



# RSPO PRINCIPLE AND CRITERIA - Annual Surveillance Assessment 1.2 Public Summary Report

### PT. Tolan Tiga Indonesia

Client company Address: Gedung Bank Sumut 7<sup>th</sup> Floor, Jl. Imam Bonjol No.18, Medan, 20152 Sumatera Utara Province

Indonesia
Certification Unit:

Perlabian Palm Oil Mill

Location of Certification Unit: Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province – 21463 Indonesia





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### **Section 1: Scope of the Certification Assessment**

1. Company Details				
RSPO Membership Number	1-0021-05-000-00	Date	7 <sup>th</sup> December 2005	
Company Name	PT. Tolan Tiga Indonesia			
Address	Head Office: Gedung Bank Sumut 7th Floor, Jl. Imam Bonjol No.18, 20152 Medan, Sumatera Utara Province – Indonesia  Site Location: Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province – 21463			
Subsidiary of (if applicable)	Part of SIPEF NV, Belgium			
Contact Name	Mr. Olivier Tichit (Director)			
Website	www.tolantiga.com	E-mail	ortichit@sipef.com	
Telephone	+62 61 415 2043	Facsimile	+62 61 452 0908	

2. Certification Information								
Certificate Number	RSPO 555208		Date	17 <sup>th</sup> May	2015			
Scope of Certification  Production of crude palm oil ar company-owned plantation nam Mill capacity is 60 tonnes FFB/I								
Other Certifications								
Certificate Number	Standard(s)	Certifi	cate Issued b	У	Expiry Date			
EU-ISCC-Cert-DE101-16489433	ISCC EU	DQS-UL C	CFS GmbH	25	<sup>th</sup> November 2017			
01 100 106312	ISO 9001:2008	TUV Rheii	nland	14	th September 2018			
01 104 106312	ISO 14001:2008	TUV Rheii	nland	14	th September 2018			

3. Location(s) of Mill & Supply Bases						
Name	GF	S				
(Mill / Supply Base)	Location [Map Reference #]	Easting	Northing			
Perlabian POM	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency,	100° 04′ 57.19″ E	02° 03′ 40.98″ N			



	Sumatera Utara Province, Indonesia		
Perlabian Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province	100° 04′ 52.40″ E	02° 03′ 37.60″ N
Tolan Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Regency, Sumatera Utara Province, Indonesia	100° 02′ 30.66″ E	02° 00′ 11.78″ N

4. Description of Supply Base										
Estate	Mature (ha)	Immature (ha)	Infrastructure & Other (ha)	HCV area (ha)	Total Planted (ha)	Total Hectarage	% of Planted			
Perlabian Estate	3,823.15	635.95	188.54	59.38	4,459.10	4,807.02	92.76			
Tolan Estate	3,579.40	0	36.65	55.99	3,579.40	3,672.04	97.47			
Total	7,402.55	635.95	225.19	115.37	8,038.50	8,479.06	95.21			

5. Plantings & Cycle									
	Age (Years)					Tonnage / Year			
Estate	0 – 3	4 - 10	11 - 20	21 - 25	26 - 30	Estimated (May 2016 – April 2017)	Actual (May 2016 – April 2017)	Forecast (May 2017 – April 2018)	
Perlabian Estate	635.95	1,851.21	815.55	1,156.39	0	95,000	82,453	105,688	
Tolan Estate	0	388.99	2,687.51	502.90	0	100,000	80,003	105,180	
<b>Total Certified</b>	635.95	2,240.20	3,503.06	1,659.29	0	195,000	162,456	210,868	

6. Certified Tonnage									
	Estimated			Actual		Forecast			
Mill	(May 2016 - April 2017)		(May 2016 - April 2017)		(May 2017 - April 2018)		2018)		
	FFB	СРО	PK	FFB	СРО	PK	FFB	СРО	PK
Perlabian POM	195,000	44,991	10,758	162,456	42,532	11,018	210,868	48,500	11,598

<sup>\*</sup>OER: 23.00 %; KER: 5.50%



### 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.c

Nicholas Cheong: <u>Nicholas.Cheong@bsigroup.com</u>

www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (RSPO-ACC-19) to conduct RSPO assessment since 10/31/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Singapore, Jakarta, Bangkok and Australia which involve in RSPO Certification Program.

#### Assessment Methodology, Programme, Site Visits

The on-site Annual Surveillance Assessment 1.2 was conducted from  $20 - 22^{nd}$  February 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. 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 & Criterias INA NI September 2016 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 of its supply base. The estates sample were determined based onformula  $N=0.8\sqrt{y}$  where y is the number of estates while the smallholders sample were determined following the RSPO Certification Requirement for Group Certification 2010. 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. There was no smallholder audited, under the scope of PT. Tolan Tiga Indonesia.

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 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 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)	Year 1	Year 2	Year 3	Year 4	Year 5	
Perlabian POM	Χ	Χ	Χ	Χ	Х	
Perlabian Estate	X	X	X	X	X	
Tolan Estate	X	X	X	X	X	

Tentative Date of Next Visit: February 20, 2018 - February 22, 2018

Total No. of Mandays: twelve (12) mandays

**BSI** Assessment Team:

#### Pratama Sedayu - Auditor (Lead Auditor)

He graduated from University of Jenderal Soedirman on 2008, majoring in Social Economic of Agriculture. He involved in RSPO certification since 2009 as a team member subsequently as a Lead Auditor, covering assessment against RSPO P&C in Indonesia, Malaysia, Thailand, Papua New Guinea, and Liberia. He completed the ISO 9001, ISO 14001, OHSAS 18001 Lead Auditor Course, HCV Identification and Management; ISPO Lead Auditor endorsed Course and RSPO P&C and RSPO SCCS Lead Auditor endorsed Courses. During this assessment, he assessed on the aspects of estate best practices, environment, OHS, and Smallholder audits. He is fluently speaking in English and Bahasa Indonesia.

### Nanang Mualib - Team member

He holds a Bachelor degree in Forestry Technology from Bogor Agriculture University, 1999. He has 4 years experience worked in the Forest plantation company in Indonesia, and has experiences involves in the several RSPO certification audits as team member. He has attended the 5 days RSPO P&C Certification System Assessment Training held by PT. Mutuagung Lestari on 2009 as well as 5 days ISO 9001 auditor training on 2009. He has been approved as an HCV Assessor under RSPO Scheme. He has been involved in many assessment related to the

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Forestry and Sustainable oil palm certification in Indonesia. He has experienced involves in RSPO certification assessments more than 15 different oil palm organizations (including mills and estates) in Indonesia. He is also familiar with RSPO P&C Certification assessment and qualified as audit team member. During this assessment, he assessed on the aspect of Legal, HCV identification and management, and also social community engagement and stakeholder consultation as well as smallholder audits.

#### Imam Fakhrurozi - Team Member

Imam holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta on 2011. He had 2 (two) years working experience related to oil palm industry, as a sustainability and HSE officer in oil palm Plantation Company in Indonesia. Imam has completed a number of relevant trainings, the training includes ISO 9001:2008 and EMS 14001:2004 Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed course. Currently he works for BSI Group based in Jakarta office. He is one of the BSI qualified RSPO auditor. He had been involved in RSPO auditing since 2015. During this assessment, he assessed on the aspects of mill and estate best practices, environment and OHS.

**Accompanying Persons: Nil** 





### **Section 3: Assessment Findings**

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

X	SIPEF	, NV. Time Bound Plan
	<b>RSPO</b>	Group Certification Standard 2016 Checklist
	<b>RSPO</b>	P&C for Smallholders TH-WG 2012 Checklist
	<b>RSPO</b>	P&C GN-NIWG 2010 Checklist
$\boxtimes$	<b>RSPO</b>	P&C INA-NIWG 2016 Checklist
	<b>RSPO</b>	P&C PNG-NIWG 2016 Checklist
	<b>RSPO</b>	P&C SI-NIWG 2010 Checklist
	<b>RSPO</b>	P&C MY-NIWG 2014 Checklist
	<b>RSPO</b>	P&C TH-WG 2011 Checklist
$\boxtimes$	<b>RSPO</b>	Supply Chain Certification Checklist November 2014
	<b>RSPO</b>	P&C 2013 Generic Checklist

### 3.2 Progress against Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bo	und Plan	
Does the plan include all subsidiaries, estates and mills?	Yes, SIPEF NV has disclose all of its companies, mills and estates. The timebound plan including un-certified units/companies.	Comply
<ul> <li>Is the time bound plan challenging?</li> <li>Age of plantations.</li> <li>Location.</li> <li>POM development</li> <li>Infrastructure.</li> <li>Compliance with applicable law.</li> </ul>	SIPEF's time bound plan is timely challenging. SIPEF NV has putting consideration on age of plantation, size of plantation as supply base with regards to location of palm oil mill in preparing the time bound plan.	Comply
Have there been any changes since the last audit? Are they justified?	Yes, there are changes in time bound plan compared to the latest annual surveillance assessment.  PT. Agro Kati Lama, change the certification date from 2019 to 2021;  PT. Agro Muara Rupit, change the certification date from 2019 to 2024;  PT. Agro Rawas Ulu, change the certification date from 2019 to 2024.  SIPEF NV provides sufficient explanation on the changes in implementation of timebound plan: SIPEF latest projections stipulates that company will have enough crop to justify the building of the two mills by the year 2021 (for Kati Lama Mill) and 2024 (for Muara Rupit Mill), as indicated in the time-bound plan. The target years for the building of these mills have been	Comply

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	set taking into consideration the current rate of planting in the three estates and plasma schemes that will consitute the supply base of the two mills.	
If there have been changes, what circumstances have occurred?	Audit team accepted management explanation on the matter.  Yes, there are changes in time bound plan compared to the latest annual surveillance assessment.  PT. Agro Kati Lama, from 2019 to 2021;  PT. Agro Muara Rupit, from 2019 to 2024;  PT. Agro Rawas Ulu, from 2019 to 2024.	Comply
	SIPEF NV provides sufficient explanation on the changes in implementation of timebound plan: SIPEF latest projections stipulates that company will have enough crop to justify the building of the two mills by the year 2021 (for Kati Lama Mill) and 2024 (for Muara Rupit Mill), as indicated in the time-bound plan. The target years for the building of these mills have been set taking into consideration from latest management review on the current rate of planting in the three estates and plasma schemes that will consitute the supply base of the two mills.	
Have there been any stakeholder comments?	Audit team accepted management explanation on the matter.  Yes. Stakeholder comments are noted. Company informed certification body on the stakeholder comments and follow up the comment in appropriate manner.  Certification body does aware of stakeholder comments, and incorporate any stakeholder comment into part of assessment and reported in public summay report.	Comply
Have there been any newly acquired subsidiaries?	No newly acquired company.	Comply
Have there been any isolated lapses in implementation of the plan?	No isolated lapse. SIPEF NV provides adequate evidence related to changes in implementation of the plan.	Comply
<b>Un-Certified Units or Hol</b>	dings	
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes. Company conduct internal audit for un-certified unit/company. Internal audit plan: Internal audit PT. Agro Kati Lama, for first half 2017has been carried out, subsequent internal audit planned for 4-9 <sup>th</sup> August 2017. Internal audit PT. Agro Muara Rupit, dated 6 – 11 <sup>th</sup> March 2017 and 18 – 23 <sup>rd</sup> September 2017. Internal audit PT. Agro Rawas Ulu, dated 27 <sup>th</sup> February – 4 <sup>th</sup> March 2017 and 11 – 16 <sup>th</sup> September 2017.	Comply
No replacement after dates defined in NIs Criterion 7.3: • Primary forest. • Any area identified as	Audit team does notice PT. Umbul Mas Wisesa was following RSPO Remediation and compensation procedure. Remediation and compensation plan was evident, progress report in line with plan was evident.  For all other non-certified unit, land clearing/conversion/planting	Comply

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was carried out after HCV assessment carried out.	Connelle
complies with RSPO New Planting Procedure.  Record seen:  RSPO NPP for PT. Mukomuko Agro Sejahtera has been uploaded in RSPO website for public notification on 6 <sup>th</sup> March 2012.	Comply
No land conflict noted. Company demonstrated land conflict is following FPIC principle. Audit team verifies through internal audit record for un-certified unit/company.  Record seen:  Internal audit PT. Agro Kati Lama seen. Internal audit report shows 25 non-conformities and findings were raised. The internal audit report indicated, there was no land conflict noted. However, internal audit raised findings related to consistent provision of documented negotiation records. Management unit was conducting correction and corrective action to rectify this issue.	Comply
No outstanding labor dispute noted. Audit team verifies through internal audit record for un-certified unit/company. Record seen: Internal audit PT. Agro Kati Lama seen. Internal audit report shows 25 non-conformities and findings were raised. The internal audit report indicated, there was no labor dispute/industrial dispute noted.	Comply
Yes, SIPEF NV conducted internal audit for all of un-certified unit/company. Audit team verifies through internal audit record for un-certified unit/company. SIPEF NV provides positive assurance statement.  Record seen: Internal audit PT. Agro Kati Lama seen. Internal audit report shows 25 non-conformities and findings were raised. The internal audit report indicated, there was no land conflict noted.  Positive assurance statement has been provided by General Manager South Sumatera Operation, as lined out in "Pernyataan Kesanggupan Memenuhi Prinsip dan Kriteria RSPO dan Kebijakan-Kebijakan Perusahaan", dated 19th December 2016. The statement indicated that PT. Agro Kati Lama, PT. Agro Rawas Ulu and PT. Agro Muara Rupit — as a member of RSPO, committed to respect and implement company polcies, as well as following and implementing all RSPO requirements related to	Comply
	All new planting after January 1st, 2010 have undergone and complies with RSPO New Planting Procedure. Record seen: RSPO NPP for PT. Mukomuko Agro Sejahtera has been uploaded in RSPO website for public notification on 6th March 2012.  No land conflict noted. Company demonstrated land conflict is following FPIC principle. Audit team verifies through internal audit record for un-certified unit/company. Record seen: Internal audit PT. Agro Kati Lama seen. Internal audit report shows 25 non-conformities and findings were raised. The internal audit report indicated, there was no land conflict noted. However, internal audit raised findings related to consistent provision of documented negotiation records. Management unit was conducting correction and corrective action to rectify this issue.  No outstanding labor dispute noted. Audit team verifies through internal audit record for un-certified unit/company. Record seen: Internal audit PT. Agro Kati Lama seen. Internal audit report shows 25 non-conformities and findings were raised. The internal audit report indicated, there was no labor dispute/industrial dispute noted.  Yes, SIPEF NV conducted internal audit for all of un-certified unit/company. Audit team verifies through internal audit record for un-certified unit/company. SIPEF NV provides positive assurance statement. Record seen: Internal audit PT. Agro Kati Lama seen. Internal audit record for un-certified unit/company. SIPEF NV provides positive assurance statement. Record seen: Internal audit PT. Agro Kati Lama seen. Internal audit report shows 25 non-conformities and findings were raised. The internal audit report indicated, there was no land conflict noted.  Positive assurance statement has been provided by General Manager South Sumatera Operation, as lined out in "Pernyataan Kesanggupan Memenuhi Prinsip dan Kriteria RSPO dan Kebijakan-Kebijakan Perusahaan", dated 19th December 2016. The statement indicated that PT. Agro Kati Lama, PT. Agro Rawas Ulu and PT. Agro Maura Rupit — as a member of RSPO, committed



	and criteria. Companies also committed to follow up all finding, both internal and external.	
Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	No outstanding legal non-compliance identified. Audit team verifies through internal audit record for un-certified unit/company. Record seen: Internal audit PT. Agro Kati Lama seen. Internal audit report shows 25 non-conformities and findings were raised. The internal audit report indicated, there was no serious legal non-compliance identified. However, internal audit raised findings related to consistent update on list of relevant laws and regulations. Management unit was conducting correction and corrective action to rectify this issue.	Comply

### 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 annual surveillance assessment 1.2, there was no nonconformity raised at PT. Tolan Tiga Indonesia - Perlabian Palm Oil Mill certification unit.

	Non-Conformity		
NCR #	Description	Category (Major / Minor)	
	Requirements Nil  Evidence of Nonconformity	Major	
	Statement of Nonconformity		
Non-Conformity			

	Observation
OFI#	Description
1	Indicator 4.6.7:
	Fertilizer warehouse and chemical store in estates have been prepared with Material Safety Data Sheet/MSDS. Based on interview with chemical storekeepers, the understanding for emergency situation is sufficient. Emergency situation being simulated during the interview related to chemical/fertilizer expose to the eye/soft tissue. Chemical storekeeper was able to explains the first aid treatment, through flushing with flowing clean water for minimum 15 minutes. Chemical storekeeper has been able to point out the only eye wash is available near the premise and it's working. However, it appeared that location of eye wash was distant from risked area. Area of concern relates to whether eye wash are being suitably sufficient and located for emergency situation in the area.



2	Indicator 4.7.5:
	In Perlabian POM, the mill management has prepared tool and equipment such as fire hydrant, in the
	case of fire emergency situation. There are three points of fire hydrant in mill compound; in loading
	ramp, pressing station and biogas plant. The use of fire hydrant was bwing simulated during visit to mill.
	It was observed during the assessment that access to key, required for opening hydrant lock, was posing
	difficulty to the operation in its timely retrieval. However, the hydrant was successfully operating. This
	may reflect on emergency team's general ability to react to ensure emergency fire fighting equipment is
	ready-to-use, where and when it is needed, through timely retrieval.

	Positive Findings		
PF#	Description		
1	Good update and evaluation of legal compliance, referring to latest requirements identified under RSPO Principle and Criteria 2013 – Indonesia National Interpretation, September 2016.		

### Issues raised by Stakeholders

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT. Tolan Tiga Indonesia – Perlabian Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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.

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

the intern	ial or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix E.
IS#	Description
1	Issues
	Tanjung Medan Village, Air Merah Village, Tanjung Selamat Village
	- Until now, there was no land dispute between company and surrounding community.
	- Company was actively participated in religious festivities, coordinated by government authority of Labuhan Batu Selatan Regency.
	<ul> <li>PT. Tolan Tiga Indonesia has provided clean water aid to Tanjung Medan Village in form of bore well.</li> <li>Community was expecting company to improve the participation for free-medical activity and productive economy development activities.</li> </ul>
	- PT. Tolan Tiga Indonesia has carried out land compensation for land belong community with traditional rights during land compensation phase.
	- PT. Tolan Tiga Indonesia has conducted Corporate Social Responsibility/Community Development program in good manner, in particular road maintenance program and provision of clean water for needing community member.
	- Opportunity for employment and rate of local manpower absorption from company is sufficient.  Adequate job vacancy was given to community/village. The recruitment process was following



selection and adjustment on roles and responsibility. Community/village wishes the process can be maintained, and improved.

### **Management Responses**

- There was no land conflict in area of PT. Tolan Tiga Indonesia.
- PT. Tolan Tiga Indonesia is actively participated in religious festivities.
- Company aknowledge the input from local community related to provision of bore well.
- Company wishes the aid related to medical service and/or productive economy activities prepared with proposal.
- Company provides aid and donation to local community, in accordance to proposal being presented to company. For instance provision of clean water supply for the needing community.
- Company always give job opportunity for community around mill and estate, in accordance to company need and vacancy availability.

#### **Audit Team Findings**

- Audit team acknowledge the inputs from community, and verified company's response.

### IS # Description

#### 2 Issues

#### Samsul Bahri Manurung - Contractor for replanting and FFB transport

- Company has communicating to contractor related to environment management, use of PPE, etc.
- Contractor has provided PPE for its worker.
- Contractor has registering all of its worker with social insurance, "BPJS Ketenagakerjaan and BPJS Kesehatan".
- Contractor has paid the worker salary above the minimum wage.
- All workers both operators and helpers was originated from surrounding community/villages.
- PT. Tolan Tiga Indonesia has made the payment in line with the timeframe stipulated in the work agreement.
- Hazardous waste produced on the field was managed by sending to contractor's office in Rantau Parapat.

#### **Management Responses**

- PT. Tolan Tiga Indonesia has communicating the policy on environment management, use of PPE, code of ethical conduct, etc. Hazardous waste from contractor operation was sent to the office.
- Contractor has provided PPE for its worker, as per work agreement.
- Contractor has registered all of its worker under BPJS Ketenagakerjaan and BPJS Kesehatan, as per work agreement.
- Contractor has paid the salary of its worker, following minimum wage regulation.
- The majority of contractor's worker comes from surrounding community/villages.
- PT. Tolan Tiga Indonesia pays the contractor ontime.

#### **Audit Team Findings**

Audit team consider this as positive finding.

### IS # Description

#### 3 Issues

#### Pengurus Serikat Pekerja Tolan Tiga Mandiri – Worker Union

- Worker unon represented by the chairman, secretary, Perlabian Estate leader and Tolan Estate leader.
- Relationship between worker union and company is relatively good. Meeting between company and worker union was on regular basis, in line with bi-partite meeting.
- There has been no grievance from worker throughout 2016.
- Company has provided facility for the worker, housing with clean water and electricity, medical clinic, school, school bus, religious house, sport facility, etc.
- There is a bi-partite organization, for mediation between worker and company.



- All normative rights has been stipulated in the collective work agreement. Worker union has always been involved in policy making related to manpower/industrial relatino. This was reflected during preparation of "Perjanjian Kerja Bersama/PKB" collective work agreement. Currently the collective work agreement has been established for period 2017-2019.
- Company has implemented minimum wage, as in "Upah Minimum Sektoral Kabupaten" for salary payment standard. The standard was referring to 2016 standard. However, company was accommodating meeting for salary increment to be in line with minimum wage 2017 regulation.
- Company has registering all worker under "BPJS Ketenagakerjaan" for social insurance.
- There is an annual worker performance evaluation, in order to determine promotion, etc.
- Company has communicated the health and safety policy, provided personal protective equipment (PPE) for all worker, provided first aid box at various premises. Company has also performed regular medical check up for all worker.
- Company has communicated the complaint and grievance settlement mechanism.

### **Management Responses**

- In order to maintain good relationship, company meeting with worker union on monthly base.
- There has been no complaint from worker, only reports related to request for house repair.
- Company provides housing, clean water, worker's hall, religious house, sports facility, school.
- LKS Bipartit bi-partite organization has been established as "Peraturan Menteri Tenaga Kerja dan Transmigrasi No.32 tahun 2008.
- All normative requirements have been stipulated in collective work agreement.
- Company has fulfilled worker's normative right such as salary payment in accordance with regulation, provision of personal protective equipment, registering all worker under "BPJS Ketenagakerjaan" for social insurance, and other rights in line with regulation and collective work agreement.
- Company carried out annual worker performance evaluation.
- No industrial relation dispute noted.
- Medical check up for all worker provided on December 2016.
- Company is respecting and uphold each worker rights to organize and collective bargain. In line with company policy, worker union in PT. Tolan Tiga Indonesia named "Serikat Pekerja Tolan Tiga Mandiri".
- Company and worker union has agreed to established bipartite organization.
- Company has a mechanism for complaint and grievance settlement, and has been communicated accordingly.

#### **Audit Team Findings**

Audit team has verified the statement from worker union and company. Audit team consider the input as positive findings.

#### IS # Description

#### 4 Issues

### Komite Gender PT. Tolan Tiga Indonesia – Gender Committee

- Company has implementing the female worker's right such as regular medical checkup for female sprayers, menstrual leave right, maternal leave and breast-feeding leave, gender equality in payment, etc.
- Policy on gender equality, female worker protection, protection of female worker's reproductive rights has been disseminated duringregular meeting, morning muster and available on notice boards.
- No sexual harassment case and/or violence case noted and/or recorded up to now.
- Most of female worker, conducting work in plant upkeep.
- Company has conveyed the mechanism for complaint and grievance settlement.

#### **Management Responses**

- Company communicating the policy on gender and mechanism for grievance related to sexual harrassment through regular meeting, morning muster.
- Policy related to gender equality, protection of reproductive rights and related policies available on



	notice board at each estate and palm oil mill.		
	- Company gives equal opportunity to work, for male and female worker, in accordance to skill and		
	company need.		
	- In order to protect worker's right, female worker in particular, company helps the establishment of		
	gender committee. Gender committee is the organization to accommodate complaint and reports		
	related to gender issue: harrassment, insult, etc Company giving the reproductive rights for female workers, in accordance to relevant regulation and		
	collective work agreement.		
	- Company has a specific mechanism for complaint and grievance settlement related to gender issue.		
	This has been communicated to all worker.		
	Audit Team Findings		
	Audit team has verified and accepted the statement from gender committee and company.		
IS#	Description		
5	Issues		
	Dinas Tenaga Kerja Kabupaten Labuhanbatu Selatan		
	- There has been no negative issue related to industrial relation/manpower provision on PT. Tolan Tiga		
	Indonesia.		
	- For the past 4 years, there has been no industrial relation dispute in PT. Tolan Tiga Indonesia.		
	- Company and the worker union has prepared the collective work agreement, company referring to		
	BKS-PPS.		
	- In PT. Tolan Tiga Indonesia, there was worker union established "Serikat Pekerja Tolan Tiga Mandiri".		
	- Worker salary has meet the regulation on minimum wage.		
	<ul> <li>Company has registering all of its worker under "BPJS Ketenagakerjaan" and "BPJS Kesehatan".</li> <li>Company has meet all of its reporting obligation.</li> </ul>		
	- Medical check up has been provided for all of its worker.		
	- Regular inspection for Perlabian POM machinery has meet regulation.		
	Management Responses		
	- PT. Tolan Tiga Indonesia complies with all manpower regulation. Therefore, no negative issue related		
	to industrial relation/manpower provision on PT. Tolan Tiga Indonesia noted.		
	- For the past 4 years, there has been no industrial relation dispute in PT. Tolan Tiga Indonesia.		
	- Company and the worker union has the approved collective work agreement, prepared in agreement		
	between company and worker union. Its in line with "Undang-undang No.13 tahun 2003 tentang		
	Ketenagakerjaan".		
	- In PT. Tolan Tiga Indonesia, there was worker union established "Serikat Pekerja Tolan Tiga Mandiri".		
	- Worker salary has meet the regulation on minimum wage.		
	- Company has registered all worker under "BPJS Ketenagakerjaan" and "BPJS Kesehatan".		
	- Company provides official report and been sent to relevant government offices, including "Dinas Tenaga Kerja dan Transmigrasi".		
	- Medical check up has been provided for all of its worker.		
	- Regular inspection for Perlabian POM machinery has meet regulation.		
	Audit Team Findings		
	Audit team has verified and accepted the statement from government and company.		
IS#	Description		
6	Issues		
	Badan Lingkungan Hidup Kabupaten Labuhanbatu Selatan		
	- The permit for temporary hazardous waste storage was active, valid up to 2020.		
	- For the hazardous waste management, company has in cooperation with license collector and		
	transporter, the performance has been reported to "Badan Lingkungan Hidup Kabupaten Labuhan batu		
	Selatan" PT. Tolan Tiga Indonesia has consistently monitor and managed the environment – as well as		
	- FT. TOTAL TIGA INQUIRESTA HAS CONSISTENTLY INTUITION AND INTUITION THE ENVIRONMENT — AS WELL AS		



reporting the environment management performance on regular basis.

- PT. Tolan Tiga Indonesia has consistently reporting the management of POME and hazardous waste from palm oil mill.
- "Badan Lingkungan Hidup Kabupaten Labuhanbatu Selatan" currently developing program for management of domestic waste. It was expected that company can support the program by combining the domestic waste management in company sites with government and helping in provision of portable waste been.
- "Pondok Pesantren Ridho Allah" in Perlabian village was filing a complaint related to waste/refuse in boundary drain, which disturbing the surrounding of the premise.
- "Badan Lingkungan Hidup Kabupaten Labuhanbatu Selatan" wanted to be positioned as company's partner in environment management.

#### **Management Responses**

- The permit for temporary hazardous waste storage in PT. Tolan Tiga: No.503/319/BPPTPM-LS/P.I/2015, valid up 22<sup>nd</sup> June 2020. The other permit No. 503/318/BPPTPM-LS/P.I/2015 valid up 22<sup>nd</sup> June 2020.
- Company is in cooperation with PT. Amindy Barokah, whose holds permit from Ministry of Environment No.SK 353/Menlhk-Setjen/2015, valid up tp 31<sup>st</sup> August 2020. The work agreement between PT. Tolan Tiga Indonesia and PT. Amindy Barokah as per "Surat Perjanjian Kerjasama No.095/TTI-ABS/SPK-LB3/III/2017.
- PT. Tolan Tiga Indonesia has consistently monitor and managed the environment, as per environment management and monitoring plan "RKL/RPL" and reporting the environment management performance on regular basis to "Badan Lingkungan Hidup Kabupaten Labuhanbatu Selatan".
- PT. Tolan Tiga Indonesia has consistently reporting the management of POME and hazardous waste from palm oil mill.
- PT. Tolan Tiga Indonesia fully support government program. However, the type of support will be determine in accordance to the proposal/application for cooperation from "Badan Lingkungan Hidup Kabupaten Labuhanbatu Selatan".
- PT. Tolan Tiga Indonesia and "Badan Lingkungan Hidup Kabupaten Labuhanbatu Selatan" has conducted joint visit to premise near "Pondok Pesantren Ridho Allah" in Perlabian village, and it was come to knowledge the waste/refuse was from surrounding villager. Company has installed warning sing to prohibit throwing waste into boundary drain.
- Company noted the goodwill from "Badan Lingkungan Hidup Kabupaten Labuhanbatu Selatan" and company is always positioning as partner in environment management. Regular reporting on environmental performance, company supports planting tree program "Program Penanaman 1 Miliar Pohon" was located in Perlabian Estate, dated 21<sup>st</sup> December 2016.

#### **Audit Team Findings**

Audit team has verified the statement from "Badan Lingkungan Hidup Kabupaten Labuhanbatu Selatan" and company. Audit team accepts the comments.

### 7 Issues

### Badan Lingkungan Hidup Kabupaten Labuhanbatu Selatan

- No report from community related to environmental pollution from operation/activity of PT. Tolan Tiga.
- No report from community related to land conflict/land dispute in the area of PT. Tolan Tiga Indonesia.
- Community was expecting company to improve the participation for free-medical activity and productive economy development activities
- Opportunity for employment and rate of local manpower absorption from company is sufficient. Adequate job vacancy was given to community/village. The recruitment process was following selection and adjustment on roles and responsibility. Community/village wishes the process can be maintained, and improved.

### **Management Responses**

- Company acknowledge there was no report from community related to environmental pollution from operation/activity of PT. Tolan Tiga and land conflict/land dispute in the area of PT. Tolan Tiga



Indonesia.

- Free-medical activity and productive economy development activities will be channelled to local community as the application accepted by management.
- PT. Tolan Tiga Indonesia provides opportunity for employment for local manpower absorption.

### Audit Team Findings

Audit team has verified the statement from the NGO and company. Audit team accepts the comments.

### 3.3.1 Status of Nonconformities Previously Identified and Observations

	Non-Conformity	
NCR #	Description	Catgory (Major / Minor)
1304318N1	Requirements RSPO P&C - Indicator 4.7.6 Records of handling of the complaints  Evidence of Nonconformity PT. Tolan Tiga Indonesia has not carried out general medical checkup for all workers once a year at minimum.  Statement of Nonconformity This minor nonconformity escalated from previously raised observation on same indicator. PT Tolan Tiga Indonesia has not carried out general medical checkup for all workers once a year at minimum.  Actions PT. Tolan Tiga Indonesia has taken correction upon the non conformity.  In Perlabian POM: Company doctor (base in Head Office Medan, Hiperkes No.Kep 55/BINWASSK3-PNK3/KK/II/2016) has conducted general medical checkup in December 2016. The general medical check up covers 85 workers in Perlabian POM, e.g. Mr. Fitriadi (office), Mr. Ahmad Affan (biogas operator), Mr. Agus Salim (Driver), Mr. Agus Hermanto (Processing Station), Mr. Abdul Rahim (workshop), etc. Perlabian POM has also carried out special medical checkup for workers on high risk area; on 5th December 2016 for 9 workers (chemical handler) and on 25th May 2016 for 27 workers, conducted by Klinik Spesialis Augerah  Libu Medan.  2. Tolan Estate: General medical checkup has conducted in December 2016 for 258 workers and special medical checkup covering 68 workers (manuring, spraying, heavy equipment operator). This has covers all worker. As of February 2017, effective employee in Tolan Estate is 314 workers.	Minor
	As a corrective action plan, PT. Tolan Tiga Indonesia has established a health and safety management plan, whereby including program for general medical check up for all worker - once a year, as in "Program Panitia Pembina Kesehatan dan Keselamatan Kerja Lingkungan Hidup Sosial 2016". In 2017, the program continues as presented in "Program Panitia Pembina Kesehatan dan Keselamatan Kerja Lingkungan Hidup Sosial tahun 2017".  Closed?	
	Audit team has reviewed all objective evidence presented to close out	



minor non conformity. The corrective action plan has been continuously implemented in 2017. Audit team has evaluated and decided the evidences are sufficient.	
NC Minor closed on 23 <sup>rd</sup> February 2017.	

	Observation
OBS #	Description
1	RSPO P & C – Indicator 1.1.2  The company has determined response of request information as regulated in circular letter no. 55/GMO-All/III/2014, dated 8 March 2014. Request information will be responded within 2 days in Estate or mill, except is needed response from HO - Medan, it will be responded within 5 days. There is request information in UMWS from Sei Toras Sub Villages on 15 January 2014, regarding using road more than twice a week, may wish to consider record of response appropriately
	Action Taken: Based on interview with local community leaders, it was confirmed that the company has response their request timely manner.
2	RSPO P & C – Indicator 4.7.1  A number of Opportunity for Improvement noted:  1. May wish to consider medical sterilizer with larger capacity for clinic;  2. PT UMW-South Estate may wish to consider installation of lightning arrester for diesel fuel tank and pump;  3. PT UMW-South Estate workshop need to consistently control diesel fuel containment valve and oil trap;  4. PT UMW POM may wish to consider provision of fire extinguisher at Barumun river pump house.  Action taken:  1. Based on field visit in clinic, it was found that the clinic has provided temporary storage for medical waste prior sent it to the "TPS limbah B3"  2. The company has installed lighting arrester in diesel tank and pump.  3. The company has monitored consistenly containment valve in workshop to prevent contamination to the environment.  4. The company has provided fire extinguisher at Barumun River Pump House.
3	RSPO P & C – Indicator 5.3.2  It is noted that lack of temperature control and monitoring over incineration process for an-organic waste handling at PT UMW and PT TUM incinerator. Care should be taken to improve incineration technique to mitigate prolonged smoke emission, causing residual environmental impact.  Action taken:  The company has taken action to minimise prolonge smoke emission with scheduling burning and increasing temperature.
4	RSPO P & C – Indicator 5.3.3  A number of Observation noted: 1. The current time frame for medical waste disposal is every three months. Clinic may wish to consider shorter period of time for disposal to municipal incinerator. 2. Consideration should be taken to consistently dispose used spill kit from PT UMWS lubricant store onto hazardous waste store, instead of incinerator.  Action Taken:



	ore to the hazardous waste store and recorded ector.
Faction taken:  The company has built the new crèche with capacity 50 ch	J

### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
032936M0	Major	15 <sup>th</sup> March 2014	Closed on 14 <sup>th</sup> May 2014
1032936M16	Major	15 <sup>th</sup> March 2014	Closed on 14 <sup>th</sup> May 2014
1032936M27	Major	15 <sup>th</sup> March 2014	Closed on 14 <sup>th</sup> May 2014
1032936N1	Minor	15 <sup>th</sup> March 2014	Closed on 1 <sup>st</sup> April 2015
1032936N11	Minor	15 <sup>th</sup> March 2014	Closed on 1 <sup>st</sup> April 2015
1032936N25	Minor	15 <sup>th</sup> March 2014	Closed on 1 <sup>st</sup> April 2015
1032936N26	Minor	15 <sup>th</sup> March 2014	Closed on 1 <sup>st</sup> April 2015
1032936N28	Minor	15 <sup>th</sup> March 2014	Closed on 1 <sup>st</sup> April 2015
1149548M1	Major	1 <sup>st</sup> April 2015	Closed on 5 <sup>th</sup> May 2015
1174416N1	Minor	1 <sup>st</sup> April 2015	Closed on 16 <sup>th</sup> March 2016
1149548N1	Minor	1 <sup>st</sup> April 2015	Closed on 16 <sup>th</sup> March 2016
1304318N1	Minor	16 <sup>th</sup> March 2016	Closed on 23 <sup>rd</sup> February 2017





#### **Assessment Conclusion and Recommendation:**

Based on the findings during the assessment of PT. Tolan Tiga Indonesia - Perlabian Palm Oil Mill Certification Unit and supply base complies with the RSPO P&C 2013, Indonesia National Interpretation, September 2016 and the RSPO Supply Chain Certification Standard (Nov 2014) for CPO Mill. It is recommended that the certification of PT. Tolan Tiga Indonesia - Perlabian Palm Oil Mill Certification Unit is approved and continued.

Acknowledgement of Assessment Findings	Report Prepared by
Name: Mr. Olivier Tichit	Name: Pratama Agung Sedayu
Company name: PT. Tolan Tiga Indonesia	Company name: On behalf of BSI Services Malaysia Sdn Bhd
Title: Director	Title: Lead Auditor
Signature:	Signature:
Date: 29 MARCH 2017	Date: 23rd March 2017



### **Appendix A: Summary of Findings**

Criterior	n / Indicator	Assessment Findings	Compliance	
Principl	e 1: Commitment to Trans	sparency		
Criterior	n 1.1:			
legal issu	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	List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available.  - Minor compliance -	Perlabian POM has a procedure for receiving and responding to inquiry and/or information request as in "Prosedur Pemberian Tanggapan terhadap Permintaan Informasi No.ENC/SOP/08" dated 6 <sup>th</sup> April 2015. The procedure stated, initial response provided in seven (7) working days by unit manager; an additional three (3) working days if the inquiry requires GMO or department head authorization; an additional seven (7) working days if the inquiry requires Medan Head Office authorization — at the latest, after information request accepted by unit.  See 1.2.1	Comply	



Criterion /	/ Indicator	Assessment Findings	Compliance
i 1	Records of requests for information and responses to the information requested shall be available.  - Major compliance -	Perlabian POM: Perlabian POM has a number of logbook to record information/aid request — Rekaman Permintaan Permohonan Bantuan Dari Masyarakat; inquiry — Rekaman Permintaan Informasi dan Tanggapan, stakeholder consultation — Rekaman Konsultasi dan Komunikasi Stakeholders, internal and external grievance — Rekaman Keluh Kesah; consultation and communication — consultation and communication record.  Sample seen: - Rekaman Konsultasi dan Komunikasi Stakeholders, incoming letter from Perlabian village head, dated 19 <sup>th</sup> December 2016, No. 430/483/PPL/XII/2016 related to communication on comprehensive law — responded on same date, by Mill manager Reporting on Pelaksanaan RKL-RPL, as per letter No.12/PLM-II/2017 dated 16 <sup>th</sup> February 2017, whereby Perlabian POM is sending report on social environmental impact management and monitoring plan to "Kepala Dinas Lingkungan Hidup Kabupaten Labuhanbatu Selatan" Inquiry from "Dinas Lingkungan Hidup Kabupaten Labuhanbatu Selatan" Inquiry from "Dinas Lingkungan Hidup Kabupaten Labuhanbatu Selatan" The response provided by Perlabian POM on 3 <sup>rd</sup> February 2017 via letter No.08/PLM-02/2017 with "Laporan Pengelolaan Sampah Periode Januari-Februari 2017" to "Kepala Dinas Lingkungan Hidup Kabupaten Labuhanbatu Selatan" Letter from "Dinas Kehutanan dan Perkebunan" No.525/0587/Hutbun/2016 dated 9 <sup>th</sup> June 2016 related to CPO data — responded through mail No.23/PLM-6/2016 dated 13 <sup>th</sup> June 2016 attaching the CPO production report.  Tolan Estate: Information request and response recorded under "Rekaman Permintaan Informasi dan Tanggapan". Sample taken: Incoming Letter from Kepala Desa Perkebunan Perlabian No.400/022/PPL/I/2017, dated 18 <sup>th</sup> January 2017, related to dispensation for a number of worker to participate in village meeting. The letter accepted on same date, response provided by sending the workers for village meeting, dated 18 <sup>th</sup> January 2017; catal the January 2017; catal the January 2017 in Labuhanbatu Selatan, No.606/612/BLH/1/2016, dated 5 <sup>th</sup> October 2016	Comply



Criterion / Indicator	Assessment Findings	Compliance
	Perlabian Estate: Information request and response recorded under "Rekaman Permintaan Informasi dan Tanggapan". Sample taken: Incoming Letter from "Universitas Islam Labuhan Batu — Fakultas Ekonomi", No.A.40/200/FE/2016 dated 14 <sup>th</sup> June 2016, related to permit for student's research. Response provided with approval. Another logbook was recording the verbal communication as in "Buku Permintaan Informasi yang Disampaikan Secara Lisan". Sample taken: local village requesting for mosquito fogging on 20 <sup>th</sup> September 2016. Estate manager responded by sending fogging team on 21 <sup>st</sup> September 2016.	

#### **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.



Criterior	/ Indicator	Assessment Findings	Compliance
1.2.1	Publicly available documents shall include, but are not necessarily limited to:  a) Land titles/user rights (Criterion 2.2) b) Occupational health and safety plans (Criterion 4.7) c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8) d) HCV documentation (Criteria 5.2 and 7.3) e) Pollution prevention and reduction plans (Criterion 5.6) f) Details of complaints and grievances (Criterion 6.3) g) Negotiation procedures (Criterion 6.4) h) Continual improvement plans (Criterion 8.1) i) Public summary of certification assessment report j) Human Rights Policy (Criterion 6.13) Major compliance —	Perlabian POM: Perlabian POM has identified and determined document that available for public, as in "Dokumendokumen yang tersedia untuk Umum" dated 3rd January 2017. The list consist of: Izin Usaha Tetap atas nama PT. Tolan Tiga Indonesia; Surat Pendaftaran Usaha Perkebunan atas nama PT. Tolan Tiga Indonesia; Sertifikat Tanda Bukti Hak; Izin usaha Perkebuan; Analisis Dampak Lingkungan; Dokumen Rencana Pengelolaan Lingkungan dan Rencana Pemantauan Lingkungan; Penyajian Evaluasi Lingkungan; Laporan-laporan Pelaksanaan RKL/RPL setiap semester; Iin Gangguan (HO) atas nama PT. Tolan Tiga Indonsia sesuai Keputusan Badan Pelayanan Perizinan Terpadu dan Penanaman Modal Kabupaten Labuhanbatu Selatan; Izin Penyimpanan Sementara Limbah B3 PT. Tolan Tiga Indonesia Kebun/PKS Perlabian; Prosedur Ganti Rugi Lahan; Program Kesehatan dan Keselamatan Kerja; Rencana Perbaikan Berkelanjutan Kebijakan-kebijakan Perusahaan; Rencana Pengurangan dan Pencegahan Polusi; Rangkuman Publik dan Laporan Hasil Sertifikasi; Rekaman Keluh Kesah Internal dan Eksternal.  Tolan Estate: Tolan Estate has identified and determined document that available for public, as in "Dokumendokumen yang tersedia untuk Umum" dated 6th February 2017. The list consist of:  Akta Pendirian Perusahaan PT. Tolan Tiga Indonesia – deed of establishment; Pemberian Hak Guna Usaha PT. Tolan Tiga Indonesia – Plantation Business Permit; Surat Pendaftaran Usaha Perkebunan atas nama PT. Tolan Tiga Indonesia – Plantation Business Registration; Sertifikat Tanda Bukti Hak – Land certificate; HCV Assessment by YASBI; Izin Usaha Perkebunan; Analisis Dampak Lingkungan; Dokumen Rencana Pengelolaan Lingkungan dan Rencana Pemantauan Lingkungan — Social	Comply
		Environmental Management and Monitoring Plan;	



Criterion / Indicator	Assessment Findings	Compliance
riterion / Indicator	- Laporan-laporan Pelaksanaan RKL/RPL setiap semester – Report of Environmental management and monitoring; - Iin Gangguan (HO) atas nama PT. Tolan Tiga Indonesia – hinder ordonantie; - Prosedur Ganti Rugi Lahan – land compensation procedure; - Program Kesehatan dan Keselamatan Kerja – health and safety plan; - Rencana Perbaikan Berkelanjutan – continuous improvement plan; - Kebijakan-kebijakan Perusahaan – Company Policies; - Laporan Community Development/CSR – CSR and community development report; - Rencana Pengurangan dan Pencegahan Polusi – Pollution mitigation and precention plan; - Rangkuman Publik dan Laporan Hasil Sertifikasi – Public Summary from CB; - Rekaman Keluh Kesah Internal dan Eksternal – internal and external grievance record.	
	Perlabian Estate: Perlabian Estate has identified and determined document that available for public, as in "Dokumendokumen yang tersedia untuk Umum" dated 18th February 2017. The list consist of: Pemberian Hak Guna Usaha PT. Tolan Tiga Indonesia – decree for land certificate issuance; Surat Pendaftaran Usaha Perkebunan atas nama PT. Tolan Tiga Indonesia – Plantation Business Registration; Sertifikat Tanda Bukti Hak BPN – Land certificate; ANDAL – Social and Environmental Impact Assessment; Penyajian Evaluasi Lingkungan; HCV Assessment by YASBI; Izin TPS Limbah B3 – permit for hazardous waste storage; Dokumen Rencana Pengelolaan Lingkungan dan Rencana Pemantauan Lingkungan – Social Environmental Management and Monitoring Plan; Laporan Community Development/CSR – CSR and community development report; Laporan-laporan Pelaksanaan RKL/RPL setiap semester – Report of Environmental management and monitoring;	
	water extraction permit;  - Prosedur Ganti Rugi Lahan – land compensation procedure;  - Program Kesehatan dan Keselamatan Kerja – health and safety plan;  - Rencana Perbaikan Berkelanjutan – continuous improvement plan;  - Kebijakan-kebijakan Perusahaan – Company Policies;	



Criterion	/ Indicator	Assessment Findings	Compliance
Criteria ·	1.3:	<ul> <li>Rencana Pengurangan dan Pencegahan Polusi – Pollution mitigation and precention plan;</li> <li>Rangkuman Publik dan Laporan Hasil Sertifikasi – Public Summary from CB;</li> <li>Rekaman Keluh Kesah Internal dan Eksternal – internal and external grievance record.</li> </ul>	
Growers a	and millers commit to ethical cor	duct in all business operations and transactions.	
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	All of subsidiaries under SIPEF is referring to Code of Conduct PT. Tolan Tiga Indonesia, signed by President Director PT. Tolan Tiga Indonesia on 17 <sup>th</sup> November 2014. Other part regulates the insider information, confidentiality, conflict of interest, etc. Code of conduct SIPEF Group 17 <sup>th</sup> November 2014, signed by President Director, the minimum policies, included: a respect fair business, prohibiton corruption, bribery (gifts, souvenir, commission, in 2 languages (English and Bahasa Indonesia) The policy have been communicated to all level of employee, stakesholders and contractors:  - Dated 12 <sup>th</sup> March 2015; sosialition to the emplofee of Toton Usaha Mandiri Estate, attended by 5 participant including Estate Manager, FHA, Factory Manager.  - Dated 12 <sup>th</sup> March 2015; sosialition to the employee of UMW-North Estate, attended by 11 participant Sosialisasi kepada karyawan UMW-North, including Estate Manager, FHA, Factory Manager.  - The policy was also communicated through sign boards in UMW-North Estate office – which publicly accessible.  Based on interview with worker union and contractors, they have understood the company's code of conduct.  Besides the code of conduct policy, in 23 <sup>rd</sup> October 2013 company has established policies related to: a) Human Right policy, signed by President Director on 23 <sup>rd</sup> October 2013; b) Company policy on forced labour and human trafficking, signed by President Director on 23 <sup>rd</sup> October 2013;	Comply

### 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.



Criterion / Indicator	Assessment Findings	Compliance
Evidence of compliance with relevant legal requirements shall be available.  - Major compliance —	PT. Tolan Tiga Indonesia has demonstated the document relevants legal requirement, such as:  1. Land Title Right docuements:  - Hand over Agreement between Indonesian Government and Societe Internationale de Plantations Et de Finnance S.A-SIPEF (Belgium), dated 19th April 1968 for 3,000 Ha and 7,031.27 Ha  - "Risalah Pemeriksaan Tanah dari Panitia "B" No. 40/PPT/B/69", dated 17th December 1968 and "Risalah Pemeriksaan Tanah dari Panitia "B" No. 48/PPT/B/71", dated 7th December 1971.  - "Fatwa Tata Guna Tanah berdasarkan Surat Kepala Inspeksi Badan Pertanahan Nasional Sumatera Utara", dated 18th April 1970.  - Land Title rights (HGU) from Badan Pertanahan Nasional/BPN (National Land Authority) No.SK.80/HGU/DA/97, dated 16th July 1997 (6,042.44 Ha), consist of 4,807.02 Ha (Perlabian Estate) dan 1,235.42 Ha (Tolan Estate).  - Land title rights (HGU) from BPN (National land Authority) No.86/HGU/BPN/97, dated 23rd July 1997 (2,436.62 Ha) for Tolan Estate.  2. Social and Environment documents  - SEIA in form of "Surat Keputusan Menteri Pertanian Republik Indonesia No.RC.220/472/B/III/1994 tentang Penyajian Evaluasi Lingkungan/PEL Perkebunan Kelapa Sawit, Karet dan Kakao serta PKS dan Sheet Kebun Perlabian Group, Kabupaten Labuhan Batu, Propinsi Sumatera Utara", dated 17th March 1994.  - Renewal SEIA (AMDAL) was approved by "Surat Badan Pengendalian Dampak Lingkungan Daerah Kabupaten Labuhan Batu, Propinsi Sumatera Utara", dated 17th March 1994.  - Renewal SEIA (AMDAL) was approved by "Surat Badan Pengendalian Dampak Lingkungan Daerah Kabupaten Labuhan Batu, Propinsi Sumatera Utara", dated 17th March 1994.  - Renewal SEIA (AMDAL) was approved by "Surat Badan Pengendalian Dampak Lingkungan Daerah Kabupaten Labuhan Batu, Propinsi Sumatera Utara", dated 17th March 1994.  - Renewal SEIA (AMDAL) was approved by "Surat Badan Pengendalian Dampak Lingkungan Daerah Kabupaten Labuhan Batu, Propinsi Sumatera Utara", dated 17th March 2000 for 8,479.06 Ha with Mill capacity 75 tonnes FFB/hour.	Comply



Criterion / Indicator	Assessment Findings	Compliance
	- Water extraction permit – "Izin Pengambilan Air Permukaan No.610/148/BPPTSU/2/XII.1/XII/2014", dated 22 <sup>nd</sup> December 2014. The permit valid until 22 <sup>nd</sup> December 2017.  - Permit for machineries: Perlabian Mill has list of machineries: Boiler (2 units), Hosting Cranes (4 units), Sterilizer (5 units), Genset (4 units), Turbine Steam (4 units). The list of mil machineries is documented in "Evaluasi Rekaman pemenuhan, 2016 – Perlabian POM". Akte Izin is available, e.g.: "Izin Bejana Uap – Sterilizer No.1 No.678/62.09/2006; "Izin Bejana Uap – Sterilizer No.2, No.02/1.0056.A tahun 1990"; "Izin Turbine No.1, No.275/PTP/W2/1996". "Izin Turbine No.2, No.273/PTP/W2/1996".  - The mil machineries inspection was conducted regularly from "Pengawas keselamatan Kerja, Dinas Tenaga Kerja Kabupaten Labuhan Batu Selatan". The last inspection for "Izin Bejana Uap, Sterilizer No.2" was conducted on 23 <sup>rd</sup> March 2013 (the next inspection 23 <sup>rd</sup> March 2013), reguler inspection every 4 years.  - The latest inspection of Turbine no. 2 was conducted on 12 <sup>th</sup> July 2016, the next inspection on 12 <sup>th</sup> July 2016, the next inspection shall conducted annually.	
	Collective work agreement – "Perjanjian Kerja Bersama (PKB)" between PT. Tolan Tiga Indonesia with the worker union, "Serikat Pekerja Tolan Tiga Mandiri/SPTTM" has been approved by "Kepala Dinas Tenaga Kerja Provinsi Sumatera Utara" through "Surat Keputusan Kepala Dinas Tenaga Kerja Provinsi Sumatera Utara No.27-6/DTK-TR/2017" dated 25 <sup>th</sup> January 2017 and valid until 8 <sup>th</sup> January 2019.	



Criterior	/ Indicator	Assessment Findings	Compliance
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained Minor compliance –	PT. Tolan Tiga Indonesia has established procedure related effort to comply with changes in the regulation as regulated in SOP No. CA/SOP/01, dated 1st November 2011.  In 2017, the company has indentified 232 regulations, e.g:  - "Undang-Undang No.11 tahun 2005 tentang Ratifikasi International Covenant on Economic, Social and Cultural Rights (ICCPR)",  - "Undang-Undang No.12 Tahun 2005 tentang Ratifikasi International Covenant on Civil and Political Rights (ISSPR)";  - "Undang-Undang No.17 Tahun 2004 tentang Pengesahan Kyoto Protocol to the United National Framework Convention on Climate Change";  - "Undang-Undang No.21 Tahun 2003 tentang pengesahan ILO Convention No.81 Concerning Labour inspection in industry and commerce";  - "Undang-Undang No.1 Tahun 2000 tentang Ratifikasi Konvensi ILO No.182 mengenai Pelarangan dan tindakan segera penghapusan bentuk bentuk pekerjaan terburuk untuk anak".  Furthermore, the company also indentified local regulations, for example: "Keputusan Gubernur Sumetera Utara No. 188.44/637/KPTS/Tahun 2015 tentang Penetapan Upah Minimum Kabupaten Labuhan Batu Selatan tahun 2016.	Comply
2.1.3	A mechanism for ensuring compliance shall be implemented Minor compliance –	Company has developed a mechanism for ensuring compliance to regulation as stated in document CA/SOP/1 issued date 1 <sup>st</sup> November 2011 (Prosedur Informasi Perubahan Undang-Undang dan Peraturan Pemerintah).  Procedure has regulated each of operation unit head shall be monitored and visited site location to check implementation of regulation. Company has developed a mechanism for ensuring compliance to regulation under document "Evaluasi Pemenuhan Peraturan Perundang-Undangan". In these documents, PT. TTI has evaluated in detail for each clause dan the evidence for compliance is available.	Comply



Criterion / Indica	tor	Assessment Findings	Compliance
changes be impleme	m for tracking any in the law shall available and ented. compliance –	Company has developed a mechanism for tracking any changes in the law as stated in document CA/SOP/1 issued date 1 <sup>st</sup> November 2011 (Prosedur Informasi Perubahan Undang-Undang dan Peaturan Pemerintah).  The company has evaluated and updated on compliance annually, as in document "Pemantauan Penambahan atau perubahan Undang-Undang/Peraturan".  In 2016 there are 7 regulation were evaluated, e.g:  "Peraturan Menteri Tenaga Kerja No.6 tahun 2016 sebagai pengganti Permenaker No.4 tahun 1994 tentang Tunjangan Hari Raya Keagamaan bagi Pekerja/Buruh di Perusahaan".  "Peraturan Menteri Tenaga Kerja No.9 dan No.10 Tahun 2016 sebagai pengganti Keputusan Dirjen Pengawasan, Pembinaan Ketenagakerjaan No.45 tahun 2008";  "Peraturan Menteri Pertanian No.18 tahun 2016 tentang Pedoman Peremajaan Perkebunan Kelapa Sawit".  In these documents has evaluated in detail for each clause dan the evidence for compliance is available.	Comply

#### 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.



Criterion / Indicator	Assessment Findings	Compliance
Documents showing legal ownership or lease, history of land tenure ownership/control, and the actual legal use of the land shall be available.  - Major compliance -	PT. Tolan Tiga Indonesia has demonstated the document relevants legal requirement, such as:  1. Land Title Right documents:  - Hand over Agreement between Indonesian Government and Societe Internationale de Plantations Et de Finnance S.A-SIPEF (Belgium), dated 19 <sup>th</sup> April 1968 for 3,000 Ha and 7,031.27 Ha  - "Risalah Pemeriksaan Tanah dari Panitia "B" No. 40/PPT/B/69", dated 17 <sup>th</sup> December 1968 and "Risalah Pemeriksaan Tanah dari Panitia "B" No.48/PPT/B/71", dated 7 <sup>th</sup> December 1971.  - "Fatwa Tata Guna Tanah berdasarkan Surat Kepala Inspeksi Badan Pertanahan Nasional Sumatera Utara", dated 18 <sup>th</sup> April 1970.  - The last renewal "Ijin Usaha Tetap-IUT No.394/T/Kehutanan-Perkebunan/1998", dated 21 <sup>st</sup> Agustus 1998, for 8.479,06 Ha.  - "Surat Pendaftaran Usaha Perkebunan (Operational Busines permit) No.213/Menhutbun-VII/2000", dated 10 <sup>th</sup> March 2000 for 8,479.06 Ha with Mill capacity 75 tonnes FFB/hour and Mill capacity permit 60 tonnes FFB/hour.  - Land Title rights (HGU) from Badan Pertanahan Nasional/BPN (National Land Authority) No.SK.80/HGU/DA/97, dated 16 <sup>th</sup> July 1997 (6,042.44 Ha), this was divided into 4,807.02 Ha as Perlabian Estate and 1,235.42 Ha for Tolan Estate.  - Land title rights (HGU) from BPN (National land Authority) No.86/HGU/BPN/97, dated 23 <sup>rd</sup> July 1997 for 2,436.62 Ha in the entirety under Tolan Estate.  The total certified land; from the Hak Guna Usaha/HGU for Perlabian Estate was 4,807.02 Ha and for Tolan Estate was 3,672.04 Ha – as documented in Section 1.	Comply



Criterion	/ Indicator	Assessment Findings	Compliance
2.2.2	Legal boundaries are demonstrated clearly and maintained Minor compliance -	All legal boundaries are clearly demarcated and maintained in the form of boundary stones, these boundary stones are photographed, mapped and GPS location is recorded.	Comply
	Timor compliance	Tolan Estate: Field inspections in HGU No IX, 01, 02, 03, 04 and 05 Division V there are confirmed that boundaries are demarcated by trenches and boundary stones, the company also conduct legal boundary stones monthly as recorded in "Blangko Cek Patok HGU".	
		Perlabian Estate: Field inspections in Division V dan Division VI there are confirmed that 5 boundaries are demarcated by trenches and boundary stones, the company also conduct legal boundary stones monthly as recorded in "Blangko Cek Patok HGU",e.g: boundary inspection on 16 <sup>th</sup> January 2017 in division V and on 31 <sup>st</sup> January 2017 for division VI.	
2.2.3	In the event that there is a dispute or a dispute has occurred, adequate evidence of legitimate acquisition and compensation or compensation settlement process through conflict resolution which has been received through Free, Prior and Informed Consent by all related parties shall be provided.  - Minor compliance -	Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.  The company has a mechanism for land compensation No.SOP/CA/02 dated 1 <sup>st</sup> July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.	Comply
		Based on stakeholder consultation with head of surroundings village, eg: Tanjung Selamat village, Tanjung Medan village and Air Merah village and interview with NGO Tim Sepuluh, there are no report from local community on land conflict between company and community.	
		Based on consultation with local goverments Kabupaten Labuhan Batu Selatan, reported that in 2016 there are no report from local community on land conflict between company and community.	



Criterion	/ Indicator	Assessment Findings	Compliance
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved.  - Major compliance —	Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.  The company has a mechanism for land compensation No.SOP/CA/02 dated 1st July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.	Comply
		Based on stakeholder consultation with head of surroundings village, eg: Tanjung Selamat village, Tanjung Medan village and Air Merah village and interview with NGO Tim Sepuluh, there are no report from local community on land conflict between company and community.  Based on consultation with local goverments Kabupaten Labuhan Batu Selatan, reported that in 2016 there are no report from local community on land conflict between company and community.	



Criterion / In	dicator	Assessment Findings	Compliance
over evid disp out with affe neig and whe	dence of the extent of puted area is mapped in a participatory way in involvement of ected parties (including ghboring communities	Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.  The company has a mechanism for land compensation No.SOP/CA/02 dated 1st July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.  Based on stakeholder consultation with head of surroundings village, eg: Tanjung Selamat village, Tanjung Medan village and Air Merah village and interview with NGO Tim Sepuluh, there are no report from local community on land conflict between company and community.  Based on consultation with local goverments Kabupaten Labuhan Batu Selatan, reported that in 2016 there are no report from local community on	Comply
		land conflict between company and community.	



Criterion / Indicator		Assessment Findings	Compliance
conflict, evidence operation violence peace current operation	roid escalation of the that palm oil ons have instigated e in maintaining and order in their and/or planned ons.  The compliance —	Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.  The company has a mechanism for land compensation No.SOP/CA/02 dated 1st July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.  Based on stakeholder consultation with head of surroundings village, eg: Tanjung Selamat village, Tanjung Medan village and Air Merah village and interview with NGO Tim Sepuluh, there are no report from local community on land conflict between company and community.  Based on consultation with local goverments Kabupaten Labuhan Batu Selatan, reported that in 2016 there are no report from local community on land conflict between company and community.	Comply

### 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.



Criterion / Indicator		Assessment Findings	Compliance
2.3.1	Maps with 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 neighboring communities where applicable, and relevant authorities).  - Major compliance -	Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.  The company has a mechanism for land compensation No.SOP/CA/02 dated 1st July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.  Based on stakeholder consultation with head of surroundings village, eg: Tanjung Selamat village, Tanjung Medan village and Air Merah village and interview with NGO Tim Sepuluh, there are no report from local community on land conflict between company and community.  Based on consultation with local goverments (Kabupaten Labuhan Batu Selatan, reported that in 2016 there are no report from local community on land conflict between company and community.	Comply



Criterion / Indicator	Assessment Findings	Compliance
Copies of negotiated agreements including the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and these include:  a) Evidence of consultation b) Statement of transfer of rights c) Evidence of compensation See specific guidance 2.3.2 - Minor compliance -	PT. Tolan Tiga Indonesia has demonstated the document relevants legal requirement, such as:  1. Land Title Right documents:  - Hand over Agreement between Indonesian Government and Societe Internationale de Plantations Et de Finnance S.A-SIPEF (Belgium), dated 19th April 1968 for 3,000 Ha and 7,031.27 Ha  - "Risalah Pemeriksaan Tanah dari Panitia "B" No. 40/PPT/B/69", dated 17th December 1968 and "Risalah Pemeriksaan Tanah dari Panitia "B" No.48/PPT/B/71", dated 7th December 1971.  - "Fatwa Tata Guna Tanah berdasarkan Surat Kepala Inspeksi Badan Pertanahan Nasional Sumatera Utara", dated 18th April 1970.  - Land Title rights (HGU) from Badan Pertanahan Nasional/BPN (National Land Authority) No.SK.80/HGU/DA/97, dated 16th July 1997 (6,042.44 Ha), consist of 4,807.02 Ha (Perlabian Estate) dan 1,235.42 Ha (Tolan Estate).  - Land title rights (HGU) from BPN (National land Authority) No.86/HGU/BPN/97, dated 23rd July 1997 (2,436.62 Ha) for Tolan Estate. The land compensation process have been completed since mid 1960s.  Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party. The company has a mechanism for land compensation No.SOP/CA/02 dated 1st July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.  Based on stakeholder consultation with head of surroundings village, eg: Tanjung Selamat village, Tanjung Medan village and Air Merah village and interview with NGO Tim Sepuluh, there are no report from local community on land conflict between company and community.	Comply Comply



Criterion / Indicator	Assessment Findings	Compliance
Relevant information shall be available in appropriate forms and languages, including analysis of impacts, proposed benefit sharing, and legal arrangements.  - Minor compliance -	Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.  The company has a mechanism for land compensation No.SOP/CA/02 dated 1st July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.  Based on stakeholder consultation with head of surroundings village, eg: Tanjung Selamat village, Tanjung Medan village and Air Merah village and interview with NGO Tim Sepuluh, there are no report from local community on land conflict between company and community.  Based on consultation with local goverments Kabupaten Labuhan Batu Selatan, reported that in 2016 there are no report from local community on land conflict between company and community.	Comply



Criterion	/ Indicator	Assessment Findings	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 -	Based on document review upon area statement Perlabian estate, there was no area under conflict status, with other party.  The company has a mechanism for land compensation No.SOP/CA/02 dated 1st July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter.  Based on stakeholder consultation with head of surroundings village, eg: Tanjung Selamat village, Tanjung Medan village and Air Merah village and interview with NGO Tim Sepuluh, there are no report from local community on land conflict between company and community.  Based on consultation with local goverments Kabupaten Labuhan Batu Selatan, reported that in 2016 there are no report from local community on land conflict between company and community.	Comply

#### 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.



Criterion / Indicator	Assessment Findings	Compliance
3.1.1 A documented management plan, a minimum of three years shall be available, including, where appropriate, plan for scheme smallholders.  - Major compliance-	Perlabian POM: Perlabian POM been able to demonstrate business plan for 2017 – 2023, indicating the FFB production/processed, palm oil production and palm kernel production, cost (for field work – estate) and processing cost, including overhead cost.    2017   2018   2019	Comply



3.1.2 An annual replanting program projected for a Perlabian Estate: The current planting year in Perlabian Planting year in Perlabian Planting year Hectarage	ın Estate:	Comply
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-  Minor compliance-  OP 2006  OP 2007  OP 2008  OP 2010  OP 2011  OP 2011  OP 2012  OP 2013  OP 2014  OP 2015  OP 2016  Total  Replanting Plan:  Replanting Plan:  Replanting Division/ Planting year year  2016 Div.IV: 1992, Div.II: 1992; Div.IV: 1992 and 1996  2018 Div.I: 1992  Div.III: 1992  2019 Div.I: 1992 and 1996  2020 Div.III: 1993; Div.IV: 1993  2021 Div.I: 1992 and 1994  Div.III: 1994  There was no change in replanting Estate.	(Ha) 279.53 195.93 212.14 138.28 210.45 326.79 442.68 118.73 308.65 318.62 164.12 2,715.92  Hectarage  166.00 Ha 167.09 Ha 167.97 Ha 172.64 Ha 195.29 Ha 172.97 Ha	



Criterion / Indicator	Assessment Findings	Compliance
	Tolan Estate: The planting year in Tolan Estate:  Planting year Hectarage (Ha)  OP 1996 161.96  OP 1997 178.91  OP 1998 431.46  OP 1999 369.95  OP 2000 302.40  OP 2001 296.04  OP 2002 233.80  OP 2003 463.55  OP 2004 132.83  OP 2005 195.59  OP 2006 117.73	
	OP 2008       77.82         OP 2010       91.25         OP 2011       95.80         OP 2012       124.12         Total       3,273.21	
	Replanting Plan:  Replanting Division/ Planting year Hectarage year  2021 Div.II: 1994 173.33 Ha 2022 Div.II: 1994 72.58 Ha Div.III: 1994 95.03 Ha  There was a change in replanting plan, from previously 2019 to 2021. The postponement was	
	based on changes in business plan 2017-2020, approved 6 <sup>th</sup> February 2017.	

#### Principle 4: Use of appropriate best practices by growers and millers

#### Criterion 4.1:

Operating procedures are appropriately documented, consistently implemented and monitored.



Estate: The procedures documented in "Agricultural Manual Oil Palm" (October 2009 and rev.on 2014) document #01-#18/SOP/Oil Palm/ESD, where it contains all sub section of the process, such as: Nursery, land clearing, planting in peat soil and mineral soil with zero burning, planting legume cover crops, terracing, upkeep (fertilizer and pesticides, included safe working practices), water level management, riparian and watercourse management, harvesting, replanting and FFB transport. Interviews with the employees indicate satisfactory level of understanding and implementation in relation to their respective job	Comply
function. Such as:  1. Biological aspects of Practical Importance No.01/SOP/Oil Palm/ESD – Karakteristik Vegetatif Tanaman Kelapa Sawit  2. Pembibitan Kelapa Sawit: No.02/SOP/Oil Palm/ESD - nursery  3. Land Clearing: No.03/SOP/Oil Palm/ESD rev.2  4. Field Planting: No.04/SOP/Oil Palm/ESD rev.1  5. Palm Supplying: No.05/SOP/Oil Palm/ESD  6. Palm Thinning Out: No.06/SOP/Oil Palm/ESD  7. Ablasi: No.07/SOP/Oil Palm/ESD - Ablation  8. Frond Pruning: No.08/SOP/Oil Palm/ESD  9. Kumbang E. Camerunensis: No.09/SOP/Oil Palm/ESD  9. Kumbang E. Camerunensis: No.09/SOP/Oil Palm/ESD - E. Camerunensis beetle  10. Sistem Pengelolaan Air: No.10/SOP/Oil Palm/ESD – water management  11. Pemupukan: No.11/SOP/Oil Palm/ESD – fertilizer placement  12. Pest and Disease: No.12/SOP/Oil Palm/ESD  13. Harvesting Standard: No.13/SOP/Oil Palm/ESD  14. Sistem Pembuatan Jalan: No.12/SOP/Oil Palm/ESD  15. Pemakaian, Penyimpanan Pemusnahan Kemasan Bekas Pestisida: No.15/SOP/Oil Palm/ESD – pesticide handling  16. Pengelolaan Sempadan Sungai, Danau dan Waduk: No.16/SOP/Oil Palm/ESD – River, Lake and water dam management  17. Pengendalian Gulma Terpadu: No.17/SOP/Oil Palm/ESD – Integrated Weed Management	
	function. Such as:  1. Biological aspects of Practical Importance No.01/SOP/Oil Palm/ESD — Karakteristik Vegetatif Fanaman Kelapa Sawit  2. Pembibitan Kelapa Sawit: No.02/SOP/Oil Palm/ESD - nursery  3. Land Clearing: No.03/SOP/Oil Palm/ESD rev.2  4. Field Planting: No.04/SOP/Oil Palm/ESD rev.1  5. Palm Supplying: No.05/SOP/Oil Palm/ESD  6. Palm Thinning Out: No.06/SOP/Oil Palm/ESD  7. Ablasi: No.07/SOP/Oil Palm/ESD - Ablation  8. Frond Pruning: No.08/SOP/Oil Palm/ESD  9. Kumbang E. Camerunensis: No.09/SOP/Oil Palm/ESD  10. Sistem Pengelolaan Air: No.10/SOP/Oil Palm/ESD — water management  11. Pemupukan: No.11/SOP/Oil Palm/ESD  12. Pest and Disease: No.12/SOP/Oil Palm/ESD  13. Harvesting Standard: No.13/SOP/Oil Palm/ESD  14. Sistem Pembuatan Jalan: No.12/SOP/Oil Palm/ESD  15. Pemakaian, Penyimpanan Pemusnahan Kemasan Bekas Pestisida: No.15/SOP/Oil Palm/ESD  16. Pengelolaan Sempadan Sungai, Danau dan Waduk: No.16/SOP/Oil Palm/ESD — River, Lake and Water dam management  17. Pengendalian Gulma Terpadu: No.17/SOP/Oil



Criterion / Indicator Ass	sessment Findings	Compliance
Periof of C List pro- into 1.	WI/PROD/0013A, revision 01 dated 1st February 2011 Pengoperasian CST, No.PLPOM-WI/PROD/0016A, revision 01 dated 1st February 2011 Penimbangan Trcuk Tangki CPO, No.PLPOM-WI/PROD/0002A, revision 02 dated 14th January 2017 Dispacth Kernel PL-POM, No.PLPOM-WI/PROD/003A, revision 01 dated 1st February 2014	



Criterio	n / Indicator	Assessment Findings	Compliance
4.1.2	Checking or monitoring of operations procedures is conducted at least once a year.  - Minor compliance -	PT. Tolan Tiga Indonesia performs checking and monitoring at different stage and level throughout all activities and processes. Estate's performance monitoring carried out in form of fertilizer application monitoring, harvesting quality monitoring, herbicide application monitoring, etc. Palm oil mill's performance monitored through FFB sortation record, preventive maintenance check, quality inspection, laboratory analysis, etc.  The company was conducted internal audit and regular inspection once a year, at minimum.  Tolan Estate:  Visit Report RSPO/ISCC internal audit on 24-25 <sup>th</sup> August 2016, reported date 5 September 2016 where 25 findings identified, medical checkup for all employees, updated for safety committee, update for hazardous waste balance and has been followed up until 02/2017.  Visit from EnC on 24-25 <sup>th</sup> January 2017 where 19 issues such as report of RKL-RPL, record of herbicide use, etc. Action plan has been prepared and followed up;	Comply
		Perlabian Estate: Visit Report RSPO/ISCC internal audit on 22-23 <sup>rd</sup> August 2016, reported date 2 <sup>nd</sup> September 2016 where 37 findings identified, e.g: issue related to spraying activities, harvesting and has been followed up until 3 <sup>rd</sup> October 2016.	
		Perlabian POM:  - The internal audit planned once per year – at minimum. Internal Audit Schedule Perlabian POM 2017, example for 26-27 <sup>th</sup> August 2016, assessing the environmental management system. There are 18 finding were issued and all of finding closed in October 2016.  Routine Visit Report on 22-23 <sup>rd</sup> January 2017, visitor team: ENC (mr Efri Paryanto, Widiarny, Elfrida and Ramson). There are 7 issued were raised, and these issues has been followed up and closed status on 6 <sup>th</sup> February 2017.	



Criterior	/ Indicator	Assessment Findings	Compliance
4.1.3	Records of monitoring and any follow-up actions shall be available Minor compliance -	Perlabian POM:  - Management Review Report on follow up of internal audit sustainability finding dated 23 <sup>rd</sup> September 2016 (internal audit conducted on 26-27 <sup>th</sup> August 2016), attended by SMM, MHA, Document Control, Team ENC.  - "Buku Kunjungan Divisi Engineering", on 5 <sup>th</sup> October 2016, Mr. Periasamy Mothian, related to maximize the boiler and turbine operation.	Comply
		Tolan Estate: Management Review Report on follow up of internal audit, dated 28 <sup>th</sup> September 2016 (internal audit conducted on 24-25 <sup>th</sup> August 2016), all the audit finding was closed status.	
		Perlabian Estate:  Record of Action Plan on visit report D.E.D (Mr Michael Keith Hoare), dated 30 <sup>th</sup> August 2016  Management Review Report on follow up of internal audit, dated 3 <sup>rd</sup> October 2016 (intenal audit conducted on 22-23 <sup>rd</sup> August 2016), all the audit finding was closed status.	
4.1.4	Records of the origins of all third-party FFB sourced (collector, deliver, Cooperative, Farmers Association and outgrower) shall be available.  - Major compliance -	Perlabian POM: Perlabian POM does not received and/or process FFB from third-party sources. Perlabian POM was receiving FFB only from certified source, Perlabian Estate and Tolan Estate.	N/A
Criterior			
Practices sustained	• •	re possible improve soil fertility to, a level that en	sures optimal and
4.2.1	A record of SOP implementation to maintain soil fertility that ensures optimal and sustained yield, shall be available Major compliance -	PT. TTI was established procedure to manage soil fertility such as "SOP Pemupukan" No.11/SOP/Oil Palm/ESD rev.1 dated 1 <sup>st</sup> October 2009.  The procedures consist of manual fertilizer application, fertilizer application with spreader, compost application, bunch ash application, EFB application and POME application (Land Application), frond pruning.  Based on field visit in estates, fertilizer application for year 2016 has completed. The inorganic fertilizer applied based on fertilizer recommendation.	Comply



Criterio	n / Indicator	Assessment Findings	Compliance
4.2.2	Records of fertilizer inputs shall be available Minor compliance -	Each estate maintains a complete record of fertilizer inputs – both organic and in-organic as documented in "Monthly Manure Program".  Perlabian Estate: Oil Palm Fertilizer recommendation for 1st half 2017 – Mature for block 2013L12A (12.43 Ha) is to have 2,778 kg Urea; 2,778 kg TSP; 2,778 kg MOP; 2,084 kg Kieserite and 278 kg HGFB. For block 1994L15A (935.86 Ha) is to have 5,933 kg Urea; 5,933 kg RockPhospate; 3,955 kg Muriate of Potash/MOP and 395 kg High Grade FBorate. Application: Total application in block 1994L15A of urea 5,993 kg was completely applied on 14 <sup>th</sup> January 2017 and 3,995 kg MOP applied on 24 <sup>th</sup> January 2017;  Tolan Estate: Fertilizer recommendation 1st half 2017 for block 05D02 (20.34 Ha) is to have 1.00 kg/palm Rock Phospate; 1.00 kg/palm MOP; 1.50 Kg/palm Urea. Application: Total application 2,523 kg MOP (applied in 11 <sup>th</sup> February 2017); 3,785 kg Urea (applied in 26 <sup>th</sup> January 2017);	Compliance
		Fertilizer recommendation 1st half 2016 for block 08C09 (22.84 Ha) is to have 1.25 kg/palm Rock Phospate; 1 kg/palm MOP; 1.50 Kg/palm Urea. Application: Total application 3,312 kg MOP (applied on 9 <sup>th</sup> February 2017); 4,018 Kg Urea (applied in 24 <sup>th</sup> January 2017);	



Criterio	n / Indicator	Assessment Findings	Compliance
4.2.3	Records of periodical leaf, soil and visual analysis shall be available Minor compliance -	JH Agriculture Service conducted the Semi-Detailed Soil Survey in October for PT. Tolan Tiga Indonesia, within the semi-detailed soil survey report, topographic condition, soil fertility status and other information has been accounted into.  The company also conduct leaf analysis annually for fertilizer recommendation, the last soil analysis was conducted by Central Plantation Services on 27 <sup>th</sup> December 2014 (Leaf Analysis no. CPS/784/XII/2014, dated 27 <sup>th</sup> December 2014.  Perlabian Estate:  Leaf analysis available "Sertifikat Hasil Pengujian Laboratorium Central Plantation Services" No. CPS/963/XII/2016 taken from 12	Comply
		oil palm leaf and rachis samples. Date of analysis 19 <sup>th</sup> December 2016.  Tolan Estate:	
		Leaf analysis available "Sertifikat Hasil Pengujian Laboratorium Central Plantation Services" No. CPS/969/XII/2016 taken from 156 oil palm leaf and 29 <sup>th</sup> December 2016.	



Criterion	/ Indicator	Assessment Findings	Compliance		
4.2.4	A nutrient recycling strategy is recorded, including use of Empty Fruit Bunches (EFB), land application, and palm residues after replanting.  - Minor compliance -	Nutrient recycling strategy is present. The company using all palm by-products for soil nutrient, such as: EFB and POME (is applied to palm nearby mill) and frond stacking.  Perlabian Estate: Record of EFB application is recorded for 2016 and 2017, e.g., applied EFB 225,63 tons in Block 2013 (8.95 Ha) in November 2016; applied EFB 2,583.56 tons in block 2006H07 and 2006H11A (51.62 Ha) in January 2017; Data volume land application 2016, in block 2005C15 (21.06Ha), 2005C14 (27.67 Ha), 2005C13 (29.39 Ha) and 20015C12 (17.49Ha), total application are: January: 10,706.84 m³ February: 8,407.215 m³ March: 6,182.641 m³ April: 5,535.899 m³ May: 5,443.619 m³ June: 8,681.237 m³ July: 5,367.912 m³ August: 6,787.001 m³ September: 6,785.540 m³ October: 6,470.927 m³ November: 7,861.950 m³ December: 10,377.650 m³ Total application in 2016 was 155,329.384 m³ for 95.61 Ha  Tolan Estate: No EFB application in Tolan Estate for year 2016 and 2017. Frond stacking is evident on estate.	Comply		
Criterion	1 4.3:				
Practices	Practices minimise and control erosion and degradation of soils.				
4.3.1	Maps of any fragile soils shall be available Major compliance -	There is no fragile soil reported in the soil survey carried out 2009 by JH Agriculture. Recent maps are available of all soils in all estates.  Limitation in form of sandy soil and surface run-off of top soil, as well as steeper terrain on Tolan Estate.	Comply		



Criterior	/ Indicator	Assessment Findings	Compliance
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soiland climate specific).  - Minor compliance -	No planting since 2007 on slopes in excess of 250. There is in fact very little planting on sloped land throughout PT. Tolan Tiga Indonesia. Planting on steeper terrain prepared with infrastructure such as terrace or individual terrace.  Perlabian Estate: In block G12 (10.47 Ha) Perlabian Estate implemented and maintained 124 individual terraces; in block E21 (9.87 Ha) implemented and maintained 30 individual terraces; in block F21 (20.03 Ha) implemented and maintained 528 individual terraces.	Comply
4.3.3	A road maintenance program shall be in place Minor compliance –	Road maintenance program prepared by estate each year; evidence of maintenance was recorded in the "Road Miantenance Program", available for 2016 and 2017. Realization of road maintenance program has been periodically monitored in montly basis and also the company was providing road map realization to monitor road maintenance program is properly implemented.  Perlabian Estate: Road maintenance program (Grading and Compacting) 2017 is available, for Division I (667.96 Ha) planned 33,689 meters, Division II (769.47 Ha) planned 38,809 meters, in Division IV (816.65 Ha) planned 29,668 meters, in Division IV (816.65 Ha) planned 24,094 meters, in division V (575 Ha) planned 43,242 meters and in Division VI (754.36 Ha) planned 38,098 meters.  Total realization in 2016, e.g: December (54,900 meters), November (51,600 meters), October (40,000 meters)	Comply
		Tolan Estate: Road maintenance program in 2017 for Division I was for 76,000 meters – total applied until February 1,100 meters. Road maintenance program for Division II was for 77,504 meters, actual total maintained until February 200. Road maintenance program for Division IV was for 85,680 meters, actual total maintained nil. Road maps for each division are provided.	
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place Major compliance –	Based on JH Agriculture Semi-detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlabian and Tolan estate.	Comply



Criterion	/ Indicator	Assessment Findings	Compliance
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.  - Minor compliance —	There is no indication of area with fragile soil in the estates.  Tolan Estate: Terracing in block 2000A29, 2000A30, 2003D34, 2003D33 and 2003D35.  Perlabian Estate: Planting <i>Mucuna</i> for area prepared for replanting in	Comply
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 –	2016 was recorded.  Based on JH Agriculture Semi Detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlabian and Tolan estate.	Comply

#### Criterion 4.4:

Practices maintain the quality and availability of surface and ground water.



Criterion	/ Indicator	Assessment Findings	Compliance
Criterior 4.4.1	An implemented water management plan shall be in place Minor compliance -	PT. TTI was updated their "Water management Plan", last updated on 29th April 2013 PT. TTI has in place a policy with regards to the protection of watercourses and wetlands which includes dedicated buffer zones and riparian areas – including establishing buffers along rivers in accordance with Indonesian laws - 50 meters buffer on each side for small rivers.  It is the policy of PT. TTI that all buffer zones as stipulated by Indonesian law are re-established at re planting. PT. TTI has also Water Management Plan and implemented. This was in evidence during replanting, presently in Perlabian and Tolan estates. The required buffer zones were seen to have been established during this process. The buffer zones are in places, to prevent run off, coming from nutrients and chemicals through the planting upkeep.  Chemical handlers are trained in the disposal of chemicals - waste chemicals containers are disposed of or are re-used for sprayers in field. PT. Tolan Tiga Indonesia has a permit for use of surface water as per "Keputusan Kepala Badan Pelayanan Perijinan Terpadu Provinsi Sumatra Utara No.610/148/BPPTSU/2/XII.1/XII/2014 tentang Ijin Pengambilan dan Pemanfaatan Air Permukaan oleh PT. Tolan Tiga Indonesia", the location for Perlabian river, allowed debit 261 m³/hour, dated 22 <sup>nd</sup> December 2014 – valid up to 22 <sup>nd</sup> December 2017. Permit for ground water use as per "Surat Keputusan Gubernur Sumatera Utara No. 546.2/414/BPPTSU/2/XIJ/3b/IX/2016, tentang Ijin Pengambilan Ait Tanah kepada PT. Tolan Tiga Indonesia" dated 19 <sup>th</sup> September 2016, valid until 3 years.  Perlabian POM Perlabian POM has shown the document of Water Management Paln, dated 25 August 2016,	Compliance



Criterio	n / Indicator	Assessment	Findings		Compliance
		permit and lic infrastructure r Water permit Labuhanbatu SU/2016 tenta	ensing, monito maintenance al under: "Sul Selatan ang Perpanjan ada PT. Tolan	icating the water need, oring of water quality, nd conservation. rat Keputusan Bupati No.546.2/421/BPPTPMgan Izin Pengambilan Tiga Indonesia" dated atil 3 years.	
4.4.2	Protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones, at the time of or prior to replanting shall be demonstrated.  - Major compliance -	Water Manage permit and lici infrastructure is buffer zone.  Perlabian Estat HCV assessme for example: river. Estate minimize eros trees in river planted divisio	Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation of river		
4.4.3	Records for monitoring of effluent especially BOD (Biochemical Oxygen Demand) and efforts to comply with legal requirements, shall be available (see criteria 2.1 and 5.6).  - Minor compliance —	Perlabian POM Result of BOI more than 5,00 regulation.  As in Septemb new method b the solid and p solid can be effluent, affect seen: "Pengop WI/PROD/022/ The result of location in outl	Perlabian POM: Result of BOD sampling analysis shown that no more than 5,000 mg/Liter as required by Indonesian		
		July 2016 8 Aug 5 Sep 8 Oct 8 Nov 8	pH BoD (mg 8.3 299.7 7.7 342.3 8.1 455.13 8.2 999.5 8.0 450.8 8.2 432.7	/L) Date of sampling 26/07/2016 19/08/2016 16/09/2016 12/10/2106 17/11/2016 21/12.2016	



Criterion / Indicator	Assessment Findings	Compliance
4.4.4 Monitoring of mill water use per ton of FFB shall be recorded.  - Minor compliance –	Perlabian POM: Perlabian POM recording the mill water use per tonne FFB. The record of water use available in "Pemakaian air dan HSD Oil per metrik FFB". The budget of water use for FFB process sets at 1 m³/ton FFB processed.  Record for year 2016 – January 2017 seen:    Month   FFB Processed   Water usage   Water usage (tons)   (m³)   (m³/ton FFB)     Jan '16	Comply

#### Criterion 4.5:

Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.



Criterior	n / Indicator	Assessment Findings	Compliance
4.5.1	Monitoring of Integrated Pest Management (IPM) plan implementation shall be available Major compliance -	PT. Tolan Tiga Indonesia is able to demonstrate Integrated Pest Management under "Program Pengendalian Hama Terpadu 2017", updated on 25 <sup>th</sup> January 2017. These plans comprise of biological, physical and chemical treatement to control pest attack.  Integrated Pest Management was documented and retrievable including building and maintenance of barn owl boxes, planting and maintenance of beneficial plants, pest and diseases census such as for ganoderma census. PT. Tolan Tiga Indonesia was implementing early warning system through regular pest monitoring (census) for rat and boar attack, leaf eating pest, etc. Reports are produced and maintained, chemical pesticide will only used if the pests attack above the economic threshold. Once implemented, management performs monitoring to re-check the program effectiveness.	Comply
		Perlabian Estate: Record of Pest and Diseases Cencus, period January 2017 in division F.4 /replanting 2016, in block E21 (11.09 Ha), percentage <i>Setora nitens</i> 0.64% (treatment with collecting by census tim), <i>Apogonia</i> 2.42% (treatment by starthene 60 gr/Ha). Benefisial plant, in January 2017 for <i>Antigonon sp.</i> (5 plots), <i>Turnera subulata</i> (20 plots) and <i>Cassia tora</i> (5 plots) in block E21, E22, F16-F23.	
		Tolan Estate: The <i>Ganoderma</i> census in November 2016 shows in division I block 2005D02 – 152 palms infested; in division block 1998B13A –591 of 3,585 (16.49%) palms infested. Treatment with de-bolling and sanitation immediately. Barn owl box installation/maintenance program for 28 boxes in Tolan Estate (active 24 boxes, 85,71%). Barn owl monitoring done on monthly basis. On 18 February 2017 in Division I, 2006C4, on 18 <sup>th</sup> February in Division 02 block 1998E20A Owl box instalation in January 2016 for 11 units and in February 2016 for 11 units.	



Criterior	/ Indicator	Assessment Findings	Compliance
4.5.2	Training records of Integrated Pest Management (IPM) shall be available Minor compliance —	There are training records for training of staff in regards to IPM and these are now formally recorded on all occasions. IPM training provided for field operators in all estates. The training was conducted by "Verdant Bioscience Indonesia".  Perlabian Estate:  - Integrated Pest Management training — Ganoderma census and treatment, dated 16 <sup>th</sup> April 2016 and attended by 21 field officers.  - Socialization of "census hama tikus" — rat baiting, on 15 <sup>th</sup> May 2016, attended by 15 workers.  Tolan Estate: Record of Integrated Pest Management training are available:  - On 11 <sup>th</sup> April 2016, on "Review Sensus Ganoderma" training, attended by 13 workers.  - On 30 <sup>th</sup> July 2016, on training "Leaf Sampling Unit", attended by 19 employees.	Comply
Criterion	1 4.6:		
Pesticides 4.6.1	Documented evidence shall be available to show that pesticide used based on regulations and the use of pesticide is specific to target species with appropriate dosage which have minimal impact on non-target species.  - Major compliance -	The use of pesticide is under strict requirement, only in the case of pest attack past the economic threshold. The justification of pesticide used is explained under Agricultural Manual General Section 12 Pest and Disease – and use of herbicide under Section 17 Weed Controls. The procedures explain the identification of target species, agrochemical to be used, and dosage and area per application in general. A further dosage reduction controlled through budget. Visit to chemical store and record review shows company chemical product for specific target species (weed).  PT. Tolan Tiga Indonesia has listed all pesticide and herbicide used on the field as per "Daftar Pestisida Yang Dipakai di Kebun Tolan Tahuan 2017". All the pesticide and herbicide have valid license from government. Example: Inteam 150SL, a.i. Ammonium glifosinat 150g/l No.0103011984695, valid until 25 <sup>th</sup> September 2018.	Comply



Criterior	/ Indicator	Assessment Findings			Compliance
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.	PT. Tolan Tiga Indonesia has records of herbicide use, available and maintained at each Estate. The records shows the total chemical used (in kg and/or liters), the active ingredients used, total area treated (in Ha), and active ingredients used per area treated and per ton FFB produced. PT Tolan Tiga Indonesia is calculating the active ingredients per block on monthly basis.			Comply
	- Major compliance -	"Rekaman Penggunaan Pe Block 1994D11, application application for Glyphosate treated 27.39 Ha.	on date 8 <sup>th</sup>	April 2016,	
		Record of herbicides us		Tolan Tiga	
		Indonesia – Tolan Estate in		2016	
		Description SMART (Isopropil amina	2015 3,800.01	2016 3,497.40	
		glyphosate)	liter	liter	
		Gramoxone (Paraquat)	-	103.00 liter	
		Garlon (Triclophyr)	72.50 liter	74.50 liter	
		Kenlon (Triclophyr)	51 liter	-	
		Vulgar (2,4 Dimetil Amina)  Metsul 24 WP (Metil	40 liter 89,233	106,551.0	
		Metsulfuron)	gram	0 gram	
		Decis (Deltametrin)	30 liter	-	
		Dithane (Mankozeb)	91 kg	-	
		Marathon 500 SL (Dimehipo)	-	-	
		Marshall 5G (Karbosulfan 5%)	-	2.10 kg	
		Inteam 150 SL (Ammonium glufosinat)	120 liter	100 liter	
		Malation 96% TC	3.10 liter	-	
		Basta 150 SL	22.50 liter	97.50 liter	
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.	There is no used of proph throughout the company used for last resort.			Comply
	- Major compliance -				
	- Major compliance -				



Criterio	n / Indicator	Assessment Findings	Compliance
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.	Based on document review, it was noted that paraquat usage is reduced. Reducing program will be continuing until phased out by the end of 2016. There is Memorandum from GM Office North Sumatera No.117/GMO-All Estate/XI/2015 dated 1st December 2015 to stop the use of paraquat by 1st January 2017; paraquat can be ordered maximum first half 2016; application of paraquat to end stock is allowed and the last used in June 2016. Paraquat has been substitute with <i>Ammonium glufosinat</i> 150 g/l (equivalent: <i>Glufosinat</i> 137 g/L).	Yes
4.6.5	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 -	Agcochemical are only handled, used and applied by trained personnel. Based on field visit to chemical store, and interview with the storekeeper, they admit to have proper training. The chemical store equipped with MSDS, appropriate PPE (face shield, respirator, apron, gloves and rubber boot) and emergency equipment – in the case of spillage or exposure.  The training data is also maintained to show the nature and content of the training covered. Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the storage and areas of mixing. Samplen taken for Tolan Estate,  Perlabian Estate:  "Pelatihan Pestisida Terbatas" (certificate No.521.4/88.31/PLA.S/V/2014) dated 29 <sup>th</sup> April 2015 for Mr.Salbini, Mr.Syahidan, Mr.Lias Doni.  "Pelatihan Pestisida Terbatas" (certificate No.521.4/38520/PLA.S/V/2014) dated 25 <sup>th</sup> June 2013 for Mr.Syahrul, Mrs.Khamida, Mrs.Sukiyem, Mrs.Susanti, Mrs.Suliani, Mr. Rano Trio, Mrs.Erna.  Training for sprayer (pesticide training) on 1 <sup>st</sup> July 2016, attended by 42 workers.  Tolan Estate: "Pelatihan Pestisida Terbatas" dated 29 <sup>th</sup> April 2015 for Ahmad Mustafa (certificateNo.521.4/88.31/PLA.S/V/2014) namely Mr. Amin Subagio, Suprianto, Juliadi, Ade Anggara.	Comply



Criterio	n / Indicator	Assessment Findings	Compliance
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 storage for all pesticide is in good condition. A standard storage system appears to be implemented across PT. TTI.  The storage is equipped with sufficient air ventilation to provide air circulation. Hazard signs, emergency shower, secondary containment, spill kit, appropriate personal protective equipment/PPE (face shield, permeable gloves, apron and mask) was available and ready for use.  Working instruction for pre-mixing, stacking and storing pesticide is current, MSDS is also readily available. Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the areas of mixing. These were all seen be controlled by date and were readily available. No concentrates are taken into the field as all spray solutions are pre-mixed in a designated area. Empty pesticide container was triple rinsed before sent for temporary hazardous waste storage.  The company supplies two sets of overalls to all pesticide operators so that one can always be considered clean. Overalls are washed at the pesticide mixing areas in specially constructed wash areas so that sprayers and mixers do not need to take them home and therefore the risk of cross contamination with family members is reduced and eliminated.	Comply
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts.  - Minor compliance -	Pesticides used were mixed accordingly as per mixing instructions. Procedure no TTI/PROS/IMP/14 revision 01 dated on 1 <sup>st</sup> December 2013 was established and approved related pesticides usage, storage, mixing and handling of container properly to minimise risk and impact.  Aplications of pesticide shall be approved by manager based on action plan from each FA (Field Assistant), reviewed by Field Head assistant. FA made pesticide plan referred to result of pest census.	Comply
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 -	There was no aerial application of pesticide throughout PT. Tolan Tiga Indonesia.	Comply



Criterion	/ Indicator	Assessment Findings	Compliance
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 -	Records of training are kept in each estate for all workers who come into contact with pesticides this include Pesticide Mixers, pesticide Sprayers and any chemical handlers in the stores.  The training data is available and centrally in all estates for whoever handles pesticides. There is a minimum requirement of PPE that must be used in the handling and application of pesticides. PPE specifications are stated in the MG and further demonstrated in training manuals.	Comply
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 -	Chemical storekeeper in estates understood the procedure and re-use of ex-chemical empty container. The empty containers are triple rinsed before sent to hazardous waste storage and/or re-use as pre-mixed water container to the field. Waste storage was separately and clearly identified as follow: hazardous waste black colour, Organic waste green colour, non-organic waste blue colour and economical waste yellow colour. This identification has been properly understood by all workers.	Comply
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.  - Major compliance -	Beside annual medical checkup, specific medical checkup was also done for pesticide and chemical operator at least once a year by external clinic "Klinik Spesialis Anugerah Ibu", record of medical checkup was evident as per record "formulir pemeriksaan medis pekerja pemakai pestisida/bahan kimia" and Specific medical checkup, e.g. Mrs. NS (Spraying team).  Based on interview with spraying team and review Medical Surveillance record/result on sampled workers, doctor concluded there was no worker with signs of intoxication detected.	Comply
		Record seen: Tolan Estate: - Annual Medical Check up Karyawan (Pekerja Tidak Berisko Tinggi), in 2016 for 258 workers, conducted on 8, 9, 10, 14, 15, 16 <sup>th</sup> December 2016 - Record of the result special medical checked up covering 68 workers (manuring, spraying, operator heavy equipment, operator genset) Total employee per February 2017, 314 employees.	



Criterion	/ Indicator	Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women.  - Major compliance -	There is no pregnant worker and breast feeding women involving for spraying, chemical and pesticides activities during audit observation and based on interview result with spraying team in Perlabian and Tolan estates.  Perlabian Estate: Attendance list female sprayer – not pregnant and not breast-feeding - "Daftar Absensi Tenaga Kerja Wanita Tidak Hamil dan Menyusui" January 2017 – No pregnant. E.g. Mrs. Erna, Mrs. Sukiyem, Mrs. Sulianti, Mrs. Susanti (period on 26-27 <sup>th</sup> January 2017) and Mrs. Khamida.  Tolan Estate: All team member of spaying application are male (N/A)	Comply

#### Criterion 4.7:

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



Criterion / Indicator	Assessment Findings	Compliance
A.7.1 A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented, and its effectiveness monitored.  - Major compliance -	An Occupational Health and Safety Policy has been established and in place, issued and signed by the President Director dated 01/03/2014. The policy has communicated to all workers, e.g. on Master Chit Pagi on 18 <sup>th</sup> February 2017 in Perlabian POM, attended by division of processing A (30 employees). Health and Safety Procedure under "Prosedur Keselamatan dan Kesehatan Kerja" No.ENC/SOP/06 dated 2 <sup>nd</sup> January 2013. The procedure covers the risk assessment process, resources, safety committee, emergency response plan, record and reporting, etc.  Perlabian POM: The record of implementation the OHS Program in 2016/2017, such as:  Meeting of safety committee – "Notulen Meeting P2K3LHS", on 2 <sup>nd</sup> February 2017 with agenda: review of progress result of previous meeting, review of accident report, review of hazard identification result. Attended by 9 members.  PT. Tolan Tiga Indonesia has been implemented the medical checkup covering all employees, e.g. in Perlabian POM was conducted in December 2016, by company doctor TTI (No.Kep. 55/BINWASSK3-PNK3/KK/II/2016), for 85 workers, sample: Mr. Fitriadi (office), Ahmad Affan (operator biogas), Agus Salim (driver), Agus Hermanto (process), abdul Rahim (worksop). The special medical checked up also conducted on 5 <sup>th</sup> December 2016 by Kilnik Spesialis Anugerah Ibu (Medan), for chemical handler (9 workers) and on 25 <sup>th</sup> May 2016 for 27 workers in high noise area (including annual medical checkup).  Safety committee report – "Laporan Triwulan P2K3 PT. Tolan Tiga Indonesia" for period October – December 2016, No.01/PL-01/2017, reported on 12 <sup>th</sup> January 2017 to manpower office.  Emergency simulation reported – "Laporan Pelaksanaan Simulasi Tanggap Darurat", conducted on 13 <sup>th</sup> February 2017. Analisys and evaluation are available. Attended 22 workers.  List of operator licenses, such as:  Mr P Sitompol (welder), no license for welding process JIP 024.0000264.2014, dated 4 <sup>th</sup> July 2017.  Mr Adi Aridian (operator for Turbine), no license 14.060.0P.TU.K3-PTP/IV/2014, dated	Comply
	29 <sup>th</sup> April 2014, valid until 29 <sup>th</sup> April 2019.	



Criterior	/ Indicator	Assessment Findings	Compliance
		<ul> <li>Mr Joko RS (Operator Pesawat Uap Kelas 1), no license 12.P.10.1280PK3-PUBT-B.IV/.2012, dated 27<sup>th</sup> April 2012, valid until 27<sup>th</sup> April 2017.</li> <li>Checklist for hydrant inspection "Pemeriksaan Hydrant" in 2017, e.g: in January and February reported in good condition;</li> <li>Checklist for fire extinguisher – "Alat Pemadan Api Ringan (APAR), No.APAR 012", location in Office dated on 10<sup>th</sup> January 2017 and 10<sup>th</sup> February 2017.</li> </ul>	
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 compliance -	The company has established the procedure of risk assessment under "Prosedur Bahaya dan Penilaian Risiki", no TTI/PROS/IMP/02, revision 01 dated 1st December 2013.  Document of risk assessment was determined, updated on 31st January 2017. Covering all activities in Perlabian POM based on location / workplace, e.g. Security, Office and weighbridge, loading ramp, sterilizer, chain/capstand, hoisting crane, screw press, water treatment plant, workshop, laboratorium, biogas plant, etc.  Perlabian Estate has established the risk assessment, updated on 15th January 2017. OHS plan are available, "in Program P2K3 tahun 2017", such as:  1. Meeting of P2K3LHS (monthly bases); 2. Report of P2K3 (Q1, Q2, Q3 and Q4); 3. Inspection and maintenance of APAR (monthly); 4. Hydrant maintenance; 5. Fire Drill; 6. Socialization on PPE, fire extinguisher; 7. First aid box inspection; 8. Medical Checkup (special and regular); 9. Accident investigation; 10. Review and updated the legal and other requirement related to OHS;	Comply



Criterion / Indicator	Assessment Findings	Compliance
All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.  - Minor compliance -	The internal training has been implemented according to the established "Realisasi P2K3LHS Tahun 2016". Safe working practice training has been done to employee and record of training was evident.  Each safe working practice was included in the working instruction including requirement PPE, and as observation at several area such as laboratory, workshop and processing have been seen proper PPE used by worker and available at location such as at area Perlabian Mill, Perlabian Estate and Tolan Estate.  Record seen: Tolan Estate:  Mr. Sugeng Tuwono, backhoe loader operator trained with "Pembinaan Teknik Keselamatan dan Kesehatan Kerja Pesawat Angkat dan Angkut" certificate No.Ser.2174/OPK3/PAA/III/2014; License No.14.33240-OPK3-PAA/III/2014 dated 28th March 2014 valid until 28th March 2019.  Perlabian Estate  - SK Keputusan Kepala Dinas Tenaga Kerja Kabuapten Labuhanbatu Selatan No. Kep.04/P2K3/Naker/I/2017, dated 25th January 2017. License for Ahli K3 Umum No.Reg. 13095/PK3A/AJ/12/2014/PO, namely Mr. Muhammad Husni Rizki Lubis, valid until 2nd April 2017.  - Lisensi K3 Pesawat Angkat dan Angkut, Reg 49231-OPK3-OC/PAA/VI/2016, namely Mr. Supriyo, valid until 24th June 2021.  - Certificate of competence for welding process, namely Mr. Jepri Hutagalung, No.Reg.JIP 024.0000270.2014.  Perlabian POM:  - Mr. Supriono, Overhead crane operator trained with "Operator Overhead Crane Kelas III" certificate No.Ser.1113/OPK3/PAA/IV/2014; License No.14.25011- OPK3/PAA/IV/2014 dated 12th April 2014 valid until 12th April 2019.  - Mr. Adi Ariadan, engine room operator, trained with "Operator Turbin Uap" certificate No.Ser.14.3/OP/TU.K3/PTP/IV/2014; License No.14.25011- OPK3/PAA/IV/2014; License No.14.25011- OPK3/PAA/IV/2014; License No.14.25011- OPK3/PAA/IV/2014 dated 12th April 2014 valid until 12th April 2019.	Comply



Criterion / Indicator	Assessment Findings	Compliance
	<ul> <li>Mr. Parluhutan Sitompul, welder at workshop, passed the welding training and competence test, certificate of competence No.00289.0721. 0002870.2014; license No.JIP.024.0000264.2014 dated 4<sup>th</sup> July 2014 valid up to 4<sup>th</sup> July 2017;</li> <li>Mr.Sugeng Syahputra, sterilizer operator, trained with steam vessel training, certificate No.Ser.419/OPK3/B.II/IV/2014; License No.6159.OPK3-PUBT-B.II/IV/2014 dated 3<sup>rd</sup> April 2014 valid up to 3<sup>rd</sup> April 2019.</li> </ul>	



Criterion / Indicator	Assessment Findings	Compliance
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 -	Safety and Health Committee has been determined and approved by Ministry of Manpower.  OHS related issues were discussed sufficiently with the fixed agenda indicated review of accident statistics and performace, inspection result, review of accident reporting system, review of committee member, review of inspection findings, training, policy and procedures, external audit action points (RSPO) and other matters.  Record seen: Perlabian POM Safety Committee has established as per "Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Kabupaten Labhuhan Batu Selatan No. Kep.41/P2K3/DSTKT/2016, dated 14 <sup>th</sup> September 2016. OHS expert namely Mr. Andi Camalata, ST license as "Ahli Kesehatan dan Keselamatan Kerja" No.Reg.13110/PK3/AJ/12/2014/PO, valid 2 <sup>nd</sup> April 2017.  - Safety committee's minutes meeting - Notulen Meeting of P2K3LHS, on 2 <sup>nd</sup> February 2017 with agenda: review of progress result of previous meeting, review of accident report, review of hazard identification result. Attended by 9 members.  - Health and safety performance report - Laporan Triwulan P2K3 PT. Tolan Tiga Indonesia for period October - December 2016, No.01/PL-01/2017, reported on 12 <sup>th</sup> January 2017.  Tolan Estate: Safety Officer, Mr.Muhammad Husni Rizki, license as "Ahli Keselamatan dan Kesehatan Kerja" No.Reg. 13095/PK3A/12/2014/PO, Health and Safety Committee, as per "Surat Keputusan Kepala Dinas Sosial, Tenaga Kerja dan Transmigrasi Kabupaten Labuhanbatu Selatan No.KEP.10/P2K3/Naker/II/2017 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja di Perusahaan" dated 17 <sup>th</sup> February 2017.  Health and Safety meeting in January 2017 as per "Notulen Rapat P2K3LHS on 12 <sup>th</sup> January 2017, reviewing on accident report discussed; result of medical checkup, safety inspection discussed; condition of conservation area; Laporan Triwulan for period October – Deember 2016, reported on 23 <sup>rd</sup> January 2016.	Comply



Criterion	/ Indicator	Assessment Findings	Compliance
4.7.5	Accident and emergency	Perlabian Estate: Notulen Rapat P2K3LHS period January 2017, on 7 <sup>th</sup> February 2017. Agenda: Review on progress the result of previous meeting, review of accident report, review of internal audit finding, etc. attended by 24 members. Laporan Triwulan P2K3 for period October – December 2016, reported on 30 <sup>th</sup> January 2017 to Dinas Tenaga Kerja Kabupaten Labuhan Batu Utara. A set of emergency response procedure is available.	Comply
7.7.3	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 -	<ul> <li>Accident response procedure under "Prosedur Penanganan, Pelaporan dan Penyelidikan Kecelakaan Kerja" No.TTI/PROS/IMP/25 dated 1st July 2009.</li> <li>First aid during accident under "Prosedur Pertolongan Pertama pada Kecelakaan" No.TTI/PROS/IMP/24. "Prosedur Tanggap Darurat" No.TTI/PROS/IMP/23 dated 1st July 2009, covering fire, earthquake, social unrest, etc.</li> <li>Emergency situation under "Instruksi Kerja Tanggap Darurat", dated 17th February 2017.</li> <li>Perlabian POM</li> <li>Training for first Aider, on 23rd March 2013, conducted by paramedic of PT. Tolan Tiga Indonesia, e.g. Mr. Rivai, Mr. Jaelani, Mr. Sugeng and Mr. Bahsrun Sani. There are 4 first aid box in Perlabian Mill, e.g. in Office mill, wherehouse, workshop and in shift office.</li> <li>License for first aider, namely Mr. Muhammad Rivai no 668/DTK/P3K/2014, valid until July 2017 and namely Mr. Susanto, license no 657/DTK/P3K/2014, valid until July 2014.</li> <li>Tolan Estate: Training for first aider conducted on 5th October 2016, attended by 19 workers, conducted by paramedical, attendance list and documentation are available.</li> <li>License for first aider, namely Mr. Roswadi, No.Reg. 560/033/DSTKT/P3K/2016, valid until 14th October 2019.</li> <li>Perlabian Estate First aider training conducted on 6th October 2016, attended by 28 workers.</li> </ul>	



Criterion	/ Indicator	Assessment Findings	Compliance
4.7.6	All workers shall be provided with medical care, and covered by accident insurance.  - Minor compliance -	PT. Tolan Tiga Indonesia has been implemented the Medical Checkup covering all employees, e.g: i perlabian POM was conducted in December 2016, by company doctor (No.Kep. 55/BINWASSK3-PNK3/KK/II/2016), for 85 workers, sample: Mr Ftriadi (office), Ahmad Affan (op biogas), AgusHsalim (driver), Agus Hermanto (process), abdul Rahim (worksop). The special medical checked up also conducted on 5 <sup>th</sup> December 2016 by Kilnik Spesialis Anugerah Ibu (Medan), for chemical handler (9 workers) and on 25 <sup>th</sup> May 2016 for 27 workers in area with high noise (including annual/general medical checkup)  Special medical checkup also has implemented in Perlabian Estate, on 26 <sup>th</sup> May 2016, for 86 workers (Spraying, manuring, worksop, etc.) General medical checkup, in December 2016, covering for 388 workers.  All employees covered by social insurance as per government regulation, BPJS — covering health insurance, accident insurance and pension fund. This scheme applicable to the dependent of the worker. Company clinics are licensed to provide medical service that meets the insurance requirements.  Record seen:  - Electronic Payment System on BPJS Ketenagakerjaan in 2016, e.g: in November 2016 amount Rp 21,737,801 and in December 2016 amount Rp 21,260,222	Comply



Criterion	/ Indicator	Assessment Findings	Compliance
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	All occupational injuries case was recorded in the "Laporan Kecelakaan Kerja" and summary monthly in the "Rekapitulasi Kecelakaan Kerja". Based on procedure no TTI/PROS/IMP/25 revision 0 dated on 1st July 2009 shall be measure LTFR (lost time frequency rate)/AFR (Accident Frequency rate), RIR (Recordable injury rate), Incident Rate (IR) and Total Accident Rate (TAR). There was no fatality and major accident since year 2016 until this audit at the Mill and Estates.  Perlabian POM Based on record of "Perhitungan Frekuensi Rate (FR) dan Safe T-core in 2016", dated review on 4 January 2017, in 2016 there were 42 days of lost time by accident. Evidence seen: record of supervisor investigation accident report, dated 3rd February 2016, namely Mr. JL (helper sterilizer station).  Tolan Estate: Based on record "Rekapitulasi Laporan Kehilangan Waktu Kerja tahun 2016", there are 10 days of lost time accident.  Perlabian Estate: Rekapitulasi Kecelakaan Kerja in 2016, there are 12 accidents, with lost time are 50 days.	Comply

#### Criterion 4.8:

All staff, workers, smallholders and contract workers are appropriately trained.



shall all a Prince that assess need the prince that as a prince that a prince that as a prince that a prince t	ormal training programme ill be in place that covers aspects of the RSPO nciples and Criteria, and t includes regular essments of training eds and documentation of programme. ajor compliance -	Perlabian POM Training program for 2017 has been prepared for all workers as per "Program Training 2017", dated 9 <sup>th</sup> January 2017. The training program prepared based on review upon health and safety performance, production quality, changes in RSPO P&C 2013, new employees, etc.  Tolan Estate: Training program for 2016 and 2017 has been prepared for all workers (harvesters, sprayers, manuring teams). E.g. Program Training Tahun 2017". The training program prepared based on review upon health and safety performance, production quality, changes in RSPO P&C 2013, new employees, etc.	Comply
empl main		Harvesting and FFB quality training implemented on 23 <sup>rd</sup> August 2016; Training for spraying and knapsack calibration implemented on 8 <sup>th</sup> August 2016.  Perlabian Estate: Program Training 2016 and 2017 are available, such as: Training for harversting, manuring, spraying, MSDS, hazardous waste, least sampling unit	
	cords of training for each ployee shall be intained. inor compliance -	training, etc.  PT. Tolan Tiga Indonesia is able to demonstrate records of training for each employee.  Perlabian POM  - Training attendance List of RSPO course, on 1st February 2017, trainer Mr Andi, attended by 13 employees  - Training attendance list of OHS, on 31st January 2016, attended by 12 employees  Tolan Estate  - Harvesting and FFB quality training implemented on 23rd August 2016; attended by 79 workers.  - Training for spraying and knapsack calibration implemented on 8th August 2016. Attended by 28 personnel  - Training for manual fertilizing, on 31st January 2017, attended by 21 employees.  Perlabian Estate:  - Pelatihan Panen dan Mutu Buah, on 1st October 2016, location in block 2010E33 division F4 PLE, attended by all workers in division I-VI, attended by 171 harvesters.  Pelatihan Tanggap Darurat Penganan Tumpah Limabh B3, on 1st October 2017 attended by 15 workers.	Comply



Criterior	n / Indicator	Assessment Findings	Compliance	
Criterior	Criterion 5.1:			
identified	Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
5.1.1	An environmental impact assessment (EIA) shall be documented Major compliance -	AMDAL document is available and approved by Agriculture Ministry No.PEL.No.RC.220/472/B/III/1994, dated 17 <sup>th</sup> March 1994. The impact assessment for Perlabian mill and its supply base was "Revisi Dokumen Rencana Pengelolaan Lingkungan (RKL) dan Rencana Pemantauan Lingkungan (RPL)" approved by "Surat Kepala Badan Pengendalian Dampak Lingkungan Daerah (Bapedalda) Kabupaten Labuhan Batu" No.660/326/BPDL-LB/Set/2006 dated 21 <sup>st</sup> July 2006. All environmental impact assessments have been carried when and where appropriate. Records of all impact assessments carried out are readily available. All operational areas have undertaken reviews of the environmental impacts on at least an annual basis.	Comply	



Criterion / Indicator	Assessment Findings	Compliance
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 -	Company has prepared report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester), e.g. RKL-RPL report semester I 2016 (Period January – June 2016) and RKL-RPL report semester II 2016 (Period July – December 2016) as per document "Laporan Pelaksanaan Rencana pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL PT. Tolan Tiga – Semester II, 2016".  The evidence of submitted report to the government is available, e.g.  - Acceptance RKL/RPL report in "Badan Lingkungan Hidup Kabupaten Labuhan Batu Selatan" on 16 February 2017 by BLH Labuhanbatu Selatan officer, namely Mr Ema Jeiha.  - Acceptance RKL/RPL report in "Bagian pengendalian Pencemaran Agro industry Kementerian lingkungan Hidup in Jakarta Timur on 16 February 2017, by courier (consignment note available – via Pandu Logistics)  The management plan incorporated in the "Rencana Pengellolaan Lingkungan", consist of:  - Air quality;  - Biodiversity;  - Economic growth in the region;  - Job opportunity;  - Social facilities;  - Local community perception;  - Disease prevalence;  The environmental impact, both positive and negative impact and increasing the positive impact, e.g.  - Air quality management: installation of dust collector, machinery service and maintenance, planting trees, road maintenance, all worker using ear plug.  - Water quality: waste water management, Clean Development Mechanism (biogas plant) project, Land Application.  - Biodiversity: maintenance of sign board of HCV area, maintenance of HCV boundary, planting trees, patrol in HCV area.  - Economic wellbeing in the region: Community Development.  - Job opportunity: for local communities, etc.	Comply



Criterion / Indicator	Assessment Findings	Compliance
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 -	Company has prepared report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester), e.g. "RKL-RPL" report semester I 2016 (Period January – June 2016) and RKL-RPL report semester II 2016 (Period July – December 2016) as per document "Laporan Pelaksanaan Rencana Pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) PT. Tolan Tiga Indonesia – Semester II, 2016".  The evidence of submitted report to the government is available, e.g.  - Acceptance RKL/RPL report by "Badan Lingkungan Hidup Kabupaten Labuhan Batu Selatan" on 16 <sup>th</sup> February 2017 by BLH Labuhanbatu Selatan officer, namely Mr. Ema Jeiha.  - Acceptance RKL/RPL report by "Bagian Pengendalian Pencemaran Agroindustri Kementerian Lingkungan Hidup" in Jakarta Timur on 16 <sup>th</sup> February 2017, by courier (Tanda Bukti Kiriman is available – via Pandul Logistics) evident.  The company also has conducted monitoring of environmental impact, such as:  - Air emission Boilers, the result is complying with "Peraturan Menteri Lingkungan Hidup No.07 tahun 2007.  - Air emission in power generator, the result was complying with "Peraturan Menteri Tenaga Kerja No.13 tahun 2009".  - Air quality in mill and surrounding mill areas, the result is complying in "Peraturan Menteri Tenaga Kerja No.13 tahun 2011".  - Noise level was also monitored in each station which high noise level in Mill.  - POME waste water, the result was complying with "Keputusan Menteri Lingkungan Hidup No.28 tahun 2003".  - Monitoring of water contamination in "Sumur Pantau Desa Lohsari" on 1st December 2014, the result was complying with the national regulation "Peraturan Menteri Lingkungan Hidup No.28 Tahun 2003".  - Monitoring of water contamination in "Sumur Pantau Desa Lohsari" on 1st December 2014, the result was complying with the national regulation "Peraturan Menteri Lingkungan Hidup No.28 Tahun 2003".  - Surface water analysis in upstream and downstream Perlabian river is complying with "Peratura	Comply



Criterio	n / Indicator	Assessment Findings	Compliance			
Criterio	Criterion 5.2:					
that exist	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.					
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).  - Major compliance -	HCV Identification in Perlabian Estate was conducted by "Yayasan Kelapa Sawit Berkelanjutan" in 2009 based on Indonesian Toolkit – 2008. Total HCV areas was identified is 59.38 Ha.  HCV Identification in Tolan Estate was conducted by "Yayasan Kelapa Sawit Berkelanjutan" in 2009. Total HCV areas was identified is 55.99 Ha.  At the time of the preparation of HCV documents there has been no scheme related ALS, however, team leader has qualified as an "assessor RSPO HCV Approved".	Comply			



Criterion / Indicator	Assessment Findings	Compliance
Where rare, threatened of endangered (RTE) species or HCVs, are present or affected by plantation or operations, appropriate measures that are expect to maintain and/or enhant them shall be implement through a management provided in the management of the managemen	Tolan Estate: Progress in implementation and monitoring of HCV poured in Report on the Implementation and Monitoring of HCV in 2016. In 2016 there is a change of identity of HCV potential become HCV actual for 1 Ha. This is due to replanting activities that have been considering the presence of HCV where previously a potential of HCV, then turned into HCV actual.	



Criterior	/ Indicator	Assessment Findings	Compliance
5.2.3	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 -	Perlabian Estate has realized the program, e.g:  - Monitoring of flora and fauna carried out every month and the results are set in "HCV monitoring checklist" no Doc: ENS/DOC.08. revision 03, 2011.  - Training fro conservasion officer, on 23 September 2013  - Mointoring the signdboard of HCV performed consistently every month, e.g repair the signboard of HCV on October 1, 2016 and February 29, 2016.  Based on the results of monitoring in 2016 described species of flora and fauna are protected.  Based on the results of field observations in Block CF9/F10 (border of Bakaran Batu river) showed that the area of the HCV no activities replanting in radius ±50 meters either side of the river, and has planted woody plants such as Mahogany (Switenia mahogany), Trembesi (Samanea saman), Saga (Adenanthera pavonina), Salam (Eugenia aperculata), Teak (Tectona grandis), etc.  Perlabian Estate: Based on field visits verification shows that the types of protected animals have been socialized through the installation of leaflets at the estate office, installation directly to the employee during the "Apel Pagi".  Based on interviews with workers and with the surrounding villages stated that the company had socialized HCV management, protection of wildlife species, a ban on hunting, poison fish, cut trees, etc. in the area of PT TTI.	Comply
5.2.4	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 -	As outlined in the indicator 5.2.3 which states that the company has drafted a management plan and monitoring of HCV in which the results are available in the "Report on the Implementation and Monitoring of HCV" and evaluated in the Report of the RKL-RPL annually.  Management of HCV have also been included in the plan and the operational implementation of replanting in PT TTI, e.g: based on the results of field observations in Block CF9/F10 (border of Bakaran Batu river) showed that the area of the HCV no activities replanting in radius ± 50 meters either side of the river, and has planted woody plants such as Mahogany ( <i>Switenia mahogany</i> ), Trembesi ( <i>Samanea saman</i> ), Saga ( <i>Adenanthera pavonina</i> ), Salam ( <i>Eugenia aperculata</i> ), Teak ( <i>Tectona grandis</i> ), etc.	Comply



Criterior	/ Indicator	Assessment Findings	Compliance
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights.  - Minor compliance -	Based on the verification of legal documents, identification of HCV as well as the area of the statement indicates that the entire HCV area HCV was under company concession.  Based on the results of public consultation with relevant agencies as well as the surrounding rural communities, stating that the HCV area under control of PT. Tolan Tiga Indonesia.	Comply
Criterior	1 5.3:		
		isposed of in an environmentally and socially resp	onsible manner.
5.3.1	All waste products and sources of pollution shall be identified and documented Major compliance -	Company maintains register of ISO 14001 environmental aspect impacts to identify all waste and pollution sources within Mill and Estates,and other company operation. Company has also maintained Environmental Management and Monitoring Plan as to comply with environmental requirements.  Record seen:  Waste management plan available in "Rencana Pengelolaan Limbah PT. Tolan Tiga Indonesia", stated that source of waste and pollution, such as:  "Limbah padat dan limbah tajam poliklinik" – solid waste and sharp waste from clinic;  "Limbah cair rumah tangga" - black water and grey water from domestic disposal;  "Limbah padat rumah tangga" - organic and anorganic waste from domestic disposal;  "Limbah bahan berbahaya beracun" – hazardous waste from power generator and vehicle such as waste lubricants, old battery and waste oil filter;  "Kemasan bekas bahan kimia ukuran kecil dan kemasan jerigen bekas bahan kimia" – empty chemical container/jerry can;  "Karung bekas pupuk" – empty fertilizer inner bag;  "Wadah toner photocopy, cartridge printer" – photocopy machine toner and printer cartridges.	Comply



Criterion / Indicator	Assessment Findings	Compliance
All chemicals and their containers shall be disposed of responsibly.  - Major compliance -	All chemical and hazardous waste from Perlabian POM and Perlabian Estate are stored in temporary hazardous waste storage in Perlabian Estate and the chemical and hazardous water from Tolan Estate is stored in temporary hazardous waste storage. The storage permit, such as:  1. "Keputusan Kepala Badan Pelayanan Perizinan Terpadu dan Penanaman Modal Kabupaten Labuhanbatu Selatan No.503/318/BPPTPM-LS/P.I/2015 tentang Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT Tolan Tiga Indonesia Kebun Tolan" dated 22 <sup>th</sup> June 2015 and valid for 5 years. Location in Tolan Estate.  2. "Keputusan Kepala Badan Pelayanan Perizinan Terpadu dan Penanaman Modal Kabupaten Labuhanbatu Selatan No.503/319/BPPTPM-LS/P.I/2015 tentang Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT Tolan Tiga Indonesia Kebun/PKS Perlabian" dated 22 <sup>th</sup> June 2015 and valid for 5 years. Location in Pelabihan Estate.  The storage meets all permit's requirements. All chemical and their containers from Mill and Estates were collected and kept in temporary waste storage for 365 days prior disposal. Records of monitoring are in place in term of Neraca Limbah B3. Auditor visited the storage in Perlabian Estate and Tolan Estate area confirmed appropriate storage have been provided with consideration of safety and environmental aspects such as second containment, spill-kit, warning signs, PPE, firefighting, alarm and first-aid kit. Review of records showed all hazardous waste has been identified and properly monitored, such as used oil, used oil filter, used batteries, empty chemical container from Perlabian Estate and Mill activities, contaminated materials, etc. Monitoring was recorded in document "Neraca Limbah B3".	Comply
	Tolan Estate: The latest disposal to third party licensed waste collector was on 3 <sup>rd</sup> October 2016 to CV Amindy Barokah. The Manifest documents and receipts were available and properly recorded:  1. "Berita Acara Serah Terima Limbah B3 No./PLE/2016 dated 3 <sup>rd</sup> October 2016 from Tolan Estate. The licensed contractor transported 61.65 kg chemical container, 48.5 kg fertilizer inner and 7 kg medical waste.  2. Manifest No.ZF0010487 for 7 kg medical used dated 3 October 2016. Manifest No.ZF001086 for 110.15 kg hazardous waste container by CV Amindy Barokah dated 3 <sup>rd</sup> October 2016.	



Criterion	/ Indicator	Assessment Findings	Compliance
		Perlabian Estate and Perlabian POM  1. "Berita Acara Serah Terima Barang – Limbah Bahan Berbahaya Beracun (B3)" – handover minutes, NO.84/PLE/2016, on 3 <sup>rd</sup> October 2016 to CV Amindy Barakah. Detail of hazardous waste are waste oil 1,700 liters, old battery 238 kg, old fuel filters 166.9 kg, old electric breaker 10 kg, contaminated rugs 19 kg, empty chemical containers 145 kg. Vehicle No. BK 8798 MN  2. Hazardous waste manifest No.ZF0010488, waste oil 1,700 liters, dated 3 <sup>rd</sup> October 2016, Vehicle No. BK 8789 MN.	
		Waste management plan is documented in "Rencana pengelolaan Limbah". Waste management consists of medical waste, domestic waste, and hazardous waste to reduce pollution to the environment	
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.  - Minor compliance -	Company maintain Environmental aspect impacts ISO 14001 registration for all waste and pollution sources within Mill and Estates. Company has also maintained Environmental Management and Monitoring Plan as to comply with environmental requirements.	Comply
	Pinior compilance	Record seen: The company has shown the document of "Penaganan Limbah untuk Mencegah Pencemaran terhadap Lingkungan", e.g: "Prosedur pengelolaan limbah klinik" No.SOP/01/CD revision 02, December 2015, for the management of clinical waste/biohazard. Implementation: - "Pembuatan septictank di perumahan karyawan" – septic tank construction in worker housing; - "Pembuatan landfill" - landfill construction in block 2011J11 division 02;	
		- "TPS Limbah B3" – operation of temporary hazardous waste storage in Perlabian Estate and Tolan Estate, etc.	

#### Criterion 5.4:

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



5.4.1	Α	plan	for	· in	nprov	ing
J. <del>4</del> . i		iciency				
	fos	ssil fuels	s an	d to	optim	ize
		newable				
	in	place a	nd n	nonit	ored.	
		inor co				

Millior Compliance

#### Perlabian POM:

Record for year 2016 seen:

Comply

Month	Fiber (tons)	Shell (tons)	Total (tons)
Jan	1669.13	615.13	2,884.274
Feb	1675.52	513.21	2,188.738
Mar	1653.60	545.53	2,199.134
Apr	1400.97	480.33	1,881.310
May	1412.95	466.86	1,879.818
Jun	1846.90	626.06	2,472.968
Jul	2666.94	909.94	3,576.889
Aug	2644.54	895.79	3,540.339
Sep	3005.06	1016.45	4,021.513
Oct	2543.92	837.65	3,371.572
Nov	2269.56	755.43	3,024.993
Dec	2292.64	815.79	3,108.448
	25,081.77	8,468.21	33,549.990

In total, for year 2016, Perlabian POM is processing 184,056 tons FFB, producing 39,909 tons CPO.

From the process, mill was producing 25,081 tons of fiber and producing 57,688,076,414 Kcal energy (in Net Calorific Value, whereby 1 kg of fiber x 2300 Kcal).

Perlabian POM also producing 8,468 tons of shell, generating 28,791,946,041 Kcal energy (whereby 1 kg of shell x 3400 Kcal).

The total energy generated is 86,480,022,454 Kcal, equivalent to saving the use of 8,236,193 kg HSD

Average renewable energy used to produce each ton CPO is 2,167 Kcal/ton.

#### Tolan Estate:

The estate is monitoring the use of HSD fuel

Year	HSD oil per ton F	FB pr	oductio	n	
2014	168,039/91,919 produced	=	1.83	liters/ton	FFB
2015	189,877/98,700 produced	=	1.92	liters/ton	FFB
2016	156,831/90,466 produced	=	1.73	liters/ton	FFB

#### Perlabian Estate:

The estate is monitoring the use of HSD fuel

Year	HSD oil per ton FFB production				
2015	156,125/92,776	=	1.68	liters/ton	FFB
	produced				
2016	156,587/90,362 produced	=	1.73	liters/ton	FFB

#### 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.



Records of land clearing with zero burning shall be available, referring to the ASEAN Policy on Zero Burning (2003) or other recognised techniques based on the existing regulations.

- Major compliance -

No open burning was noted during field visit and interviewed with local communities and workers. "Prosedur Pencegahan dan Pengendalian Kebakaran Lahan" No.ENC/SOP/10 dated 1st February 2014 for prevention and control of fire. PT. Tolan Tiga Indonesia was using fire danger rating; risk categorized through a number of factorial: by number of rainy day, rain fall intensity, and/or occurrence of fire at boundary.

Perlabian Estate and Tolan Estate: Laporan Patroli Ranger January – December 2016, shows no fire. A system is in place to monitor fire risk in plantation. The fire risk monitoring is based on rainfall measurement and number of raining day; the result recorded under "Status Resiko kebakaran" and exposed on fire risk notice board. Fire patrol carried out on regular basis.

Perlabian POM: In accordance with regulation on fire fighting unit on work place, "Keputusan Menteri Tenaga Kerja dan Transmigrasi No.186 Tahun 1999 tentang Unit Penanggulangan Kebakaran di Tempat Kerja" — firefighting team at Perlabian POM available: "Surat Keputusan Kepala Dinas Sosial Tenaga Kerja dan Transmigrasi Kabupaten Labuhan Batu Selatan No.KEP.07/Bakortiba/TK/2015 tentang Pengesahan Tim Tanggap Darurat dan Badan Koordinator Anti Kebakaran di PT Tolan Tiga Indonesia", dated 18<sup>th</sup> May 2015. Team has been appointed, trained and ready; Firefighting equipments (fire extinguisher, hydrant, hose, water pump, nozzle, etc.)

Inspected on monthly basis, last dated 3-4<sup>th</sup> March 2016. 50 fire extinguishers and 6 hydrant points identified and controlled at Perlabian POM; Firefighting training on 12<sup>th</sup> July 2015 for Perlabian POM and "Laporan Simulasi Tanggap Darurat dated 9<sup>th</sup> February 2016". Attendance list (85 employees participated), analysis and evaluation are available.

#### Tolan Estate:

#### Record seen:

- Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Kabupaten Labuhanbatu Selatan Nomor KEP.03/BAKORTIBA/Naker/II/2017 tentang Pengesahan Tim Tanggap Darurat dan Badan Koordinator Anti Kebakaran (Bakortiba), dated 17<sup>th</sup> February 2017.
- Fires patrol/monitoring of land fire occurrence recorded in "Buku Rekaman Kebakaran Areal Kebun Tolan". E.g. in October, November and December 2016 reported "Nihil" nil;

Comply



		Perlabian Estate: Based on field visit to replanting area, no burning	
		for replanting area. Furthermore, company demonstrates contract for land preparation using mechanical method "Surat Perjanjian Kerja No.12/GMO-PLE/TG/VIII/2015 between PT. Tolan Tiga Indonesia and CV Tua Gabe tentang Replanting Oil Palm 2016" dated 3 <sup>rd</sup> August 2015. The mechanical process indicating job specification such as ripping, felling.	
		Agreement for replanting 2017 in Perlabian estate, as in contract between company and CV Tua Gabe "Surat Perjanjian Kerja No.06/GMO-PLE/TG/VI/2016 antara PT. Tolan Tiga Indonesia dengan CV Tua Gabe tentang Replanting OP 2017", dated 27 <sup>th</sup> January 2016. Job specification: ripping 2 round, felling, chipping, spreading, etc. Buku Rekaman Kebakaran Areal Kebun Perlabian, in January 2017 reported that nil fire point.	
5.5.2	Where fire has been used for eradication of pest during replanting, the records of the analysis of the use of fire and permit from the authorised agency shall be available.  - Minor compliance -	No open burning was noted for replanting. Contractor was using mechanical method.	Comply
Criterion	1 5.6:		
Plans to monitored	The state of the s	s, including greenhouse gases, are developed,	implemented and
5.6.1	Document(s) assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent, shall be available. (see Criterion 4.4) - Major compliance -	The company has developed pollution and emission reduction plan. The plan covers planning, implementing plans and monitoring activities generating pollution and emission. PT. Tolan Tiga Indonesia's plantation are located on 100% mineral soil. POME application/Land application permitted for plantation in mineral soil. Identification of pollution and emission sources recorded under Environmental Aspect & Impact List (Daftar Aspek & Pengaruh Lingkungan). The identification listed all relevant activities that generate pollution and emission from office, plantations, palm oil mill, mill effluent treatment up to workers activities.	Comply
		Perlabian POM: Assessment of aspect and impact, including the source of polluton and emission as in "Environmental Aspect & Impact List No.PLPOM-EMS/110111/001" latest review 31st January 2017.	



5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plan to reduce or minimize them implemented.  - Major compliance -	Perlabian Estate: Identification source of pollutant available in the "Environmental Aspect & Impact List", while the source of green house gasses identified under "Inventarisasi Sumber Emisi Gas Rumah Kaca" from use of anorganic fertilizer, use of agrochemical (pesticide and herbicide) and use of HSD fuel for transport.  GHG mitigation plan:  To reduce of pesticide and herbicide; program: no spraying on riparian area; target 2017: all block; timeline: January – December 2017; Program: to plant cover crop and beneficial plant on replanting area; target: all replanting blocks; timeline: April – August 2017; Program: spraying tool calibration regularly; target 2017: once a year; timeline: June 2017; Program: spraying regime based on weed growth above 45%; target: conduct monitoring on weed growth on monthly base; timeline: January – December 2017;  To reduce fossil fuel use; Program: transporation/fleet management; target reduce fuel use 2017:156,000 liters; timeline: January – December 2017; Program: conduct checking and regular maintenance for all vehicle; target: regular vehicle check; timeline: January – December 2017;  To increase the efficiency in use of fertilizer; Program: Fertiliser application in line with fertilizer recommendation; target: for all oil palm block; target: January – October 2017; Program: oaplied eFB on replanting area; target: for all replanting blocks; timeline: all year.  To reduce, reuse and recycle empty chemical container: Program: Collection and storage empty chemical container as hazardous waste; target: all hazardous waste to be place in temporary storage; timeline: January – December 2017; Program: appropriate handling on empty chemical container to pre-mixing of chemical; timeline: January – December 2017; Program: utilization of empty fertilizer bag; target: using fertilizer bag for bridge construction and individual terrace; timeline: all year; Program: planting trees in HCV area, planting trees around worker housing, etc.; target 350 trees; timeline: January – December 2017	ellence a habit



Tolan Estate:

Identification source of pollutant available in the "Environmental Aspect & Impact List", while the source of green house gasses identified under "Inventarisasi Sumber Emisi Gas Rumah Kaca" from use of anorganic fertilizer, use of agrochemical (pesticide and herbicide) and use of HSD fuel for transport.

#### GHG mitigation plan:

- To reduce of pesticide and herbicide; program: no spraying on riparian area; target 2017: all block; timeline: January – December 2017;
  - Program: spraying tool calibration regularly; target 2017: 2 times a year; timeline: March and September 2017;
  - Program: spraying regime based on weed growth above 45%; target: conduct monitoring on weed growth on monthly base; timeline: January December 2017;
- To reduce fossil fuel use; Program: transporation/fleet management; target reduce fuel use 2017:156,000 liters; timeline: January
   December 2017;
  - Program: conduct checking and regular maintenance for all vehicle; target: regular vehicle check; timeline: January December 2017:
  - Program: Road maintenance; target: road maintenance as planned; timeline: January December 2017;
- To increase the efficiency in use of fertilizer; Program: Fertiliser application in line with fertilizer recommendation; target: for all oil palm block; target: January – October 2017;
- To reduce, reuse and recycle empty chemical container: Program: Collection and storage empty chemical container as hazardous waste; target: all hazardous waste to be place in temporary storage; timeline: January – December 2017;

Program: appropriate handling on empty chemical container to be reuse and hand over hazardous waste into licensed operator; target: reuse empty chemical container for pre-mixing of chemical; timeline: January – December 2017;

Program: utilization of empty fertilizer bag; target: using fertilizer bag for bridge construction and individual terrace; timeline: all year;

 Planting trees: planting trees in HCV area, planting trees around worker housing, etc.; target 350 trees; timeline: January – December 2017;

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			1
		Observation: PT. Tolan Tiga Indonesia demonstrates plan to reduce or minimize greenhouse gas (GHG) emissions. However, it is need to consider reducing or minimizing pollution and greenhouse gas emissions with detail in target, timeline and person in charge.  Action taken: PT. Tolan Tiga Indonesia has prepared GHG mitigation plan for palm oil mill and estate operation. The detail in target, timeline and person in charge has been identified.	
5.6.3	A monitoring plan and results of regular reporting on emission and pollutants from estate and mill operations using	Perlabian POM, Perlabian Estate, Tolan Estate: Calculation of GHG has been demonstrated. The data input submitted for calculation in palmGHG ver.3.0 has been verified and found to be in line with data produced on the field (Perlabian POM, Perlabian Estate and Tolan Estate).	Comply
	appropriate methods, shall be available. - Minor compliance –	Result of GHG calculation is attached as part of public summary report $Appendix\ I - PalmGHG$ Calculation.	
Principle affected	e 6: Responsible considera by growers and millers	ation of employees and of individuals an	d communities
Criterior	n 6.1:		
participat		nt that have social impacts, including replanting, the negative impacts and promote the positive ate continual improvement.	
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented Major compliance -	PT TTI has the environmental Doceument, as per "Dokumen Revisi Pengelolaan Lingkungan (RKL) for plantation area 8,479.06 Ha and POM with a capacity of 60 tons FFB/hour, in accordance with Surat Persetujuan Kepala Badan Pengendalian Dampak Lingkungan Daerah No. 660/326/BPDLLB/Set/2006 dated 21 <sup>st</sup> July 2006.	Comply
		The company also has conducted social impact assessment was conducted by "YASBI" in 2010. The process of preparing social impact assessment in 03/2010 has actively involving stakeholders through guided interview, questionnaires and focus group	



6.1.2	There shall be evidence that the assessment has been conducted with the participation of affected parties.  - Major compliance -	Based on document verification, social impact assessment done by Yayasan Kelapa Sawit Berkelanjutan Indonesia (YASBI) – demonstrates participation of communities through interview, focus group discussionand questionnaires and filling the questionnaire, it was also confirmed from the results of interviews with the surrounding villages, which states that the village government involved in data collection for social studies in 2010.  In each year the Company also conducts social data collection as part of the monitoring of social impacts.	Comply
6.1.3	Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties, shall be available, documented and timetabled, including responsibilities for implementation.  - Major compliance -	PT Tolan Tiga Indonesia has established Impact Management and Monitoring Plan as outlined in the Matrix of Environmental Management and Monitoring EIA documents. The period for implementation of the management and monitoring including social impacts regulated in detail in the matrix. The reporting period is done every six months, while for social impacts, monitoring and evaluation carried out annually  Within the AMDAL and SIA document, the negative and positive impact of oil palm development has been explained. The environmental management and monitoring plan document has lined out effort that company should carry out in order to minimize negative impact and promote positive impact from oil palm development.	Comply
		The Social Impact Assessment document has explained the recommendation that sould be done by company to minimize negative impact and promote positive impact from social impact management.	



6.1.4	The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties.  - Minor compliance —	The Company has consistently monitoring the social impact each year, both from the aspect of social impact assessment results of the EIA and Social Studies in 2010. Data from the monitoring activity is used as a material evaluation of the implementation of social management every year and it is available in the Report of the RKL-RPL. The social impact of replanting activities and manufacturing boundry ditch has also been included in the monitoring of impact.  Monitoring the social impact is done by involving the local community through a questionnaire, for example in 2016 conducted data collection questionnaire number of 40 respondents from the village community Tolan I/Tolan II, Perlabian, Gunung Selamat, Air Merah, Tanjung Selamat, Pekan Tolan, Perkebunan Perlabian dan Desa Meranti.  In the Report of the Implementation and Monitoring of the Environment in 2016 also described the analysis of trends and plan efforts to reduce the negative impact.	Comply
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance –	PT. Tolan Tiga Indonesia does not have scheme for smallholder.	N/A

#### 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.



5.2.1	Communication and	Communication and consultation with stakeholder is	Comply
o.∠. I	consultation procedures	regulated under:	
	shall be documented.	- Procedure for receiving and providing response	
	- Major compliance -	upon information request "Prosedur Pemberian	
	riajor compilance	dan Tanggapan terhadap Permintaan Informasi" Dok.No.ENC/SOP/08 dated 6 <sup>th</sup> April 2015. In the	
		procedure regulates mechanism for providing	
		and responding to information request, from	
		stakeholder.	
		- Procedure for internal complaint and grievance	
		"Prosedur Keluh Kesah dengan Pihak Internal"	
		Dok.No.SOP/025/Dept dated 27 <sup>th</sup> March 2015.	
		The procedure explains steps to convey complaint and receive complaint from internal	
		party, as well providing appropriate response.	
		The document complemented with flow chart.	
		- Procedure for external complaint and grievance	
		"Prosedur Keluh Kesah dengan Pihak Eksternal"	
		Dok.No.SOP/026/HRA, dated 27 <sup>th</sup> March 2015.	
		The procedure explains steps to convey	
		complaint and receive complaint from internal party, as well providing appropriate response.	
		The document complemented with flow chart.	
		The accument complemented with now chart.	
		Perlabian POM:	
		Stakeholder communication recorded under: "Buku Rekaman Permintaan Informasi dan	
		"Buku Rekaman Permintaan Informasi dan Tanggapan", for type of information received in	
		written. In 2016, thre are 8 type request	
		information, e.g :	
		- on 8 <sup>th</sup> August 2016 there was a request/call for	
		participant in a Boiler training from government	
		through letter No.560/475/DSTKT/2016 and has	
		been responded to by company on 22 <sup>nd</sup> August 2016 to approve a person for training;	
		- on 10 <sup>th</sup> June 2016 there was an inquiry for	
		production data from "Dinas Kehutanan dan	
		Perkebunan" through letter	
		No.525/0587/Kehutanan/2016 and has been	
		responded to 13 <sup>th</sup> June 2016 by sending data	
		production (CPO).	
		"Buku Rekaman Keluh Kesah Internal & Ekternal",	
		for recording complaint from internal stakeholder	
		and external stakeholders; In 2016 there are 27	
		types of internal complaints and no external	
		complaints, e.g: - On 25 <sup>th</sup> July 2016 related to boiller ash	
		disruption to employee housing and has been	
		followed up by management with the cleaning	
		and repair boiller which was completed on 7 <sup>th</sup>	
		August 2016;	
		- Complaints by employees of office on 1 <sup>st</sup> August	
		2016 related to the water pipes broke and have	
		August 2010.	
		been addressed by the company to make improvements on 6 <sup>th</sup> August 2016.	



		Perlabian Estate Stakeholder communication recorded under "Buku Rekaman Permintaan Informasi dan Tanggapan", for type of information received in written. In 2016 there were 16 types of requests for information from both internal and external, in 2017 up to February 2017, there are 2 types of requests for information from the local community, related to request for intership from SMK Lohsasi and dispensation permit for "Musrenbangdes" from employees in Desa Perkebunan Perbalian.	
		"Buku Rekaman Keluh Kesah Internal", for recording complaint from internal stakeholders; In 2016 there are 12 types of internal complaints and all of them have received a response from the company in accordance with the mechanism that is owned. "Buku Rekaman Keluh Kesah Eksternal", for recording complaint from external stakeholders; In 2016 there are 5 types of external complaints and all of them have received a response from the company in accordance with the mechanism that is owned. The status of complaints have been settled.	
		Tolan Estate: Stakeholder communication recorded under:  - "Buku Rekaman Permintaan Informasi dan Tanggapan", for type of information received in written. In 2016 there were 8 types of requests for information, e.g: on 25 <sup>th</sup> July 2016 related to boiller ash disruption to employee housing and has been followed up by management with the cleaning and repair boiller which was completed on 7 <sup>th</sup> August 2016; "Buku Rekaman Keluh Kesah Internal & Ekternal", for recording complaint from internal stakeholder and external stakeholders; In 2016 there are 34 types of internal complaints and no external complaints, for example; the complaints officer kindergarten on 8 <sup>th</sup> August 2018 and has been addressed by the management on 12 <sup>th</sup> August 2016;	
6.2.2	The company shall have official(s) who is responsible for consultation and communications with parties Minor compliance -	As regulated under procedure No.ENC/SOP/08, stated the organization structure responsible to receive and provide response upon information request or internal and external complaint is estate manager. During operation in Perlabian estate, senior manager also appointed field head assistant and office assistant to help communicate with surrounding community.	Comply



6.2.3	The company shall have a
0.2.3	list of stakeholders,
	records of
	communications, including
	confirmation of receipt
	and that efforts are made
	to ensure understanding
	by affected parties, and
	records of actions taken in
	response to input from
	stakeholders.

- Minor compliance -

Company was able to show list of stakeholders, latest update in January 2017, e.g.:

- Authorities of Labuhanbatu regency comprise of 7 offices: Regent office, Manpower office, Land office, Plantation services, Health office, Environmental Monitoring Body;
- District level authorities: District head, police office, military office;
- Surrounding villages, comprise of eight (8) villages for example: Desa Perlabian, Dewsa Tanjung Selamat, Desa Tanjung Medan, Desa Pekan Tolan, etc.;
- Worker union of Serikat Pekerja Tolan Tiga Mandiri covering 5 committees;

Communication and consultation with stakeholder is regulated under:

- Procedure for receiving and providing response upon information request "Prosedur Pemberian dan Tanggapan terhadap Permintaan Informasi" Dok.No.ENC/SOP/08 dated 6<sup>th</sup> April 2015. In the procedure regulates mechanism for providing and responding to information request, from stakeholder.
- Procedure for internal complaint and grievance "Prosedur Keluh Kesah dengan Pihak Internal" Dok.No.SOP/025/Dept dated 27<sup>th</sup> March 2015. The procedure explains steps to convey complaint and receive complaint from internal party, as well providing appropriate response. The document complemented with flow chart.
- Procedure for external complaint and grievance "Prosedur Keluh Kesah dengan Pihak Eksternal" Dok.No.SOP/026/HRA, dated 27<sup>th</sup> March 2015. The procedure explains steps to convey complaint and receive complaint from internal party, as well providing appropriate response. The document complemented with flow chart.

#### Perlabian POM:

Stakeholder communication recorded under:

"Buku Rekaman Permintaan Informasi dan Tanggapan", for type of information received in written. In 2016, thre are 8 type request information, e.g :

- on August 8, 2016 there was a request/call for participant in a Boiler training from government through letter No.560/475/DSTKT/2016 and has been responded to by company on 22<sup>nd</sup> August 2016 to approve a person for training;
- on 10<sup>th</sup> June 2016 there was an inquiry for production data from "Dinas Kehutanan dan Perkebunan" through letter No.525/0587/Kehutanan/2016 and has been responded to 13<sup>th</sup> June 2016 by sending data production (CPO).

Comply

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"Buku Rekaman Keluh Kesah Internal & Ekternal", for recording complaint from internal stakeholder and external stakeholders; In 2016 there are 27 types of internal complaints and no external complaints, e.g:

- On 25<sup>th</sup> July 2016 related to boiller ash disruption to employee housing and has been followed up by management with the cleaning and repair boiller which was completed on 7<sup>th</sup> August 2016;
- Complaints by employees of office on 1<sup>st</sup> August 2016 related to the water pipes broke and have been addressed by the company to make improvements on 6<sup>th</sup> August 2016.

#### Perlabian Estate

Stakeholder communication recorded under "Buku Rekaman Permintaan Informasi dan Tanggapan", for type of information received in written.

In 2016 there were 16 types of requests for information from both internal and external, in 2017 up to February 2017, there are 2 types of requests for information from the local community, related to request for intership from SMK Lohsasi and dispensation permit for "Musrenbangdes" from employees in Desa Perkebunan Perbalian.

"Buku Rekaman Keluh Kesah Internal", for recording complaint from internal stakeholders; In 2016 there are 12 types of internal complaints and all of them have received a response from the company in accordance with the mechanism that is owned.

"Buku Rekaman Keluh Kesah Eksternal", for recording complaint from external stakeholders; In 2016 there are 5 types of external complaints and all of them have received a response from the company in accordance with the mechanism that is owned. The status of complaints have been settled.

#### Tolan Estate:

Stakeholder communication recorded under:

 "Buku Rekaman Permintaan Informasi dan Tanggapan", for type of information received in written. In 2016 there were 8 types of requests for information, e.g: on 25<sup>th</sup> July 2016 related to boiller ash disruption to employee housing and has been followed up by management with the cleaning and repair boiller which was completed on 7<sup>th</sup> August 2016;

"Buku Rekaman Keluh Kesah Internal & Ekternal", for recording complaint from internal stakeholder and external stakeholders; In 2016 there are 34 types of internal complaints and no external complaints, for example; the complaints officer kindergarten on 8<sup>th</sup> August 2018 and has been addressed by the management on 12<sup>th</sup> August 2016;





#### 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.

6.3.1

The mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested, as long as that information is supported with adequate initial evidence.

- Major compliance -

PT. TTI

Company has a mehcanism to resolve dispute, which consist of:

- a. Land dispute referring to land conflict resolution "Prosedur Ganti Rugi Lahan No.SOP/CA/02" dated 1<sup>st</sup> July 2012. The procedure demonstrates that company has provides effective land conflict resolution:
  - Company communicating the permit/HGU to community.
  - Should there be claim from community, company will receive the claim if complemented with evidence of land ownership.
  - Status verification of the said land, with involvement of company personnel, claimant/community and government representative.
  - Field visit and measurement to the claimed land. Minutes of land measurement then produced, with information on hectarage and coordinate points of claimed land, signed by all parties.
  - Final verification based on measurement result and map, to ensure the land is clean and clear, no overlapping with other ownership/other right and no claim from other party.
  - Should the final verification demonstrated that the land has no overlapping with other ownership/other right and no claim from other party company will negotiate the price and carried out the compensation.
  - Once price agreed, based on negotiation, company will pay the claimant/land
- Internal dispute/complaint resolution referring to "Mekanisme Keluh Kesah dengan Pihak Internal rev.II Doc.No.SOP/025/Dept" dated 27<sup>th</sup> March 2015.
- c. External dispute/complaint resolution referring to "Mekanisme Keluh Kesah dengan Pihak Eksternal rev.II Doc.No.SOP/026/HRA" dated 27<sup>th</sup> March 2015.

Within these documents, company has indicated policy to protect anonymity of whistleblower, if requested.

Comply



6.3.2	There shall be records of process and outcome of dispute resolution Major compliance -	Based on document verification and/or stakeholder consultation with relevant authorities and surrounding villages, it was known that there was no land dispute between company and surrounding community.  Internal and external complaint/dispute has been documented by company. See 6.2.3.	Comply
a docume	tiations concerning compensatio	n for loss of legal, customary or user rights are de nous peoples, local communities and other stakeh ive institutions.	
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be available, referring to decision of the Constitution Court.  - Major compliance –	As explained in criterion 2.2, PT. Tolan Tiga Indonesia has obtained the legal ownership of the land since long time ago. The legal ownership of the land granted by Republic of Indonesia through "Konversi Hak Barat/Erfpacht" right. Based on document review upon area statement PT. Tolan Tiga Indonesia shows no land under conflict status with other party.  Up to ASA1.2, PT. Tolan Tiga Indonesia does not have new land clearing/expansion. However, company does have mechanism for land compensation, "Prosedur Ganti Rugi Lahan No.SOP/CA/02" dated 1st July 2012. The procedure comprise of compensation mechanism through communication, FPIC, document verification, evaluation upon land ownership document, participatory land measurement, price negotiation. The documentationfor land compensation consist of measurement application document, minutes of land measurement, "Surat Keterangan Tanah", "Surat Keterangan Tidak Sengketa" – statement letter no dispute, "Surat Pernyataan Pengakuan Hak" – statement letter on right acknowledgement, "Surat Pernyataan Lahan Pemilik Tanah/Lahan untuk Plasma" – Statement letter for heir/next of kin, "Surat Pernyataan Lahan Pemilik Tanah/Lahan untuk Plasma" – Statement letter landowner/land for scheme smallholder (if any), "Surat Pelepasan Hak Menggarap atas Tanah Garapan" – statement letter on release of arable land, "Surat Ganti Rugi Tanah Garapan" – compensation letter.  Based on stakeholder consultation with head of surroundings village, eg: Tanjung Selamat village, Tanjung Medan village and Air Merah village and interview with NGO Tim Sepuluh, there are no report from local community on land conflict between company and community.	Comply



	A procedure for calculating	As explained in criterion 2.2, PT. Tolan Tiga	Comply
6.4.2	A procedure for calculating and distributing fair compensation shall be established, implemented, monitored and evaluated in a participatory way. Corrective actions are taken as a result of this evaluation.  - Minor compliance —	Indonesia has obtained the legal ownership of the land since long time ago. The legal ownership of the land granted by Republic of Indonesia through "Konversi Hak Barat/Erfpacht" right. Based on document review upon area statement PT. Tolan Tiga Indonesia shows no land under conflict status with other party.  Up to ASA1.2, PT. Tolan Tiga Indonesia does not have new land clearing/expansion. However, company does have mechanism for land compensation, "Prosedur Ganti Rugi Lahan No.SOP/CA/02" dated 1st July 2012. The procedure comprise of compensation mechanism through communication, FPIC, document verification, evaluation upon land ownership document, participatory land measurement, price negotiation. The documentationfor land compensation consist of measurement application document, minutes of land measurement, "Surat Keterangan Tanah", "Surat Keterangan Tidak Sengketa" – statement letter no dispute, "Surat Pernyataan Pengakuan Hak" – statement letter on right acknowledgement, "Surat Pernyataan Ahli Waris" – statement letter for heir/next of kin, "Surat Pernyataan Lahan Pemilik Tanah/Lahan untuk Plasma" – Statement letter landowner/land for scheme smallholder (if any), "Surat Pelepasan Hak Menggarap atas Tanah Garapan" – statement letter on release of arable land, "Surat Ganti Rugi Tanah Garapan" – compensation letter.	Comply
		Based on stakeholder consultation with head of surroundings village, eg: Tanjung Selamat village, Tanjung Medan village and Air Merah village and interview with NGO Tim Sepuluh, there are no report from local community on land conflict between company and community.	
		Based on consultation with local goverments Kabupaten Labuhan Batu Selatan, reported that in 2016 there are no report from local community on	

land conflict between company and community.



	Compone	ation		clair	200
6.4.3	Compens			clair	
0.1.0	process	and	out	come	of
	any		negotiated		ted
	agreements		sh	hall be	
	document			W	/ith
	evidence		of		the
	participat	ion	of	affect	ted
	parties.				

- Major compliance -

As explained in criterion 2.2, PT. Tolan Tiga Indonesia has obtained the legal ownership of the land since long time ago. The legal ownership of the land granted by Republic of Indonesia through "Konversi Hak Barat/Erfpacht" right. Based on document review upon area statement PT. Tolan Tiga Indonesia shows no land under conflict status with other party.

Up to ASA1.2, PT. Tolan Tiga Indonesia does not have new land clearing/expansion. However, company does have mechanism for land compensation, "Prosedur Ganti Rugi Lahan No.SOP/CA/02" dated 1st July 2012. The procedure comprise of compensation mechanism through communication, FPIC, document verification, evaluation upon land ownership document, participatory land measurement, price negotiation. The documentation for land compensation consist of measurement application document, minutes of land measurement, "Surat Keterangan Tanah", "Surat Keterangan Tidak Sengketa" – statement letter no dispute, "Surat Pernyataan Pengakuan Hak" - statement letter on right acknowledgement, "Surat Pernyataan Ahli Waris" – statement letter for heir/next of kin, "Surat Pernyataan Lahan Pemilik Tanah/Lahan untuk Plasma" – Statement letter landowner/land for scheme smallholder (if any), "Surat Pelepasan Hak Menggarap atas Tanah Garapan" - statement letter on release of arable land, "Surat Ganti Rugi Tanah Garapan" compensation letter.

Based on stakeholder consultation with head of surroundings village, eg: Tanjung Selamat village, Tanjung Medan village and Air Merah village and interview with NGO Tim Sepuluh, there are no report from local community on land conflict between company and community.

Based on consultation with local governments Kabupaten Labuhan Batu Selatan, reported that in 2016 there are no report from local community on land conflict between company and community.

#### 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 for employees based on the existing manpower regulations shall be available Major compliance -	Collective water Bersama" his stated "Peker Tetap diberi berdasarkan manajemen undang damengingat perusahaan" paid in cadetermined union, in considering ability.  The minimum through "Sur No.188.44/7 Minimum Kaz 2017". The refor Labuhan
1	1	Lici Eabanai

Collective work agreement — "Perjanjian Kerja Bersama" has regulated the salary payment. As stated "Pekerja Harian Tetap dan Pekerja Bulanan Tetap diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama antara manajemen dengan SPTTM sesuai dengan undangundang dan peraturan yang berlaku dengan mengingat situasi ekonomi dan kemampuan perusahaan" — daily worker and monthly worker paid in cash, based on common agreement determined between management and worker union, in accordance to relevant regulations, considering economic situation and company's ability.

The minimum payment year 2017 has been issued through "Surat Keputusan Gubernur Sumatera Utara No.188.44/771/Kpts/Tahun 2016 tentang Upah Minimum Kabupaten Labuhan Batu Selatan tahun 2017". The regulation states the minimum payment for Labuhan Batu Selatan regency year 2017 was sets at Rp.2,300,000/month, increased from 2016 at Rp.2,250,000/month.

Based on document verification, interview with worker union committee stated that at the time of audit using standard for salary 2016. During the interview, worker union committee stated the salary for year 2017 will be discussed between worker union and company on March 2017 in Medan. There was a commitment that the salary for year 2017 would applies retrospective since January 2017. This means the difference of payment between salary 2017 and salary 2016, will be topped up once the salary increment agreed by both parties.

Based on document verification, salary payment for month January 2017 was using 2016 standard. A number of worker salary payment sampled:

- Mrs. S\*\*\*\*\*\*\*, sprayer, SKU-H on January 2017 receives Rp.2,553,562; consist of basic salary Rp.2,182,000; rice benefit Rp.132,750; BPJS Ketenagakerjaan benefit Rp.105,192; BPJS Kesehatan benefit Rp.87,820; BPJS Pensiun benefit Rp.46,340;
- Mr. A\*\*\*, harvester, PKWT on January 2017 receives Rp.3,851,023; consist of basic salary Rp. 2,180,500; rice benefit Rp.212,400; BPJS Ketenagakerjaan benefit Rp.105,125; BPJS Kesehatan benefit Rp.87,820; BPJS Pensiun benefit Rp.46,340 total salary Rp.2,631,555. Aside from the salary, harvesting premium of Rp.962,248; other benefit of Rp.239,720 and Rp. 17,500.

Comply

...making excellence a habit."



4.5.2	Collective Labor	<ul> <li>Mr. Z******, processing employee, SKU-H on January 2017 receives Rp.4,319,815; consist of basic salary Rp.2,184,000; rice benefit Rp.345,150; BPJS Ketenagakerjaan benefit Rp.105,283; BPJS Kesehatan benefit Rp.87,360; BPJS Pensiun benefit Rp.46,380. Aside from the salary, premium of Rp.106,501; overtime Rp.1,427,641; other benefit of Rp.17,500.</li> <li>Temporary worker was hired through cooperative service, "Koperasi Jasa Karyawan PT Tolan Tiga Indonesia", in accordance to work agreement and in accordance to regulation, whereby the determination of daily salary refering to minimum salary year 2016 divided into 25 working days. While payment for piece-rate work calculated based on daily salary divided with average productivity per day.</li> <li>Collective work agreement – "Perjanjian Kerja</li> </ul>	Comply
6.5.2	Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the workers Major compliance -	Bersama" which signed by worker union and management of PT. Tolan Tiga Indonesia has been registered with "Dinas Tenaga Kerja Propinsi Sumatera Utara". The collective work agreement has been acknowledged through "Surat Keputusan Kepala Dinas Tenaga dan Transmigrasi Propinsi Sumatera Utara No.27-6/DTK-TR/2017" dated 25th January 2017, and valid for two (2) years up to 8th January 2019. Inside the collective work agreement has regulated  - Salary payment: salary in form of cash based on agreement and in accordance to relevant laws and regulation; salary in form of rice benefit, 15 kg for worker, 9 kg for spouse and 7.5 kg for each children (up to maximum 3 children).  - Working time regulates the number of working hour per week, change and replacement of working time, weekly rest day, national holidays, working time for female worker.  - Chapter X regulates working overtime — in accordance with "Keputusan Menteri Tenaga Kerja No.Kep-102/Men/VI2014".  - Religious day and bonus also regulated.  Based on document verification upon sampled work agreement shows the right and obligation including salary and benefit refers to relevant laws and regulations.	Сопіріу



6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where such public facilities are unavailable or inaccessible.  - Minor compliance —	From document review and field visit to worker's housing shows that company has prepared facility for workers:  - Worker housing: 138 units in Tolan Estate and 205 units in Perlabian Estate;  - School: 1 primary school in and 1 kindergarten in Tolan Estate, 1 primary school and 5 units kindergarten in Perlabian estate;  - Sport field: football field 4 units, volley vall field 7 units, badminton field 5 units, tennis field 2 units;  - Worker's meeting hall: 6 units;  - Clinic: 1 unit in Perlabian estate, 1 unit in Tolan estate;  - Religious house: 7 units masjid and 1 unit church;  - School bus: 3 units  - Workers also supplied with clean water. Electricity comes from national grid, company provides subvention of Rp.17,500/household/month.  Based on field visit to housing Division IV and Division V shows that housing was completed with 3 bed rooms, living room and a toilet/bathroom. Clean water supply was sufficient every day and company responded swiftly if any damage in worker housing. Company has a plan for renovation in worker housing, has been started in housing Division IV and Division V since 2016. No water drainage clogging found during the visit. Grass in housing compound was mowed down during the visit. Company also provided waste bin, and waste collected on weekly basis.	Comply
6.5.4	There shall be demonstrable efforts to improve workers' access to adequate, sufficient and affordable food Minor compliance –	The employees able to access traditional market. Company also provided cooperative to provides affordable staple food supply.	Comply

#### 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 record of the company's policy in understandable language recognising freedom of association, shall be available.  - Major compliance —	Company respects the freedom association in "Kebijakan Kebebasan Berserikat", signed by President Director on 1st March 2014, which stated the company recognizes the role of lawful and independent workers and employees. Representative organization in creating a constructive working environment. In PT. Tolan Tiga Indonesia, there was Serikat Pekerja Tolan Tiga Mandiri, whereby the member was comprise of all level of workforce, SKU-B, SKU-H and PKWT. Record seen:  Documentation and attendance list of dissemination the company policy (including policy of freedom association), for example:  Communication on 12th February 2017 in Perlabian POM attended by 30 processing workers Shift A;  Communication on 14th February 2017 in Perlabian POM attended by 28 processing workers shift B;  Communication on 12th January 2017 for Tolan estate workers attended by 32 SKU workers;  The communication of freedom of association also conducted by intalling the copy of policy in Perlabian and Tolan Estate.	Comply		
6.6.2	Records of meetings with labor unions or workers representatives shall be available.  - Minor compliance —	Meeting with the company and labour union was conducted regularly, on monthly basis. Several meetings were held, in conjuction with bi-partite meeting, e.g.:  On 1 <sup>st</sup> and 2 <sup>nd</sup> December 2016 between management of Perlabian POM and worker union, discussing industrial relation dispute with one of mill worker. Minutes of meeting and attendance list was sighted.  Meeting on 27 <sup>th</sup> January 2017 between Perlabian Estate management and worker union to discuss collective work agreement 2016/2017. Minutes of meeting and attendance list was sighted.	Comply		
	Criterion 6.7: Children are not employed or exploited.				



6.7.1	There shall be documented evidence that minimum age requirements are met Major compliance –	under "Kebijakan Pekerja Anak" signed by President Director dated 1 <sup>st</sup> March 2014 that stated "PT Tolan	Comply
		Based on document review upon employment records February 2017 shows no wokers under 18 years old. For instance Mrs. S******, sprayer, was recruited on 29 years 6 months old; Mrs. S******, sprayer, was recruited when 35 years 2 months old; Mr.A*** S******, harvester was recruited when 22 years 2 months old; Mr. Z****, operator in Perlabian POM, was recruited when 23 years 9 months old; MR. S****** S******, mill worker in Perlabian POM, was recruited when 24 years 11 months old.	
		This policy has also been communicated to "Koperasi Jasa Karyawan Tolan Tiga" whereby act as outsourcing service provider for daily worker. Based on interview and verification, there was no worker under 18 years old accepted for work.	
		Communication to workforce was through installing policy on estate and mill's notice board, as well as communicating directly. For instance: communication on 17 <sup>th</sup> February 2017 to Perlabian POM workers, attended by 30 workers; communication on 16 <sup>th</sup> January 2017 to Tolan Estate worker – attended by 74 SKU workers and	
		contractor workers.	

#### 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 company's policy on equal opportunity and treatment for work shall be available and documented Major compliance –	The company has policy for equal opportunities, under "Kebijakan Persamaan Kesempatan Kerja", which stated that "The company is not discriminating against anyone in the recruitment practice or in the performance of the company business operation" dated 1 <sup>st</sup> March 2014, signed by President Director.	Comply
		Record seen: Documentation and attendance list of socialization the company policy (including policy for equal opportunities and anti-discrimination), e.g:  - On 18 <sup>th</sup> January 2017 in Perlabian POM attended by 30 processing workers Shift A;  - Communication on 30 <sup>th</sup> December 2016 in Perlabian POM attended by 31 processing workers shift B;  - Communication on 14 <sup>th</sup> March 2016 for Tolan estate workers attended by 28 security force;	
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated.  - Major compliance –	Based on verification upon list of workers in Perlabian POM, Tolan Estate and Perlabian Estate, there was no indication of worker discrimination related to gender, race, religion or tribe. Based on interview with worker union committee, "Serikat Pekerja Tolan Tiga Mandiri" and interview with workers (sprayers, fertilizer applicator and harvesters) company does not discriminate any of the workers.	Comply



6.8.3	Records of evidence that equal opportunity and treatment for work shall be available.  – Minor compliance -	Company has an equal employment opportunity policy, signed by President Director on 1st March 2014. The policy stated company will not discriminate anyone during recruitment, hiring or other business; Selection to fill in position based on qualification and experience. Violation against policy results in disciplinary action and could be legal action.  Company has human resources system, with clear organization structure, job description,incentive system, bonus system, training plan and implementation, provision of human resoures in line with required qualification. Company has procedure for hiring workers, dated 25th April 2007. The procedure regulated that hiring and promotion of workers based on skill, work experiences, interview/evaluation, and medical check up result. This has also regulated inside the collective work agreement.  Based on verification against employment document and interview with worker union "Serikat Pekerja Tolan Tiga Mandiri", it is known that recruitment, hiring and promotion are based on test, considering the job type. Promotion done through yearly worker evaluation. As example; "Form Penilaian Karyawan SKU" consists of 10 evaluation parameters done by Evaluator (FA/TA/OA) and verified by Estate Manager.  Working tools for workers are provided by company, as regulated by "Perjanjian Kerja Bersama/PKB". The provision of wheelbarrow was paid half by worker and half by company. Provision of other working tools for other upkeep/general work is provided by cooperative.	Comply
Criterior	1 6.9:		

There is no harassment or abuse in the work place, and reproductive rights are protected.



6.9.1	A policy to prevent sexual and all other forms of harassment and violence, shall be documented, implemented and communicated to all levels of the workforce.  - Major compliance —	PT. Tolan Tiga Indonesia has a policy to prevent sexual harassment under "Kebijakan Pelecehan Seksual", signed by President director on 1st March 2013. The policy stated: Company uphold the laws under Republic of Indonesia related to sexual harassment; sexual harassment could occurs in form of physical contact, comments, jokes, exhibition or other behavior; All discrimination and sexual harassment complaint will be handle in good manner and confidential to achieve fair statement and reduce false accusation. There shall be no false sexual harassment accusation. Sexual harassment applies equally — both men and women. Sexual harassment accusation with solid evidence could lead to disciplinary action including termination. False report on sexual harassment, without evidence could also lead to disciplinary action including termination and legal action.  PT. Tolan Tiga Indonesia have established gender committee to solve sexual harassment cases and enhance reproductive right for women workers. Gender committee conducts meeting Regularly, e.g.  Meeting on 17th February 2017, in Perlabian POM, attended by 30 workers shift A;  Meeting on 16th January 2017, attended by 9 workers SKU level.  No sexual harassment and violating of reproductive rights were noted during audit and interview with	Comply
		rights were noted during audit and interview with workers and gender committee leader and members. Until this surveillance period, there has no sexual harassment complaint received by the gender committee.	



	communicated to all levels of the workforce Major compliance –	pregnancy, contraception aid, infertility, infection and sexually-transmitted-disease; sex education and gender; prevention and medication on reproductive infection including HIV/AIDS; Provision of pregnancy, delivery and ante-natal treatment; Baby and infant health service; Encourage male participation in sharing responsibility related to sexual behavior, during maternal period, HIV/AIDS and domestic violence.  Pregnancy check employee performed once every month, the record seen in Perlabian Estate:  Attendance list female sprayer – not pregnant and not breast-feeding - "Daftar Absensi Tenaga Kerja Wanita Tidak Hamil dan Menyusui" January 2017 – No pregnant. E.g. Mrs. Erna, Mrs. Sukiyem, Mrs. Sulianti, Mrs. Susanti (period on 26-27 <sup>th</sup> January 2017) and Mrs. Khamida.  Based on interview with gender committee, company has understood the implementation of protection on reproductive rights in form of menstruation leave issue, maternal leave, medical checkup for female worker, performing jobs related to agrochemical, prevention of domestic violence, etc.  The policy communicated through notification board and during gender committee meeting to workers or during company policy dissemination:  Meeting on 17 <sup>th</sup> February 2017, in Perlabian POM, attended by 30 workers shift A;  Meeting on 16 <sup>th</sup> January 2017, attended by79 workers SKU level.	
6.9.3	A specific grievance mechanism which respects anonymity of complainants where requested, and as long as they are supported with adequate information, shall be documented, implemented, and communicated to all workforce.  - Minor compliance —	The company has provided the "Pedoman Pengelolaan Gender" under memorandum, No.ENC/Pedoman/GC/01 dated 21 <sup>st</sup> April 2011. Based on interview with gender committee in PT. Tolan Tiga Indonesia; company has a specific mechanism to handle sexual harassment case or another gender related cases through gender committee. The procedure has covers protection of anonymity of complainants. Based on interview with female worker (sprayers team), they understand the grievance mechanism.	Comply

#### 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 -  Pricing mechanisms for Fresh Fruit Bunches (FFB) and inputs/services shall be explained and documented (where these are under the control of the mill or plantation).  - Major compliance -	PT. TTI: Perlabian POM does not received and/or process FFB from third-party sources. Perlabian POM was receiving FFB only from certified source, Perlabian Estate and Tolan Estate. This criterion was not applicable for Perlabian POM. PT. TTI: Perlabian POM does not received and/or process FFB from third-party sources. Perlabian POM was receiving FFB only from certified source, Perlabian Estate and Tolan Estate. This criterion was not applicable for Perlabian POM.	N/A N/A
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 -	The company was using service from cooperative, "Koperasi Jasa Karyawan PT. Tolan Tiga Indonesia" for the provision of temporary worker. Based on interview with the contractor worker/temporary worker and cooperative committee, they have contractual agreement with PT. Tolan Tiga Indonesia. The agreement, "Surat Perjanjian Kerja antara PT. Tolan Tiga Indonesia dan Koperasi Jasa Karyawan PT. Tolan Tiga Indonesia No.01/TTI/KJK/II/2017", dated 2 <sup>nd</sup> January 2017 has been signed by both parties. The work agreement covers the scope of work, i.e. field upkeep work for Tolan Estate, Perlabian Estate and Perlabian POM; regulates the provision of social insurance "BPJS Ketenagakerjaan dan BPJS Kesehatan" by cooperative to its worker; Provision of minimum wage by cooperative; monitoring on the use of PPE; and prohibition on worker under 18 years old.  The agreement was available in Bahasa Indonesia and has been understood by worker and the cooperative committee.	Comply
6.10.4	Agreed payments shall be made in a timely manner Minor compliance -	From documented evidence, the payment of contracor/cooperative was made on time. In accordance to the time-frame regulated in the contract. Furthermore, based on interviews with the management of cooperatives and temporary employees stated that PT. Tolan Tiga Indonesia has paid the cooperative in accordance with the employment agreement in the Employment Agreement.	Comply

#### Criterion 6.11:

Growers and millers contribute to local sustainable development where appropriate.



6.11.1	Records of contributions to local development based on the results of consultation with local communities shall be available.  - Minor compliance -	Perlabian Estate and Tolan Estate in 2016 and 2017, thre are 8 types Prgram Community Development, e.g. in Education, Insfrastucture, Agriculture, entrepreneurship, sports, arts, religious and social-economics.  Record of implementation the program of CSR documented by company, e.g. heavy machinery to renovation of the football field in Pekan Tolan village on 26 <sup>th</sup> July 2016, assistanece for road maintenance in Meranti village on 20 <sup>th</sup> September 2016, etc.	Comply		
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve scheme smallholder productivity.  - Minor compliance -	No smallholder scheme in PT Tolan Tiga Indonesia. Not applicable.	N/A		
Criterion	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 labor are used Major compliance -	The company has had a policy against Forced Labour or Labour traded (Company Policy or trafficked Against Forced Labour) adopted by President Director dated 1st March 2014, that is:  The Company does not use forced labor or trafficked workers either directly or through a third party.  The Company acknowledged that slave labor or trafficked labor can take many forms, all of which are equally unacceptable. Debt bondage or bonded labor employment relationship because the debt is considered forced labor.  The alleged use of forced labor or labor which are traded by the company's employees if proven would result in disciplinary action up to termination of employment and also can result in legal action.  Companies that do business with PT. Tolan Tiga Indonesia required adhering to this policy. Violation of this policy if proven would result in disciplinary action up to termination of employment and also can result in legal action.  This policy applies to PT. Tolan Tiga Indonesia and for the entire company under the management of PT. Tolan Tiga.  The policy has been disseminated to stakeholders through the installation of such policies on the notice board, in their respective Estate offices and dissemination directly to the employees, for example:  Socialization to employees Perlabian Mill on 18th Januari 2017 which was attended by 30 employees Shift A.  Socialization to employees Perlabian Mill on 30th December 2016 which was attended by 31 employees Shift B.  Tolan Estate socialization to employees on 14th March 2016, followed by 28 security personnels.	Comply
6.12.2	It shall be demonstrated that no contract substitution has occurred Minor compliance -	Based on document review and interview with workers and labour union, confirmed that no contract substitution was noted.	Comply



6.12.3	Where migrant/foreign/honorary workers are employed, a special worker policy and procedures and the evidence of implementation shall be available.  - Major compliance -	Pekerja Harian Lepas – PHL (temporary workers) and piece-rate worker were managed by Cooperative, "Koperasi Jasa Karyawan PT. Tolan Tiga Indonesia", as a reference work has been signed Working Agreement (SPK) are outlined in "Surat Perjanjian Kerja antara PT. Tolan Tiga Indonesia dan Koperasi Jasa Karyawan PT. Tolan Tiga Indonesia No.01/TTI/KJK/II/2017", dated 2 <sup>nd</sup> January 2017. Valid until 1 year since it was signed, covering BPJS for employees, the minimum wage, PPE provision and usage, etc.  Based on interview with "Koperasi Jasa Karyawan" indicate that they have understood the right and obligations as a provider of services procurement of temporary worker.	Comply	
Criterion				
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations.  - Major compliance -	Company has a policy in protection of human rights under "Kebijakan Perusahaan tentang Hak Asasi Manusia", signed by President Director on 1st March 2013, consist of, among other:  The company acknowledges human rights are universal; this applicable to all operation.  The company support implementation of human rights and ILO declaration related to principles and basic rights in working place that has been ratified by Republic of Indonesia.  Charges against violation of human rights, if proven, resulted in disciplinary action up to termination of work relation, and could cause legal action.  This Policy applies to PT. Tolan Tiga Indonesia and to all companies under the management of PT. Tolan Tiga Indonesia.  The policy has been disseminated to stakeholders through the installation of such policies on the notice board, in their respective Estate offices and dissemination directly to the employees, for example:  Socialization to employees Perlabian Mill on 14th Januari 2017 which was attended by 18 employees Shift A.  Socialization to employees Perlabian Mill on 12th February 2016 which was attended by 30 employees Shift B.  Tolan Estate socialization to employees on 16th January 2017, followed by 79 workers and contractor's worker.	Comply	
Principle 7: Responsible development of new plantings				



#### **Criterion 7.1:**

A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.

N/A



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

7.1.1	An independe	ent social and
	environmenta	al impact
	assessment	(SEIA),
	undertaken	through a
	participatory	methodology
	including t	he relevant
	affected	stakeholders,
	shall be docu	mented.

- Major compliance -

There was no new planting after November 2005. The criterion 7.1 was not applicable.

#### Tolan Estate:

From old maps and documentation, it was found that the oil palm:

- Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980;
- Oil palm planted in 2008 was originated from oil palm planted in 1980;
- Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982;
- Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982;
- Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982;

Replanting Plan Tolan Estate:

Replanting	Division/Initial Planting	Hectarage
year	year	
2021	Div.II: 1994	173.33 Ha
2022	Div.II: 1994	72.58 Ha
	Div.III: 1994	95.03 Ha

It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.

#### Perlabian Estate:

Planting Year	Initial	Planting	Ha	Total
	Year			
2006	1977		279.53	279.53
2007	1978		43.93	195.93
	1989		144.00	
	1980		3.00	
	1992		5.00	
2008	1979		83.00	212.14
	1980		129.14	
2009	1982		138.28	138.28
2010	1978		4.00	210.45
	1979		26.00	
	1980		126.00	
	1982		49.00	
	1992		5.45	
2011	1984		326.79	326.79
2012	1983		54.64	442.68
	1985		3.02	
	1986		385.02	
2013	1983		95.83	118.73
	1985		21.43	
	1996		1.47	
2014	1987		63.73	308.65
	2000		1.10	
	1988		201.86	
	1989		41.96	
2015	1986		176.94	318.62
	1987		110.94	
	1990		30.74	
2016	1992		163.28	164.12
	1996		0.84	

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7.1.2	Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts.  - Minor compliance -	See Criterion 7.1.1	N/A
7.1.3	Where the development includes an outgrower scheme (skema kemitraan), the impacts of the scheme and the implications of the way it is managed shall be given particular attention.  - Minor compliance -	See Criterion 7.1.1	N/A

#### Criterion 7.2:

Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.



						T-
7.2.1	Soil suitability maps or soil		no new planting a		nber 2005.	N/A
7.2.1	surveys adequate to establish	The criterion	7.1 was not applic	cable.		
	the long-term suitability of					
	land for oil palm cultivation	Tolan Estate				
	shall be available and taken		aps and documer	itation, it i	was found	
	into account in plans and	that the oil p		oo orioinat	ad frama all	
	operations.		planted in 2006 w nted in 1976 and 1		ea from oil	
	•		planted in 2008 w		ad from oil	
	- Major compliance -		nted in 1980;	as originate	eu mom on	
			planted in 2010 w	as originate	ed from oil	
			nted in 1976 and 1		ca mom on	
			planted in 2011 w		ed from oil	
			nted in 1980 and			
			planted in 2012 w		ed from oil	
			nted in 1980 and 1			
			lan Tolan Estate:			
		Replanting	Division/Initial Plan	iting He	ctarage	
		year	year		172.22.11	
		2021	Div.II: 1994		173.33 Ha	
		2022	Div.II: 1994 Div.III: 1994		72.58 Ha 95.03 Ha	
		It was also k	nown that replant	ing plan for		
			epared for oil palm			
		2022 Was pi	cparca for on pain	i piantea in	1551.	
		Perlabian Est	tate:			
		Planting Year		На	Total	
			Year			
		2006	1977	279.53	279.53	
		2007	1978	43.93	195.93	
			1989 1980	144.00 3.00		
			1992	5.00		
		2008	1979	83.00	212.14	
			1980	129.14		
		2009	1982	138.28	138.28	
		2010	1978	4.00	210.45	
			1979 1980	26.00 126.00		
			1982	49.00		
			1992	5.45		
		2011	1984	326.79	326.79	
		2012	1983	54.64	442.68	
			1985 1986	3.02 385.02		
		2013	1983	95.83	118.73	
			1985	21.43	110.75	
			1996	1.47		
		2014	1987	63.73	308.65	
			2000	1.10		
			1988 1989	201.86 41.96		
		2015	1986	176.94	318.62	
			1987	110.94	310.02	
			1990	30.74		
		2016	1992	163.28	164.12	
			1996	0.84		



Topographic information adequate to guide the planning of drainage and irrigation systems, roads ar other infrastructure shall be available and taken into account in plans and operations.  - Minor compliance -		N/A
---	--	-----

#### Criterion 7.3:

New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.



7.3.1 There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).

- Major compliance -

There was no new planting after November 2005. The criterion 7.1 was not applicable.

#### Tolan Estate:

From old maps and documentation, it was found that the oil palm:

- Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980;
- Oil palm planted in 2008 was originated from oil palm planted in 1980;
- Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982;
- Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982;
- Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982;

Replanting Plan Tolan Estate:

Replanting	Division/Initial Planting	Hectarage
year	year	
2021	Div.II: 1994	173.33 Ha
2022	Div.II: 1994	72.58 Ha
	Div.III: 1994	95.03 Ha

It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.

#### Perlabian Estate:

Planting Year	Initial	Planting	На	Total
	Year			
2006	1977		279.53	279.53
2007	1978		43.93	195.93
	1989		144.00	
	1980		3.00	
	1992		5.00	
2008	1979		83.00	212.14
	1980		129.14	
2009	1982		138.28	138.28
2010	1978		4.00	210.45
	1979		26.00	
	1980		126.00	
	1982		49.00	
	1992		5.45	
2011	1984		326.79	326.79
2012	1983		54.64	442.68
	1985		3.02	
	1986		385.02	
2013	1983		95.83	118.73
	1985		21.43	
	1996		1.47	
2014	1987		63.73	308.65
	2000		1.10	
	1988		201.86	
	1989		41.96	
2015	1986		176.94	318.62
	1987		110.94	
	1990		30.74	
2016	1992		163.28	164.12
	1996		0.84	

N/A



7.3.2	A comprehensive HCV assessment, including stakeholder consultation, shall be conducted prior to any conversion or new planting. This shall include a land use change analysis to determine changes to the vegetation since November 2005. This analysis shall be used, with proxies, to indicate changes to HCV status.  - Major compliance -	See Criterion 7.3.1	N/A
7.3.3	Dates of land preparation and commencement shall be recorded.  - Minor compliance -	See Criterion 7.3.1	N/A
7.3.4	An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower's relevant operational procedures (see Criterion 5.2).  - Major compliance -	See Criterion 7.3.1	N/A
7.3.5	Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).	See Criterion 7.3.1	N/A
	- Minor compliance -		

#### Criterion 7.4:

Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.



-		1				
7.4.1	Maps identifying marginal	There was i	no new planting a	after Noven	nber 2005.	N/A
/ .4.1	and fragile soils, including	The criterior	n 7.1 was not appli	cable.		
	excessive gradients and peat					
	soils, shall be available and	Tolan Estate	::			
		From old m	naps and docume	ntation, it	was found	
	used to identify areas to be	that the oil p		•		
	avoided		planted in 2006 v	vas originat	ed from oil	
	Minor compliance		inted in 1976 and		ouo o	
	- Minor compliance -		planted in 2008 v		ed from oil	
			inted in 1980;	vas originae	ca moni on	
			planted in 2010 v	vas originat	ed from oil	
			inted in 1976 and		ca mom on	
			planted in 2011 v		ed from oil	
			inted in 1980 and		ed Holli oli	
					ad from ail	
			planted in 2012 v		ed ITOITI OII	
			inted in 1980 and	1902,		
			Plan Tolan Estate:	ating II-	ctorogs	
		Replanting	Division/Initial Plan	iuriy   He	ctarage	
		year 2021	year Div.II: 1994		173.33 Ha	
		2021	Div.II: 1994 Div.II: 1994		72.58 Ha	
		2022	Div.III: 1994		95.03 Ha	
		It was also I	known that replant	ting plan for		
		2022 was pi	epared for oil paln	i piariteu iri	1994.	
		Dorlahian Ec	tata			
		Perlabian Es Planting Year		На	Total	
		Planting real	Year	Ha	Total	
		2006	1977	279.53	279.53	
		2007	1978	43.93	195.93	
			1989	144.00	255.55	
			1980	3.00		
			1992	5.00		
		2008	1979	83.00	212.14	
			1980	129.14		
		2009	1982	138.28	138.28	
		2010	1978	4.00	210.45	
			1979	26.00		
			1980 1982	126.00 49.00		
			1992	49.00 5.45		
		2011	1984	326.79	326.79	
		2012	1983	54.64	442.68	
			1985	3.02	. 12.00	
			1986	385.02		
		2013	1983	95.83	118.73	
			1985	21.43		
			1996	1.47		
		2014	1987	63.73	308.65	
			2000	1.10		
			1988	201.86		
		2015	1989 1986	41.96	318.62	
		2012	1986	176.94 110.94	318.62	
			1990	30.74		
		2016	1992	163.28	164.12	
			1996	0.84	101.12	
	1			0.01		



7.4.2	Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and implemented to protect them without incurring adverse impacts.  - Major compliance -	See Criterion 7.4.1	N/A
-------	--	---------------------	-----

#### Criterion 7.5:

No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.





7.5.1 Evidence shall be available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the grower/miller is signed and ratified by these local peoples.

- Major compliance -

There was no new planting after November 2005. The criterion 7.1 was not applicable.

#### Tolan Estate:

From old maps and documentation, it was found that the oil palm:

- Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980;
- Oil palm planted in 2008 was originated from oil palm planted in 1980;
- Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982;
- Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982;
- Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982;

Replanting Plan Tolan Estate:

Replanting	Division/Initial Planting	Hectarage
year	year	
2021	Div.II: 1994	173.33 Ha
2022	Div.II: 1994	72.58 Ha
	Div.III: 1994	95.03 Ha

It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.

#### Perlabian Estate:

Planting Year	Initial Planting		Ha	Total
	Year			
2006	1977		279.53	279.53
2007	1978		43.93	195.93
	1989		144.00	
	1980		3.00	
	1992		5.00	
2008	1979		83.00	212.14
	1980		129.14	
2009	1982		138.28	138.28
2010	1978		4.00	210.45
	1979		26.00	
	1980		126.00	
	1982		49.00	
	1992		5.45	
2011	1984		326.79	326.79
2012	1983		54.64	442.68
	1985		3.02	
	1986		385.02	
2013	1983		95.83	118.73
	1985		21.43	
	1996		1.47	
2014	1987		63.73	308.65
	2000		1.10	
	1988		201.86	
	1989		41.96	
2015	1986		176.94	318.62
	1987		110.94	
	1990		30.74	
2016	1992		163.28	164.12
	1996		0.84	

N/A



#### Criterion 7.6:

Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.



Tolan Estate: From old maps and documentation, it was found that the oil palm:	7.6.1	Documented identification		no new planting a 7.1 was not appli	nber 2005.	N/A		
Total Estate:		and assessment of	THE CHECHOI	17.1 Was not appli	cubic.			
Customary and user rights shall be available.		<u> </u>	Tolan Estate					
that the oil palm: - Major compliance -  Najor compliance in 1980;  Najor compliance in 1980;  Najor compliance in 1980;  Najor compliance in 1980;  Najor compliance in 1980 and 1982;  Najor compliance in 1980 and 1984.  Najor compliance in 1984 and 1984.  Najor compliance in 1980 and 1984.  Najor compliance in 1984 and 1985.  Najor compliance in 1986 and 1985.  Najor compliance in 1980 and 1980.  Najor compliance in 1980.  Najor compliance in 1980.  Najor complianc					ntation it	was found		
- Major compliance -  - Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980;  - Oil palm planted in 2008 was originated from oil palm planted in 1980;  - Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982;  - Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982;  - Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982;  - Oil palm planted in 1980 and 1982;  - Oil palm planted in 1980 and 1982;  - Replanting Plan Tolan Estate:  - Planting Plantin		shall be available.			ricación, ic	was round		
palm planted in 1976 and 1980;  Oil palm planted in 2008 was originated from oil palm planted in 1980;  Oil palm planted in 1976 and 1982;  Oil palm planted in 1976 and 1982;  Oil palm planted in 1890 and 1982;  Oil palm planted in 1890 and 1982;  Oil palm planted in 1980 and 1982;  Replanting Plan Tolan Estate:  Replanting Planting Plan for 2021 and 2022 was prepared for oil palm planted in 1994.  Perlabian Estate:  Planting Year Initial Planting Ha Total Year  2006 1977 279.53 279.53 279.53 2007 1978 43.93 195.93 1989 144.00 1989 1989 144.00 1989 1989 1989 1980 120.45 1989 1980 120.45 1980 120.45 1980 120.45 1980 120.45 1980 120.45 1980 120.45 1980 120.45 1980 120.45 1980 120.45 1980 120.45 1980 120.45 1980 120.45 1980 1880 120.45 1980 1982 49.00 1982 5.45 2011 1984 326.79 326.79 2012 1983 5.00 210.45 1980 1885 20.48 1980 1985 20.48 1980 120.46 1980 1885 20.86 1989 1980 1.10 1988 20.86 126.00 1988 20.86 126.00 1988 20.86 126.00 1988 20.86 126.00 1988 20.86 126.00 1988 1986 1885.02 20.86 1989 41.96 1990 180.40 11.00 1988 1987 110.94 1990 180.40 180.40 180		Major compliance			vas originat	ed from oil		
- Öli palm planted in 2008 was originated from oil palm planted in 1980; - Öli palm planted in 1976 and 1982; - Öli palm planted in 10211 was originated from oil palm planted in 10211 was originated from oil palm planted in 10212 was originated from oil palm planted in 10212 was originated from oil palm planted in 1980 and 1982; - Öli palm planted in 1980 and 1982; - Öli palm planted in 1980 and 1982; - Replanting Plan Tolan Estate: - Replanting Plan Tolan Estate: - Replanting Division/Initial Planting Hectarage year - ye		- Major compliance -				ca moni on		
palm planted in 1980; Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982; Oil palm planted in 1980 and 1982; Poil palm planted in 1980 and 1982; Replanting Plan Tolan Estate: Planting Year Initial Planting plan for 2021 and 2022 was prepared for oil palm planted in 1994.  Perlabian Estate: Planting Year Initial Planting Ha Total Year Year 2006 1977 279.53 279.53 2007 1978 43.93 195.93 198.9 144.00 1980 3.00 1980 3.00 1980 3.00 1980 1980 3.00 1980 1980 3.00 1980 1980 3.00 1982 5.00 2008 1979 83.00 212.14 1980 129.14 1980 129.14 1980 126.00 1982 49.00 1982 49.00 1982 49.00 1982 49.00 1982 5.05 1985 3.02 1985 3.02 1986 385.02 1888 118.73 1986 110.94 1987 110.94 1987 110.94 1987 110.94 1987 110.94 1987 110.94 1987 110.94 1987 110.94 1987 110.94 1987 110.94 1987 110.94 1987 110.94 1987 110.94 1987 110.94 1987 110.94 1987 110.94 1990 30.74 2016 1999 163.28 164.12						ed from oil		
Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982;   Oil palm planted in 1980 and 1982;   Replanting Plan Tolan Estate:   Planting Tolan Planting Plan Tolan Planting Planted in 1994.   Perlabian Estate:   Planting Year Initial Planting Plan					vas originat	ca moni on		
palm planted in 1976 and 1982; Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982; Oil palm planted in 1980 and 1982; Oil palm planted in 1980 and 1982; Replanting Plan Tolan Estate: Replanting Division/Initial Planting Hectarage year 2021 Div.II: 1994 173.33 Ha 2022 Div.III: 1994 72.58 Ha Div.III: 1994 72.58 Ha Div.III: 1994 95.03 Ha It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.  Perlabian Estate: Planting Year Initial Planting Ha Total Year (Initial Planting Year 1006 1977 279.53 279.53 2007 1978 43.93 195.93 1989 144.00 1980 3.00 1980 3.00 1980 3.00 1980 3.00 1992 5.00 2008 1979 83.00 212.14 2009 1982 138.28 138.28 2000 1978 4.00 210.45 1980 129.14 2009 1982 138.28 138.28 2010 1978 4.00 210.45 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1982 1985 3.02 1986 385.02 1985 3.02 1986 385.02 1986 385.02 1986 385.02 2013 1983 95.83 118.73 1986 124.3 1996 1.47 2014 1987 63.73 308.65 1.47 2014 1987 63.73 308.65 1.986 176.94 318.62 1987 110.94 2016 1992 163.28 164.12					vas originat	ed from oil		
- Oil palm planted in 1980 and 1982; - Oil palm planted in 1980 and 1982; - Oil palm planted in 1980 and 1982; Replanting Plan Tolan Estate: Replanting Plan Tolan Estate: Replanting Division/Initial Planting   Hectarage   year   year						ca moni on		
palm planted in 1980 and 1982; Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982; Replanting Plan Tolan Estate: Replanting Division/Initial Planting Hectarage year 2021 Div.II: 1994 173.33 Ha 2022 Div.II: 1994 77.58 Ha Div.III: 1994 95.03 Ha It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.  Perlabian Estate: Planting Year Initial Planting Ha Total Year 2006 1977 279.53 279.53 2007 1978 43.93 195.93 1989 144.00 1980 3.00 1980 3.00 1980 3.00 1992 5.00 2008 1979 83.00 212.14 2009 1982 138.28 138.28 2010 1978 4.00 210.45 1980 120.45 1980 120.45 1980 120.45 2010 1978 4.00 210.45 1980 120.45 120.4						ed from oil		
- Oil palm planted in 1980 and 1982; Replanting Plan Tolan Estate: Replanting Plan Tolan Estate: Replanting Division/Initial Planting Vear 2021 Div.II: 1994 173.33 Ha 2022 Div.II: 1994 72.58 Ha Div.III: 1994 72.58 Ha Div.III: 1994 95.03 Ha It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.  Perlabian Estate: Planting Year Initial Planting Ha Total Year 2006 1977 279.53 279.53 2007 1978 43.93 195.93 1989 144.00 1980 3.00 1980 3.00 1980 3.00 1992 5.00 2008 1979 83.00 212.14 1980 129.14 2009 1982 138.28 138.28 2010 1978 4.00 210.45 1979 26.00 1980 129.14 2010 1978 4.00 210.45 1979 26.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1982 49.00 1992 5.45 2011 1984 366.79 326.79 2012 1983 54.64 426.8 1985 3.02 1985 3.02 1986 385.02 1986 385.02 1986 385.02 2013 1983 55.83 118.73 1985 21.43 1996 1.47 2014 1987 63.73 308.65 2000 1.10 1988 201.86 1989 41.96 2015 1986 176.94 318.62 1987 10.94 1990 30.74 2016 1990 30.74 2016 1990 30.74 2016 1990 30.74 2016 1990 163.28 164.12						cao o		
palm planted in 1980 and 1982; Replanting Plan Tolan Estate: Replanting Plan Tolan Estate: Replanting Plan Tolan Estate: Replanting Plan Tolan Estate: Planting Plan Tolan Estate: Div.II: 1994 173.33 Ha 2022 Div.II: 1994 72.58 Ha Div.III: 1994 95.03 Ha  It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.  Perlabian Estate: Planting Year Initial Planting Ha Total Year 2006 1977 279.53 279.53 2007 1978 43.93 195.93 2007 1978 43.93 195.93 2007 1978 43.93 195.93 2007 1978 83.00 212.14 2009 1980 3.00 2008 1979 83.00 212.14 2009 1982 138.28 138.28 2010 1978 4.00 210.45 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1982 49.00 1982 49.00 1982 49.00 1982 1983 54.64 42.68 2011 1984 326.79 326.79 2012 1983 54.64 442.68 2013 1983 95.83 118.73 1985 21.43 1996 1.47 2014 1987 63.73 308.65 2000 1.10 1988 201.86 1989 41.96 2015 1986 176.94 318.62 1987 110.94 2016 1992 163.28 164.12						ed from oil		
Replanting   Division/Initial Planting   Hectarage   year   year   year   2021   Div.II: 1994   173.33 Ha   2022   Div.II: 1994   72.58 Ha   Div.III: 1994   95.03 Ha   It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.    Perlabian Estate:   Planting Year   Initial   Planting   Ha   Total   Year   Year   2006   1977   279.53   279.53   279.53   2007   1978   43.93   195.93   1980   144.00   1980   3.00   1992   5.00   2008   1979   83.00   212.14   1980   129.14   2009   1982   138.28   138.28   2010   1978   4.00   210.45   1979   26.00   1980   126.00   1980   126.00   1980   126.00   1982   49.00   1982   49.00   1982   49.00   1982   5.45   2011   1984   326.79   326.79   2012   1983   54.64   442.68   1985   3.00   2013   1985   21.43   1985   21.43   1985   21.43   1985   21.43   1985   21.43   1985   21.43   1985   21.43   1986   1.47   2014   1987   63.73   308.65   2000   1.10   1988   201.86   1989   41.96   2015   1986   176.94   318.62   1989   41.96   2015   1986   176.94   318.62   1989   41.96   2015   1986   176.94   318.62   1989   41.96   2016   1992   163.28   164.12   2016   1992   163.28   164.12   2016   1992   163.28   164.12   2016   2016   1992   163.28   164.12   2016   201					ou o o			
Replanting   Division/Initial Planting   Hectarage   year   2021   Div.II: 1994   173.33 Ha   2022   Div.II: 1994   72.58 Ha   Div.III: 1994   79.03 Ha   17   2014   2016   1992   20.03 Ha   2022 was prepared for oil palm planted in 1994.   Perlabian Estate:   Planting Year   Initial   Planting   Ha   Total   Year   2006   1977   279.53   279.53   279.53   2007   1978   43.93   195.93   1980   3.00   1980   3.00   1990   25.00   2008   1979   83.00   212.14   2009   1982   138.28   138.28   2010   1978   4.00   210.45   1980   126.00   1980   126.00   1980   126.00   1982   49.00   1992   5.45   2011   1984   326.79   326.79   2012   1983   54.64   442.68   1985   3.02   1986   385.02   2013   1983   95.83   118.73   1985   21.43   1996   1.47   2014   1987   63.73   308.65   1989   41.96   2015   1988   201.66   1989   41.96   2015   1986   176.94   318.62   1987   110.94   1990   30.74   2016   1992   163.28   164.12								
vear								
Div.II: 1994			year	year				
Div.III: 1994								
It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.  Perlabian Estate:  Planting Year   Initial   Planting   Ha   Total   Year   2006   1977   279.53   279.53   279.53   2007   1978   43.93   195.93   1989   144.00   1980   3.00   1992   5.00   1980   129.14   2009   1982   138.28   138.28   2010   1979   26.00   1980   129.14   2009   1982   138.28   138.28   2010   1979   26.00   1980   126.00   1980   126.00   1980   126.00   1982   49.00   1982   49.00   1992   5.45   2011   1984   326.79   326.79   2012   1983   54.64   442.68   1985   3.00   210.00   1985   3.00   210.00   1985   3.00   210.00   1985   3.00   210.00   1985   3.00   210.00   1986   385.02   2013   1983   95.83   118.73   1985   21.43   1996   1.47   2014   1987   63.73   308.65   1986   1989   41.96   1990   30.74   2016   1990   30.74   2016   1990   30.74   2016   1990   163.28   164.12			2022					
Perlabian Estate:   Planting Year   Initial Year   Planting   Pl								
Perlabian Estate: Planting Year   Initial   Planting   Ha   Total   Year   2006   1977   279.53   279.53   2007   1978   43.93   195.93   1989   144.00   1990   3.00   1992   5.00   2008   1979   83.00   212.14   1980   129.14   2009   1982   138.28   138.28   2010   1978   4.00   210.45   1979   26.00   1980   126.00   1980   126.00   1980   126.00   1992   5.45   2011   1984   326.79   326.79   2012   1983   54.64   442.68   1985   3.02   1986   385.02   2013   1983   95.83   118.73   1985   21.43   1996   1.47   2014   1987   63.73   308.65   2015   1986   76.94   1987   110.94   1987   110.94   1990   30.74   2016   1992   163.28   164.12								
Planting Year			2022 was pr	epared for oil palm	n planted in	1994.		
Planting Year								
Year   2006   1977   279.53   279.53   279.53   2007   1978   43.93   195.93   1989   144.00   1980   3.00   1992   5.00   2008   1979   83.00   212.14   1980   129.14   2009   1982   138.28   138.28   2010   1978   4.00   210.45   1979   26.00   1980   126.00   1980   126.00   1980   126.00   1982   49.00   1982   49.00   1982   49.00   1982   49.00   1982   49.00   1982   49.00   1982   49.00   1982   40.00   1982   40.00   1982   40.00   1985   3.02   1986   385.02   1986   385.02   1986   385.02   1986   385.02   1986   385.02   1986   385.02   1986   385.02   1986   385.02   1986   385.02   1986   385.02   1986   31.47   2014   1987   63.73   308.65   2000   1.10   1988   201.86   1989   41.96   2015   1986   176.94   318.62   1987   110.94   1990   30.74   2016   1992   163.28   164.12					1			
2006			Planting Yea		Ha	Total		
2007			2006		270 52	270 52		
1989								
1980   3.00   1992   5.00			2007			155.55		
2008								
1980   129.14								
2009   1982   138.28   138.28   2010   1978   4.00   210.45   1979   26.00   1980   126.00   1982   49.00   1992   5.45   2011   1984   326.79   326.79   2012   1983   54.64   442.68   1985   3.02   1986   385.02   2013   1983   95.83   118.73   1985   21.43   1996   1.47   2014   1987   63.73   308.65   2000   1.10   1988   201.86   1989   41.96   2015   1986   176.94   318.62   1987   110.94   1990   30.74   2016   1992   163.28   164.12			2008			212.14		
2010						122.22		
1979   26.00   1980   126.00   1982   49.00   1992   5.45   2011   1984   326.79   326.79   2012   1983   54.64   442.68   1985   3.02   1986   385.02   2013   1983   95.83   118.73   1985   21.43   1996   1.47   2014   1987   63.73   308.65   2000   1.10   1988   201.86   1989   41.96   2015   1986   176.94   318.62   1987   110.94   1990   30.74   2016   1992   163.28   164.12								
1980			2010			210.45		
1982								
1992   5.45								
2012       1983       54.64       442.68         1985       3.02       1986       385.02         2013       1983       95.83       118.73         1985       21.43       1996       1.47         2014       1987       63.73       308.65         2000       1.10       1988       201.86         1989       41.96       201.86       176.94       318.62         1987       110.94       1990       30.74         2016       1992       163.28       164.12				1992				
1985     3.02       1986     385.02       2013     1983     95.83     118.73       1985     21.43       1996     1.47       2014     1987     63.73     308.65       2000     1.10       1988     201.86       1989     41.96       2015     1986     176.94     318.62       1987     110.94       1990     30.74       2016     1992     163.28     164.12								
1986   385.02			2012			442.68		
2013     1983     95.83     118.73       1985     21.43       1996     1.47       2014     1987     63.73     308.65       2000     1.10       1988     201.86       1989     41.96       2015     1986     176.94     318.62       1987     110.94       1990     30.74       2016     1992     163.28     164.12				1985				
1985     21.43       1996     1.47       2014     1987     63.73     308.65       2000     1.10       1988     201.86       1989     41.96       2015     1986     176.94     318.62       1987     110.94       1990     30.74       2016     1992     163.28     164.12			2013			110 72		
1996     1.47       2014     1987     63.73     308.65       2000     1.10       1988     201.86       1989     41.96       2015     1986     176.94     318.62       1987     110.94       1990     30.74       2016     1992     163.28     164.12			2013			110./3		
2014     1987     63.73     308.65       2000     1.10       1988     201.86       1989     41.96       2015     1986     176.94     318.62       1987     110.94       1990     30.74       2016     1992     163.28     164.12								
2000 1.10 1988 201.86 1989 41.96 2015 1986 176.94 318.62 1987 110.94 1990 30.74 2016 1992 163.28 164.12			2014			308.65		
1989   41.96				2000				
2015 1986 176.94 318.62 1987 110.94 1990 30.74 2016 1992 163.28 164.12								
1987 110.94 1990 30.74 2016 1992 163.28 164.12			2015			242.55		
1990 30.74			2015			318.62		
2016 1992 163.28 164.12								
			2016			164 12		
1996   0.84						101.12		



7.6.2	A system for identifying people entitled to compensation shall be in place.  - Major compliance -	See Criterion 7.6.1	N/A
7.6.3	A system for calculating and distributing fair compensation (monetary or otherwise) shall be in place.  - Major compliance -	See Criterion 7.6.1	N/A
7.6.4	Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development.  - Minor compliance -	See Criterion 7.6.1	N/A
7.6.5	The process and outcome of any compensation claims shall be documented and made publicly available.  - Minor compliance -	See Criterion 7.6.1	N/A
7.6.6	Evidence shall be available that the affected communities and rights holders have access to information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.  - Minor compliance -	See Criterion 7.6.1	N/A

#### **Criterion 7.7:**

No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.



7.7.1	There shall be no land
1.1.1	preparation by burning, other
	than in specific situations, as
	identified in the 'Guidelines
	for the Implementation of
	the ASEAN Policy on Zero
	Burning' 2003, or comparable
	guidelines in other regions.

- Major compliance -

There was no new planting after November 2005. The criterion 7.1 was not applicable.

#### Tolan Estate:

From old maps and documentation, it was found that the oil palm:

- Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980;
- Oil palm planted in 2008 was originated from oil palm planted in 1980;
- Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982;
- Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982;
- Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982;

Replanting Plan Tolan Estate:

Replanting	Division/Initial Planting	Hectarage
year	year	
2021	Div.II: 1994	173.33 Ha
2022	Div.II: 1994	72.58 Ha
	Div.III: 1994	95.03 Ha

It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.

#### Perlabian Estate:

Planting Year	Initial Planting		Ha	Total
	Year			
2006	1977		279.53	279.53
2007	1978		43.93	195.93
	1989		144.00	
	1980		3.00	
	1992		5.00	
2008	1979		83.00	212.14
	1980		129.14	
2009	1982		138.28	138.28
2010	1978		4.00	210.45
	1979		26.00	
	1980		126.00	
	1982		49.00	
	1992		5.45	
2011	1984		326.79	326.79
2012	1983		54.64	442.68
	1985		3.02	
	1986		385.02	
2013	1983		95.83	118.73
	1985		21.43	
	1996		1.47	
2014	1987		63.73	308.65
	2000		1.10	
	1988		201.86	
	1989		41.96	
2015	1986		176.94	318.62
	1987		110.94	
	1990		30.74	
2016	1992		163.28	164.12
	1996		0.84	

N/A



7.7.2	In exceptional cases where fire has to be used for preparing land for planting, 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.	See Criterion 7.7.1	N/A			
- Minor compliance -						
Criterion 7.8:						

New plantation developments are designed to minimise net greenhouse gas emissions.



The criterion 7.1 was not applicable.   Tolan Estate:		I 1		1	C	1 2225			
and major potential sources of emissions that may result directly from the development shall be identified and estimated.  - Major compliance -  - Major compliance in 1976 and 1980;  - Oil palm planted in 1976 and 1982;  - Oil palm planted in 1976 and 1982;  - Oil palm planted in 1976 and 1982;  - Oil palm planted in 1980 and 1982;  - Replanting Plan Tolan Estate:  Replanting Plan Tolan Estate:  Replanting Vear Initial Planting plan for 2021 and 2022 was prepared for oil palm planted in 1994.  - Perlabian Estate:  Planting Year Initial Planting Ha Total Year Year Year Year Year Year Year Year	781	The carbon stock of the					N/A		
Total Estate:   Total restate:	7.0.1	proposed development area	The criterion 7.1 was not applicable.						
Total Estate:   From old maps and documentation, it was found that the development shall be identified and estimated.   Major compliance -   Oil palm planted in 2006 was originated from oil palm planted in 1976 and 1980;   Oil palm planted in 1900 was originated from oil palm planted in 1980;   Oil palm planted in 1980;   Oil palm planted in 1980;   Oil palm planted in 1980 and 1982;   Oil palm planted in 1911 was originated from oil palm planted in 1980 and 1982;   Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982;   Replanting plan Total Estate:   Planting Plan Total Planting Pla		and major potential sources							
directly from the development shall be identified and estimated.									
development shall be identified and estimated Major compliance -     Oil palm planted in 1976 and 1980; -     Oil palm planted in 1976 and 1980; -     Oil palm planted in 1980 as originated from oil palm planted in 1980; -     Oil palm planted in 1982; -     Oil palm planted in 1980; -     Oil palm planted in 1982; -     Oil palm planted in 1980; -     Oil palm planted in 1982; -     Oil palm planted in 1980; -     Oil palm planted in 1982; -     Oil palm planted in 1980; -     Oil palm planted in 1982; -     Oil palm planted in 19		,			ntation, it	was found			
identified and estimated Major compliance -    Oil palm planted in 1908 was originated from oil palm planted in 1908 was originated from oil palm planted in 1908 and 1982;   Oil palm planted in 1976 and 1982;   Oil palm planted in 1976 and 1982;   Oil palm planted in 1976 and 1982;   Oil palm planted in 1980 and 1982;   Replanting plan Tolan Estate:   Replanting plan Tolan Estate:   Replanting plan planted in 1994   173.33 Ha   2022   Div.II: 1994   173.33 Ha   2022   Div.III: 1994   173.33 Ha   2022   Div.II: 1994   173.33 Ha   2024   2024   Div.II: 1994   173.33 Ha   2024   2024   2025   Div.II: 1994   2025		1							
- Major compliance -  - Major compliance -  - Oil palm planted in 2008 was originated from oil palm planted in 1980;  - Oil palm planted in 1980 and 1982;  - Oil palm planted in 1910 and 1982;  - Oil palm planted in 1980 and 1982;  - Replanting Plan Tolan Estate:  - Replanting   Division/Initial Planting   Hectarage   year						ed from oil			
palm planted in 1980;  Oil palm planted in 1910 was originated from oil palm planted in 1976 and 1982;  Oil palm planted in 1980 and 1982;  Planting Planting India Estate:  Replanting Planting India Planting Planting It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.  Perlabian Estate:  Planting Year Initial Planting Planting Initial Planting Initial Planting Initial Planting Initial Planting Initial Initial Planting Initial Initial Planting Initial Ini									
- Oil palm planted in 2010 was originated from oil palm planted in 1976 and 1982; - Oil palm planted in 1980 and 1982; Replanting Plan Tolan Estate: Replanting Plan Tolan Estate: Replanting   Division/Initial Planting   Hectarage year year   Wear   173.33 Ha   2022   Div.II: 1994   72.58 Ha   Div.III: 1994   72.58 Ha   Div.III: 1994   95.03 Ha   It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.  Perlabian Estate: Planting Year   Initial   Planting   Ha   Total Year   Year   2006   1977   279.53   279.53   279.53   2007   1978   43.93   195.93   1989   144.00   1980   3.00   1980   3.00   1992   5.00   2008   1979   83.00   212.14   2009   1982   138.28   138.28   138.28   2010   1978   4.00   210.45   1979   26.00   1980   126.00   1980   126.00   1980   126.00   1980   126.00   1982   49.00   1992   5.45   2011   1984   326.79   326.79   2012   1983   54.64   442.68   1985   3.02   1985   3.02   1986   385.02   2013   1983   95.83   118.73   1985   21.43   1996   1.47   2014   1987   63.73   308.65   2000   1.10   1988   201.86   1988   201.86   1989   41.96		- Major compliance -	- Oil palm	planted in 2008 w	vas originat	ed from oil			
palm planted in 1976 and 1982; Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982; Oil palm planted in 1980 and 1982; Palm planted in 1980 and 1982; Replanting plan Tolan Estate: Planting Year Initial Planting Ha Total Year Vear Planting Year Initial Planting Ha Total Year Planting Year Initial Planting Ha Non 1994.  Perlabian Estate: Planting Year Initial Planting Ha Total Year Year 279.53 279.53 279.53 279.53 2007 1978 43.93 195.93 1989 144.00 1980 3.00 1980 3.00 1980 3.00 1980 120.14 1980 3.00 1982 138.28 138.28 2010 1979 83.00 212.14 1980 122.14 1980 122.10 1979 26.00 1980 126.00 1980 126.00 1980 126.00 1990 1990 126.00 1990 126.00 1			palm pla	inted in 1980;					
- Oil palm planted in 2011 was originated from oil palm planted in 1980 and 1982; - Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982; Replanting Plan Tolan Estate: Replanting Division/Initial Planting Hectarage year 2021 Div.II: 1994 173.33 Ha 2022 Div.II: 1994 72.58 Ha Div.III: 1994 95.03 Ha It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.  Perlabian Estate: Planting Year Initial Planting Ha Total Year 2006 1977 279.53 279.53 2007 1978 43.93 195.93 1989 144.00 1980 3.00 1992 5.00 2008 1979 83.00 212.14 1980 129.14 2009 1982 138.28 138.28 2010 1978 4.00 210.45 1979 26.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 136.00 1980 12						ed from oil			
palm planted in 1980 and 1982; - Oil palm planted in 1980 and 1982; Replanting Plan Tolan Estate: Replanting Plan Tolan Estate: Replanting Division/Initial Planting Hectarage year 2021 Div.II: 1994 173.33 Ha 2022 Div.II: 1994 72.58 Ha Div.III: 1994 75.03 Ha It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.  Perlabian Estate: Planting Year Initial Planting Ha Total Year Year 2006 1977 279.53 279.53 2007 1978 43.93 195.93 1989 144.00 1989 1980 3.00 1992 5.00 2008 1979 83.00 212.14 2009 1982 138.28 138.28 2010 1978 4.00 210.45 1979 26.00 1978 4.00 210.45 1979 26.00 1978 4.00 210.45 1979 26.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 126.00 1980 385.02 2011 1984 326.79 326.79 2012 1983 54.64 442.68 1985 3.02 1986 385.02 2013 1983 58.83 118.73 1986 385.02 2013 1983 58.83 118.73 1996 1.47 2014 1987 63.73 308.65 2000 1.10 1988 201.86 1989 41.96			palm pla	inted in 1976 and	1982;				
- Oil palm planted in 2012 was originated from oil palm planted in 1980 and 1982;  Replanting Plan Tolan Estate:  Replanting Division/Initial Planting Hectarage year year  Z021 Div.II: 1994 173.33 Ha  Z022 Div.II: 1994 72.58 Ha  Div.III: 1994 95.03 Ha  It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.  Perlabian Estate:  Planting Year Initial Planting Ha Total Year  Z006 1977 279.53 279.53  Z007 1978 43.93 195.93  1980 3.00  1980 3.00  1992 5.00  Z008 1979 83.00 212.14  1980 129.14  2009 1982 138.28 138.28  2010 1978 4.00 210.45  1979 26.00  1980 126.00  1982 49.00  1982 49.00  1982 49.00  1982 49.00  1982 49.00  1982 49.00  1982 49.00  1982 49.00  1982 49.00  1982 49.00  1983 546 442.68  2011 1984 326.79 326.79  Z012 1983 5464 442.68  1985 21.43  1986 385.02  Z013 1983 95.83 118.73  1985 21.43  1996 1.47  Z014 1987 63.73 308.65  Z000 1.10  1988 21.86  1989 41.96			- Oil palm	planted in 2011 w	vas originat	ed from oil			
palm planted in 1980 and 1982; Replanting Plan Tolan Estate:  Replanting polivision/Initial Planting year  2021			palm pla	inted in 1980 and	1982;				
Replanting Plan Tolan Estate:   Replanting   Division/Initial Planting   Hectarage   year   2021   Div.III: 1994   173.33 Ha   2022   Div.III: 1994   72.58 Ha   Div.IIII: 1994   95.03 Ha   It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.    Perlabian Estate:			- Oil palm	planted in 2012 w	vas originat	ed from oil			
Replanting   Division/Initial Planting   Hectarage   year   2021   Div.II: 1994   173.33 Ha   2022   Div.II: 1994   72.58 Ha   Div.III: 1994   72.58 Ha   Div.III: 1994   95.03 Ha   Div.III: 1994   Ps.03 Ha   Div.III: 1994   Div.III: 1994   Ps.03 Ha   Div.III: 1994   Ps.03 Ha   Div.III: 1994   Div.III: 1995   Div.III: 1996   Div.III: 1996   Div.III: 1998   Div.III: 1998   Div.III: 1998   Div.III: 1998   Div.III: 1996   Div.III: 1998   Div.III: 1996   Div.III: 1998   Div.III: 1996   Div.			palm pla	inted in 1980 and	1982;				
Replanting   Division/Initial Planting   Hectarage   year   year   year   2021   Div.II: 1994   173.33 Ha   2022   Div.II: 1994   72.58 Ha   Div.III: 1994   95.03 Ha   Div.III: 1994   Planting plan for 2021 and 2022 was prepared for oil palm planted in 1994.      Perlabian Estate:			Replanting F	Plan Tolan Estate:					
2021   Div.II: 1994   173.33 Ha   2022   Div.III: 1994   72.58 Ha   Div.III: 1994   95.03 Ha   It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.   Perlabian Estate:   Planting Year   Initial Planting Ha Year   Year   2006   1977   279.53   279.53   279.53   2007   1978   43.93   195.93   1980   3.00   1980   3.00   1992   5.00   2008   1979   83.00   212.14   2009   1982   138.28   138.28   2010   1978   4.00   210.45   1979   26.00   1982   2010.45   1979   26.00   1982   4.00   210.45   1980   126.00   1982   4.900   1982   4.900   1982   4.900   1982   4.900   1982   4.900   1982   4.900   1982   4.900   1982   4.900   1982   4.900   1982   4.900   1982   4.900   1982   4.900   1982   4.900   1982   4.900   1982   4.900   1982   4.900   1983   54.64   442.68   1985   3.02   1986   385.02   2013   1983   95.83   118.73   1985   21.43   1986   201.86   1989   41.96			Replanting	Division/Initial Plan	nting He	ctarage			
Div. II: 1994   72.58 Ha   Div. III: 1994   95.03 Ha     It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.    Perlabian Estate: Planting Year Initial Year Year   100									
Div.III: 1994   95.03 Ha   It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.    Perlabian Estate:									
It was also known that replanting plan for 2021 and 2022 was prepared for oil palm planted in 1994.  Perlabian Estate:    Planting Year			2022						
Perlabian Estate:   Planting Year   Initial   Planting   Ha   Total									
Perlabian Estate:    Planting Year   Initial Year   Planting   Ha Year									
Planting Year   Initial Year   Planting   Ha   Total			2022 was prepared for oil palm planted in 1994						
Planting Year   Initial Year   Planting   Ha   Total									
Year         2006         1977         279.53         279.53           2007         1978         43.93         195.93           1989         144.00         1980         3.00           1992         5.00         1992         5.00           2008         1979         83.00         212.14           1980         129.14         1980         129.14           2009         1982         138.28         138.28           2010         1978         4.00         210.45           1979         26.00         1980         126.00           1982         49.00         1982         49.00           1992         5.45         200           2011         1984         326.79         326.79           2012         1983         54.64         442.68           1985         3.02         1986         385.02           2013         1983         95.83         118.73           1986         385.02         21.43           2014         1987         63.73         308.65           2000         1.10         1988         201.86           1989         41.96         41.96 <td></td> <td></td> <td></td> <td>1</td> <td></td> <td></td>					1				
2006     1977     279.53     279.53       2007     1978     43.93     195.93       1980     3.00     1980     3.00       1992     5.00     212.14       2008     1979     83.00     212.14       1980     129.14       2009     1982     138.28     138.28       2010     1978     4.00     210.45       1979     26.00     1980     126.00       1982     49.00     1982     49.00       1992     5.45     201       2011     1984     326.79     326.79       2012     1983     54.64     442.68       1985     3.02       1986     385.02       2013     1983     95.83     118.73       1985     21.43       1996     1.47       2014     1987     63.73     308.65       2000     1.10       1988     201.86       1989     41.96			Planting Year		Ha	Total			
2007			2006		270 52	270.52			
1989									
1980   3.00   1992   5.00			2007			195.95			
1992   5.00									
2008     1979     83.00     212.14       1980     129.14     129.14       2009     1982     138.28     138.28       2010     1978     4.00     210.45       1979     26.00     1980     126.00       1982     49.00     1992     5.45       2011     1984     326.79     326.79       2012     1983     54.64     442.68       1985     3.02     1986     385.02       2013     1983     95.83     118.73       1985     21.43     1996     1.47       2014     1987     63.73     308.65       2000     1.10     1988     201.86       1989     41.96     41.96									
2009     1982     138.28     138.28       2010     1978     4.00     210.45       1979     26.00     1980     126.00       1982     49.00     1992     5.45       2011     1984     326.79     326.79       2012     1983     54.64     442.68       1985     3.02       1986     385.02       2013     1983     95.83     118.73       1985     21.43       1996     1.47       2014     1987     63.73     308.65       2000     1.10       1988     201.86       1989     41.96			2008			212.14			
2010				1980	129.14				
1979   26.00   1980   126.00   1982   49.00   1992   5.45					138.28				
1980			2010			210.45			
1982     49.00       1992     5.45       2011     1984     326.79     326.79       2012     1983     54.64     442.68       1985     3.02       1986     385.02       2013     1983     95.83     118.73       1985     21.43       1996     1.47       2014     1987     63.73     308.65       2000     1.10       1988     201.86       1989     41.96	İ								
1992     5.45       2011     1984     326.79     326.79       2012     1983     54.64     442.68       1985     3.02       1986     385.02       2013     1983     95.83     118.73       1985     21.43       1996     1.47       2014     1987     63.73     308.65       2000     1.10       1988     201.86       1989     41.96									
2011     1984     326.79     326.79       2012     1983     54.64     442.68       1985     3.02       1986     385.02       2013     1983     95.83     118.73       1985     21.43       1996     1.47       2014     1987     63.73     308.65       2000     1.10       1988     201.86       1989     41.96									
2012     1983     54.64     442.68       1985     3.02       1986     385.02       2013     1983     95.83     118.73       1985     21.43       1996     1.47       2014     1987     63.73     308.65       2000     1.10       1988     201.86       1989     41.96	Ì		2011			326.70			
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1986     385.02       2013     1983     95.83     118.73       1985     21.43       1996     1.47       2014     1987     63.73     308.65       2000     1.10       1988     201.86       1989     41.96	İ					772.00			
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2015 1000 170 04 210 02			2015			210.62			
2015   1986   176.94   318.62   1987   110.94			2015			318.62			
1987 110.94 1990 30.74									
2016 1992 163.28 164.12			2016			164 12			
1996 0.84						101.12			



7.8.2	There shall be a plan to minimise net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options.  - Minor compliance -	See Criterion 7.8.1	N/A
Principle	8: Commitment to continua	al improvement in key areas of activity	
Criterior	ı 8.1:		
	and millers regularly monitor ar demonstrable continual improve	nd review their activities, and develop and impler ement in key operations.	ment action plans
8.1.1	The action plan for monitoring shall be available, based on a consideration of the social and environmental impacts and routine evaluation of the plantation and mill operations. As a minimum, these shall include, but are not necessarily be limited to:  • Reduction in use of certain chemicals (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 FFB production (Criterion 4.2)  - Major compliance —	PLM Mill Efficiency Improvement Plan dated 17 <sup>th</sup> January 2017: Related to criterion 4.4: 9 works and repair items, No.9 boiler 35 ton/hour rehabilitation, status 55% repair front wall furnace, ducting and IDF in progress – based on contract No.25/PLM-HO/EDM/2016, since 25 <sup>th</sup> October 2016. Item No.3 Sterilizer condensate chamber and additional shell for condensate chamber, completed based on contract No.10/PLM-HO/EDM/2016.  Tolan Estate: Reduce the use of paraquat (4.6): Memorandum from "GMO Sumut" No.117/GMO-All Estate/XI/2016,	Comply



#### Perlabian Estate:

Reduce the use of paraquat (4.6): Memorandum from "GMO Sumut" No.117/GMO-All Estate/XI/2016, dated 1<sup>st</sup> December 2015. The memorandum stating the use of paraquat as contact pesticide is not allowed as of 1<sup>st</sup> January 2017. Target: Zero use of paraquat effective since 1<sup>st</sup> January 2017. Target for circle and path spraying by SA15 sets at 5.5 Ha.

Optimising the yield of FFB production (4.2): Target to increase ratio per harvester is 17.91; Target capacity per harvester and loose fruit collector per day is 1,500 kg; Target for loose fruit percentage sets at 8.5%; Capacity for fertilizer application based on dosage: for dosage 0.10-0.25 kg fertilizer per palm, target productivity is 5.5 Ha per manday; for dosage 0.25-1 kg fertilizer per palm, target productivity is 3.1 Ha per manday; for dosage 1-1.5 kg fertilizer per palm, target productivity is 2.6 Ha per manday.

Waste reduction (5.3): To manage all medical waste from clinic; To construct septic tank in order to handle black water from housing and office; To construct and maintain concrete drainage to handle domestic waste water from all employee housing and office:

Perlabian Estate has taking action to follow up from GM visit on 2-3<sup>rd</sup> February 2017.

#### Observation:

Continuous Improvement Plan has been prepared by PT Tolan Tiga Indonesia, including reduction in use of pesticides; environmental impacts; pollution and greenhouse gas (GHG) emissions; social impacts; etc. However, it is need to consider provide continuous improvement plan with detail target and measurement method.

#### Action taken:

PT. Tolan Tiga Indonesia has improved the Continuous Improvement Plan in order to reduce use of pesticide, reduce pollution, reduce GHG emission, improve yield and productivity in "Program Target Kerja 2016 dan 2017". The program has been complemented with detailed target and measured method. The program has been implemented in 2016, and continues to implement in 2017.



### **Appendix B: Approved Time Bound Plan**

Name of company	Name of Mill	Location	Supply Base	Time Bound Plan	Target Year for RSPO
PT. Agro Muko	Muko Muko Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Muko Muko estate, S. Betung estate, Tanah rekah estate, Talang Petai estate, S. Kiang estate and KMD	2011	Certified February 2011
	Bunga Tanjung	Mukomuko Regency,	Bunga Tanjung estate, Air Bikuk estate, Air Buluh estate and KMD	2011	Certified February 2011
	Mill	Bengkulu Province, Indonesia	PT. Mukomuko Agro Sejahtera: - Air Majunto estate - Malin Deman estate	2014	Certified February 2015
PT. Tolan Tiga	Bukit Maradja Mill	Simalungun Regency, Sumatera Utara Province, Indonesia	<ul><li>Bukit Maradja Estate (PT. Eastern Sumatra Indonesia)</li><li>Kerasaan Estate (PT. Kerasaan Indonesia)</li></ul>	2010	Certified May 2010
	Perlabian Mill	Labuhan Batu Selatan Regency, Sumatera Utara Province, Indonesia	Perlabian estate and Tolan estate.	2010	Certified May 2010
PT. Umbul Mas Wisesa	Umbul Mas Wisesa Mill	Labuhan Batu Selatan Regency, Sumatera Utara Province, Indonesia	UMW South estate, UMW North estate and Toton Usaha Mandiri estate	2014	Certified March 2015
PT. Agro Kati Lama	·	Sumatera Selatan Province, Indonesia	-	Will be certified when mill is commissioned (planned for 2019 at the earliest)	Under development (It has been RSPO NPP), RSPO public Notification on 31st March 2014.
PT. Agro Rawas Ulu	1	Sumatera Selatan Province, Indonesia	-	Will be certified when mill is commissioned (planned for 2019 at the earliest)	Under development (It has been RSPO NPP), RSPO public Notification on 31 <sup>st</sup> March 2014.
PT. Agro Muara Rupit	•	Sumatera Selatan Province, Indonesia	-	Will be certified when mill is commissioned (planned for 2019 at the earliest)	Under development (It has been RSPO NPP), RSPO public Notification on 31 <sup>st</sup> March 2014.
Hargy Oil Palm Limited	Hargy Mill	East of Bialla, West New Britain Province, PNG	Hargy Plantation, Navo Plantation, Pandi Plantation and Smallholders	2009	RSPO Certified in April 2009
(HOPL)	Navo Mill	50 Kms East of BIalla, West New	Hargy Plantation, Navo Plantation, Pandi Plantation and Smallholders	2009	RSPO Certified in April 2009

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



	Britain Province, PNG			
Barem MII	a 30 km East of Bialla, West New Britain Province, PNG	Hargy Plantation, Navo Plantation, Pandi Plantation and Smallholders	2014	RSPO Certified in April 2014





#### **Appendix C: Certification Unit RSPO Certificate Details**

PT. Tolan Tiga Indonesia Perlabian POM Perkebunan Perlabian Village Kampung Rakyat District, Labuhan Batu Selatan Regency and Sumatera Utara Province Indonesia

BSI RSPO Certificate Nº: RSPO 555208 Date of Initial Certificate Issued: 17/05/2010

Date of Expiry: 16/05/2020

RSPO membership number: 1-0021-05-000-00

Applicable Standards: RSPO P&C 2013, Indonesia National Interpretation, September 2016; RSPO Supply Chain

Certification Standard November 2014 Module Module D - CPO Mills: Identity Preserved

PT. Tolan Tiga In	PT. Tolan Tiga Indonesia – Perlabian Palm Oil Mill and Supply Base							
Location Address			Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province					
GPS Location			100° 04′ 57.19″	E and 02°	03′ 40.98″ N			
CPO Tonnage Total			48,500 r	nt				
PK Tonnage Total			11,598 r	nt				
CPO Claimed for Ce	rtification*		48,500 r	nt				
PK Claimed for Certification *			11,598 r	nt				
Own estates FFB To	nnage		210,868 mt					
Scheme Smallholde	r FFB Tonnage		- mt					
	Production Area		Infrastructure	HCV	Certified Area /	Annual FFB		
Estates	Mature (ha)	Immature (ha)	& Other (ha)	(ha)	Total land lease (ha)	Production (mt)		
Perlabian Estate         3,823.15         635.95		188.54	59.38	4,807.02	105,688			
Tolan Estate	3,579.40	0	36.65	55.99	3,672.04	105,180		
TOTAL	7,402.55	635.95	225.19	115.37	8,479.06	210,868		



### **Appendix D: Assessment Plan**

Sunday, 19/02/2017  19/02/2017  19/02/2017  19/02/2017  15.30 – 21.00 Travelling Medan – Rantau Parapat (by train) 21.00 – 22.30 Travelling Rentau Parapat (by train) 21.00 – 22.30 Travelling Rantau Parapat (by train) 20/02/2017  Monday, 20/02/2017  08.00 – 08.30 Opening Meeting – Presentation by client (Overview of PT. Tolan Tiga Indonesia V V V Presentation by Client (Overview of PT. Tolan Tiga Indonesia – Perlabian Palm Oil Mill and its supply base); Presentation by BSI team (Objective, scope, audit plan, etc.)  08.30 – 12.00 Document Review (Perlabian POM): General information, RSPO time bound plan, RSPO partial certification verification, RSPO RSC (for Principle 1, Principle 3 and Principle 8), RSPO SCCS implementation  Stakeholder Interview: Local Government in Labuhan Batu Selatan Regency (Badan Pertamahan Nasional, Dinas Tenaga Kerja dan Transmigrasi, Dinas Perkebunan dan Badan Lingkungan Document Review (Perlabian POM): RSPO P&C (for Principle 4 and Principle 5)  12.00 – 14.00 Break  14.00 – 15.30 Field Visit (Perlabian POM): V V V V V V V V V V V V V V V V V V V	Date	Time	Subjects			Imam F
Sunday, 19/02/2017   10.40 - 13.05   Flight Jakarta - Medan (GA 186)				AS	Mualib	DDCDO T
Sunday, 10.40 – 13.05 Flight Jakarta – Medan (GA 186)				_		
Sunday, 19/02/2017   10.40 – 13.05   Flight Jakarta = Medan (GA 186)   √ √ √ √ √ √ √ √ √ √ √ √ √ √ √ √ √ √					EMS/SA	OHS/EMS
19/02/2017   15.30 – 21.00   Travelling Medan – Rantau Parapat (by train)   √ √ √ √ √ √ √ √ √ √ √ √ √ √ √ √ √ √	Cundou	10.40 12.05	Flight Jakosta Madan (CA 196)	UHS/EMS	-/	-/
Monday,   08.00 - 08.30   Opening Meeting   Opening   Opening Meeting   Opening   Open	• •			V /	,	/ V
Monday, 20/02/2017	19/02/2017			V /	·,	/ V
20/02/2017   Presentation by Client (Overview of PT. Tolan Tiga Indonesia - Perlabian Palm Oil Mill and its supply base); - Presentation by BSI team (Objective, scope, audit plan, etc.)   08.30 - 12.00   Document Review (Perlabian POM);   General information, RSPO time bound plan, RSPO partial certification verification, RSPO P&C (for Principle 1, Principle 3 and Principle 8), RSPO SCCS implementation   Stakeholder Interview:	N4 1			V	· · · ·	7
Indonesia - Perlabian Palm Oil Mill and its supply base); - Presentation by BSI team (Objective, scope, audit plan, etc.)  08.30 – 12.00  Document Review (Perlabian POM): General information, RSPO time bound plan, RSPO partial certification verification, RSPO PRC (for Principle 1, Principle 3 and Principle 8), RSPO SCCS implementation  Stakeholder Interview: Local Government in Labuhan Batu Selatan Regency (Badan Pertanahan Nasional, Dinas Tenaga Kerja dan Transmigrasi, Dinas Perkebunan dan Badan Lingkungan Document Review (Perlabian POM): RSPO PRC (for Principle 4 and Principle 5)  12.00 – 14.00  Break  14.00 – 15.30  Field Visit (Perlabian POM): RSPO SCCS implementation  Stakeholder Consultation: Visit to local communities (head of villages, contractor, community leader)  Field Visit (Perlabian POM): Interview with Perlabian POM workers, visit and observing Occupational Safety and Health management, Enrivronmental management (including but not limited to: use of PPE, safe working environment, walk ways, signs, palm oil mill effluent, diesel tanks, fire extinguishers, emission, first aiders and boxes, etc), as well as social criteria.  15.30 – 17.00  Document Review (Perlabian POM): RSPO PRC (for Principle 1, Principle 1, Principle 3 and Principle 18, PSPO SCCS implementation — continued Document Review (Perlabian POM): RSPO PRC (for Principle 2 and Principle 1, Principle 3 and Principle 8) RSPO SCCS implementation — continued Document Review (Perlabian POM): RSPO PRC (for Principle 2 and Principle 5) — continued  Tuesday, 08.00 – 12.00  Field Visit (Tolan Estate): V Worker interview - FFB harvesting, FFB loading, road		08.00 - 08.30	1 3 3	V	٧	-
- Presentation by BSI team (Objective, scope, audit plan, etc.)  08.30 – 12.00   Document Review (Perlabian POM): General information, RSPO time bound plan, RSPO partial certification verification, RSPO P8C (for Principle 1, Principle 3 and Principle 8), RSPO SCCS implementation  Stakeholder Interview: Local Government in Labuhan Batu Selatan Regency (Badan Pertanahan Nasional, Dinas Tenaga Kerja dan Transmigrasi, Dinas Perkebunan dan Badan Lingkungan  Document Review (Perlabian POM): RSPO P8C (for Principle 4 and Principle 5)  12.00 – 14.00   Break   V V V V V V V V V V V V V V V V V V	20/02/2017					
etc.)  08.30 – 12.00  Document Review (Perlabian POM): General information, RSPO time bound plan, RSPO partial certification verification, RSPO P&C (for Principle 1, Principle 3 and Principle 8), RSPO SCCS implementation  Stakeholder Interview: Local Government in Labuhan Batu Selatan Regency (Badan Pertanahan Nasional, Dinas Tenaga Kerja dan Transmigrasi, Dinas Perkebunan dan Badan Lingkungan Document Review (Perlabian POM): RSPO P&C (for Principle 4 and Principle 5)  12.00 – 14.00  Break  14.00 – 15.30  Field Visit (Perlabian POM): RSPO SCCS implementation  Stakeholder Consultation: Visit to local communities (head of villages, contractor, community leader)  Field Visit (Perlabian POM): Interview with Perlabian POM): Interview with Perlabian POM workers, visit and observing Occupational Safety and Health management, Environmental management (including but not limited to: use of PPE, safe working environment, walk ways, signs, palm oil mill effluent, diesel tanks, fire extinguishers, emission, first aiders and boxes, etc), as well as social criteria.  15.30 – 17.00  Document Review (Perlabian POM): General information, RSPO PeC (for Principle 1, Principle 3 and Principle 3, RSPO PSC (Simplementation — continued Document Review (Perlabian POM): RSPO P&C (for Principle 2 and Principle 6) Document Review (Perlabian POM): RSPO P&C (for Principle 4 and Principle 5) — continued  Tuesday, 08.00 – 12.00  Field Visit (Tolan Estate): V V RSPO P&C (for Principle 4 and Principle 5) — continued V V RSPO P&C (for Principle 4 and Principle 5) — continued V V RSPO P&C (for Principle 4 and Principle 5) — continued V V RSPO P&C (for Principle 4 and Principle 5) — continued V V RSPO P&C (for Principle 4 and Principle 5) — continued V V RSPO P&C (for Principle 5 and Principle 5) — continued Field Visit (Tolan Estate): V V RSPO P&C (for Principle 5 and Principle 5) — continued						
08.30 - 12.00   Document Review (Perlabian POM):   General information, RSPO time bound plan, RSPO partial certification verification, RSPO PR&C (for Principle 1, Principle 3 and Principle 8), RSPO SCCS implementation   Stakeholder Interview:						
General information, RSPO time bound plan, RSPO partial certification verification, RSPO Pac (for Principle 1, Principle 3 and Principle 8), RSPO SCCS implementation  Stakeholder Interview: Local Government in Labuhan Batu Selatan Regency (Badan Pertanahan Nasional, Dinas Tenaga Kerja dan Transmigrasi, Dinas Perkebunan dan Badan Lingkungan Document Review (Perlabian POM): RSPO Pac (for Principle 4 and Principle 5)  12.00 – 14.00 Break  14.00 – 15.30 Field Visit (Perlabian POM): RSPO SCCS implementation Stakeholder Consultation: Visit to local communities (head of villages, contractor, community leader) Field Visit (Perlabian POM): Interview with Perlabian POM workers, visit and observing Occupational Safety and Health management, Environmental management (including but not limited to: use of PPE, safe working environment, walk ways, signs, palm oil mill effluent, diesel tanks, fire extinguishers, emission, first aiders and boxes, etc), as well as social criteria.  15.30 – 17.00 Document Review (Perlabian POM): General information, RSPO P&C (for Principle 1, Principle 3 and Principle 8), RSPO SCCS implementation – continued Document Review (Perlabian POM): RSPO P&C (for Principle 2 and Principle 6) Document Review (Perlabian POM): RSPO P&C (for Principle 4 and Principle 5) – continued  Tuesday, 08.00 – 12.00 Field Visit (Tolan Estate): V		00.20 12.00		-/		
certification verification, RSPO P&C (for Principle 1, Principle 3 and Principle 8), RSPO SCCS implementation  Stakeholder Interview: Local Government in Labuhan Batu Selatan Regency (Badan Pertanahan Nasional, Dinas Tenaga Kerja dan Transmigrasi, Dinas Perkebunan dan Badan Lingkungan  Document Review (Perlabian POM): RSPO P&C (for Principle 4 and Principle 5)  12.00 – 14.00 Break  14.00 – 15.30 Field Visit (Perlabian POM): RSPO SCCS implementation  Stakeholder Consultation: Visit to local communities (head of villages, contractor, community leader)  Field Visit (Perlabian POM): Interview with Perlabian POM workers, visit and observing Occupational Safety and Health management, Environmental management (including but not limited to: use of PPE, safe working environment, walk ways, signs, palm oil mill effluent, diesel tanks, fire extinguishers, emission, first aiders and boxes, etc), as well as social criteria.  15.30 – 17.00  Document Review (Perlabian POM): General information, RSPO time bound plan, RSPO partial certification verification, RSPO P&C (for Principle 1, Principle 3 and Principle 8), RSPO SCCS implementation – continued  Document Review (Perlabian POM): RSPO P&C (for Principle 2 and Principle 6)  Document Review (Perlabian POM): RSPO P&C (for Principle 2 and Principle 5) – continued  Tuesday, 21/02/2017  V		08.30 - 12.00		V	-	-
3 and Principle 8), RSPO SCCS implementation   Stakeholder Interview:   Cocal Government in Labuhan Batu Selatan Regency (Badan Pertanahan Nasional, Dinas Tenaga Kerja dan Transmigrasi, Dinas Perkebunan dan Badan Lingkungan   Document Review (Perlabian POM):   RSPO P&C (for Principle 4 and Principle 5)						
Stakeholder Interview: Local Government in Labuhan Batu Selatan Regency (Badan Pertanahan Nasional, Dinas Tenaga Kerja dan Transmigrasi, Dinas Perkebunan dan Badan Lingkungan  Document Review (Perlabian POM): RSPO P&C (for Principle 4 and Principle 5)  12.00 – 14.00 Break  14.00 – 15.30 Field Visit (Perlabian POM): RSPO SCCS implementation  Stakeholder Consultation: Visit to local communities (head of villages, contractor, community leader)  Field Visit (Perlabian POM): Interview with Perlabian POM): Interview with Perlabian POM workers, visit and observing Occupational Safety and Health management, Environmental management (including but not limited to: use of PPE, safe working environment, walk ways, signs, palm oil mill effluent, diesel tanks, fire extinguishers, emission, first aiders and boxes, etc), as well as social criteria.  15.30 – 17.00 Document Review (Perlabian POM): General information, RSPO time bound plan, RSPO partial certification verification, RSPO time bound plan, RSPO partial certification verification, RSPO time bound plan, PSPO partial certification verification, RSPO time bound plan, RSPO partial certification verification, RSPO time bound Document Review (Perlabian POM): RSPO P&C (for Principle 2 and Principle 6)  Document Review (Perlabian POM): RSPO P&C (for Principle 2 and Principle 5) – continued  Tuesday, 108.00 – 12.00 Field Visit (Tolan Estate): Worker interview - FFB harvesting, FFB loading, road						
Local Government in Labuhan Batu Selatan Regency (Badan Pertanahan Nasional, Dinas Tenaga Kerja dan Transmigrasi, Dinas Perkebunan dan Badan Lingkungan Document Review (Perlabian POM):  RSPO P&C (for Principle 4 and Principle 5)  12.00 − 14.00 Break  14.00 − 15.30 Field Visit (Perlabian POM):  RSPO SCCS implementation  Stakeholder Consultation:  Visit to local communities (head of villages, contractor, community leader)  Field Visit (Perlabian POM):  Interview with Perlabian POM):  Interview with Perlabian POM workers, visit and observing Occupational Safety and Health management, Environmental management (including but not limited to: use of PPE, safe working environment, walk ways, signs, palm oil mill effluent, diesel tanks, fire extinguishers, emission, first aiders and boxes, etc), as well as social criteria.  15.30 − 17.00 Document Review (Perlabian POM):  General information, RSPO time bound plan, RSPO partial certification verification, RSPO time bound plan, RSPO partial certification verification, RSPO time bound plan, PSPO partial certification verification, RSPO time bound plan, RSPO partial certification verification, RSPO time bound plan, RSPO partial certification verification, RSPO time bound plan, RSPO partial certification verification, RSPO B&C (for Principle 1, Principle 3 and Principle 8), RSPO SCCS implementation − continued  Document Review (Perlabian POM):  RSPO P&C (for Principle 2 and Principle 6)  Document Review (Perlabian POM):  RSPO P&C (for Principle 3 and Principle 5) − continued  V − − − − √ − − − − − − − − − − − − − −					- /	
(Badan Pertanahan Nasional, Dinas Tenaga Kerja dan Transmigrasi, Dinas Perkebunan dan Badan Lingkungan    Document Review (Perlabian POM):   RSPO P&C (for Principle 4 and Principle 5)				-	٧	-
Transmigrasi, Dinas Perkebunan dan Badan Lingkungan  Document Review (Perlabian POM):  RSPO P&C (for Principle 4 and Principle 5)  12.00 – 14.00 Break  14.00 – 15.30  Field Visit (Perlabian POM):  RSPO SCCS implementation  Stakeholder Consultation:  Visit to local communities (head of villages, contractor, community leader)  Field Visit (Perlabian POM):  Interview with Perlabian POM workers, visit and observing Occupational Safety and Health management, Environmental management (including but not limited to: use of PPE, safe working environment, walk ways, signs, palm oil mill effluent, diesel tanks, fire extinguishers, emission, first aiders and boxes, etc), as well as social criteria.  15.30 – 17.00  Document Review (Perlabian POM):  General information, RSPO time bound plan, RSPO partial certification verification, RSPO P&C (for Principle 1, Principle 3 and Principle 8), RSPO SCCS implementation – continued  Document Review (Perlabian POM):  RSPO P&C (for Principle 2 and Principle 6)  Document Review (Perlabian POM):  RSPO P&C (for Principle 4 and Principle 5) – continued  Tuesday,  108.00 – 12.00  Field Visit (Tolan Estate):  Worker interview - FFB harvesting, FFB loading, road						
Document Review (Perlabian POM):   RSPO P&C (for Principle 4 and Principle 5)   -						
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21/02/2017 Worker interview - FFB harvesting, FFB loading, road	Tuesday,	08.00 - 12.00	, , ,	√	-	-
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		Field Visit (Tolan Estate):	-	$\checkmark$	1
		Boundaries inspection, HCV, riparian zone, water			
		management, housing, social amenities, school, clinic, etc.			
		Field Visit (Tolan Estate):		-	√
		Worker interview - Herbicide application programmes,			
		fertilizer application, chemical and fertilizer warehouse,			
		hazardous waste storage, landfill (waste management), etc.			
	12.00 - 14.00	• , , , , , , , , , , , , , , , , , , ,	√	√	√
	14.00 - 17.00	Document Review (Tolan Estate)	√	-	-
		RSPO P&C (for Principle 1, Principle 3, Principle 7 and	·		
		Principle 8)			
		Document Review (Tolan Estate)	-	-	√
		RSPO P&C (for Principle 4 and Principle 5)			•
	14.00 - 15.00	Stakeholder Consultation:	-	-	√
		Interview with worker union and gender committee			·
	15.00 - 17.00	Document Review (Tolan Estate)	-	-	√
		RSPO P&C (for Principle 2 and Principle 6)			
Wednesday,	08.00 - 12.00	Field Visit (Perlabian Estate):	√	-	1
22/02/2017		Worker interview - FFB harvesting, FFB loading, road			
		maintenance, workshop, etc.			
		Field Visit (Perlabian Estate):	-	√	-
		Boundaries inspection, HCV, riparian zone, water			
		management, housing, social amenities, school, clinic, etc.			
		Field Visit (Perlabian Estate):	-	-	√
		Worker interview - Herbicide application programmes,			
		fertilizer application, chemical and fertilizer warehouse,			
		hazardous waste storage, landfill (waste management), etc.			
	12.00 - 14.00	Break	√	√	√
	14.00 - 16.00	Document Review (Perlabian Estate)	√	-	-
		RSPO P&C (for Principle 1, Principle 3, Principle 7 and			
		Principle 8)			
		Document Review (Perlabian Estate)	-	√	-
		RSPO P&C (for Principle 2 and Principle 6)			
		Document Review (Perlabian Estate)	-	-	√
		RSPO P&C (for Principle 4 and Principle 5)			
		Report Preparation	√	$\checkmark$	$\checkmark$
	16.30 - 17.00	Closing Meeting	$\sqrt{}$	√	$\sqrt{}$



### **Appendix E: Stakeholders Contacted**

Internal Stakeholders	Union/Contractors/Local Communities
Mill workers Sprayer workers Harvester workers Upkeep workers	CV Tua Gabe Koperasi Jasa Karyawan PT. Tolan Tiga Indonesia Serikat Pekerja Tolan Tiga Mandiri Tanjung Medan Village Air Merah Village Tanjung Selamat Village
Government Departments	NGO
Dinas Tenaga Kerja dan Transmigrasi Kabupaten Labuhan Batu Selatan Badan Lingkungan Hidup Kabupaten Labuhan Batu Selatan	LSM Tim Sepuluh



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

Requirements	Compliance
D.1 Definition	
D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.	Perlabian POM is implementing Module D for CPO Mills: Identity Preserved. Perlabian POM only receiving certified FFB from company owned plantation; Perlabian Estate and Tolan Estate.  Perlabian Palm Oil Mill currently holding valid RSPO P&C certificate No.RSPO 555208, valid until 16 <sup>th</sup> May 2020, with current supply chain standard for CPO Mills: Module D – Identity Preserved.
D.2 Explanation	
D.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimate annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases. The certified supply base is coming from Perlabian Estate and Tolan Estate.  This has been recorded in this public summary report.
D.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).	Company holds eTrace registration under Perlabian POM. Perlabian POM registered all the transactions within eTrace. RSPO etrace ID for PT. Tolan Tiga Indonesia: RSPO_PO1000000099.
D.3 Documented procedures	
D.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:	
a) Complete and up to date procedures covering the implementation of all the elements in these requirements;	Perlabian POM has a procedure "Rantai Pasok dan Mampu Telusur No.ENC/SCC/01 rev.3" dated 26 <sup>th</sup> March 2015. The procedure explains 4.1.1 The harvesting procedure; 4.1.3 Recording harvest production; 4.1.4 Transporting the FFB and indicating the name of Estate, date of FFB delivery, transport detail, year of planting, block ID, total of bunches, identification of sustainable product; non-certified FFB will bear "Non-certified product" marking; 4.2.1 Weighing of FFB truck; 4.2.2 Weighbridge ticket indicating name of POM, weighbridge ticket number, name of supplying estate, date and hour of FFB weighing, transport detail, year of planting, block ID, gross, tare and nett weight, identification of sustainable

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	product; non-certified FFB will bear "Non-certified product"
	marking; 4.2.3 Processing of FFB and loose fruit and "Processing Daily Report" which indicate: FFB sustainable, FFB processed per shift, CPO production, PK production, stock CPO sustainable and stock PK sustainable, dispatch CPO and PK, outstanding CPO and PK; 4.3 Sales of CPO and PK; 4.4 Delivery of CPO and PK, to include information on name of buyer, name of transporter, DO number, transport detail, commodity type, certification status, contract number, delivery address, etc.
b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.	<ul> <li>The Standard Operating Procedure Traceability covers responsibility for implementation of RSPO Supply Chain Module D: CPO Mills Identity Preserved.</li> <li>Marketing Dept. Head Office responsible to coordinate buyer, POM, and tank terminal for all transaction related to distribution of contract and supporting document, shipping management; reporting on three-monthly basis of CPO production and sales balance; determine the certification system and supply chain model to be used; Issue delivery order/DO to Perlabian POM;</li> <li>Estate: Ensure the FFB harvest was in line with quality standard; calculate number of bunches and create accurate harvesting record; prepare and make delivery of FFB to POM;</li> <li>POM: Receive FFB and create record accordingly; ensure the milling process meet all requirements; in coordination with Marketing Department in Head Office to control the CPO and PK, identify the certification status and deliver on timely manner;</li> <li>Marketing Department in coordination with ENC Department to report any projected overproduction;</li> <li>All relevant staff and operators have been adequately trained: Mrs.Debi Fadli, document control and processing received training on RSPO Supply Chain dated 20<sup>th</sup> December 2016; Mrs.Fironica Julianti, weighbridge operator received training on RSPO Supply Chain on 20<sup>th</sup> December 2016;</li> </ul>
D.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	Mr. Ramadhan, laboratory/dispatch operator received training on 20 <sup>th</sup> December 2016;  Perlabian POM has a procedure "Rantai pasok dan Mampu Telusur No.ENC/SCC/01 rev.3" dated 26 <sup>th</sup> March 2015. The procedure explains
	4.1.1 The harvesting procedure; 4.1.3 Recording harvest production; 4.1.4 Transporting the FFB and indicating the name of Estate, date of FFB delivery, transport detail, year of planting, block ID, total of bunches, identification of sustainable product; non-certified FFB will bear "Non-certified product" marking; 4.2.1 Weighing of FFB truck; 4.2.2 Weighbridge ticket indicating name of POM, weighbridge ticket number, name of supplying estate, date and hour of FFB weighing, transport detail, year of planting, block ID, gross, tare and nett weight, identification of sustainable product; non-certified FFB will bear "Non-certified product" marking; making excellence a habit



Record seen: Certified FFB (from company-owned plantations): Delivery of FFB from Field Tolan Estate, No.TLE/004553, dated 20 <sup>th</sup> February 2017, with 414 bunches from block 1010B5, planting year 2010 – total 414 bunches. Weighbridge ticket No.FFB17004007W dated 20 <sup>th</sup> February 2017, with total 414 bunches; weigh 5,680 MT. Stamped "Sustainable Product IP RSPO certified No.555208". Delivery of FFB from Perlabian Estate, No.PLE/013380, dated 20 <sup>th</sup> February 2017, with 236 bunches from block 1993D08A – planting year 1993 – total 236 bunches. Weighbridge ticket No.FFB17004071W dated 20 <sup>th</sup> February 2017, with total 236 bunches; weigh 6,180 MT. Stamped "Sustainable Product IP RSPO certified No.555208".
There is no non-certified FFB entering production in Perlabian POM.
Perlabian POM only received FFB from certified supply base, whereby consist of company owned plantation: Perlabian Estate and Tolan Estate.
Certified FFB (from company-owned plantations): Delivery of FFB from Field Tolan Estate, No.TLE/004553, dated 20 <sup>th</sup> February 2017, with 414 bunches from block 1010B5, planting year 2010 – total 414 bunches. Weighbridge ticket No.FFB17004007W dated 20 <sup>th</sup> February 2017, with total 414 bunches; weigh 5,680 MT. Stamped "Sustainable Product IP RSPO certified No.555208". Delivery of FFB from Perlabian Estate, No.PLE/013380, dated 20 <sup>th</sup> February 2017, with 236 bunches from block 1993D08A – planting year 1993 – total 236 bunches. Weighbridge ticket No.FFB17004071W dated 20 <sup>th</sup> February 2017, with total 236 bunches; weigh 6,180 MT. Stamped "Sustainable Product IP RSPO certified No.555208".
Based on interview with weighbridge operators, they understood currently receiving FFB from company-owned plantation as certified supply base to be eligible for supply chain module Identity Preserved.  Perlabian POM has a procedure "Rantai pasok dan Mampu
Telusur No.ENC/SCC/01 rev.3" dated 26 <sup>th</sup> March 2015.  The procedure explains Marketing Department in coordination with ENC Department to report any projected overproduction;
, , , , , , , , , , , , , , , , , , , ,
on three-monthly basis of CPO production and sales balance;  Record seen: Three monthly CPO production for period January – March 2016; April – June 2016; July – September 2016; and October – December 2016 has signed by mill manager. Record seen: CPO Production and Sales Balance; in period January-March 2016, CPO production 8,291 tons, CSPO sold nil; in period April – June 2016, CPO production 7,334 tons, CSPO sold 1,343 tons; in period July- September 2016, CPO production 13,043 tons, CSPO sold 9,463 tons; in period October-

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December 2016, CPO production 11,313 tons, CSPO sold 12,149 tons. Total CPO production in 2016 is 39,982 tons and CSPO sold 22.957 tons.

PK Production and Sales Balance; in period January-March 2016, PK production 2,165 tons, CSPK sold 2,140 tons; in period April – June 2016, PK production 1,986 tons, CSPK sold 1,931 tons; in period July- September 2016, PK production 3,330 tons, CSPK sold 3,012 tons; in period October-December 2016, PK production 3,008 tons, CSPK sold 2,995 tons. Total PK production in 2016 is 10,491 tons and CSPK sold 10,079 tons.

Certified FFB (from company-owned plantations):

Delivery of FFB from Field Tolan Estate, No.TLE/004553, dated 20/02/2017, with 414 bunches from block 1010B5, planting year 2010 – total 414 bunches.

Weighbridge ticket No.FFB17004007W dated 20/02/2017, with total 414 bunches; weigh 5,680 MT. Stamped "Sustainable Product IP RSPO certified No.555208".

Delivery of FFB from Perlabian Estate, No.PLE/013380, dated 20/02/2017, with 236 bunches from block 1993D08A – planting year 1993 – total 236 bunches.

Weighbridge ticket No.FFB17004071W dated 20/02/2017, with total 236 bunches; weigh 6,180 MT. Stamped "Sustainable Product IP RSPO certified No.555208".

#### Production:

Three monthly CPO production for period January – March 2016; April – June 2016; July – September 2016; and October – December 2016 has signed by mill manager. Record seen: CPO Production and Sales Balance; in period January-March 2016, CPO production 8,291 tons, CSPO sold nil; in period April – June 2016, CPO production 7,334 tons, CSPO sold 1,343 tons; in period July- September 2016, CPO production 13,043 tons, CSPO sold 9,463 tons; in period October-December 2016, CPO production 11,313 tons, CSPO sold 12,149 tons. Total CPO production in 2016 is 39,982 tons and CSPO sold 22,957 tons.

PK Production and Sales Balance; in period January-March 2016, PK production 2,165 tons, CSPK sold 2,140 tons; in period April – June 2016, PK production 1,986 tons, CSPK sold 1,931 tons; in period July- September 2016, PK production 3,330 tons, CSPK sold 3,012 tons; in period October-December 2016, PK production 3,008 tons, CSPK sold 2,995 tons. Total PK production in 2016 is 10,491 tons and CSPK sold 10,079 tons.

#### Sales:

Perlabian POM has registered the sales of CPO and PK:

TR-060g32g3 Contract No.2016/PL-CPO/05 dated 6<sup>th</sup> September 2016 for 300 tons CSPO MB. The sales made for buyer PT. Multimas Nabati Asahan.

In order to fulfill the contract, Perlabian POM send 14 vehicle tanks and completed as of 20<sup>th</sup> September 2016. Sample seen: Delivery Order No.13/101/MS/SSSS/IX/2016 with vehicle BK9235DG. Weighbridge ticket No.CPO16000982W dated 19<sup>th</sup> September 2016, for 18.02 tons CPO MB to PT. Multimas Nabati Asahan, contract No.2016/PL-CPO/05, D/O

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	number 2016/PL-CPO/101. Transport with vehicle No.BK9235DG.  TR-075af36a-8eb1 was based from delivery of contract No.2016/PL-PK/LTC/10 dated 6 <sup>th</sup> September 2016 for 950 tons CSPK SG. The sales made for buyer PT. Musim Mas – KIM 1. Perlabian POM completed the contract as of 21 <sup>st</sup> October 2016. Sample of delivery seen: Delivery Order No.2016/PL-PK/DO/12 with vehicle BM9124CU. Weighbridge ticket No.PK16000257W dated 15 <sup>th</sup> September 2016, for 22.93 tons palm kernal to PT. Musim Mas (MM), contract No.2016/PL-PK/LTC/10, D/O number 2016/PL-PK/DO/12. Transport with vehicle No.BM9124CU.
D.6 Processing	
D.6.1The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from non-certified material including during transport and storage.	Record seen: Delivery of FFB from Field Tolan Estate, No.TLE/004553, dated 20/02/2017, with 414 bunches from block 1010B5, planting year 2010 – total 414 bunches. Weighbridge ticket No.FFB17004007W dated 20 <sup>th</sup> February 2017, with total 414 bunches; weigh 5,680 MT. Stamped "Sustainable Product IP RSPO certified No.555208". Delivery of FFB from Perlabian Estate, No.PLE/013380, dated 20 <sup>th</sup> February 2017, with 236 bunches from block 1993D08A – planting year 1993 – total 236 bunches. Weighbridge ticket No.FFB17004071W dated 20 <sup>th</sup> February 2017, with total 236 bunches; weigh 6,180 MT. Stamped "Sustainable Product IP RSPO certified No.555208".
D.6.2 The objective is for 100 % segregated material to be reached.	As a preparation to implement RSPO SCCS for CPO Mills: Module D – Identity Preserved, Perlabian POM has conducted system and machinery clearance to ensure no contamination. Record seen: "Berita Acara Storage Tank No.3 Kapasitas 3,000 Ton", conducted by Mr.Ramadhan on 8 <sup>th</sup> July 2016.  PT. Tolan Tiga Indonsia is cooperating with PT. Jasa Sahabat Abadi in transporting the certified CPO. Document seen, Work agreement, "Perjanjian Kerja No.2015/Angkutan/CPO/PL-Dumai/06" dated 21 <sup>st</sup> October 2015, chapter 1, verse 5 stating "PT.Jasa Sahabat Abadi menyediakan motor tangki dengan kondisi siap pakai, miliknya atau yang berada di bawah penguasannya, dan tangkinya harus bersih dari kontaminasi selain Minyak Kelapa Sawit" – PT. Jasa Sahabat Abadi providing tanker in ready-to-use condition, and the tank is clean from contamination. Through the work agreement, company demonstrating effort to minimize risk of contamination.

#### Actual Tonnage Certified Palm Production - May 2016 - April 2017

Mill	Capacity	СРО	PK
Perlabian POM	45 tons FFB/hour	42,532	11,018

#### Actual Tonnage Sales of Certified Palm Products - May/2016 - April/2017

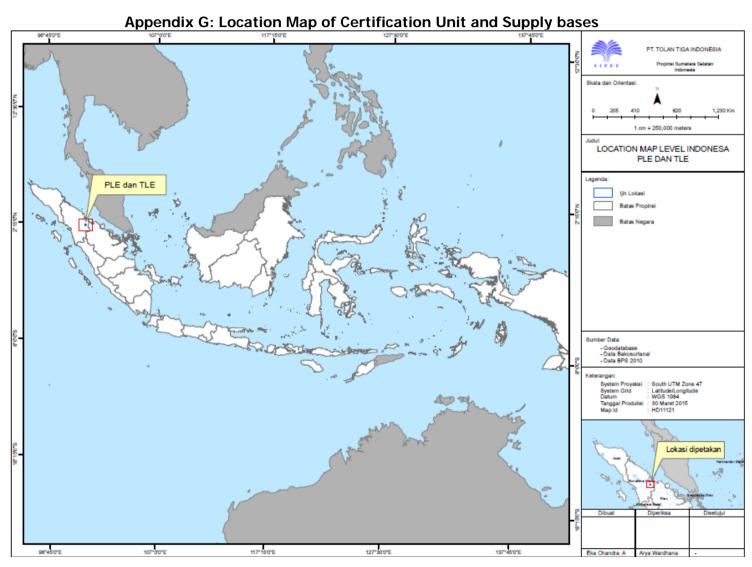
Mill	Certified CPO Sales	Certified PK Sales	Remarks
Perlabian POM	35,668	9,396	-



Month	Certified S	Certified Supply Base (from own certificate scope) (mt)			
Month	Perlabian Estate	Tolan Estate	Total FFB/Month (MT)*		
May 2016	5,,134.59	5,236.36	10,370.95		
June 2016	7,382.52	6,134.77	13,517.29		
July 2016	9,052.11	7,994.66	17,046.77		
August 2016	9,615.08	8790.06	18,405.14		
September 2016	10,878.65	11,123.51	22,002.16		
October 2016	9,421.05	9,083.33	18,504.38		
November 2016	8,533.17	8,108.73	16,641.90		
December 2016	7,795.80	8397.12	16,192.92		
January 2017	8,094.49	8,342.31	16,436.80		
February 2017	6,532.18	6,779.14	13,311.32		
March 2017	7,098.53	6,794.00	13,892.53		
April 2017	6,580.74	6,626.00	13,206.74		
Total	82,453.31	80,003.41	162,456.72		

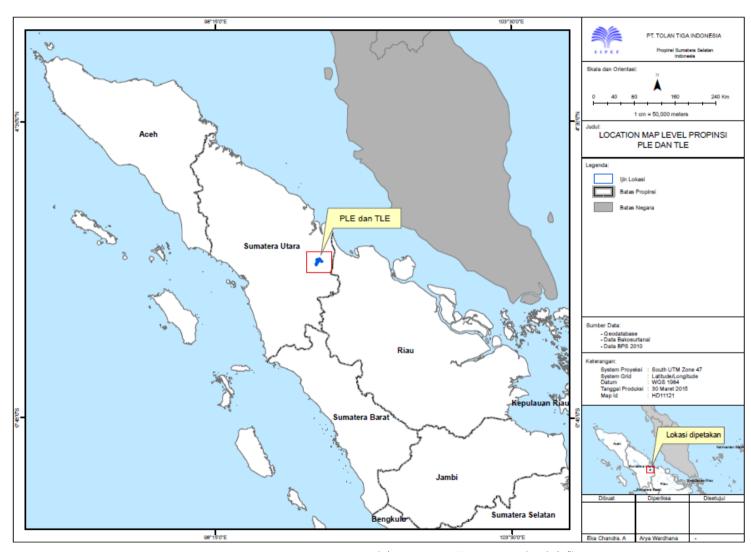






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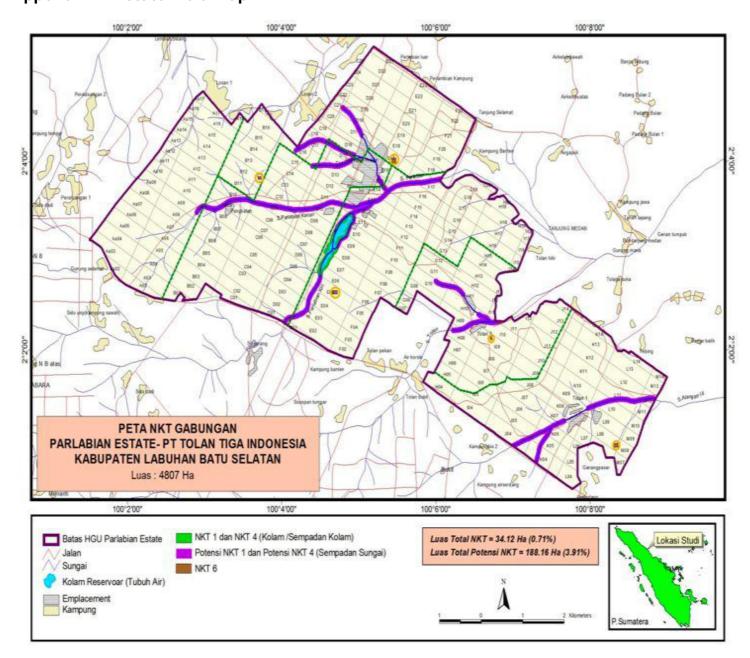


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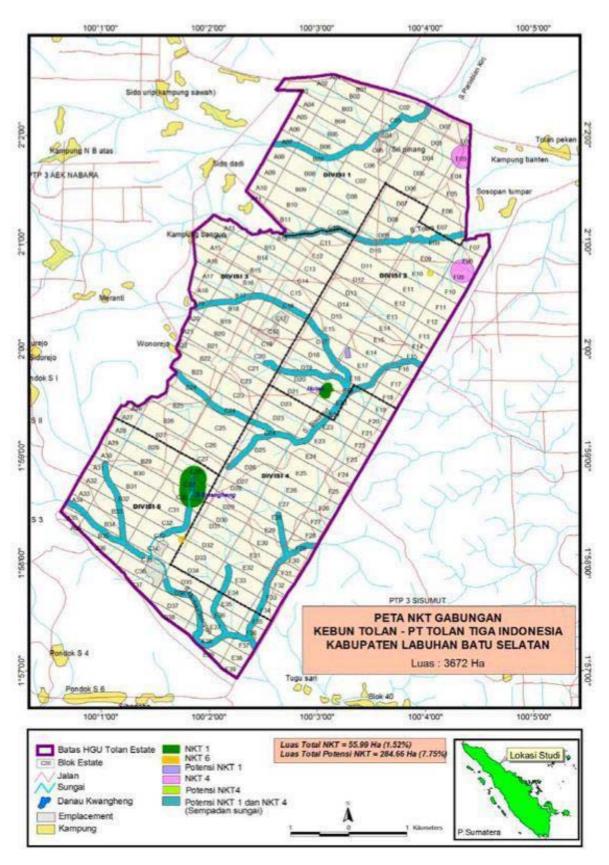


### **Appendix H: Estate Field Map**













### Appendix I: PalmGHG Calculation

**Summary of Net GHG Emissions** 

Summary of Net One Emissions			
Emission per	tCO₂e/tProduct		
Product			
CPO	0.62		
PK	0.62		

Extraction	Percentage (%)
OER	22.28
KER	5.85

Production	Ton/year
FFB processed	179453
CPO processed	39982

Land Use	Hectare	
OP planted area	8020.04	
OP planted on peat	0	
Conservation (forested)	81.02	
Conservation (non-	0	
forested)		
Total	8101.06	

**Summary of Field Emissions and Sinks** 

_	Own Crop		Group	
Ī	tCO₂e	tCO₂e/tFFB	tCO₂e	tCO₂e/tFFB
Emissions				
Land conversion	79210.96	9.88	0.44	0
*CO <sub>2</sub> Emissions from Fertilizer	7631.13	0.95	0.04	0
**N <sub>2</sub> O Emissions	7867.49	0.98	0.04	0
Fuel Consumption	977.86	0.12	0.01	0
Peat Oxidation	0	0	0	0
Sinks				
Crop Sequestration	-75081.48	-9.36	-0.42	0
Conservation Sequestration	0	0	0	0
Total	20605.96	2.57	3.44	0

**Summary of Mill Emissions and Credits** 

•	tCO₂e	tCO₂e/tFFB
Emissions		
POME	6635.57	0.04
Fuel Consumption	866.34	0
Grid Electricity Utilisation	3208.55	0.02
Credits		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	10710.46	0.06

#### Palm Oil Mill Effluent (POME) Treatment

Divert to compost		post	0%	
Divert	to	anaerobic	100%	





digestion
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#### **POME diverted to Anaerobic Digestion**

Divert to anaerobic pond		erobic pond	0%
Divert	to	methane	100%
capture (flaring)		ıg)	
Divert	to	methane	0%
capture		(electricity	
generation)		•	



#### Appendix J: List of Abbreviations Used

AMDAL Analisis Mengenai Dampak Lingkungan – Social Environmental Impact Assessment

BLH Badan Lingkungan Hidup
BOD Biological Oxygen Demand
CD Community Development

CPO Crude Palm Oil

CSR Corporate Social Responsibility

EFB Empty Fruit Bunch

EMS Environmental Management System
ENC Environment and Conservation Department

FA Field Assisstant FFB Fresh Fruit Bunch

GMP Good Manufacturing Practice

GRTG Ganti Rugi Tanah Garapan – Compensation upon land used GRTT Ganti Rugi Tanam Tumbuh – Compensation upon planting

HCV High Conservation Value

HGU Hak Guna Usaha – Legal ownership of the land

IAV Initial Assessment Visit
IPM Integrated Pest Management
KER Kernel Extraction Rate
LD<sub>50</sub> Lethal Dosage on 50
MCA Manager Corporate Affair
MSDS Material Safety Data Sheet
NPP New Planting Procedure

PK Palm Kernel

OER

PKB Perjanjian Kerja Bersama – Collective Work Agreement

POM Palm Oil Mill

PPE Personal Protective Equipment

Oil Extraction Rate

PUK Pengurus Unit Kerja – Unit's Committee

RED Renewable Energy Directive

RKL Rencana Pengelolaan Lingkungan – Environmental Management Plan RPL Rencana Pemantauan Lingkungan – Environmental Monitoring Plan

RSPO Roundtable on Sustainable Palm Oil

RSPO P&C Roundtable on Sustainable Palm Oil Principle & Criteria

SCCS Supply Chain Certification Standard

SEIA Social and Environmental Impact Assessment

SIA Social Impact Assessment
SK Surat Keputusan – Decree Letter
SKT Surat Keterangan Tanah – Land Letter

SOP Standard Operating Procedure

SPTTM Serikat Pekerja Tolan Tiga Mandiri – worker union PT. Tolan Tiga Indonesia

TTI PT. Tolan Tiga Indonesia