Estate	Complied
Date	Training Topic	Trainer	Remarks												
2/8/17	Spraying	External	Jerangau Estate												
24/7/17	IPM (Rat)	Internal	Taylor Estate												
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 -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was found that no stock of pesticides in the store. The chemical stores was securely locked and comply with regulation.	Complied												
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	Pesticides had been applied using the Best Management Practices that minimize risk and impacts. The pesticide operators found to understand the use of the right nozzle, spray drift, spray quality and run-off.	Complied												
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 -	No aerial spraying at Sungai Tong Certification unit.	Complied												
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders. Employees handling pesticide given knowledge and skill required by the Compliance Department to cover safe handling practices and standard operating procedures.	Complied												

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Criterion / Indicator		Assessment Findings	Compliance																						
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Disposal method of all identified waste was already included in the pollution prevention plan where the site visit confirmed that the practice of reduce, reuse and recycle of materials has been implemented throughout the company within mill and estates.	Complied																						
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<p>Annual medical surveillance for sprayers and pesticide operators were demonstrated.</p> <p>Medical examination programme established for 1 group of sprayer team which conducted by Klinik Bestari Sdn Bhd-HQ/08/DOC/00/352</p> <table border="1"> <thead> <tr> <th>ID No</th> <th>Date of Medical check up</th> <th>Result</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>640810115324</td> <td rowspan="4">15/10/16</td> <td>Fit</td> <td rowspan="4">Jerangau Estate</td> </tr> <tr> <td>840919035260</td> <td>Fit</td> </tr> <tr> <td>830109035294</td> <td>Fit</td> </tr> <tr> <td>*701020715014</td> <td>Not fit</td> </tr> <tr> <td>AD6969645</td> <td rowspan="3">19/4/17</td> <td>Fit</td> <td rowspan="3">Tayor estate</td> </tr> <tr> <td>AT761525</td> <td>Fit</td> </tr> <tr> <td>AE4839242</td> <td>Fit</td> </tr> </tbody> </table> <p>*exposure to pesticide, was transferred to other job (Linesite upkeep) immediately.</p>	ID No	Date of Medical check up	Result	Estate	640810115324	15/10/16	Fit	Jerangau Estate	840919035260	Fit	830109035294	Fit	*701020715014	Not fit	AD6969645	19/4/17	Fit	Tayor estate	AT761525	Fit	AE4839242	Fit	Complied
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4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	<p>At Tayor Estate, all the sprayers were male workers. However, at Jerangau Estate there were female worker works as a sprayer. There is an issue where 2 female sprayers were pregnant for 3 months and transferred to another job. There is no monitoring system established to identify pregnant workers especially for spraying activity.</p> <p>Thus, the major NC was raised during this assessment.</p>	Major nonconformance																						
<p>Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>																									
4.7.1	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>STPOM has been continued to establish and implement safety and health policy which was signed by CEO of TDM Plantation Sdn Bhd on 1/9/2017. The policy has been communicated to the staff and workers. On site supervisors, safety coordinator and Mill assistant managers ensure the implementation of the safety plan.</p> <p>Sample of OSH activities carried out were:</p> <p>STPOM</p> <ol style="list-style-type: none"> CHRA was conducted on 24/8/2015 by Occumed Consultancy & Services Sdn Bhd (JKKP IH 127/171-2(08)). The entire action plan has been established as per CHRA recommendation. Medical Surveillance was conducted on 19/4/2017 by Klinik Ibra (Dr Samsuri Ismail-HQ/08/DOC/00/272. Sighted records: Nadzian B. Mohd (WTP), Mohd Hafizan (Workshop), Zainal Mat Amin (Boiler), Amezi Abdullah, Che Mat Riffin, Mohd Sofian (Lab), Comments from OHD: Still in the same job using PPE. LEV inspection by IHT2 was conducted on 23/3/2017 (JKKP HIE 127/171-3/2(202). From the inspection, it 	Complied																						

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Criterion / Indicator		Assessment Findings	Compliance
		<p>found that the fume hood is generally safe and acceptable to be used by lab workers.</p> <p>iv. Annual Audiometric Test was conducted on 2/5/2017 by SI Energy Sdn Bhd. Total attendance for the audiometric test was 101 persons. 8 persons were found temporary STS. Retest for audiometric for those 8 persons was conducted on 15/8/2017. Out of 8 persons, none of them are found to have permanent standard threshold shift.</p> <p>v. Chemical Exposure Monitoring was conducted on 2/11/2016 by Boil Resources (JKKP HIE 127/171-3/1(185)).</p> <p><u>Jerangau Estate and Tayor Estate</u></p> <p>i. CHRA was conducted on 14/6/2017 (Jerangau Estate) by Occumed Consultancy & Services Sdn Bhd (JKKP IH 127/171-2(08)). The entire action plan has been established as per CHRA recommendation.</p> <p>ii. CHRA was conducted on 21/6/2017 (Tayor Estate) by Occumed Consultancy & Services Sdn Bhd (JKKP HIE 127/171/2(8)). All the action plan has been established as per CHRA recommendation.</p>	
4.7.2	<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.</p> <p>- Major compliance -</p>	<p>TDM plantation had identified and reviewed significant hazards and risks and determined appropriate risk control measures through the HIRARC procedure. The technique was described accordingly in the SOP. The HIRARC was reviewed on 1/4/2017 to include all the activities in the mill and estate. However, the activity for construction new pump house (BOMBA) at STPOM and new nursery at Tayor Estate was not identified accordingly.</p> <p>Thus, Major NC was raised during this assessment.</p>	Major nonconformance

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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>Training programme planned for year 2017 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to:</p> <ul style="list-style-type: none"> - workers exposed to machinery and high noise levels, - workers working in confined space, - harvesters - pesticides operators - manurers <p>Sample training checked:</p> <table border="1" data-bbox="660 678 1310 1341"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>30/1/2017</td> <td>Oil Room</td> <td rowspan="7">STPOM</td> </tr> <tr> <td>19/2/2017</td> <td>SOP-Boiler</td> </tr> <tr> <td>19/3/2017</td> <td>AESP</td> </tr> <tr> <td>25/7/17</td> <td>Turbine</td> </tr> <tr> <td>14/9/17</td> <td>OSHA</td> </tr> <tr> <td>12/9/2017</td> <td>Chemical handling</td> </tr> <tr> <td>25/7/17</td> <td>Operation</td> </tr> <tr> <td>2/8/17</td> <td>Chemical handling</td> <td rowspan="7">Jerangau Estate</td> </tr> <tr> <td>4/3/17</td> <td>Manuring</td> </tr> <tr> <td>5/4/17</td> <td>Handling tractor</td> </tr> <tr> <td>7/4/17</td> <td>Loading of FFB</td> </tr> <tr> <td>2/8/17</td> <td>Harvesting</td> </tr> <tr> <td>19/9/17</td> <td>First Aid by BOMBA</td> </tr> <tr> <td>11/9/17</td> <td>Chemical handling</td> </tr> <tr> <td>20/8/17</td> <td>Buffer zone/Scheduled waste</td> <td rowspan="6">Tayor Estate</td> </tr> <tr> <td>9/7/17</td> <td>Accident investigation</td> </tr> <tr> <td>26/7/17</td> <td>Manuring</td> </tr> <tr> <td>24/7/17</td> <td>P&D</td> </tr> <tr> <td>4/4/17</td> <td>Workshop</td> </tr> <tr> <td>2/4/17</td> <td>Harvesting</td> </tr> </tbody> </table> <p>However, adequate and appropriate protective equipment was not made available to the workers at workplace to cover all potentially hazardous operations especially for harvester and loose fruit collector.</p> <p>Thus, Minor NC was raised during this assessment.</p>	Date	Training	Remark	30/1/2017	Oil Room	STPOM	19/2/2017	SOP-Boiler	19/3/2017	AESP	25/7/17	Turbine	14/9/17	OSHA	12/9/2017	Chemical handling	25/7/17	Operation	2/8/17	Chemical handling	Jerangau Estate	4/3/17	Manuring	5/4/17	Handling tractor	7/4/17	Loading of FFB	2/8/17	Harvesting	19/9/17	First Aid by BOMBA	11/9/17	Chemical handling	20/8/17	Buffer zone/Scheduled waste	Tayor Estate	9/7/17	Accident investigation	26/7/17	Manuring	24/7/17	P&D	4/4/17	Workshop	2/4/17	Harvesting	<p>Minor nonconformance</p>
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<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>The responsible persons are the Manager, Assistant Manager & safety coordinator of the respective operating units. SHE committee meeting members consist of employer & employee representatives. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to be satisfactory. Refer OHS meeting minutes :</p> <ol style="list-style-type: none"> OHS meeting at STPOM – #3:dated 18/9/17, #2: dated 21/6/17, #1: dated 20/3/17. All the agenda was discussed accordingly during OHS meeting, eg: workplace inspection, accident statistic and OSH issue including training. OHS meeting at Jerangau Estate – #3:dated 12/9/17, #2: dated 23/5/17, #1: dated 28/3/17. All the agenda was discussed accordingly during OHS meeting, eg: workplace inspection, accident statistic, welfare, OSH issue including training. OHS meeting at Tayor Estate – #3: dated 14/8/2017, #2: dated 23/5/17, #1: dated 19/3/17. All the agenda was discussed accordingly during OHS meeting, eg: workplace inspection, accident statistic, welfare, OSH issue including training. 	<p>Complied</p>								
<p>4.7.5</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p>	<p>TDM Plantation Sdn Bhd continued to maintain and implemented the accident and emergency procedures including ERP for accident, ERP for Fire, ERP for chemical spillage, ERP for Flood at Estate, maps showing assembly areas and up-to-date lists of emergency contacts which has been communicated to employees, contractors and visitors. Latest fire drill was conducted on 24/7/2017 (STPOM), 25/5/17 (Jerangau Estate) and 4/7/17 (Tayor Estate). Interviews of Mill/Estate staff and workers confirmed understanding of emergency response procedures. Workers trained in First Aid were present in the mill and field operations:</p> <table border="1" data-bbox="660 1451 1305 1688"> <thead> <tr> <th>Estate/Mill</th> <th>First Aider/Station</th> </tr> </thead> <tbody> <tr> <td>Sg Tong POM</td> <td>Mohd Shaful Nizam (CS), Shahrul Azwar (Store), Hairuldin (W/bridge)</td> </tr> <tr> <td>Jerangau Estate</td> <td>Ropfi (Harvesting), Fatimah (manuring), Norma (sprayer)</td> </tr> <tr> <td>Tayor Estate</td> <td>Ab Razak (Harvesting), Hazazi (operation), Zulkifli (Spraying)</td> </tr> </tbody> </table> <p>However, the emergency procedure was not implemented effectively. The inventory in the first aid box at STPOM, Jerangau Estate and Tayor Estate was not adequate and found some item were expired.</p> <p>Sg Tong POM:</p> <ul style="list-style-type: none"> - Ramp (yellow iodine expired on July 17) - CS station (yellow iodine expired on May 17 and antiseptic cream was not available) - Boiler (antiseptic cream expired on March 17) <p>Jerangau Estate:</p>	Estate/Mill	First Aider/Station	Sg Tong POM	Mohd Shaful Nizam (CS), Shahrul Azwar (Store), Hairuldin (W/bridge)	Jerangau Estate	Ropfi (Harvesting), Fatimah (manuring), Norma (sprayer)	Tayor Estate	Ab Razak (Harvesting), Hazazi (operation), Zulkifli (Spraying)	<p>Minor nonconformance</p>
Estate/Mill	First Aider/Station									
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	<p>- Harvesting (Eye Mo was not available) - Creche (Antiseptic cream was not available)</p> <p>Thus, the Minor NC was raised during this assessment.</p> <p>DOSH visits (Annual Audit) on 17/7/17 at STPOM been recorded in the DOSH log book and noted comments highlighted by DOSH has been taken action accordingly by the organization.</p> <p>Records on all accidents kept and summary sent to Head Office. Quarterly review on accident cases carried out during OSH quarterly meeting.</p> <p>STPOM JKKP 8 was sent to DOSH on 24/1/2017.</p> <p>Jerangau Estate JKKP 8 was sent to DOSH on 10/1/2017. There is a accident happened on 18/1/2017 with 21 days MC. The internal investigation was conducted accordingly. The JKKP 6 was sent to DOSH on 22/1/2017.</p> <p>Tayor Estate JKKP 8 was sent to DOSH on 8/1/2017. There are 2 accidents happened on 14/8/2017 with 14 days MC and happened on 4/2/17 with 5 days MC. The internal investigation was conducted accordingly. The JKKP 6 was sent to DOSH on 22/8/2017 and 18/2/2017.</p>																								
4.7.6	<p>All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p>	<p>STPOM</p> <table border="1" data-bbox="662 1227 1289 1615"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Remark</th> <th></th> </tr> </thead> <tbody> <tr> <td>SOCSCO</td> <td>July 17, Aug 17</td> <td>Only Local</td> <td>STPOM</td> </tr> <tr> <td>SOCSCO</td> <td>July 17, Aug 17</td> <td>Only Local</td> <td rowspan="2">Jerangau Estate</td> </tr> <tr> <td>RHB Insurance Bhd</td> <td>22/9/17-21/3/2019</td> <td>FWCS</td> </tr> <tr> <td>SOCSCO</td> <td>July 17, Aug 17</td> <td>Only Local</td> <td rowspan="2">Tayor Estate</td> </tr> <tr> <td>RHB Insurance Bhd</td> <td>25/9/17-24/9/18</td> <td>FWCS</td> </tr> </tbody> </table>	Insurance	Period	Remark		SOCSCO	July 17, Aug 17	Only Local	STPOM	SOCSCO	July 17, Aug 17	Only Local	Jerangau Estate	RHB Insurance Bhd	22/9/17-21/3/2019	FWCS	SOCSCO	July 17, Aug 17	Only Local	Tayor Estate	RHB Insurance Bhd	25/9/17-24/9/18	FWCS	Complied
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4.7.7	<p>Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -</p>	<p>Mill & Estates Records on Lost Time Accident (LTA) metrics had been verified to be satisfactory. Sample of accident statistic as shown below :</p> <table border="1" data-bbox="662 1794 1295 1944"> <thead> <tr> <th>Year</th> <th>STPOM</th> <th>Jerangau Estate</th> <th>Tayor Estate</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>2017 (as at Sep 17)</td> <td>6</td> <td>21</td> <td>19</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days</p>	Year	STPOM	Jerangau Estate	Tayor Estate	2016	0	0	0	2017 (as at Sep 17)	6	21	19	Complied										
Year	STPOM	Jerangau Estate	Tayor Estate																						
2016	0	0	0																						
2017 (as at Sep 17)	6	21	19																						

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Criterion / Indicator	Assessment Findings	Compliance																																																
Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.																																																		
4.8.1 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 -	A formal training programme on all aspects of RSPO principle and Criteria has been established and implemented. The training program for 2017 includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to: - workers exposed to machinery and high noise levels, - workers working in confined space, - harvesters - pesticides operators - manurers Sample training checked: <table border="1" data-bbox="660 763 1289 1458"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>30/1/2017</td> <td>Oil Room</td> <td rowspan="7">STPOM</td> </tr> <tr> <td>19/2/2017</td> <td>SOP-Boiler</td> </tr> <tr> <td>19/3/2017</td> <td>AESP</td> </tr> <tr> <td>25/7/17</td> <td>Turbine</td> </tr> <tr> <td>14/9/17</td> <td>OSHA</td> </tr> <tr> <td>12/9/2017</td> <td>Chemical handling</td> </tr> <tr> <td>25/7/17</td> <td>Operation</td> </tr> <tr> <td>2/8/17</td> <td>Chemical handling</td> <td rowspan="5">Jerangau Estate</td> </tr> <tr> <td>4/3/17</td> <td>Manuring</td> </tr> <tr> <td>5/4/17</td> <td>Handling tractor</td> </tr> <tr> <td>7/4/17</td> <td>Loading of FFB</td> </tr> <tr> <td>2/8/17</td> <td>Harvesting</td> </tr> <tr> <td>19/9/17</td> <td>First Aid by BOMBA</td> <td rowspan="6">Tayor Estate</td> </tr> <tr> <td>11/9/17</td> <td>Chemical handling</td> </tr> <tr> <td>20/8/17</td> <td>Buffer zone/Scheduled waste</td> </tr> <tr> <td>9/7/17</td> <td>Accident investigation</td> </tr> <tr> <td>26/7/17</td> <td>Manuring</td> </tr> <tr> <td>24/7/17</td> <td>mmmmmmmmmm</td> </tr> <tr> <td>4/4/17</td> <td>Workshop</td> <td></td> </tr> <tr> <td>2/4/17</td> <td>Harvesting</td> <td></td> </tr> </tbody> </table>	Date	Training	Remark	30/1/2017	Oil Room	STPOM	19/2/2017	SOP-Boiler	19/3/2017	AESP	25/7/17	Turbine	14/9/17	OSHA	12/9/2017	Chemical handling	25/7/17	Operation	2/8/17	Chemical handling	Jerangau Estate	4/3/17	Manuring	5/4/17	Handling tractor	7/4/17	Loading of FFB	2/8/17	Harvesting	19/9/17	First Aid by BOMBA	Tayor Estate	11/9/17	Chemical handling	20/8/17	Buffer zone/Scheduled waste	9/7/17	Accident investigation	26/7/17	Manuring	24/7/17	mmmmmmmmmm	4/4/17	Workshop		2/4/17	Harvesting		Complied
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4.8.2 Records of training for each employee shall be maintained. - Minor compliance -	Records of training for employees available and maintained. Records verified on a sampling basis at the Mill and estates visited covers all aspect of training and RSPO P&C.	Complied																																																
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.																																																		

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5.1.1 An environmental impact assessment (EIA) shall be documented. - Major compliance -	<p>There is no EIA conducted. However Environmental Aspect and Impact has been conducted for all the operations. The aspect and impact identification is conducted according to Standard Operation Manual on Environmental Aspects / Impacts Evaluation Procedure (rev 4 dated 01/01/2017).</p> <p>Mill: The Aspect & Impact Evaluation and Identification for FY 2017/2018 was sighted. The aspects and impacts for 17 operations (including reception station, Sterilizer, pressing station, incinerator, clarification station, kernel station, POME treatment plant, boiler house, water treatment plant, CPO tanks, lab, store, cafeteria, compost plant, workshop and construction site).</p> <p>Estate: The Aspect & Impact Evaluation and Identification for Jerangau and Tayor Estates was sighted. The assessment and evaluation has been conducted based on the area of operations.</p> <p>In Tayor estate, parameter drain was sighted. However the EAI was not conducted for this activity.</p>	Major nonconformance
5.1.2 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>The management plan for all operating units are provided in the "Environment Improvement Plan / Pollution Prevention Plan / Continuous Improvement Plan".</p> <p>All the management plans (for POM, Jerangau and Tayor) had not considered all the impact that were identified in the Aspect & Impact Evaluation. Currently, management plan did not include responsible person, timetable and mitigation measures.</p>	Minor nonconformance
5.1.3 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. - Minor compliance -	<p>The monitoring records of the Environment Improvement Plan / Pollution Prevention Plan / Continuous Improvement Plan are available.</p> <p>However the monitoring plan had not considered all the impacts identified in the Aspect & Impact Evaluation.</p>	Minor nonconformance
<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 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-</p> <p>The assessment has been conducted by SRA Consultancy. The report dated May 2012 had identified the HCV present at the areas. The HCV assessment is valid as the HCV</p>	Complied

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	<p>level considerations (such as wildlife corridors). - Major compliance -</p> <p>assessment was not for the purpose of new planting development.</p> <p>The map of the HCV areas are provided in the report.</p> <p>The methodology prescribe in the report stated that the border of the forest reserved is considered during the identification of the HCV.</p>	
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. - Major compliance -</p> <p>The management plan has been developed according to the recommendation by SRA Consultancy.</p> <p>TDMP conducts periodic animal sigting. The Taylor records for 2016 were reviewed by the assessment team. The records shown that the wild animal are still repeatedly sighted at the vicinity of the estates. This concludes that management plan to protect any wildlife implemented by TDMP is effective.</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. - Minor compliance -</p> <p>Interview with workers confirmed that they are aware on the forbidden of hunting and prohibit of disturbance of protected areas identified by TDMP.</p> <p>TDMP conducts regular briefing to workers during morning muster.</p> <p>Signage to continuously remind the wrokers of no hunting, fishing and the use of fire is available.</p>	Complied
5.2.4	<p>Where a management plan has been created there shall be ongoing monitoring: • 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> <p>The assessment was conducted at Tayor and Jerangau Estate. There is no RTE in this two estates. However, continuous animal sighting activities has been undertaken by TDMP.</p> <p>The monitoring records on the HCV areas (e.g. boundary of forest reserve) are available. During the field assessment, there were no encroachment observed. This is consistent with the monitoring records.</p> <p>The monitoring records are acknowledged by the estates management.</p> <p>As the monitoring plan is effectively implemented, the management had considered to continuous implement the management plan until there is necessary to improve the plan.</p>	Complied
5.2.5	<p>Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -</p> <p>It is verified that there has been no instance of HCV set-aside that conflicts with the rights of local communities at the estates visited. Thus negotiated agreement of such nature is not applicable.</p>	Complied
<p>Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>		
5.3.1	<p>All waste products and sources of pollution shall be identified and documented. - Major compliance -</p> <p>The list of waste that is produced in POM is registered in the Waste Management Plan. The type of waste identified including Scheduled waste, Domestic waste, POME and scrap metal.</p>	Complied

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	<p>The list of scheduled wastes produced in POM are registered in the "eswis" portal. The last entry of the amount of waste produced was on 30/08/2017. The submission to the "eswis" portal is being carried out every month. The "eswis" is used as the scheduled waste inventory at the POM.</p> <p>The wastes generated from Jerangau Estate has been identified in the Waste management action plan 2017/2018. The wastes identified are Scheduled waste and Domestic waste.</p>	
5.3.2	<p>All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p> <p>The disposal of scheduled waste are disposed through licensed disposal company. The current licensed disposal engaged by POM is 3R Quest Sdn Bhd. The last disposal consignment note dated 05/09/2017.</p> <p>The current licensed disposal engaged by Jerangau Estates is 3R Quest Sdn Bhd and Rengkas Maju (M) Sdn Bhd.</p> <p>The current licensed disposal engaged by Taylor Estates is Pentas Flora Sdn Bhd.</p>	Complied
5.3.3	<p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p> <p>The waste management and disposal plans has been sighted.</p> <p>The POM, Jerangau Estate Waste Management Action Plans 2017/2018 were sighted. The wastes generated were identified. Action to be taken to dispose has been provided and the person responsible has been identified.</p> <p>On site observation confirmed that the pesticide are disposed according to the action plan. In the operating units, recycle bins are available. According to the estate managers, recyclables e.g. plastics and papers are send to nearby recycle center.</p> <p>For Jerangau Estate, the chemical containers that will be triple rinsed, and recycle. There is no action for through scheduled waste collector.</p>	Complied
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		
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 biogas plant has been included in the improvement plan.</p> <p>The POM is using biomass to generated power to energies the mill's operation. The percentage of diesel use for total power generation is approximately 10%.</p> <p>The diesel consumption / mt FFB is recorded. The average diesel consumption / mt FFB is 0.67.</p> <p>The diesel consumption / mt FFB is recorded. The average diesel consumption / mt FFB is 2.02.</p> <p>The total diesel consumption for vehicles are monitored.</p>	Complied
<p>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.</p>		
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'</p> <p>The Group enforced the policy of "Zero open burning" since July 2008. Field assessment confirmed that there is no evidence of open burning.</p>	Complied

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	2003, or comparable guidelines in other regions. - Major compliance -	
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.		
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	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 -	Complied
Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.		
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.		
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Complied

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6.1.3 Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	Social Impact Assessment Action Plan Revision 2017/2018 was developed on 18/9/2017 in Mill, September 2017 for Jerangau Estate and 15/3/2017 for Tayor Estate. The plan has incorporated area of concerns, findings from SIA assessors, action plan status, remarks as well as person in charge. For eg: a. Headmistress of SK Tayor has requested to have Solat Hajat Perdana for all schools in estate area as for UPSR preparation – The event has been conducted on 29/8/2017 and interviewed with the relevant Headmistress confirmed that the management has organized such activity as per request. b. Not designated transport for emergency purpose – The recommended action to be taken was one unit of van (TAR 3826) provided to transport for emergency purpose. Interviewed with the workers confirmed that van was provided to the workers for emergency purpose. However, no specific timeline to mitigate the negative impacts and promotion of positive impacts was not available in the action plan. Thus, a major non-conformance was raised.	Major nonconformance
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 -	The last reviewed of the action plan was carried out on 18/9/2017 in mill, September 2017 in Jerangau Estate and 15/3/2017 in Tayor Estate. The plan will be reviewed on annual basis.	Complied
6.1.5 Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	Not applicable for Sungai Tong Palm Oil Mill and supply base.	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 -	TDM Plantation Sdn Bhd has developed a Communication Procedure with POM/ Estates and Flowchart to Handle Social Issue. Maximum 28 working days shall be taken to resolve the issues. All internal and external stakeholders were briefed on this procedure. Interviewed with the stakeholders during stakeholder consultation confirmed that they were briefed by the management and understood the communication procedure.	Complied
6.2.2 A management official responsible for these issues shall be nominated. - Minor compliance -	Manager of the mill and estates has been appointed as officer to handle social issue by Human Resource Department in Head Office. Appointment letter dated 2/9/2014 (Sg. Tong Mill), 18/9/2017 (Jerangau Estate and Tayor Estate) was sighted.	Complied
6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that	Stakeholder meeting was conducted on 27/7/2017 for the whole Sg. Tong Complex with the participation of internal and external stakeholders. Seen the meeting minutes and	Complied

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	<p>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 -</p> <p>attendance list. No issue was raised during the meeting. Only questions and requests were raised and immediate replies from the management during the meeting.</p> <p>Stakeholder list was developed which has included local communities, suppliers, contractors, and government authorities into the list.</p> <p>Records of Communication with Stakeholders were sighted. The stakeholders have requested through written letter and responded by the management. Evidence of payment vouchers were sighted for any donation requested by the stakeholders. Besides, interviewed with the stakeholders confirmed that the management has responded to all the requests from them and provided assistance whenever requested.</p>	
<p>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.</p>		
6.3.1	<p>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 -</p> <p>TDM Plantation Sdn Bhd has developed a Flowchart on handling social issue and Complaint/ Grievance Procedure. The management has to discuss the issue raised by stakeholders within 2 weeks for the first meeting and issues have to be resolved within 28 working days. Interviewed with the stakeholders found that they were aware of the complaint procedure.</p>	Complied
6.3.2	<p>Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –</p> <p>Jerangau Estate has implemented Report Record and found that issues raised by the workers were resolved. Sampled of complaint as below: a. Roof and the supporting of roof was broken and reported on 14/8/2017. Evidence of voucher of purchase of materials dated 23/8/2017 was sighted. The complainant has acknowledged on the record form after issue has been resolved.</p> <p>The mill has implemented Linesite Repair Report. Any complaints related to housing repair will be recorded in the report. Evidence of action taken was sighted.</p> <p>Taylor Estate has implemented Complaint Form for Housing Repair. Seen the complaints that lodged by the workers and sampled of complaint as below: House No. 10 – Roof of house was broken which lodged complaint on 19/8/2017. The management has taken action to replace the roof. Seen the tax invoice that purchase the material of roofing supporting structure.</p>	Complied
<p>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.</p>		
6.4.1	<p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.</p> <p>TDM Plantation Sdn Bhd has established Procedures for Handling Boundaries Disputes and Procedures for Handling Squatters Disputes. SOP of Calculating and Distributing Fair Compensation, Doc. No.: TDMP/SOP-ESTATE/01, Rev No.: SOP ESTATES/REV 00, Effective Date: 1/1/2017 was</p>	Complied

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- Major compliance -	established by the Head Office. The objectives of the procedure is to provide guideline to SOU on how to compensate any land disputes and ensure proper practices of compensation. The compensation can be settled by mutual agreement od refer to District Land Department to value the land on dispute. If the consultation process failed, higher authority and resurvey shall be conducted. 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 of Calculating and Distributing Fair Compensation, Doc. No.: TDMP/SOP-ESTATE/01, Rev No.: SOP ESTATES/REV 00, Effective Date: 1/1/2017 was established by the Head Office. The objectives of the procedure is to provide guideline to SOU on how to compensate any land disputes and ensure proper practices of compensation. The compensation can be settled by mutual agreement od refer to District Land Department to value the land on dispute. If the consultation process failed, higher authority and resurvey shall be conducted. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
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 reported during the time of audit through interviewed with the local communities. Trenches were available to demarcate the boundary of land between the local communities.	Complied
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.			
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	The mill and estates consist of local workers, foreign workers and contract workers. The management has included basic pay, net pay, gross pay, deduction of salary and holiday pay on the pay slip. Sampled of payslip for October 2016 (highest crop), February 2017 (lowest crop) and July 2017 as below: a. Employee No.: SM0900168 (STPOM) b. Employee No.: SM00051(STPOM) c. Employee No.: SM0900161 (STPOM) d. Employee No.: SM0900098 (STPOM) e. Employee No.: JR1503191 (Jerangau Estate) f. Employee No.: JR1403149 (Jerangau Estate) g. Employee No.: JR1102936 (Jerangau Estate) h. Employee No.: JR1102972 (Jerangau Estate) i. Employee No.: JR0800166 (Jerangau Estate) j. Employee No.: TY1100606 (Tayor Estate) k. Employee No.: TY1000273 (Tayor Estate) l. Employee No.: TY0800209 (Tayor Estate) m. Employee No.: TY1100472 (Tayor Estate) n. Employee No.: TY1000323 (Tayor Estate)	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>o. I/C No.: 560616-03-5179 (Contract Worker in Tayor Estate)</p> <p>p. I/C No.: 810201-11-5635 (Contract Worker in Tayor Estate)</p> <p>All the sampled workers below were achieved Minimum Wage Order 2016.</p> <p>Deduction of water, electricity and Tabung Haji fee was made and seen in the payslips. The management has applied the permit for deduction from Pejabat Tenaga Kerja Besut/ Setiu and the department has replied that no permit will be issued anymore. Seen the letter from the department dated February 2013 with Ref. No. PTK/ST/600.2.2(34). Consent letters signed by the workers to allow the management to deduct the relevant bills and fees were sighted.</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.</p> <p>- Major compliance -</p>	<p>Employment contract are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, public holiday entitlement and annual leave and termination of services. The contract was signed by the workers and sampled contracts as below:</p> <ul style="list-style-type: none"> a. Employee No.: SM0900231 (STPOM) b. Employee No.: SM0900232 (STPOM) c. Employee No.: SM0900168 (STPOM) d. Employee No.: SM0900161 (STPOM) e. Employee No.: JR1503191 (Jerangau Estate) f. Employee No.: JR1503208 (Jerangau Estate) g. Employee No.: JR1102968 (Jerangau Estate) h. Employee No.: JR0500166 (Jerangau Estate) i. Employee No.: TY1100606 (Tayor Estate) j. Employee No.: TY1100638 (Tayor Estate) k. I/C No.: 560616-03-5179 (Contract Worker in Tayor Estate) l. I/C No.: 810201-11-5635 (Contract Worker in Tayor Estate) <p>Extension contracts were sighted for the foreign workers who have worked more than 2 years. The terms stated in the extension contract was similar to their original signed contracts. Sampled of extension contracts as below:</p> <ul style="list-style-type: none"> a. Employee No.: TY1100500 (Tayor Estate) b. Employee No.: TY1100586 (Tayor Estate) c. Employee No.: TY1100589 (Tayor Estate) d. Employee No.: TY1100465 (Tayor Estate) e. Employee No.: TY1000299 (Tayor Estate) <p>The mill has received approval from Pejabat Tenaga Kerja Besut/ Setiu with Ref. No. PTK/ST/600.2.2 (37) dated 8/7/2014 for overtime more than 104 hours with term of getting consent letters from the workers. Seen the consent letters dated 7/8/2014 for the workers who have worked more than 104 hours. Recently, the mill has received approval from Jabatan Tenaga Kerja Semenanjung Malaysia on 9/8/2017 to work overtime for 130 hours with Ref. No. BHG. PU/9/134 JLD 9 (60). Cross checked with the Check</p>	<p>Complied</p>

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	Roll Record Book confirmed that no overtime exceeded 130 hours on August 2017.	
6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –	<p>The mill and estates management has provided free housing to all the workers with subsidized of water and electricity to certain amount. Medical facilities were provided to the workers without any charges. Schools were located in the compound as well as neighboring village.</p> <p>Linesite inspection was done on weekly basis in Jerangau Estate. 7/9/2017, 14/9/2017, 21/9/2017 and 26/9/2017 in Landas Div. and 24/8/2017, 7/9/2017, 14/9/2017 and 21/9/2017 at Jerangau Div. and seen the acknowledgement by checker, staff, assistant manager and manager. However, during linesite visit found that the perimeter drain behind House No. 16 and 18 was stagnant with water that caused the water could not properly flow. In addition, spraying at the linesite was sighted at the compound of House No. 16.</p> <p>Linesite inspection was carried out by Assistant in Taylor Estate on weekly basis. The inspection was covered the cleanliness and condition of the housing area and any burning sign. The last inspection was conducted on 17-23/9/2017. In the inspection record mentioned that rubbish was scattered behind the houses. Briefing to the workers was conducted during morning roll call. However, linesite visit during audit found that the rubbish was not properly disposed where it scattered under the wooden houses and behind the houses.</p> <p>Thus, a minor non-conformance was raised.</p>	Minor nonconformance
6.5.4 Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance –	The mill and estates were located nearby villages where the workers can access easily to adequate, sufficient and affordable foods. Interviewed with the workers found that they were satisfied with the price of goods and foods.	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 -	TDM Plantation Sdn Bhd has established Freedom of Association Policy dated 1/6/2017 which signed by CEO. All the workers are allowed to join or form any association that comply with labour law. Interviewed with the workers confirmed that they are allowed to join any association without any restriction.	Complied
6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	<p>The mill management has established Workers' Committee to discuss any issues related to working condition, wages, and housing facilities. The last meeting was conducted on 30/8/2017 with total 7 participants. No issue was raised during the meeting by verified the minutes and interviewed with the workers' representatives.</p> <p>Meeting between the management and NUPW representative was conducted on 20/4/2017 upon requested by the workers to increase the petrol allowance dated 15/3/2017. During the meeting, the management has</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
	explained the reasons of maintained the petrol allowance and it was accepted by the NUPW representative.		
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 -	TDM Plantation Sdn Bhd has developed Child Protection Policy dated 1/6/2017 which signed by CEO. The company will not recruit or exploit any individual less than 16 years old to work in the company. Seen the employee master list confirmed that all the workers were above 18 years old. Besides, interviewed with workers and stakeholders confirmed that TDM Plantation Sdn Bhd did not recruit any workers less than 18 years old.	Complied
Criterion 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 -	TDM Plantation Sdn Bhd has developed Human Rights Policy dated 1/6/2017 and Social Policy dated 1/6/2017 which signed by CEO. These policies have stated that the management was committed to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality and gender. Interviewed with workers confirmed that no discrimination was practice by the management. Briefing of the policies were provided to the workers on 20/8/2017. The policies were displayed at the notice board outside the office. Besides, the mill has displayed the Job Advertisement on the notice board at office and at security post. The last job advertisement was offered on 15/5/2017.	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 -	Through document reviewed on the list of employees found that the composition of workers are local, foreign workers and contract workers, male and female workers. Interviewed with the sampled female and male workers from different nationalities confirmed that no discrimination was happened. They are allowed to transfer work station by getting approval from management if they felt unfit on the work assigned. Besides, verified the payslips for female and male workers found that they were paid according to Minimum Wage Order 2016 without discrimination on gender.	Complied
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 -	TDM Plantation Sdn Bhd has developed Foreign Workers Policy dated 1/6/2017 where the company has decided to recruit foreign workers within the framework of Employment Act 1955, Immigration Act 1959/63 and Workmen's Compensation Act 1952. Besides, the Human Resource Department has developed a flowchart for recruitment of foreign workers. The flowchart has explained the process of how the company recruits for foreign workers.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			

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Criterion / Indicator	Assessment Findings	Compliance
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 -	TDM Plantation Sdn Bhd has developed Gender Policy and Reproductive Policy dated 1/6/2017 which signed by CEO. The management will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment, religious, gender and country of origin. They will ensure that the rights of women will be protected. Briefing of the policies were provided to the workers on 20/8/2017 and the policy been explained again during Gender Committee Meeting on 20/9/2017.	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 -	TDM Plantation Sdn Bhd has developed Gender Policy and Reproductive Policy dated 1/6/2017 which signed by CEO. The management will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment, religious, gender and country of origin. They will ensure that the rights of women will be protected. Briefing of the policies were provided to the workers on 20/8/2017 and the policy been explained again during Gender Committee Meeting on 20/9/2017. Besides, memorandum on "No work with pesticide for confirmed pregnant and breast-feeding women was issued on 1/1/2017 to ensure no chemical works among pregnant and breast-feeding women. Seen the notification for reassignment of work dated 23/7/2017 to transfer the pregnant spraying worker to linesite sweeper for 3 years.	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 -	<p>The mill management has established Gender Committee to handle and monitor the gender issue. Seen the appointment letter of the committees which valid until 31/12/2018. Meeting was conducted on 20/9/2017 with total 15 members attended. Sighted the meeting minutes and interviewed with the representative confirmed that no sexual harassment case was reported so far. Besides, the committee has organized many activities that involved the female workers such as Bowling competition among the members, Awareness seminar on cancer in female and health inspection on 10/9/2017.</p> <p>Gender Committee was established in Jerangau Estate. Last meeting was conducted on 14/9/2017 with the participation of 8 members. Meeting minutes was sighted and issues raised during meeting was resolved. Interviewed with the female workers (manuring) found that no sexual harassment or violence case reported so far. Activities such as bowling and Zumba dance was organized with the involvement of female workers.</p> <p>Gender Committee was established. The last meeting conducted on 13/9/2017. Issues raised during meeting was clarified and solved by interviewed with the Chairman of Gender Committee.</p>	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 -	Not applicable as Sungai Tong Palm Oil Mill has stopped received FFB from outsiders.	Not applicable
6.10.2 Evidence shall be available that growers/millers have explained FFB	Not applicable as Sungai Tong Palm Oil Mill has stopped received FFB from outsiders.	Not applicable

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Criterion / Indicator	Assessment Findings	Compliance	
	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 -		
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 -	Sampled of Work Order Agreement between contractors and management are as below: a. Order No.: STOM: 250/17 for providing labour, materials, and transport for repair the monsoon drainage in the office area which valid until 30/9/2017. b. LJR No.: 03/17 for providing labour to work as harvester in field which valid until 31/12/2017. c. Order No.: LT- 02/17 to carry out transport of FFB in field 98 which valid until 31/12/2017. Payment mechanism has stated in the agreement.	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	The payment was made by Head Office after the mill has sent the invoice to Head Office. Interviewed with the contractors confirmed that the payment was made promptly.	Complied
Criterion 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 –	The mill management has made contribution to the local communities and the workers. For eg: The management has donated RM 300 to SMK Sungai Tong for Community Day, sport day and family day was organized to celebrate together with the employees, provided transport to the students for any activities that requested by the Headmasters. Besides, job opportunities were given to local communities where all of the workers in mill are Malaysian. SK Telemong has requested the management to plant few coconut trees in the school compound on 13/4/2017. The management has approved on 18/4/2017 with Ref No.: TDMP/LIR/RSPO.	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 –	Not applicable for Sungai Tong Palm Oil Mill and supply base.	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 -	The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers and contract workers. Contract of employment was signed by the workers prior to work. Sampled of foreign workers with valid work permit as below: a. Permit No.: PD 7252765 valid until 13/2/2018 (Jerangau Estate) b. Permit No.: PD 4605388 valid until 16/6/2018 (Jerangau Estate) c. Permit No.: PD 6983536 valid until 18/1/2018 (Jerangau Estate) d. Permit No.: PD 6742785 valid until 29/10/2017 (Jerangau Estate)	Major nonconformance

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> e. Permit No.: PD 8049899 valid until 9/5/2018 (Contract Worker in Jerangau Estate) f. Permit No.: PD 8533715 valid until 7/5/2018 (Tayor Estate) g. Permit No.: PD 6921379 valid until 29/10/2017 (Tayor Estate) h. Permit No.: PD 7252059 valid until 19/1/2018 (Tayor Estate) i. Permit No.: PD 3459520 valid until 28/2/2018 (Tayor Estate) j. Permit No.: PD 8534410 valid until 17/8/2018 (Tayor Estate) <p>Interviewed with the foreign workers sampled below found that they are not allowed to take their passport whenever they intended to leave the estates during off day or annual leave. Photocopied of passport and letter of travelling issued by the management were only given to the workers. Besides, the workers did not know what the purpose of keeping passport by the employers even though they have signed on the consent letters dated 1/2/2017 in Tayor Estate and employment contracts for the safe keeping of passport by the management. Sampled of workers as below:</p> <ul style="list-style-type: none"> a. Employee No.: JR1202992 b. Employee No.: JR1102968 c. Employee No.: JR1102972 d. Employee No.: TY1100616 e. Employee No.: TY1100418 f. Employee No.: TY1100567 <p>Thus, a major non-conformance was raised.</p>	
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	Interviewed with the foreign workers confirmed that no substitution of contract has occurred. The work condition and job position was the same as they were been informed in Indonesia and Bangladesh prior to Malaysia.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	TDM Plantation Sdn Bhd has implemented Code of Ethical Conduct Policy dated 1/8/2017. The policy has stated the following criteria as below:	Complied
<p>Criterion 6.13: Growers and millers respect human rights.</p>			
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 -	TDM Plantation Sdn Bhd has developed Human Rights Policy dated 1/6/2017 and Social Policy dated 1/6/2017 which signed by CEO. Briefing of the policies were provided to the workers on 20/8/2017. The policies were displayed at the notice board outside the office.	Complied
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	Not applicable in Peninsular Malaysia.	Not applicable

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<p>a process to secure these children access to education as a moral obligation.</p>			
<p>Principle 7: Responsible development of new plantings Sg Tong 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>			
<p>8.1.1</p>	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • 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); • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>The continual improvement plan for mill was last reviewed on 18/09/2017. Comparing to the 2016/2017 Improvement plan for mill, it was identified biogas project improvement and approval of budget for new boiler shows the continuous improvement for environmental and air emission.</p>	<p>Complied</p>

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Appendix B: Approved Time Bound Plan

No	Name of the Estate and Mills	TBP for certification	Status as Aug, 2016	Any unresolved (Labour Disputes/Land conflicts/Legal Non-Compliance etc.)	
1	TDM Plantation Sdn. Bhd. Tebak Estate , Kemaman, Terengganu, Malaysia	Supply base for TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill, Kemaman, Terengganu, Malaysia.	Nov, 2013	Certified	None
2	TDM Plantation Sdn. Bhd. Pelantoh Estate , Kemaman, Terengganu, Malaysia		Nov, 2013	Certified	None
3	TDM Plantation Sdn. Bhd. Jernih Estate , Kemaman, Terengganu, Malaysia		Nov, 2013	Certified	None
4	TDM Plantation Sdn. Bhd. Air Putih Estate , Kemaman, Terengganu, Malaysia		Nov, 2013	Certified	None
5	TDM Plantation Sdn. Bhd. Gajah Mati Estate, Dungun, Terengganu, Malaysia		Nov, 2013	Certified	None
6	TDM Plantation Sdn. Bhd. MAIDAM Estate, Dungun, Terengganu, Malaysia		Nov, 2013	Certified	None
1	TDM Plantation Sdn. Bhd. Tayor Estate, Setiu, Terengganu, Malaysia	Supply base for TDM Plantation Sdn. Bhd. Sungai Tong Palm Oil Mill, Setiu, Terengganu, Malaysia.	Dec, 2013	Certified	None
2	TDM Plantation Sdn. Bhd. Pelong Estate , Setiu, Terengganu, Malaysia		Dec, 2013	Certified	None
3	TDM Plantation Sdn. Bhd. Jaya Estate , Setiu, Terengganu, Malaysia		Dec, 2013	Certified	None
4	TDM Plantation Sdn. Bhd. Fikri Estate , Setiu, Terengganu, Malaysia		Dec, 2013	Certified	None
5	TDM Plantation Sdn. Bhd. Pinang Emas Estate, Dungun, Terengganu, Malaysia		Dec, 2013	Certified	None
6	TDM Plantation Sdn. Bhd. Jerangau Estate, Ajil, Terengganu, Malaysia		Dec, 2013	Certified	None

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Appendix C: Certification Unit RSPO Certificate Details

TDM Plantation Sdn. Bhd.
Sungai Tong Palm Oil Mill
Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu
21500 Setiu, Terengganu, Malaysia
RSPO membership number: 1-0095-11-000-00

BSI RSPO Certificate No. : RSPO 595564
Date of Initial Certificate Issued: 27/12/2013
Date of Expiry: 26/12/2018
Applicable Standards: RSPO P&C MYNI-2014; RSPO Supply Chain Certification Standard November 2014 Module E
– CPO Mills: Mass Balance)

Sg Tong Palm Oil Mill and Supply Base					
Location Address	Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu 21500 Setiu, Terengganu, Malaysia				
GPS Location	102° 54' 37.80" E ; 5° 18' 29.88" N				
CPO Tonnage Total	55,457.90 mt				
PK Tonnage Total	14,416.60 mt				
CPO Claimed for Certification*	55,457.90 mt				
PK Claimed for Certification *	14,416.60 mt				
Own estates FFB Tonnage	262,120 mt				
Scheme Smallholder FFB Tonnage	-				
Estates	Production Area		Other use (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Jaya Estate	3,365.50	-	90.29	3,455.79	76,800.00
Fikri Estate	3,198.85	-	512.20	3,711.05	63,400.00
Tayor Estate	2,143.41	-	131.27	2,274.68	40,950.00
Pelong Estate	1,238.81	222.26	1,556.13	3,017.20	12,000.00
Jerangau Estate	1,436.57	-	44.36	1,480.93	28,300.00
Pinang Emas Estate	2,153.39	705.52	812.01	3,670.92	40,670.00
TOTAL	13,536.53	927.78	3,146.26	17,610.57	262,120.00

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Appendix D: Assessment Plan

Date	Time	Subjects	Nicholas	Ning Shing	Mohd Hafiz
Monday 25/09/2017	PM	Audit Team travelling to Terengganu	√	√	√
Tuesday 26/09/2017 Sungai Tong Palm Oil Mill	0700-0830	Travel from Hotel Primula to site	√	√	√
	0830-0900	Opening Meeting at Sungai Tong Palm Oil Mill <ul style="list-style-type: none"> • Presentation by TDM Team (if any) • Presentation by BSI Lead Auditor - introduction of team member and assessment agenda • Confirmation of assessment scope and finalized stakeholders list for interview 	√	√	√
	0900-1230	Sungai Tong POM Mill Visit covering FFB receiving, milling process, warehouse, workshop, wastes management storage & Landfill, Effluent Ponds, OSH & ERP, SEIA requirement, POME application, water treatment, chemical storage, laboratory, housing and facility inspection, clinic, etc	√	√	√
		Interview with stakeholders: Workers, Union Leader, contractor, village rep RSPO Supply Chain for CPO mill, weighbridge and storage area.	-	√	-
	1230-1330	Lunch	√	√	√
	1330-1700	Sungai Tong POM <ul style="list-style-type: none"> • Verification of effectiveness of findings closure • Document review P1 – P8: Transparency and commitments, Legal Requirement, Land use rights and compensation, Organization structure and responsibility, Long Term Economic and financial viability, Mill best practices, OHS, Workers training, Pay and contract, Social and Environment Assessment/Management Plan/ Monitoring, Workers' Grievances and complaints, Equality, human right and no harassment, Forced and trafficked labor , HCV Assessment/Management Plan/ Monitoring, Peat Conservations (if any), Community/stakeholder engagement, New Planting (if any), Continuous Improvement Plans, Supply Chain elements at POM. 	√	√	√
	1700-1730	Interim Closing briefing	√	√	√
Wednesday 27/09/2017 Tayor Estate	0830-1230 1100-1230	Tayor 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.	√	√	√

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Date	Time	Subjects	Nicholas	Ning Shing	Mohd Hafiz
		Community/stakeholder/workers engagement, worker housing, clinic, social requirements,	√	√	√
	1230-1330	Lunch	√	√	√
	1330-1700	Tayor Estate <ul style="list-style-type: none"> • Verification of effectiveness of findings closure • Document review P1 – P8: Transparency and commitments, Legal Requirement, Land use rights and compensation, Organization structure and responsibility, Long Term Economic and financial viability, Estate best practices, OHS, Workers training, Pay and contract, Social and Environment Assessment/Management Plan/ Monitoring, Workers' Grievances and complaints, Equality, human right and no harassment, Forced and trafficked labor , HCV Assessment/Management Plan/ Monitoring, Peat Conservations (if any), Community/stakeholder engagement, New Planting (if any), Continuous Improvement Plans, Supply Chain elements at POM. 	√	√	√
	1700-1730	Interim Closing briefing	√	√	√
Thursday 28/09/2017 Jerangau Estate	0830-1030	Jerangau 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.	√	√	√
		Community/stakeholder/workers engagement, worker housing, clinic, social requirements,		√	
	1230-1330	Lunch	√	√	√
	1330-1600	Continue records review	√	√	√
	1600-1645	Prepare for closing meeting	√	√	√
	1645-1730	Closing meeting	√	√	√
	Friday 29/09/2017	AM	Audit Team traveling back to KL	√	√

Appendix E: Stakeholders Contacted

<p>Internal Stakeholders</p> <ul style="list-style-type: none"> • Managers and Assistant Managers • Staff and Clerks • Foreign Workers • Gender Committee Leader • Field workers 	<p>Union/Contractors/Local Communities</p> <ul style="list-style-type: none"> • NUPW representatives • Puteri UMNO • Sekolah Kg Jaya • Sekolah Kg Tayor • Sin Joo Tak Trading (Contractor) • KT Mega Steel Sdn Bhd (Contractor) • Cahaya Nilam East (Contractor)
<p>Government Departments</p> <ul style="list-style-type: none"> • Department of Environment, State of Terengganu • Human Resource Department, State of Terengganu • Department of Occupation Health and Safety, State of Terengganu 	<p>NGO</p> <p><i>Note: no specific contentious issues found</i></p>

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Appendix F: CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance

Requirements	Compliance
E.1 Definition	
<p>E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The Palm Oil Mill receives both certified and non-certified FFB and only processes certified FFB. The Palm Oil Mill only acts as weighing station to receive non-certified crop from outsiders and transfer the FFB to other palm oil mills. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>
E.2 Explanation	
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the 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 should 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>E.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p> <p>Sungai Tong Palm Oil Mill has registered under the RSPO IT, Palm Trace system. Member Name: Sungai Tong Palm Oil Mill Member ID: RSPO_PO1000001113</p> <p>However, the transactions for the Contract No. PO 170605, PO 170706 and PO 170811 has yet to be announced and confirmed in the Palm Trace system. Thus, a major non-conformance was raised.</p>
E.3 Documented procedures	
<p>E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>Latest written documented procedures with Doc. No. TDM/STPOM/03, Revision STPOM-01/2015 dated 1/9/2015 for the chain of custody is with Mass Balance (MB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and noncertified FFB. This developed based on the RSPO SCCS 21 November 2014. The Mill Manager has the responsibility to ensure implementation assisted by the Compliance Executive. The MB model is used because certified and non-certified FFB from own supply base, adjacent certified group estates and independent FFB supplied/smallholder are received and only processed certified FFB from own supply base at Sungai Tong Palm Oil Mill.</p> <p>The Mill Manager, Assistant Manager and Compliance Executive have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>

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E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBS.	The documented procedures with Doc. No. TDM/STPOM/03, Revision STPOM-01/2015 dated 1/9/2015 for the incoming FFB, processing and outgoing palm products (CPO and PK). System available to make marking on the receiving documents to differentiate the certified and non-certified FFB received.
E.4 Purchasing and goods in	
E.4.1 The site shall verify and document the volumes of certified and non-certified FFBS received.	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. Records of weighbridge tickets are verified by internal and external audit.
E.4.2 The site shall inform the CB immediately if there is a projected overproduction.	The documented procedures with Doc. No. TDM/STPOM/03, Revision STPOM-01/2015 dated 1/9/2015 for the incoming FFB, processing and outgoing palm products (CPO and PK). The facilities aware of this procedure.
E.5 Record keeping	
E.5.1 a) 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. (b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. Computerized system in place. Records verified by internal and external audit. Sampled of weighbridge tickets are as below: <ul style="list-style-type: none"> a. Docket No.: P0227308 dated 14/8/2017 – 8.64MT b. Docket No.: P0227303 dated 14/8/2017 – 9.19MT Computerized system in place with the delivery deducted accordingly. The Mill aware that only positive stock can be delivered. No short selling.
E.5.2 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement	No outsourcing activities.

Actual Tonnage Certified Palm Production – 01 September 2016 – 31 August 2017 (ASA4)

Mill	Capacity	CPO	PK
Sg Tong Palm Oil Mill	60 mt/hr	42,506.82	10,883.11

Actual Tonnage Sales of Certified Palm Products – 01 September 2016 – 31 August 2017 (ASA4)

Mill	Certified CPO Sales	Certified PK Sales	Remarks
Sg Tong Palm Oil Mill	24,840.54	3,800.00	-

Actual Tonnage Sales of Certified Palm Products (under other Scheme) - 01 September 2016 – 31 August 2017 (ASA4)

Mill	Certified CPO Sales	Certified PK Sales	Remarks
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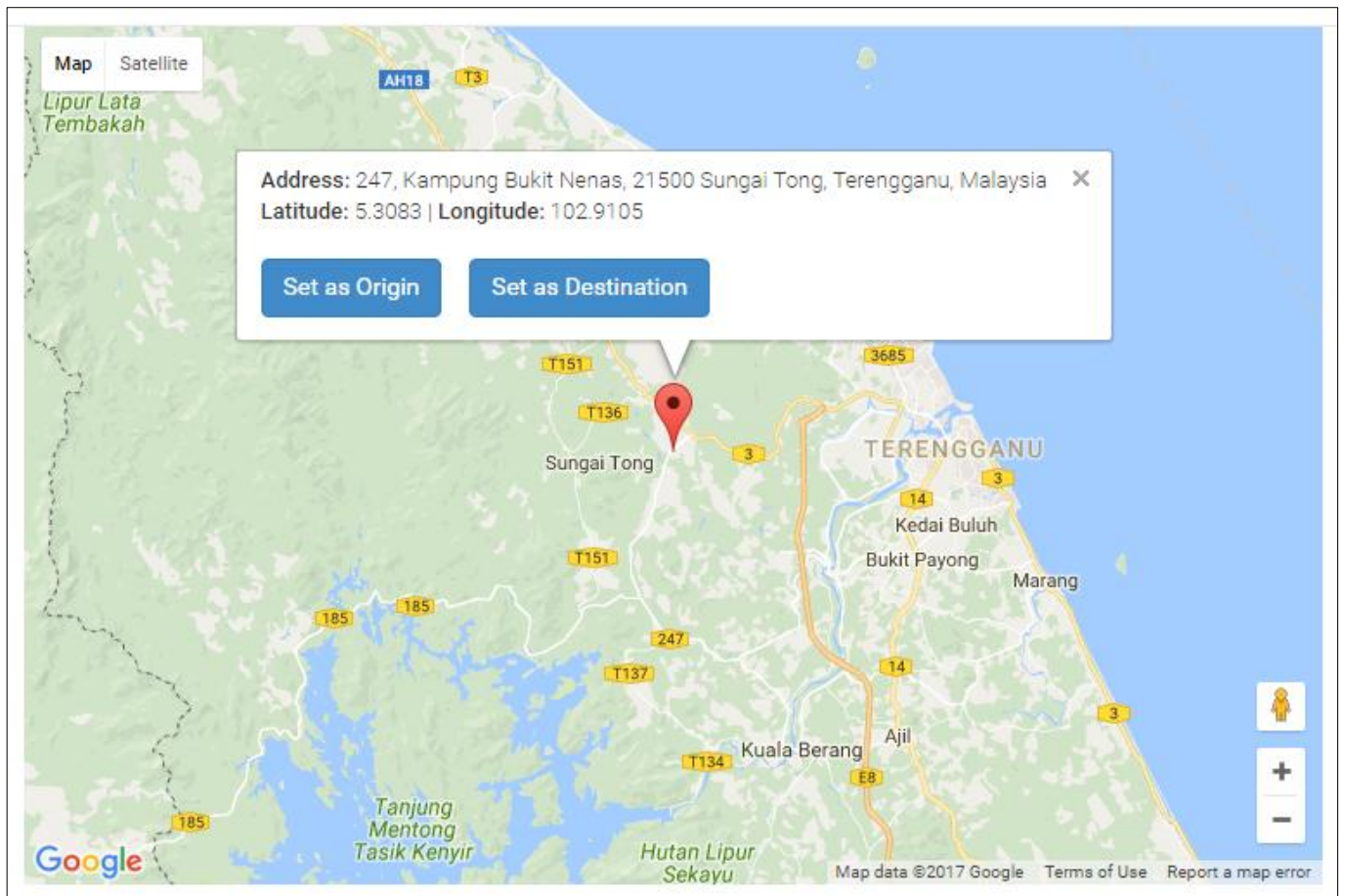
Sg Tong Palm Oil Mill	-	-	-
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Actual Tonnage Sales of Conventional Palm Products – 01 September 2016 – 31 August 2017 (ASA4)

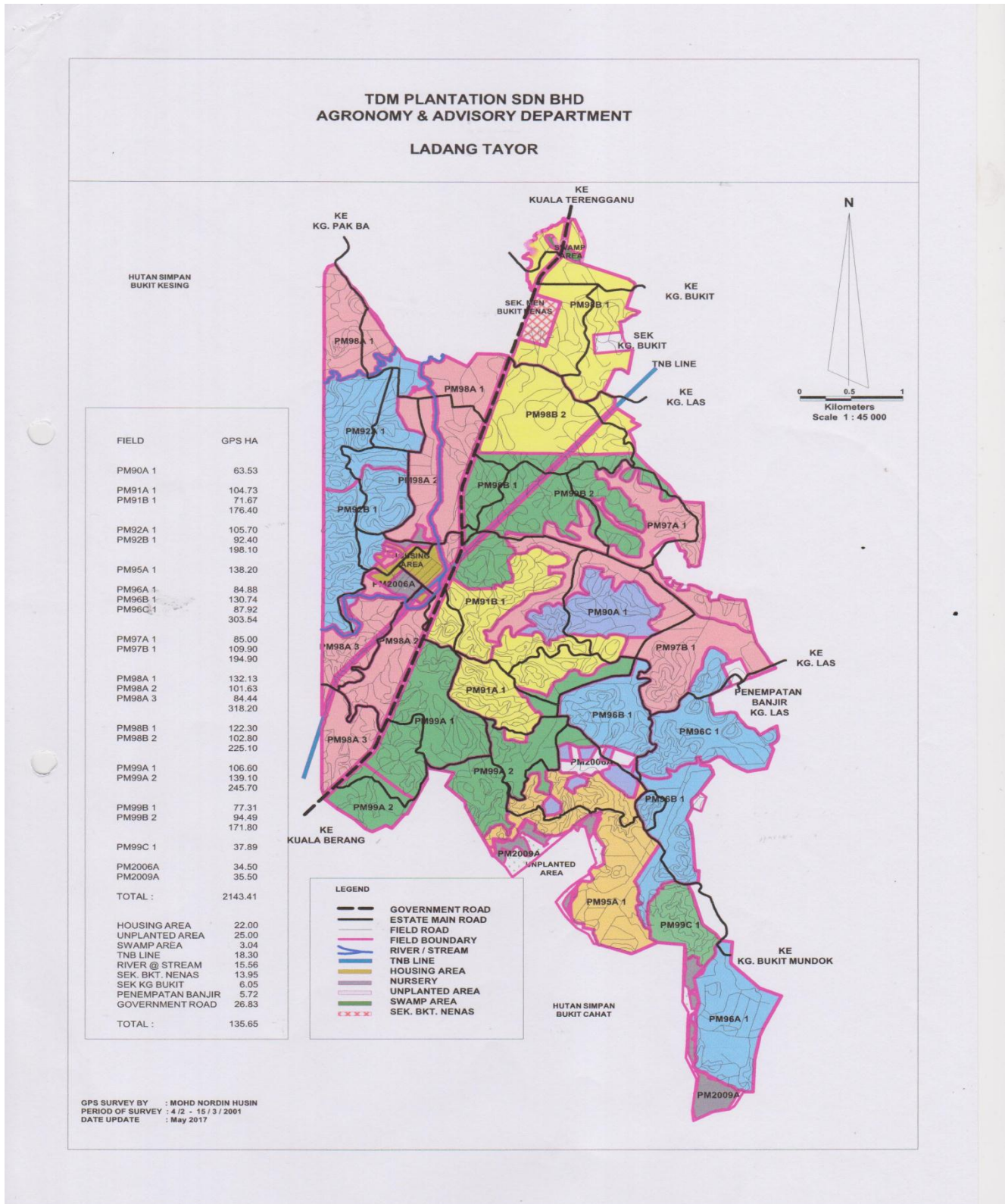
Mill	CPO Sales	PK Sales	Remarks
Sg Tong Palm Oil Mill	17,666.28	7,083.11	-

Month	Sg Tong POM							
	Jaya Estate	Fikri Estate	Tayor Estate	Pelong Estate	Jerangau Estate	Pinang Emas Estate	Gajah Mati Estate	Total FFB/Month (mt)
Sep-16	7,753.03	4,573.72	3,786.12	1,209.30	1,607.65	54.79	68.97	19,053.58
Oct-16	8,656.18	5,027.11	4,866.84	1,320.19	1,996.51	47.48	-	21,914.31
Nov-16	7,208.53	5,010.00	4,289.37	1,263.54	1,990.80	359.49	178.03	20,299.76
Dec-16	6,515.39	4,354.89	3,257.04	1,177.54	2,002.93	360.74	177.99	17,846.52
Jan-17	5,291.45	3,883.96	2,706.76	974.42	1,622.18	-	-	14,478.77
Feb-17	3,906.31	3,181.24	2,368.57	783.52	1,405.34	-	-	11,644.98
Mar-17	4,499.26	3,738.22	2,590.69	918.14	1,470.82	260.88	-	13,478.01
Apr-17	4,580.83	4,104.50	2,941.47	1,088.28	1,828.13	699.45	-	15,242.66
May-17	5,087.17	4,887.05	3,632.92	1,287.74	2,302.72	1,180.14	-	18,377.74
Jun-17	3,924.23	3,375.04	2,350.14	990.20	1,749.17	103.12	-	12,491.90
Jul-17	5,750.25	4,400.08	3,330.39	1,036.94	1,608.43	293.78	-	16,419.87
Aug-17	7,912.94	5,059.77	3,441.60	1,072.74	1,786.42	678.73	-	19,952.20
TOTAL	71085.57	51,595.58	39,561.91	13,122.55	21,371.10	4,038.60	424.99	201,200.30

Appendix G: Location Map of Sungai Tong Palm Oil Mill and Supply bases



Appendix H: Taylor Estate Field Map



Appendix I: Jerangau 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 Sg Tong 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 GHGplam 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 Sg Tong Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.23
PKO	0.23

Extraction	%
OER	20.42
KER	5.27

Production	t/yr
FFB Process	169,141.65
CPO Produced	40,488.59
PKO Produced	10,459.58

Land Use	Ha
OP Planted Area	14,284.48
OP Planted on peat	0
Conservation (forested)	90.29
Conservation (non-forested)	0
Total	14,374.77

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	87,017.15	0.5	0	0	0	0	87,017.15	0.5
CO ₂ Emission from fertilizer	7,564.95	0.04	0	0	0	0	7,564.95	0.04
NO ₂ Emmision	6,164.14	0.04	0	0	0	0	6,164.14	0.04
Fuel Consumption	927.02	0.01	0	0	0	0	927.02	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-101,905.5	-0.57	0	0	0	0	-101,905.5	-0.57
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	-231.64	0.02	0	0	0	0	-231.64	0.02

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	10,509.33	0.06
Fuel Consumption	352.49	0
Grid Electricity Utilisation	142.32	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	11,004.14	0.06

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	2,209.38
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 (%)	0

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
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EIA	Environmental Impact Assessment
EMS	Environmental Management System
ERP	Emergency Response Plan
FFB	Fresh Fruit Bunch
HCV	High Conservation Value
HIRARC	Hazard Identification, Risk Assessment and Risk Control
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
MPOA	Malaysian Palm Oil Association
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
MY-NI	Malaysian National Interpretation
NGO	Non Governmental Organisation
OSH	Occupational Safety & Health
OUs	Operating Units
P&D	Pest & Disease
PK	Palm Kernel
PKO	Palm Kernel Oil
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