

**RSPO PRINCIPLE AND CRITERIA –  
ANNUAL SURVEILLANCE ASSESSMENT 1\_2  
Public Summary Report**

<b>PT. Agro Muko (SIPEF Group): Bunga Tanjung Palm Oil Mill</b>
Client company Address: <b><u>Bank Sumut 7<sup>th</sup> Floor</u></b> <b><u>Jl. Imam Bonjol No.18</u></b> <b><u>Medan 20152</u></b> <b><u>Sumatera Utara Province</u></b> <b><u>Indonesia</u></b>
Certification Unit: Bunga Tanjung Palm Oil Mill  Location of Certification Unit: Brangan Mulia Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0021-05-000-00	<b>Membership Approval Date</b>	7 <sup>th</sup> December 2005
<b>Parent Company Name</b>	SIPEF Group		
<b>Address</b>	Head Office: Bank Sumut 7 <sup>th</sup> Floor Jl. Imam Bonjol No.18, Medan - 20152 Sumatera Utara Province Indonesia  Plantation location: Brangan Mulia Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia		
<b>Subsidiary (Certification Unit Name)</b>	Bunga Tanjung Palm Oil Mill		
<b>Address</b>	Brangan Mulia Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia		
<b>Contact Name</b>	Mr. Olivier Tichit		
<b>Website</b>	<a href="http://www.tolantiga.co.id">www.tolantiga.co.id</a>	<b>E-mail</b>	<a href="mailto:ortichit@sipef.com">ortichit@sipef.com</a>
<b>Telephone</b>	+62 61 415 2043	<b>Facsimile</b>	+62 61 452 0908

2. Certification Information			
<b>Certificate Number</b>	<b>RSPO 646338</b>	<b>Date of First Certification</b>	22 <sup>nd</sup> February 2011
		<b>Certificate Start Date</b>	22 <sup>nd</sup> February 2016
		<b>Certificate Expiry Date</b>	21 <sup>st</sup> February 2021
<b>Scope of Certification</b>	<p>Production of sustainable Crude Palm Oil (CPO) and Palm Kernel (PK) at Bunga Tanjung Palm Oil Mill with company-owned estates and scheme smallholders as supply bases.</p> <p>Four (4) company-owned estates, namely: Bunga Tanjung Estate, Air Bikuk Estate, Air Buluh Estate, Malin Deman Estate. The company-owned estates also fully-managing 23 <i>Kebun Masyarakat Desa</i>/KMD belong to surrounding villages.</p> <p>Two (2) scheme smallholders cooperatives namely: Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS) and Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA), are also under full management of company-owned estate.</p>		

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<b>Applicable Standards</b>	RSPO P&C 2013 - Indonesia National Interpretation, September 2016; RSPO Certification System 2007 (revised March 2011) - including Annex 4: Procedures for Annual Surveillance; RSPO Supply Chain Certification Standard 2014 Module D – CPO Mills: Identity Preserved; RSPO Supply Chain Certification System 2014;
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<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
01 100 106313	ISO 9001:2008	TUV Rheinland GmbH	19/09/2016 – 14/09/2018
01 104 106313	ISO 14001:2004	TUV Rheinland GmbH	19/09/2016 – 14/09/2018

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base)</b>	<b>Location [Map Reference #]</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Bunga Tanjung POM	Brangan Mulia Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia	101°22'16.94"E	02°43'00.39"S
Bunga Tanjung Estate*	Brangan Mulia Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia	101°22'21.51"E	02°43'30.14"S
Air Bikuk Estate*	Air Bikuk Village, Lubuk Bento Village and Air Berau Village, Pondok Suguh District, Mukomuko Regency, Bengkulu Province, Indonesia	101°24'44.68"E	02°46'27.67"S
Air Buluh Estate*	Air Buluh Village, Semundam Village, Tanjung Jaya Village, Talang Baru Village and Talang Arah Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	101°33'15.79"E	03°01'27.29"S
Malin Deman Estate*	Air Merah Village, Talang Arah Village and Talang Baru Village, Malin Deman District, Mukomuko Regency, Bengkulu Province, Indonesia	101°33'15.79"E	03°01'27.29"S
Kebun Masyarakat Desa/KMD	Mukomuko Regency, Bengkulu Province, Indonesia	101°16'40.26"E	02°36'25.05"S
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	Air Merah Village and Air Buluh Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	101°29'53.43"E	03°03'15.11"S
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	Air Merah Village and Air Buluh Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	101°35'51.83"E	02°58'50.37"S

*\*) The Kebun Masyarakat Desa/KMD and cooperative is fully managed by each estate*

<b>5. Description of Supply Base</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Bunga Tanjung Estate*	2,312.19	236.97	353.84	2,903.00	79.64
Air Bikuk Estate*	1,217.23	176.97	15.80	1,410.00	86.32
Air Buluh Estate*	2,170.79	257.13	72.08	2,500.00	86.80
Malin Deman Estate*	631.76	133.49	401.75	1,167.00	54.09
Kebun Masyarakat Desa/KMD	361.30	0	0	361.30	100.00
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	135.10	0	0	135.10	100.00
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	164.40	0	0	164.40	100.00
<b>Total</b>	<b>6,992.77</b>	<b>804.56</b>	<b>843.47</b>	<b>8,640.8</b>	

\*) The Kebun Masyarakat Desa/KMD and cooperative is fully managed by each estate

<b>6. Plantings &amp; Cycle</b>							
<b>Estate</b>	<b>Age (Years)</b>					<b>Mature</b>	<b>Immature</b>
	<b>0 - 3*</b>	<b>4 - 10</b>	<b>11 - 20</b>	<b>21 - 25</b>	<b>26 - 30</b>		
Bunga Tanjung Estate*	0	0	2,312.19	0	0	2,312.19	0
Air Bikuk Estate*	288.76	0	928.47	0	0	928.47	288.76
Air Buluh Estate*	21.90	202.62	1,946.27	0	0	2,148.89	21.90
Malin Deman Estate*	124.60	507.16	0	0	0	507.16	124.60
Kebun Masyarakat Desa/KMD	120.40	76.90	164.00	0	0	240.90	120.40
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	0	135.10	0	0	0	135.10	0
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	0	164.40	0	0	0	164.40	0
<b>Total (ha)</b>	<b>555.66</b>	<b>1,086.18</b>	<b>5,350.93</b>	<b>0</b>	<b>0</b>	<b>6,437.11</b>	<b>555.66</b>

\*) The Kebun Masyarakat Desa/KMD and cooperative is fully managed by each estate

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<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>			
Estate	Tonnage / year		
	Estimated (January – December 2017)	Actual (January – December 2017)	Forecast (January – December 2018)
Bunga Tanjung Estate*	51,656.00	44,726.17	50,122.77
Air Bikuk Estate*	21,164.00	18,275.74	16,654.03
Air Buluh Estate*	53,741.00	49,674.92	54,400.00
Malin Deman Estate*	10,503.00	8,894.44	13,505.00
Kebun Masyarakat Desa/KMD	4,432.00	4,050.87	4,315.00
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	2,848.00	2,639.65	3,302.20
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	3,204.00	2,360.80	3,573.10
<b>Total</b>	<b>147,548.00</b>	<b>130,622.59</b>	<b>145,872.10</b>

\*) The Kebun Masyarakat Desa/KMD and cooperative is fully managed by each estate

<b>8. Certified Tonnage of FFB (from other certified unit(s))</b>			
Estate	Tonnage / year		
	Estimated (January – December 2017)	Actual (January – December 2017)	Forecast (January – December 2018)
Nil	N/A		N/A
<b>Total</b>			

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>			
Independent FFB Supplier	Tonnage / year		
	Estimated (January – December 2017)	Actual (January – December 2017)	Forecast (January – December 2018)
Nil			
<b>Total</b>			

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<b>10. Certified Tonnage</b>			
	<b>Estimated</b> (January – December 2017)	<b>Actual</b> (January – December 2017)	<b>Forecast</b> (January – December 2018)
<b>Mill Capacity:</b> 60 MT/hr	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>
	<b>147,548.00</b>	<b>130,622.59</b>	<b>145,872.10</b>
<b>SCC Model:</b> IP	<b>CPO (OER: 23.00 %)</b>	<b>CPO (OER: 22.65 %)</b>	<b>CPO (OER: 23.00 %)</b>
	<b>33,937.20</b>	<b>29,580.82</b>	<b>33,550.57</b>
	<b>PK (KER: 5.10 %)</b>	<b>PK (KER: 5.40 %)</b>	<b>PK (KER: 5.10 %)</b>
	<b>7,524.90</b>	<b>7,058.94</b>	<b>7,439.43</b>

<b>11. Actual Sold Volume (CPO)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSB</b>		
<b>CPO (MT)</b>	<b>13,919.73</b>	<b>0</b>	<b>0</b>	<b>7,053.20</b>	<b>20,972.93</b>

<b>12. Actual Sold Volume (PK)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSB</b>		
<b>PK (MT)</b>	<b>6,363</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6,363</b>

<b>13. Actual Group certification Claims</b>		
	<b>Credit</b>	<b>Physical Volume (MT)</b>
<b>IS-CSPO</b>	Nil	
<b>IS-CSPKO</b>		
<b>IS-CSPKE</b>		

## 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  
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### 2.1 Assessment Methodology, Programme, Site Visits

The on-site surveillance assessment was conducted from 4 – 7 December 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 Major NC close out on-site assessment was conducted on 23 January 2018. The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria Indonesia National Interpretation, 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 (or smallholders) of its supply base.

- The estates sample were determined based on formula  $N = 0.8\sqrt{y}$  where  $y$  is the number of estates
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where  $y$  is total number of independent group member and where  $z$  is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each

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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 Section 3.5.

All the previous nonconformities are remains closed. The assessment findings for the annual surveillance assessment are detailed in Section 3.4.

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.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA1_1)</b>	<b>Year 3 (ASA1_2)</b>	<b>Year 4 (ASA1_3)</b>	<b>Year 5 (ASA1_4)</b>
Bunga Tanjung Palm Oil Mill	X	X	X	X	X
Bunga Tanjung Estate*	X	X			X
Air Bikuk Estate*		X		X	
Air Buluh Estate*	X		X		
Malin Deman Estate*			X		X
Kebun Masyarakat Desa/KMD	X	X	X	X	X
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	X			X	X
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)		X		X	

*\*) The Kebun Masyarakat Desa/KMD included into each estate, because it is fully managed by estate*

**Tentative Date of Next Visit: November 1, 2018 - November 4, 2018**

**Total No. of Mandays: 13**

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**2.2 BSI Assessment Team:**

Team Member Name	Role	Qualifications <i>(Short description of the team members)</i>
Pratama Agung Sedayu	Team Leader/ 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.
Eko Purwanto	Auditor	He graduated as Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Agricultural University (IPB) in 2001. He owned working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implemented good agricultural practice including integrated pest management and limited pesticides uses. He has been trained for lead auditor of RSPO P&C (2013), ISO 9001:2008 (2012), ISO 14001:2004 (2013), ISPO (2012) and RSPO SCC (2012). He has also completed training course of ISO 14001 (2012), Minaut (Oil and Automotive) Indonesia (2011) and Introduction to HCV Toolkit HCV (2011). Since October 2012 he has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in Indonesia Sustainable Palm Oil (ISPO) and RSPO P&C audit for several plantations and mills, also RSPO Supply Chain audit for several KCP, Bulking and Refinery. During this assessment, he assessed on the aspects of estate best practices, environment, OHS, and Smallholder audits.
Imam Fakhrurozi	Auditor	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.
Nanang Kualib	Auditor	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 passed 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 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 has passed the RSPO Lead Auditor Training in 2017. 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.

**Accompanying Persons: Nil**

No.	Name	Role
	Nil	

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**2.3 Assessment Plan**

The assessment plan was sent to the client prior to the assessment (attached assessment plan).

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Date	Time	Subjects	PS	NM	IF	EP
Tuesday, 28/11/2017	07.30 – 08.50	Flight Jakarta – Bengkulu (Flight GA296, ETD 06.15 – ETA 08.50)	√	√	√	√
	12.00 – 13.00	Flight Bengkulu - Mukomuko	√	√	√	√
	13.00 – 14.00	Travel to PT. Agro Muko	√	√	√	√
Monday 4/12/2017	08.00-12.00	<b>Document review: Bunga Tanjung Mill</b> General information; time bound plan; partial certification verification; RSPO P&C (Economic viability P3, Palm Oil Mill's Best Management Practices P4.1, Use of Renewable Energy P.5.4, GHG Calculation P5.6); RSPO SCCS for CPO Mills	√			
		<b>Document review: Bunga Tanjung Mill</b> RSPO P&C (Transparency P1, Social policy and implementation P6)		√		
		<b>Document review: Bunga Tanjung Mill</b> RSPO P&C (Health and Safety P4.7, Environmental Management System P5.1, Waste management system P5.3, Continual Improvement P8)			√	
		<b>Field visit 3 KMD under Air Buluh Estate: KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang</b> Harvesting, fertilizer application/spraying regime, interview with workers (environmental, health and safety) and interview with KMD committee (pengurus)				
	12.00 – 14.00	Break/lunch	√	√	√	√
	14.00 – 17.00	<b>Field Visit: Bunga Tanjung Mill</b> Weighbridge, Mill process from incoming FFB to CPO storage tank/PK silo. RSPO SCCS for CPO Mills	√			
		<b>Stakeholder Consultation: Bunga Tanjung Mill</b> Interview with Gender Committee, Labour Union, worker representative, FFB Supplier, Local Contractor (employment, welfare)		√		
		<b>Field Visit: Bunga Tanjung Mill</b> EMS, PPE, safe working environment, walk ways, signs, EFB, WWTP, emissions, diesel tanks, fire extinguishers, clinic, first aiders and boxes, workshop, storage, etc. Interview with workers (health and safety)			√	
		<b>Field visit 3 KMD under Air Buluh Estate: KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang</b> Harvesting, fertilizer application/spraying regime, interview with workers (environmental, health and safety) and interview with KMD committee (pengurus)				
	Tuesday, 5/12/2017	08.00 – 12.00	<b>Field Visit: Air Buluh Estate</b> Harvesting, transport of FFB, road maintenance, terracing, IPM implementation and worker interview (best management practices)	√		
<b>Field Visit: Air Buluh Estate</b> HGU pegs maintenance, HCV area, river buffer zone, housing, cooperative, and worker interview (social and welfare)				√		
<b>Field Visit: Air Buluh Estate</b> fertilizer application/spraying regime, pesticide and agrochemical storage, equipment and PPE storage, diesel fuel storage, workshop and; Interview with Workers (environmental, health and safety)					√	
08.00		Travel to Padang, for audit Agro Muko Tank Terminal, Teluk Bayur, Padang				√

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	12.00 – 14.00	Break/lunch	√	√	√	√
	14.00 – 17.00	<b>Document review: Air Buluh Estate and KMD</b> RSPO P&C (Economic viability P3, Estate's Best Management Practices P4.1, Use of Renewable Energy P.5.4, GHG Calculation P5.6, New Development P7);	√			
		<b>Document review: Air Buluh Estate and KMD</b> RSPO P&C (Transparency P1, Legal Compliance P2, Social policy and implementation P6)		√		
		<b>Document review: Air Buluh Estate and KMD</b> RSPO P&C (Health and Safety P4.7, Environmental Management System P5.1, Waste management system P5.3, Continual Improvement P8)			√	
	17.00	<b>Overnight in Padang</b>				√
Wednesday 6/12/2017	08.00 – 12.00	<b>Field Visit: Malin Deman Estate and KMD</b> Harvesting, transport of FFB, road maintenance, terracing, IPM implementation and worker interview (best management practices)	√			
		<b>Field Visit: Malin Deman Estate and KMD</b> HGU pegs maintenance, HCV area, river buffer zone, housing, cooperative, and worker interview (social and welfare)		√		
		<b>Field Visit: Malin Deman Estate and KMD</b> fertilizer application/spraying regime, pesticide and agrochemical storage, equipment and PPE storage, diesel fuel storage, workshop and; Interview with Workers (environmental, health and safety)			√	
	08.00 – 11.00	<b>RSPO SCCS in Agro Muko Tank Terminal</b> RSPO SCCS				√
	12.00-14.00	Break/lunch	√	√	√	√
	14.00-17.00	<b>Document review: Malin Deman Estate and KMD</b> RSPO P&C (Economic viability P3, Estate's Best Management Practices P4.1, Use of Renewable Energy P.5.4, GHG Calculation P5.6, New Development P7);	√			
		<b>Document review: Malin Deman Estate and KMD</b> RSPO P&C (Transparency P1, Legal Compliance P2, Social policy and implementation P6)		√		
<b>Document review: Malin Deman Estate and KMD</b> RSPO P&C (Health and Safety P4.7, Environmental Management System P5.1, Waste management system P5.3, Continual Improvement P8)				√		
	17.00	Flight from Padang to Jakarta				√
Thursday 7/12/2017	08.00 – 09.00	<b>Closing meeting</b>	√	√	√	-
	13.00 - 14.00	Flight Mukomuko - Bengkulu	√	√	√	-
	17.00 – 18.00	Flight Bengkulu – Jakarta (Flight GA135, ETD 17.40 – ETA 19.00)	√	√	√	√

\*) PS: Pratama A Sedayu; NM: Nanang Mualib; IF: Imam Fakhrurozi; EP: Eko Purwanto

NCR Close Out

Date	Time	Subjects	Pratama Sedayu
			PRSCO LA/ PRSCO- OHS/EMS
Monday, 23/01/2018	08.00 – 08.30	Opening Meeting	√
	08.30 – 12.00	<b>Interview and Document Review:</b> KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang	√
	12.00 – 13.00	Break	√
	13.00 – 15.30	<b>Interview and Document Review (continued):</b> KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang	√

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Date	Time	Subjects	Pratama Sedayu PRSP0 LA/ PRSP0- OHS/EMS
	15.30	<b>Closing Meeting</b>	√

### Section 3: Assessment Findings

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

- SIPEF Group Time Bound Plan
- RSPO Supply Chain Certification Checklist November 2014
- RSPO P&C INA-NIWG 2016 Checklist

#### 3.2 Progress against Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
<b>Summary of the Time Bound Plan</b>		
Does the plan include all subsidiaries, estates and mills?	PT. Agro Muko is a subsidiary of SIPEF Group. SIPEF Group has disclose all of its companies, mills and estates. The timebound plan including un-certified units/companies.	Comply
Have all the estates and mills certified within five years after obtaining RSPO membership?	No. Not all the estates and mills certified within five years after obtaining RSPO membership. New estates and mills are under progress to be RSPO certified after RSPO NPP carried out in 2014.	Comply
Is the time bound plan challenging? <ul style="list-style-type: none"> <li>• Age of plantations.</li> <li>• Location.</li> <li>• POM development</li> <li>• Infrastructure.</li> <li>• Compliance with applicable law.</li> </ul>	SIPEF Group's time bound plan is timely challenging. SIPEF Group 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 in PT. Agro Muko. <ul style="list-style-type: none"> <li>• PT. Agro Kati Lama, from 2019 to 2021;</li> <li>• PT. Agro Muara Rupit, from 2019 to 2024;</li> <li>• PT. Agro Rawas Ulu, from 2019 to 2024.</li> <li>• PT. Timbang Deli Indonesia, to be certified in 2018.</li> </ul> For PT. Agro Kati Lama, PT. Agro Muara Rupit an PT. Agro Rawas Ulu - SIPEF Group provides sufficient explanation on the changes in implementation of timebound plan: SIPEF Group's 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 the current rate of planting in the	Comply

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	<p>three estates and plasma schemes that will constitute the supply base of the two mills.</p> <p>For PT. Timbang Deli Indonesia, a seed production plantation, currently prepared as supply base to PT. Eastern Sumatra Indonesia and to be certified in 2018.</p> <p>Audit team accepted management explanation on the matter.</p>	
If there have been changes, what circumstances have occurred?	The major cause of the changes is due to delay in land acquisition and starting of planting. The assessment team accepted the explanation.	Comply
Have there been any stakeholder comments?	<p>Yes. Stakeholder comments are noted.</p> <p>The assessment team has conducted a search in internet to confirm that there is a comment that was recorded as complaint under RSPO Case Tracker; raised by the communities on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint.</p> <p>On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company.</p> <p>On 28 August 2017 - Secretariat received response from the company.</p> <p>On 5 September 2017 - Complainant failed to provide the document.</p> <p>On 11 September 2017 - Secretariat has sent an email to SIPEF.</p> <p>On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter.</p> <p>The assessment team was also sought for additional evidences from PT. Agro Muara Rupit/SIPEF. Documented evidence demonstrated company has attend the complainant and invited the complainant to lodge a complaint/resolve the complaint through company complaint procedures.</p> <p>Company provides all documented evidence that the complaint was being responded in appropriate manners to resolve the complaint.</p>	Comply
Have there been any newly acquired subsidiaries?	The most recent acquisition was on 1 August 2017, PT. Dendymarker Indah Lestari. RSPO certified. The certification has been verified from the RSPO website.	Comply

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<p>If yes, have the newly acquisitions certified within a three-year timeframe?</p>	<p>The most recent acquisition was on 1 August 2017, PT. Dendymarker Indah Lestari. RSPO certified. The certification has been verified from the RSPO website.</p>	<p>Comply</p>
<p>Have there been any isolated lapses in implementation of the plan?</p>	<p>No isolated lapse. SIPEF Group provides adequate evidence related to changes in implementation of the plan.</p>	<p>Comply</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	<p>As NPP has been conducted, it can be confirmed that there is no replacement of primary forest as the LUCA has been completed and accepted by RSPO.</p> <p>As part of the NPP, HCV assessment has been conducted and any HCV area requires to be maintained are stated in the management plan of the NPP.</p> <p>The company has carried out HCV assessment for scheme smallholders.</p>	<p>Comply</p>
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>All new planting after January 1<sup>st</sup>, 2010 have undergone and complies with RSPO New Planting Procedure/RSPO NPP.</p> <p>RSPO NPP for PT. Agro Muara Rupit, PT. Agro Kati Lama, PT. Agro Rawas Ulu and PT. Timbang Deli Indonesia has been published in RSPO website.</p>	<p>Comply</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 2.2, 6.4, 7.5 and 7.6.</p>	<p>Yes. Stakeholder comments are noted.</p> <p>The assessment team has conducted a search in internet to confirm that there is a comment that was recorded as complaint under RSPO Case Tracker; raised by the communities on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint.</p> <p>On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company.</p> <p>On 28 August 2017 - Secretariat received response from the company.</p> <p>On 5 September 2017 - Complainant failed to provide the document.</p> <p>On 11 September 2017 - Secretariat has sent an email to SIPEF.</p> <p>On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter.</p>	<p>Comply</p>

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	<p>The assessment team was also sought for additional evidences from PT. Agro Muara Rupit/SIPEF. Documented evidence demonstrated company has attend the complainant and invited the complainant to lodge a complaint/resolve the complaint through company complaint procedures.</p> <p>Company provides all documented evidence that the complaint was being responded in appropriate manners to resolve the complaint.</p>	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labor dispute noted. The assessment team has conducted a search in internet to confirm that there is no new comments or dispute raised by the communities related to labor dispute on those units that have not been certified.	Comply
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No non-legal compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities, related to legal non-compliance on those units that have not been certified.	Comply
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>The internal audit has been conducted for all uncertified units:</p> <ul style="list-style-type: none"> <li>• PT. Agro Muara Rupit was conducted on 13-15 March 2017;</li> <li>• PT. Agro Kati Lama was conducted on 20-21 February 2017;</li> <li>• PT. Agro Rawas Ulu was conducted on 27 February – 1 March 2017;</li> <li>• PT. Timbang Deli Indonesia was conducted on 30 October – 3 November 2017;</li> </ul>	Comply

**3.3 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	All of scheme smallholders has to be certified before they can supply their FFB to SIPEF Group's palm oil mills. As recorded and audited during RSPO ASA1_2 for PT. Agro Muko – Bunga Tanjung POM (this assessment), company was extending their scope of certificated supply base with additional scheme smallholder in form of <i>Kebun Masyarakat Desa/KMD</i> .	Comply

### 3.4 Details of findings

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

During the Certification Assessment there were twelve (12) Major & eleven (11) Minor nonconformities raised for new proposed scheme smallholder of in form of *Kebun Masyarakat Desa/KMD*. The PT. Agro Muko – Bunga Tanjung Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-M1	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 February 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate a list of publicly available documents that covers: <ul style="list-style-type: none"> <li>a) Land titles/user rights (Criterion 2.2)</li> <li>b) Occupational health and safety plans (Criterion 4.7)</li> <li>c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)</li> <li>d) HCV documentation (Criteria 5.2 and 7.3)</li> <li>e) Pollution prevention and reduction plans (Criterion 5.6)</li> <li>f) Details of complaints and grievances (Criterion 6.3)</li> <li>g) Negotiation procedures (Criterion 6.4)</li> <li>h) Continual improvement plans (Criterion 8.1)</li> <li>i) Public summary of certification assessment report</li> <li>j) Human Rights Policy (Criterion 6.13).</li> </ul>		
<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 1.2.1 Publicly available documents shall include, but are not necessarily limited to: <ul style="list-style-type: none"> <li>a) Land titles/user rights (Criterion 2.2)</li> <li>b) Occupational health and safety plans (Criterion 4.7)</li> <li>c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)</li> <li>d) HCV documentation (Criteria 5.2 and 7.3)</li> <li>e) Pollution prevention and reduction plans (Criterion 5.6)</li> <li>f) Details of complaints and grievances (Criterion 6.3)</li> <li>g) Negotiation procedures (Criterion 6.4)</li> <li>h) Continual improvement plans (Criterion 8.1)</li> <li>i) Public summary of certification assessment report</li> <li>j) Human Rights Policy (Criterion 6.13).</li> </ul>		
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), a list of publicly available documents that covers: <ul style="list-style-type: none"> <li>a) Land titles/user rights (Criterion 2.2)</li> </ul>		

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	<p>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).  has not been established</p>
<b>Corrections:</b>	<p>PT. Agro Muko supports each <i>Kebun Masyarakat Desa/KMD</i> to establish a list of publicly available document that covers all publicly available documents. Documents available at General Manager Office PT. Agro Muko and/or at the estates in charge of management of the <i>Kebun Masyarakat Desa/KMD/cooperatives</i>.  Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataaan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to relevant policies and SOP from PT. Agro Muko.  List of documents titled "Dokumen-dokumen yang tersedia untuk Umum KMD Mundam Marap" dated 13 December 2017; related to land titles/user rights; occupational health and safety plans as in "Program K3 Tahun 2018 KMD Mundam Marap"; environmental and social impacts including mitigation plans and "Rencana Pengelolaan Limbah B3"; HCV documentation as in "Laporan Identifikasi Nilai Konservasi Tinggi Smallholders Koperasi dan Kebun Masyarakat Desa PT. Agro Muko by Koompasia Enviro Institute; pollution prevention and reduction plans; details of complaints and grievances; negotiation procedures; continual improvement plans; public summary of certification assessment report; human rights policy.</p>
<b>Root Cause Analysis:</b>	<p>The committee/management of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> was relative new to the RSPO requirements. The committee has limited understanding on publicly available documents. PT. Agro Muko focused on implementation of HCV, best management practices and plantation management, leads to lack of monitoring for administrative requirements.</p>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko conduct monitoring once per year by the Field Head Assisstant for <i>Kebun Masyarakat Desa/KMD</i> or Environment and Conservation/ENC team. This is to ensure the list is publicly displayed, all necessary documents are available at the estate/GMO-AM office, and that the procedure to access the documents is understood by the KMD/cooperative management. Report to the Estate Managers. Checklist evidenced on January 2018.</li> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager PT. Agro Muko to all Managers and <i>Kebun Masyarakat Desa/KMD</i> Chairman on the importance of the implementation to provide a list of publicly available document. Letter No.27/GM-AM/ENC/M/XII/2017 dated 12 December 2017.</li> <li>- Awareness session was carried out for example on 13 December 2017 for all committee and worker (8 person attended) for <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap. The session covers policies related to occupational health and safety policy, equal opportunity policy, zero burning policy, freedom of association policy, policy to prohibit sexual policy and to protect reproductive</li> </ul>

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	<p>rights, policy on environment protection, no forced labour policy, code of ethical conduct policy, human rights policy.</p> <p>Another round of awareness was carried out on 15 December 2017 to KMD Mundam Marap. The awareness related to grievance procedure, legal requirement update procedure, land compensation procedure, information request and response procedure.</p> <p>- The internal audit carried out by ENC Department, PT. Agro Muko to review the document in place and ensure understanding of committees.</p>		
<b>Assessment Conclusion:</b>	<p>Audit team has reviewed and accepted the corrective action plan prepared by company and KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. updated list of publicly available documents; furthermore audit team review the monitoring of awareness/communication session to improve smallholder's information and compliance against RSPO P&amp;C requirements – and internal verification of publicly available documents, as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. NC Major closed on 23 January 2018.</p>		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-M2	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 February 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	<p>3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate evaluation of compliance with relevant legal requirements.</p>		
<b>Requirement Reference:</b>	<p>RSPO P&amp;C INA NI September 2016, Indicator 2.1.1 Evidence of compliance with relevant legal requirements shall be available.</p>		
<b>Objective Evidence:</b>	<p>Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), evaluation of compliance with relevant legal requirements has not been established.</p>		
<b>Corrections:</b>	<p>PT. Agro Muko assisted <i>Kebun Masyarakat Desa/KMDs</i> in preparing a list of all relevant laws and regulations as in "Daftar Undang-undang/Peraturan Pemerintah/Peraturan Menteri/Keputusan Menteri/Peraturan Daerah/Peraturan Internasional terkait Persyaratan Prinsip &amp; Kriteria RSPO &amp; ISPO"; evaluating relevant legal requirements for smallholders under "Evaluasi Pemenuhan Peraturan dan Perundang-undangan terkait Persyaratan Prinsip &amp; Kriteria RSPO &amp; ISPO"; assist <i>Kebun Masyarakat Desa/KMD</i> in updating the latest regulation as in "Pemantauan Penambahan atau Perubahan terhadap Persyaratan Undang-undang" – latest update December 2017.</p>		
<b>Root Cause Analysis:</b>	<p>The committee/management of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> was relative new to the RSPO requirements. The committee has limited understanding regarding compliance to laws and regulations. PT. Agro Muko focused on implementation of HCV, best management practices and plantation management, leads to lack of monitoring for legal compliance requirements.</p>		
<b>Corrective Actions:</b>	<p>- PT. Agro Muko has carried out awareness/training session with <i>Kebun Masyarakat Desa/KMD/cooperative leadership</i>. Company has send out a letter from General Manager PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of the implementation to comply with RSPO P&amp;C. Letter No.27/GM-AM/ENC/M/XII/2017 dated 12 December 2017. Awareness session was carried out on 13 December 2017 for all committee</p>		

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	<p>and worker for <i>Kebun Masyarakat Desa</i>/KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. There was also explanation related to SOP “Prosedur Informasi Perubahan Undang-undang dan Peraturan Pemerintah No.CA/SOP/01” dated 1 November 2011.</p> <ul style="list-style-type: none"> <li>- Another round of awareness was carried out on 15 December 2017 to KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang related to legal requirement update procedure. The session was attended by all 8 committee of KMD.</li> <li>- Annual evaluation of compliance with relevant legal requirements at KMD location by Field Head Assistant of <i>Kebun Masyarakat Desa</i>/KMD and ENC, January 2018. This includes the communication of regulations related to cooperative in Indonesia, i.e. Undang-undang No.17 tahun 2012 tentang Perkoperasian.</li> </ul>		
<b>Assessment Conclusion:</b>	<p>Audit team has reviewed and accepted the corrective action plan prepared by company and <i>Kebun Masyarakat Desa</i>/KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. updated list relevant laws and regulation, the evaluation of relevant laws and regulation, updated list of latest laws and regulation – for scope of smallholders. Furthermore audit team review the awareness/communication session to improve smallholder’s information and compliance against laws and regulations and internal verification of laws and regulation evaluation; as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. NC Major closed on 23 January 2018.</p>		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-M3	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 February 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	<p>3 <i>Kebun Masyarakat Desa</i>/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate that a health and safety policy is in place; health and safety plan has not been documented and implemented, and its effectiveness monitored.</p>		
<b>Requirement Reference:</b>	<p>RSPO P&amp;C INA NI September 2016, Indicator 4.7.1  A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored.</p>		
<b>Objective Evidence:</b>	<p>Based on document review and interview with the "Panitia KMD" from 3 <i>Kebun Masyarakat Desa</i>/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), it was known that health and safety policy has not been established; health and safety plan has not been documented and implemented, and its effectiveness monitored.</p>		
<b>Corrections:</b>	<p>Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa</i>/KMD committee “Surat Pernyataaan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO” dated 12 December 2017; stating that the <i>Kebun Masyarakat Desa</i>/KMD organizations are committed to comply to relevant policies and SOP to comply with RSPO P&amp;C requirements, as implemented by PT. Agro Muko, including health and safety policy and health and safety plan.  PT. Agro Muko Occupational Health and Safety Policy (Kebijakan Keselamatan dan Kesehatan Kerja) dated 1 March 2013, available in English and Bahasa Indonesia.</p> <ul style="list-style-type: none"> <li>- PT. Agro Muko helped <i>Kebun Masyarakat Desa</i>/KMD to update the health and Safety plans of relevant estates to include the KMD/cooperatives. “Program K3</li> </ul>		

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	<p>Tahun 2018” explains the health and safety plan for KMD, including safety meeting on quarterly basis, emergency response plan simulation for tackling forest fire, and prepare safety signages in KMD plantation.</p> <ul style="list-style-type: none"> <li>- Monitoring of the aspects of the Health and safety plans relevant to the KMD/cooperatives is included in the Health/Safety/Environmental/Social Committee (P2K3 LHS) proceedings. Identification and risk assessment as in document “Resiko K3/OHS di area rencana penanaman Desa Mundam Marap”, “Resiko K3/OHS di area rencana penanaman Desa Serami Baru – Air Masad”, “Resiko K3/OHS di area rencana penanaman Desa Lubuk Talang”. The plan covering activities of heavy machinery, felling and clearing, terrace construction, road construction, planting hole preparation, etc. – including work schedule.</li> </ul>		
<b>Root Cause Analysis:</b>	<p>The committee/management of new <i>Kebun Masyarakat Desa</i>/KMD/cooperatives was relative new to the RSPO requirements. The committee has limited understanding on health and safety plan for their oil palm plantation. PT. Agro Muko focused on implementation of HCV, best management practices and plantation management, leads to lack of monitoring for OHS planning in smallholder context.</p>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko has carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of the implementation to health and safety at work place. Letter No.29/GMO-AM/ENC/M/XII/2017 dated 13 December 2017. Awareness session was carried out on 13 December 2017 for all committee and workers of <i>Kebun Masyarakat Desa</i>/KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. The session covers policies related to occupational health and safety.</li> <li>- Another round of awareness was carried out on 15 December 2017 to KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. The awareness related to health and safety procedure. Safety meeting on same date.</li> <li>- Internal verification by PT. Agro Muko to KMDs in January 2018 have been carried out.</li> </ul>		
<b>Assessment Conclusion:</b>	<p>Audit team has reviewed and accepted the corrective action plan prepared by company and Kebun Masyarakat Desa/KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. health and safety policy; health and safety plan KMD Mundam Marap; health and safety plan KMD Serami Baru – Air Masad; health and safety plan KMD Lubuk Talang; furthermore audit team review the monitoring of awareness/communication session to improve smallholder’s awareness on health and safety on oil palm plantation – and internal verification of health and safety plan, as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. NC Major closed on 23 January 2018.</p>		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-M4	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 February 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	<p>3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate that environmental impact assessment document(s) has been established.</p>		

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<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 5.1.1 Environmental impact assessment document(s) shall be available.
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), it was known that KMD has not prepared environmental impact assessment document(s).
<b>Corrections:</b>	Agreement made between company and Kebun Masyarakat Desa/KMD to produce a statement letter that Kebun Masyarakat Desa/KMD committee will abide to environment policy. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to relevant policies and SOP from PT. Agro Muko. PT. Agro Muko Environmental Policy (Kebijakan Lingkungan Hidup) dated 1 March 2013, available in English and Bahasa Indonesia. PT. Agro Muko helped Kebun Masyarakat Desa/KMD to prepare an environmental impact assessment document(s) covering the KMD/cooperatives location, endorsed by the relevant government agencies. The document presented in SPPL (Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup) dated 12 December 2017.
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> was relative new to the RSPO requirements. The committee has limited understanding on environment management. PT. Agro Muko focused on preparation of SEIA, environmental aspects in HCV, best management practices and plantation management, leads to lack of monitoring for smallholder preparedness to identify, manage and mitigation plan of environment aspects.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of environment protection. Awareness session was carried out on 13 December 2017 for all committee and workers of <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. The session covers policies related to environment, etc.</li> <li>- PT. Agro Muko carried out internal audit by Environment and Conservation/ENC Department to ensure the established document related to environmental impact assessment document(s), implementation and reporting to the relevant agencies; dated January 2018.</li> <li>- Periodic reporting to the relevant Government Agency, as required. This is evident in form of "Laporan Rencana Pengelolaan Lingkungan/Rencana Pemantauan Lingkungan (RKL/RPL), from PT. Agro Muko, period II year 2017, whereby indicating the management and monitoring regime of smallholder plantation.</li> </ul>
<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and Kebun Masyarakat Desa/KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. statement letter that Kebun Masyarakat Desa/KMD committee will abide to environment policy; environment aspect-impact identification for KMD; environment management planning to KMD and SPPL (Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup). Furthermore, audit team review the reporting of environment management and monitoring report and internal audit checklist, as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. NC Major closed on 23 January 2018.

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<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-M5	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 February 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate that documented communication and consultation procedures has been established.		
<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 6.2.1 Communication and consultation procedures shall be documented.		
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), it was known that KMD has not established documented communication and consultation procedures.		
<b>Corrections:</b>	<p>Agreement made between company and Kebun Masyarakat Desa/KMD to signed a statement letter that Kebun Masyarakat Desa/KMD committee will follow PT. Agro Muko's procedure on consultation and communication. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&amp;C through implementation of relevant policies and SOP from PT. Agro Muko.</p> <p>PT. Agro Muko's "SOP Pemberian Tanggapan Terhadap Permintaan Informasi, No.ENC/SOP/08 rev.02" – Response upon information request procedure dated 6 April 2015, available in English and Bahasa Indonesia. Any information request will be channeled to the field head assistant <i>Kebun Masyarakat Desa/KMD</i>.</p>		
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD</i> /cooperatives was relative new to the RSPO requirements. The committee has limited understanding on stakeholder consultation. PT. Agro Muko focused on consultation for HCV and legal ownership of the land, leads to lack of monitoring for consultation and communication, between smallholder with stakeholder.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of communication and consultation, including responding to information request. Awareness session was carried out on 13 December 2017 for all committee and workers for <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. The session covers policies related to communication and consultation, responding to information request, etc.</li> <li>- Checklist with evidence information logbook, list of stakeholder to consult with KMD seen on December 2017.</li> <li>- PT. Agro Muko carry out internal audit by Environment and Conservation/ENC Department to ensure the established document related to communication and consultation record.</li> </ul>		
<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and Kebun Masyarakat Desa/KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. KMD statement to follow PT. Agro Muko's procedure on responding to information request – and internal verification of availability information request logbook, as part of corrective action. Audit team checked the information logbook, it is available,		

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	despite no communication and consultation request recorded yet. Audit team concluded that the correction, corrective action and evidences are sufficient. NC Major closed on 23 January 2018.		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-M6	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 February 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrated that dispute resolution mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.		
<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 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.		
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), it was known that a dispute resolution mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested - has not been established.		
<b>Corrections:</b>	Company and Kebun Masyarakat Desa/KMD agreed that Kebun Masyarakat Desa/KMD committee will follow PT. Agro Muko's procedure on complaint/grievance/dispute resolution mechanism. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&C through implementation of relevant policies and SOP from PT. Agro Muko. KMD committed to follow PT. Agro Muko's "Prosedur Keluh Kesah dengan Pihak Internal, No.SOP/025/HRA rev.02" – grievance settling with internal parties procedure dated 27 March 2015, available in English and Bahasa Indonesia. KMD committed to follow PT. Agro Muko's "Prosedur Keluh Kesah dengan Pihak Eksternal, No.SOP/026/HRA rev.02" – grievance settling with external parties procedure dated 27 March 2015, available in English and Bahasa Indonesia. Any information on complaint/grievance/dispute will be channeled to the field head assisstant <i>Kebun Masyarakat Desa/KMD</i> .		
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD</i> /cooperatives was relative new to the RSPO requirements. The committee has limited understanding of on the importance of handling complaint/grievance/dispute. PT. Agro Muko focused on the legal ownership evidence, leads to lack of monitoring for procedure for on the importance of handling complaint/grievance/dispute – at smallholders.		
<b>Corrective Actions:</b>	- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of grivance/dispute resolution mechanism. Awareness session was carried out on 13 December 2017 for all committee and workers for <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami Baru – Air Masad, KMD		

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	<p>Lubuk Talang. The session covers policies related to grievance/dispute resolution mechanism, etc.</p> <p>- PT. Agro Muko carried out internal audit by Environment and Conservation/ENC Department to ensure the established document related to grievance/dispute resolution mechanism. Checklist with evidence "Rekaman Keluh Kesah KMD Mundam Marap" seen on January 2018.</p>		
<b>Assessment Conclusion:</b>	<p>Audit team has reviewed and accepted the corrective action plan prepared by company and Kebun Masyarakat Desa/KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang statement to follow PT. Agro Muko's procedure on complaint/grievance/dispute resolution – and internal verification of complaint/grievance/dispute logbook, as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. NC Major closed on 23 January 2018.</p>		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-M7	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 February 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	<p>3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrated procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, has been made available, referring to decision of the Constitution Court.</p>		
<b>Requirement Reference:</b>	<p>RSPO P&amp;C INA NI September 2016, Indicator 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.</p>		
<b>Objective Evidence:</b>	<p>Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), it was known that procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, referring to decision of the Constitution Court - has not been made available.</p>		
<b>Corrections:</b>	<p>Company and Kebun Masyarakat Desa/KMD agreed on a statement letter that Kebun Masyarakat Desa/KMD committee will follow PT. Agro Muko's procedure on identifying people entitled to compensation. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is committed to comply to RSPO P&amp;C through implementation of relevant policies and SOP from PT. Agro Muko. KMD follows PT. Agro Muko's "Prosedur Ganti Rugi Lahan, No.SOP/CA/02" – land compensation procedure dated 1 July 2012, available in English and Bahasa Indonesia. Any identification of people entitled for land compensation will be identified by <i>Kebun Masyarakat Desa/KMD</i> committee and acknowledged by PT. Agro Muko.</p>		
<b>Root Cause Analysis:</b>	<p>The committee/management of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> was relative new to the RSPO requirements. The committee has limited understanding of identifying people entitled to compensation because the land for plantation purchased directly or given by community members. PT. Agro Muko focused on the legal ownership evidence, leads to lack of monitoring for procedure for identification of people entitled to compensation – in smallholders.</p>		

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<p><b>Corrective Actions:</b></p>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of identifying people entitled to compensation. Awareness session was carried out on 13 December 2017 for all committee and workers for <i>Kebun Masyarakat Desa</i>/KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. The session covers policies related to identifying people entitled to compensation – in form of PT. Agro Muko’s “Prosedur Ganti Rugi Lahan, No.SOP/CA/02” – land compensation procedure dated 1 July 2012;</li> <li>- PT. Agro Muko through their Environment and Conservation/ENC Department audited any report of land conflict and recorded under “Rekaman Keluh Kesah KMD Mundam Marap”. However, no report of land conflict recorded.</li> <li>- Checklist with evidence “Rekaman Keluh Kesah KMD Mundam Marap” seen on January 2018.</li> <li>- Compensation record has been reviewed, and has identified parties – entitled for compensation.</li> </ul>		
<p><b>Assessment Conclusion:</b></p>	<p>Audit team has reviewed and accepted the corrective action plan prepared by company and Kebun Masyarakat Desa/KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. KMD statement to follow PT. Agro Muko’s procedure on identifying people entitled to compensation – and internal verification of complaint/grievance/dispute logbook, as part of corrective action. Audit team has verified the record of land compensation, including payment process. Audit team concluded that the correction, corrective action and evidences are sufficient. NC Major closed on 23 January 2018.</p>		
<p><b>Nonconformity</b></p>			
<p><b>NCR Ref #</b></p>	<p>1563740-201712-M8</p>	<p><b>Clause &amp; Category (Major / Minor)</b></p>	<p><b>Major NC</b></p>
<p><b>Date Issued</b></p>	<p><b>7 December 2017</b></p>	<p><b>Due Date</b></p>	<p><b>6 February 2018</b></p>
<p><b>Closed (Yes / No)</b></p>	<p><b>Yes</b></p>	<p><b>Date of nonconformity Closure</b></p>	<p><b>23 January 2018</b></p>
<p><b>Statement of Nonconformity:</b></p>	<p>3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), cannot demonstrated a documented policy on equal opportunity and treatment for work has not been established.</p>		
<p><b>Requirement Reference:</b></p>	<p>RSPO P&amp;C INA NI September 2016, Indicator 6.8.1 A company’s policy on equal opportunity and treatment for work shall be available and documented.</p>		
<p><b>Objective Evidence:</b></p>	<p>Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), it was known that a documented policy on equal opportunity and treatment for work has not been established.</p>		
<p><b>Corrections:</b></p>	<p>Kebun Masyarakat Desa/KMD committee produce a statement letter follows PT. Agro Muko’s policy on equal opportunity and treatment for work. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa</i>/KMD committee “Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO” dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&amp;C through implementation of relevant policies and SOP from PT. Agro Muko. PT. Agro Muko’s policy “PT. Agro Muko Equal Employment Opportunity Policy (Kebijakan Persamaan Kesempatan Kerja)” dated 1 March 2013, available in English and Bahasa Indonesia has been made available in KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang.</p>		

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<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> was relative new to the RSPO requirements. The committee has little understanding on the importance of equal opportunity and treatment for work, in their smallholder plantation. PT. Agro Muko lacks in monitoring for policy for equal opportunity and treatment for work – in smallholders.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and <i>Kebun Masyarakat Desa/KMD</i> Chairman on the importance of equal opportunity and treatment for work. Awareness session was carried out on 13 December 2017 for all committee and workers of <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. The session covers policies related to equal opportunity and treatment for work – in form of "PT. Agro Muko Equal Employment Opportunity Policy (Kebijakan Persamaan Kesempatan Kerja)" dated 1 March 2013.</li> <li>- PT. Agro Muko through their Environment and Conservation/ENC Department carried out internal audit and found the posting of equal opportunity and treatment for work policy in KMD Mundam Marap. Checklist with evidence reference has been made to verifies "PT. Agro Muko Equal Employment Opportunity Policy (Kebijakan Persamaan Kesempatan Kerja)" dated 1 March 2013.</li> </ul>		
<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and <i>Kebun Masyarakat Desa/KMD</i> . Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. KMD statement to follow PT. Agro Muko's policy on equal opportunity and treatment for work – and internal verification of equal opportunity and treatment for work policy availability, and committee's understanding of the policy as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. NC Major closed on 23 January 2018.		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-M9	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 February 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 <i>Kebun Masyarakat Desa/KMDs</i> (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), cannot demonstrated a documented policy to prevent sexual and all other forms of harassment and violence has been established.		
<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 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.		
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 <i>Kebun Masyarakat Desa/KMDs</i> (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), it was known that a documented policy to prevent sexual and all other forms of harassment and violence has not been established.		
<b>Corrections:</b>	Statement letter that <i>Kebun Masyarakat Desa/KMD</i> committee will follow PT. Agro Muko's policy on prevent sexual and all other forms of harassment and violence. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataaan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the		

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	<p>organization is a committed to comply to RSPO P&amp;C through implementation of relevant policies and SOP from PT. Agro Muko. PT. Agro Muko’s policy “PT. Agro Muko Sexual Harassment Policy (Kebijakan Pelecehan Seksual)” dated 1 March 2013, available in English and Bahasa Indonesia has been communicated. Company also includes the specific grievance mechanism for reporting case of sexual harassment as in PT. Agro Muko’s “Prosedur Keluh Kesah dengan Pihak Internal, No.SOP/025/HRA rev.02” – grievance settling with internal parties procedure dated 27 March 2015, available in English and Bahasa Indonesia. And in PT. Agro Muko’s “Prosedur Keluh Kesah dengan Pihak Eksternal, No.SOP/026/HRA rev.02” – grievance settling with internal parties procedure dated 27 March 2015, available in English and Bahasa Indonesia.</p>		
<b>Root Cause Analysis:</b>	<p>The committee/management of new <i>Kebun Masyarakat Desa/KMD</i>/cooperatives was relative new to the RSPO requirements. The committee has little understanding on the policy to prevent sexual and all other forms of harassment and violence, in their smallholder plantation. PT. Agro Muko lacks in monitoring for policy to prevent sexual and all other forms of harassment and violence – in smallholders.</p>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and <i>Kebun Masyarakat Desa/KMD</i> Chairman on the importance of preventing sexual and all other forms of harassment and violence. Awareness session was carried out on 13 December 2017 for all committee and worker (8 person attended) for <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap. The session covers policies related to prevent sexual and all other forms of harassment and violence – in form of “PT. Agro Muko Sexual Policy (Kebijakan Pelecehan Seksual)” dated 1 March 2013.</li> <li>- PT. Agro Muko through their Environment and Conservation/ENC Department verified the posting of preventing sexual and all other forms of harassment and violence in <i>KMD Mundam Marap</i>”. Checklist with evidence reference has been made to “PT. Agro Muko Equal Employment Opportunity Policy (Kebijakan Persamaan Kesempatan Kerja)” dated 1 March 2013.</li> </ul>		
<b>Assessment Conclusion:</b>	<p>Audit team has reviewed and accepted the corrective action plan prepared by company and <i>Kebun Masyarakat Desa/KMD</i>. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. KMD statement to follow PT. Agro Muko’s policy on prevention sexual and all other forms of harassment and violence – and internal verification of preventing sexual harassment and violence policy availability, committee understanding - as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. NC Major closed on 23 January 2018.</p>		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-M10	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 February 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	<p>3 <i>Kebun Masyarakat Desa/KMDs</i> (<i>KMD Mundam Marap</i>, <i>KMD Serami Baru - Air Masad</i>, <i>KMD Lubuk Talang</i>) has not established a policy to protect the reproductive rights.</p>		
<b>Requirement Reference:</b>	<p>RSPO P&amp;C INA NI September 2016, Indicator 6.9.2 A policy to protect the reproductive rights, shall be documented, implemented</p>		

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	and communicated to all levels of the workforce.
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), it was known that a policy to protect the reproductive rights has not been established.
<b>Corrections:</b>	<p>Agreement made between company and Kebun Masyarakat Desa/KMD to produce a statement letter that Kebun Masyarakat Desa/KMD committee will follow PT. Agro Muko's policy on protection of the reproductive rights. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&amp;C through implementation of relevant policies and SOP from PT. Agro Muko.</p> <p>PT. Agro Muko's policy "PT. Agro Muko Kebijakan Perlindungan Hak-Hak Reproduksi (Protection of Reproductive Rights Policy)" dated 1 March 2013, available in English and Bahasa Indonesia has been communicated.</p> <p>Company also includes the specific grievance mechanism for reporting case of reproductive rights violation as in PT. Agro Muko's "Prosedur Keluh Kesah dengan Pihak Internal, No.SOP/025/HRA rev.02" – grievance settling with internal parties procedure dated 27 March 2015, available in English and Bahasa Indonesia. And in PT. Agro Muko's "Prosedur Keluh Kesah dengan Pihak Eksternal, No.SOP/026/HRA rev.02" – grievance settling with internal parties procedure dated 27 March 2015, available in English and Bahasa Indonesia. This has been accepted and communicated to Kebun Masyarakat Desa/KMD Mundam Marap, KMD Serami Baru - Air Masad and KMD Lubuk Talang.</p>
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> was relative new to the RSPO requirements. The committee has little understanding on the policy for protection of the reproductive rights, in their smallholder plantation. PT. Agro Muko lacks in monitoring against availability of policy for protection of the reproductive rights – in smallholders.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Company has carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of protection of the reproductive rights. Awareness session was carried out on 13 December 2017 for all committee and workers for <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang. The session covers policies related to protection of the reproductive rights – in form of policy "PT. Agro Muko Kebijakan Perlindungan Hak-Hak Reproduksi (Protection of Reproductive Rights Policy)" dated 1 March 2013.</li> <li>- PT. Agro Muko internal audit through their Environment and Conservation/ENC Department verified the understanding of protection of the reproductive rights in KMD Mundam Marap, KMD Serami Baru - Air Masad and KMD Lubuk Talang. Checklist with evidence reference has been made to "PT. Agro Muko Kebijakan Perlindungan Hak-Hak Reproduksi (Protection of Reproductive Rights Policy)" dated 1 March 2013.</li> </ul>
<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and <i>Kebun Masyarakat Desa/KMD</i> . Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. KMD Mundam Marap, KMD Serami Baru - Air Masad and KMD Lubuk Talang's statement to follow PT. Agro Muko's policy on protection of the reproductive rights – and internal verification of protection of the reproductive rights policy availability, as

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	part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. NC Major closed on 23 January 2018.		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-M11	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 February 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), has not established policy to respect human rights.		
<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 6.13.1 A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations.		
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), policy to respect human rights shall be documented and communicated to all levels of the workforce and operations - has not established.		
<b>Corrections:</b>	Agreement made between company and Kebun Masyarakat Desa/KMD to produce a statement letter that Kebun Masyarakat Desa/KMD committee will follow PT. Agro Muko's policy on respecting and upholding human rights. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&C through implementation of relevant policies and SOP from PT. Agro Muko. PT. Agro Muko's policy "PT. Agro Muko Kebijakan tentang Hak Asasi (Human Rights Policy)" dated 1 March 2014, available in English and Bahasa Indonesia has been communicated.		
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD</i> /cooperatives was relative new to the RSPO requirements. The committee has little understanding on respecting human rights policy, in their smallholder plantation. PT. Agro Muko lacks in internal audit for policy to respect human rights – in smallholders context.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko has carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of respecting and upholding human rights. Awareness session was carried out on 13 December 2017 for all committee and worker (8 person attended) for <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap. The session covers policies related to respecting and upholding human rights – in form of policy "PT. Agro Muko Kebijakan tentang Hak Asasi (Human Rights Policy)" dated 1 March 2014.</li> <li>- PT. Agro Muko internal audit through their Environment and Conservation/ENC Department verified the understanding on respecting and upholding human rights in KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. Checklist with evidence reference has been made to "PT. Agro Muko Kebijakan tentang Hak Asasi (Human Rights Policy)" dated 1 March 2014.</li> </ul>		
<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and Kebun Masyarakat Desa/KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. KMD statement to follow PT. Agro Muko's policy on respecting and upholding human rights – and		

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	internal verification of respecting and upholding human rights policy availability as well as committee understands, as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. NC Major closed on 23 January 2018.		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-M12	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 February 2018</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) has not established procedure for identifying people entitled to compensation.		
<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 7.6.2 A procedure for identifying people entitled to compensation shall be available.		
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), has not established procedure for identifying people entitled to compensation.		
<b>Corrections:</b>	<p>Agreement made between company and Kebun Masyarakat Desa/KMD to produce a statement letter that Kebun Masyarakat Desa/KMD committee will follow PT. Agro Muko's procedure on identifying people entitled to compensation. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&amp;C through implementation of relevant policies and SOP from PT. Agro Muko.</p> <p>PT. Agro Muko's "Prosedur Ganti Rugi Lahan, No.SOP/CA/02" – land compensation procedure dated 1 July 2012, available in English and Bahasa Indonesia. Any identification of people entitled for land compensation will be identified by <i>Kebun Masyarakat Desa/KMD</i> committee and acknowledged by PT. Agro Muko.</p>		
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD</i> /cooperatives was relative new to the RSPO requirements. The committee has limited understanding on the mechanism for identification of people entitled to compensation for new planting (after November 2005), because the land for plantation purchased directly or given by community members. PT. Agro Muko focused on the legal ownership evidence, leads to lack of monitoring for procedure for identification of people entitled to compensation – in smallholders context.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of identifying people entitled to compensation. Awareness session was carried out on 13 December 2017 for all committee and worker (8 person attended) for <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. The session covers policies related to identifying people entitled to compensation – in form of PT. Agro Muko's "Prosedur Ganti Rugi Lahan, No.SOP/CA/02" – land compensation procedure dated 1 July 2012</li> <li>- PT. Agro Muko internal audit through their Environment and Conservation/ENC Department to check any report of land conflict and recorded under "Rekaman</li> </ul>		

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	Keluh Kesah KMD Mundam Marap” and understanding of how policy works. Checklist with evidence “Rekaman Keluh Kesah KMD” seen on December 2017.		
<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and Kebun Masyarakat Desa/KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. KMD statement to follow PT. Agro Muko’s procedure on identifying people entitled to compensation – and internal verification of complaint/grievance/dispute logbook, understanding as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. NC Major closed on 23 January 2018.		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-N1	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 December 2018 (Subsequent visit)</b>
<b>Closed (Yes / No)</b>	<b>No (remains open)</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate a list of information related to criterion 1.2 that can be accessed by relevant stakeholders be available.		
<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 1.1.1 List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available.		
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), a list of information related to criterion 1.2 that can be accessed by relevant stakeholders has not been established.		
<b>Corrections:</b>	PT. Agro Muko supports each <i>Kebun Masyarakat Desa/KMD</i> to establish a list of publicly available document that covers all publicly available documents. Documents are available at General Manager Office PT. Agro Muko and/or at the estates in charge of management of the <i>Kebun Masyarakat Desa/KMD/cooperatives</i> . Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee “Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO” dated 12 December 2017; stating that the organization is a committed to comply to relevant policies and SOP from PT. Agro Muko. List of documents titled “Dokumen-dokumen yang tersedia untuk Umum KMD Mundam Marap” dated 13 December 2017; related to land titles/user rights; occupational health and safety plans as in “Program K3 Tahun 2018 KMD Mundam Marap”, “Program K3 Tahun 2018 KMD Serami Baru – Air Masad”, “Program K3 Tahun 2018 KMD Lubuk Talang”; environmental and social impacts including mitigation plans and “Rencana Pengelolaan Limbah B3”; HCV documentation as in “Laporan Identifikasi Nilai Konservasi Tinggi Smallholders Koperasi dan Kebun Masyarakat Desa PT. Agro Muko” by Koompasia Enviro Institute; pollution prevention and reduction plans; details of complaints and grievances; negotiation procedures; continual improvement plans; public summary of certification assessment report; human rights policy.		
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> was relative new to the RSPO requirements. The committee has limited understanding on publicly available documents. PT. Agro Muko focused on implementation of HCV, best management practices and plantation management, leads to lack of monitoring for publicly available documents.		

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<p><b>Corrective Actions:</b></p>	<ul style="list-style-type: none"> <li>- PT. Agro Muko conduct monitoring once per year by the Field Head Assistant for <i>Kebun Masyarakat Desa/KMD</i> or Environment and Conservation/ENC team. This is to ensure the list is publicly displayed, all necessary documents are available at the estate/GMO-AM office, and that the procedure to access the documents is understood by the KMD/cooperative management. Report to the Estate Managers. Checklist evidenced on January 2018.</li> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager PT. Agro Muko to all Managers and <i>Kebun Masyarakat Desa/KMD</i> Chairman on the importance of the implementation to provide a list of publicly available document. Letter No.27/GM-AM/ENC/M/XII/2017 dated 12 December 2017. Awareness session was carried out on 13 December 2017 for all committee and workers of <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami baru – Air Masad, KMD Lubuk Talang. The session covers policies related to occupational health and safety policy, equal opportunity policy, zero burning policy, freedom of association policy, policy to prohibit sexual policy and to protect reproductive rights, policy on environment protection, no forced labour policy, code of ethical conduct policy, human rights policy, etc.</li> <li>- Another round of awareness was carried out on 15 December 2017 to KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. The awareness related to grievance procedure, legal requirement update procedure, land compensation procedure, information request and response procedure, etc.</li> </ul>		
<p><b>Assessment Conclusion:</b></p>	<p>Audit team has reviewed and accepted the corrective action plan prepared by company and <i>Kebun Masyarakat Desa/KMD</i>. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. updated list of publicly available documents; furthermore audit team review the monitoring of awareness/communication session to improve smallholder’s information and compliance against RSPO P&amp;C requirements – and internal verification of publicly available documents, as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. However, audit team will review the effectiveness and consistency of corrective action implementation for NC Minor close out during subsequent surveillance assessment.</p>		
<p><b>Nonconformity</b></p>			
<p><b>NCR Ref #</b></p>	<p>1563740-201712-N2</p>	<p><b>Clause &amp; Category (Major / Minor)</b></p>	<p><b>Minor NC</b></p>
<p><b>Date Issued</b></p>	<p><b>7 December 2017</b></p>	<p><b>Due Date</b></p>	<p><b>6 December 2018 (Subsequent visit)</b></p>
<p><b>Closed (Yes / No)</b></p>	<p><b>No (remains open)</b></p>	<p><b>Date of nonconformity Closure</b></p>	<p><b>23 January 2018</b></p>
<p><b>Statement of Nonconformity:</b></p>	<p>3 <i>Kebun Masyarakat Desa/KMDs</i> (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate a written policy committing to a code of ethical conduct and integrity in all operations and transactions.</p>		
<p><b>Requirement Reference:</b></p>	<p>RSPO P&amp;C INA NI September 2016, Indicator 1.3.1          There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions along with the documentation of socialisation process of the policy to all levels of the workers and operations.</p>		
<p><b>Objective Evidence:</b></p>	<p>Based on document review and interview with the "Panitia KMD" from 3 <i>Kebun Masyarakat Desa/KMDs</i> (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate a written policy committing to a code of ethical conduct and integrity in all operations and transactions.</p>		

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<b>Corrections:</b>	Statement letter that Kebun Masyarakat Desa/KMD committee will follow PT. Agro Muko’s policy on code of ethical conduct and integrity in all operations and transactions. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee “Surat Pernyataaan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO” dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&C through implementation of relevent policies and SOP from PT. Agro Muko. PT. Agro Muko’s policy “PT. Agro Muko Kebijakan tentang Kode Etik (Code of Ethical Conduct Policy)” dated 17 November 2014, available in English and Bahasa Indonesia has been communicated.		
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD</i> /cooperatives was relative new to the RSPO requirements. The committee has limited understanding on code of ethical conduct in business operation as per RSPO requirements. PT. Agro Muko have not monitored committee’s understanding on code of ethical conduct for smallholder context.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of code of ethical conduct and integrity in all operations and transactions. Awareness session was carried out on 13 December 2017 for all committee and workers of <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. The session covers policies related to code of ethical conduct and integrity in all operations and transactions – in form of policy “PT. Agro Muko Kebijakan tentang Kode Etik (Code of Ethical Conduct Policy)” dated 17 November 2014.</li> <li>- PT. Agro Muko internal audit in January 2018 through their Environment and Conservation/ENC Department verified the posting of code of ethical conduct and integrity in all operations and transactions policy in KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. Company internal audit team also verified understanding. Checklist with evidence reference has been made to “PT. Agro Muko Kebijakan tentang Kode Etik (Code of Ethical Conduct Policy)” dated 17 November 2014 -sighted.</li> </ul>		
<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. KMD statement to follow PT. Agro Muko’s policy on code of ethical conduct and integrity in all operations and transactions – and internal verification of policy availability, as part of corrective action. Audit team interviewed the committee to confirm understand of policy. Audit team concluded that the correction, corrective action and evidences are sufficient. However, audit team will review the effectiveness and consistency of corrective action implementation for NC Minor close out during subsequent surveillance assessment.		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-N3	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 December 2018 (Subsequent visit)</b>
<b>Closed (Yes / No)</b>	<b>No (remains open)</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate a documented system, which includes written information on all applicable legal requirements.		

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<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 2.1.2 A documented system, which includes written information on legal requirements, shall be maintained.
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) it was known that a documented system, which includes written information on all applicable legal requirements has not been established.
<b>Corrections:</b>	PT. Agro Muko assisted <i>Kebun Masyarakat Desa/KMDs</i> in assisted Kebun Masyarakat Desa in preparing documented system to list, evaluate and update all relevant laws and regulations as in "Daftar Undang-undang/Peraturan Pemerintah/Peraturan Menteri/Keputusan Menteri/Peraturan Daerah/Peraturan Internasional terkait Persyaratan Prinsip & Kriteria RSPO & ISPO"; evaluating relevant legal requirements for smallholders under "Evaluasi Pemenuhan Peraturan dan Perundang-undangan terkait Persyaratan Prinsip & Kriteria RSPO & ISPO"; assist <i>Kebun Masyarakat Desa/KMD</i> in updating the latest regulation as in "Pemantauan Penambahan atau Perubahan terhadap Persyaratan Undang-undang" – latest update December 2017.
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> was relative new to the RSPO requirements. The committee has limited understanding on documented system to demonstrate legal requirements and compliance to legal requirements as per RSPO requirements. PT. Agro Muko have not monitored the availability of documented system to demonstrate compliance against relevant legal requirements at smallholder level.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with <i>Kebun Masyarakat Desa/KMD/cooperative leadership</i>. Company has send out a letter from General Manager PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of the implementation to comply with RSPO P&amp;C. Letter No.27/GM-AM/ENC/M/XII/2017 dated 12 December 2017. Awareness session was carried out on 13 December 2017 for all committee and workers of <i>Kebun Masyarakat Desa/KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang</i>. There was also explanation related to SOP "Prosedur Informasi Perubahan Undang-undang dan Peraturan Pemerintah No.CA/SOP/01 dated 1 November 2011.</li> <li>- Latest regulation update related to "Peraturan Menteri Koperasi dan Usaha Kecil dan Menengah Republik Indonesia No.10/Per/M.KUKM/IX/2015 tentang Kelembagaan Koperasi";</li> <li>- Another round of awareness was carried out on 15 December 2017 to KMD Mundam Marap related to legal requirement update procedure. The session was attended by all 8 committee of KMD.</li> <li>- Annual evaluation of compliance with relevant legal requirements at KMD location by Field Head Assisstant of <i>Kebun Masyarakat Desa/KMD</i> and ENC, January 2018.</li> <li>- Internal audit in January 2018.</li> </ul>
<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and <i>Kebun Masyarakat Desa/KMD</i> . Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. updated list relevant laws and regulation, the evaluation of relevant laws and regulation, updated list of latest laws and regulation – for scope of smallholders. Furthermore audit team review the awareness/communication session to improve smallholder's information and compliance against laws and regulations and internal verification of laws and regulation evaluation; as part of corrective action. Audit team interviewed the KMD comiittees to understand the level of

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	knowledge on legal compliance update. Audit team concluded that the correction, corrective action and evidences are sufficient. However, audit team will review the effectiveness and consistency of corrective action implementation for NC Minor close out during subsequent surveillance assessment.		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-N4	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 December 2018 (Subsequent visit)</b>
<b>Closed (Yes / No)</b>	<b>No (remains open)</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate an implemented mechanism for ensuring compliance.		
<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 2.1.3 A mechanism for ensuring compliance shall be implemented.		
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) it was known that a mechanism for ensuring compliance has not been documented.		
<b>Corrections:</b>	PT. Agro Muko assisted <i>Kebun Masyarakat Desa/KMDs</i> in assisted Kebun Masyarakat Desa in preparing documented system to evaluate all relevant laws and regulations as in "Evaluasi Pemenuhan Peraturan dan Perundang-undangan terkait Persyaratan Prinsip & Kriteria RSPO & ISPO"– latest update December 2017. Sample seen on latest compliance related to "Undang-undang No.39 tahun 1999 tentang Hak Asasi Manusia" related to policy on human rights; "Peraturan Menteri Koperasi dan Usaha Kecil dan Menengah Republik Indonesia No.10/Per/M.KUKM/IX/2015 tentang Kelembagaan Koperasi";		
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> was relative new to the RSPO requirements. The committee has limited understanding on documented system to ensure compliance against relevant laws and regulation. PT. Agro Muko have not monitored availability of document to demonstrate compliance against relevant legal requirements at smallholder level.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with <i>Kebun Masyarakat Desa/KMD/cooperative</i> leadership. Company has send out a letter from General Manager PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of the implementation to comply with RSPO P&amp;C. Letter No.27/GM-AM/ENC/M/XII/2017 dated 12 December 2017. Awareness session was carried out on 13 December 2017 for all committee and workers of <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. There was also explanation related to SOP "Prosedur Informasi Perubahan Undang-undang dan Peraturan Pemerintah No.CA/SOP/01 dated 1 November 2011.</li> <li>- Another round of awareness was carried out on 15 December 2017 to KMD Mundam Marap related to legal requirement update procedure. The session was attended by all committee of KMDs.</li> <li>- Annual evaluation of compliance with relevant legal requirements at KMD location by Field Head Assistant of <i>Kebun Masyarakat Desa/KMD</i> and ENC, January 2018.</li> </ul>		

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	- Internal audit in January 2018.		
<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. updated list relevant laws and regulation, the evaluation of relevant laws and regulation, updated list of latest laws and regulation – for scope of smallholders. Furthermore audit team review the awareness/communication session to improve smallholder’s information and compliance against laws and regulations and internal verification of laws and regulation evaluation; as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. However, audit team will review the effectiveness and consistency of corrective action implementation for NC Minor close out during subsequent surveillance assessment.		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-N5	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 December 2018 (Subsequent visit)</b>
<b>Closed (Yes / No)</b>	<b>No (remains open)</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate system for tracking any changes in the law be available.		
<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 2.1.4 A system for tracking any changes in the law shall be available and implemented.		
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), a system for tracking any changes in the law has not been made available and implemented.		
<b>Corrections:</b>	PT. Agro Muko assisted <i>Kebun Masyarakat Desa/KMDs</i> in preparing documented system to list and update all relevant laws and regulations as in "Pemantauan Penambahan atau Perubahan terhadap Persyaratan Undang-undang" – latest update December 2017.		
<b>Root Cause Analysis:</b>	Lack of awareness from the committee of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> on the importance of compliance to laws and regulation. The committee/management of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> was relative new to the RSPO requirements. The committee has limited understanding on system to track changes in relevant legal requirements as per RSPO requirements. PT. Agro Muko have not monitored sytem to track changes of relevant legal requirements for new KMD.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with <i>Kebun Masyarakat Desa/KMD/cooperative</i> leadership. Company has send out a letter from General Manager PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of the implementation to comply with RSPO P&amp;C. Letter No.27/GM-AM/ENC/M/XII/2017 dated 12 December 2017. Awareness session was carried out on 13 December 2017 for all committee and worker of <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. There was also explanation related to SOP "Prosedur Informasi Perubahan Undang-undang dan Peraturan Pemerintah No.CA/SOP/01" dated 1 November 2011.</li> <li>- Another round of awareness was carried out on 15 December 2017 to KMD Mundam Marap related to legal requirement update procedure. The session</li> </ul>		

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	<p>was attended by all committee of KMDs.</p> <ul style="list-style-type: none"> <li>- Latest update related to "Undang-undang No.39 tahun 1999 tentang Hak Asasi Manusia" related to policy on human rights; "Peraturan Menteri Koperasi dan Usaha Kecil dan Menengah Republik Indonesia No.10/Per/M.KUKM/IX/2015 tentang Kelembagaan Koperasi".</li> <li>- Internal audit on January 2018.</li> </ul>		
<b>Assessment Conclusion:</b>	<p>Audit team has reviewed and accepted the corrective action plan prepared by company and Kebun Masyarakat Desa/KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. updated list relevant laws and regulation, the evaluation of relevant laws and regulation, updated list of latest laws and regulation – for scope of smallholders. Furthermore audit team review the awareness/communication session to improve smallholder's information and compliance against laws and regulations and internal verification of laws and regulation evaluation; as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. However, audit team will review the effectiveness and consistency of corrective action implementation for NC Minor close out during subsequent surveillance assessment.</p>		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-N6	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 December 2018 (Subsequent visit)</b>
<b>Closed (Yes / No)</b>	<b>No (remains open)</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	<p>3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate that environment management plan document has been established.</p>		
<b>Requirement Reference:</b>	<p>RSPO P&amp;C INA NI September 2016, Indicator 5.1.2 Environment management plan document to prevent negative impacts, its implementation report and revision (if the identification of impact requires changes in current company's practices) shall be available. The company's management shall appoint the responsible person(s) for the implementation of the document.</p>		
<b>Objective Evidence:</b>	<p>Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), it was known that KMDs have not prepared environment management plan document.</p>		
<b>Corrections:</b>	<p>Statement letter that Kebun Masyarakat Desa/KMD committee will abide to environment policy. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to relevant policies and SOP from PT. Agro Muko. PT. Agro Muko Environmental Policy (Kebijakan Lingkungan Hidup) dated 1 March 2013, available in English and Bahasa Indonesia. PT. Agro Muko helped Kebun Masyarakat Desa to prepare an environmental impact assessment document(s) covering the KMD/cooperatives location, endorsed by the relevant government agencies. The document presented in SPPL (Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup) which also covers environment management and monitoring plan, dated 12 December 2017.</p>		

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	The SPPL comprise plan to manage and monitors: to avoid oil palm development/land clearing on conservation/protected area (river riparian or area with steep slope); to plant legume cover crop; to control soil erosion and surface run off; to prevent loss of biodiversity; to monitor the flora and fauna on the smallholder location; no hunting in KMD area; efficient use of fertilizer and herbicide; to report environment management performance on 6 monthly base.		
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> was relative new to the RSPO requirements. The committee has limited understanding on environment management plan document to prevent negative impacts. PT. Agro Muko lack of monitoring to assess environment management plan for new KMD.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of environment protection. Awareness session was carried out on 13 December 2017 for all committee and worker of <i>Kebun Masyarakat Desa/KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang</i>. The session covers policies related to environment, etc.</li> <li>- PT. Agro Muko conduct internal audit in January 2018 by Environment and Conservation/ENC Department to ensure the established document related to environmental impact assessment document(s) and reporting to the relevant agencies. Periodic reporting to the relevant Government Agency, as required. This is evident in form of "Laporan Rencana Pengelolaan Lingkungan/Rencana Pemantauan Lingkungan (RKL/RPL), from PT. Agro Muko, period II year 2017, whrereby indicating the management and monitoring regime of smallholder plantation.</li> </ul>		
<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. statement letter that Kebun Masyarakat Desa/KMD committee will abide to environment policy; environment aspect-impact identification for KMD; environment management planning to KMD and SPPL (Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup). Furthermore, audit team review the reporting of environment management and monitoring report and internal audit checklist, as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. However, audit team will review the effectiveness and consistency of corrective action implementation for NC Minor close out during subsequent surveillance assessment.		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-N7	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 December 2018 (Subsequent visit)</b>
<b>Closed (Yes / No)</b>	<b>No (remains open)</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate that environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) has been made available.		
<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 5.1.3 Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be		

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	available. This plan is reviewed on two-yearly basis.
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), it was known that KMDs have not prepared environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result).
<b>Corrections:</b>	Statement letter that Kebun Masyarakat Desa/KMD committee will abide to environment policy. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataaan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to relevent policies and SOP from PT. Agro Muko. PT. Agro Muko Environmental Policy (Kebijakan Lingkungan Hidup) dated 1 March 2013, available in English and Bahasa Indonesia. PT. Agro Muko helped Kebun Masyarakat Desa to prepare an environmental impact assessment document(s) covering the KMD/cooperatives location, endorsed by the relevant government agencies. The document presented in SPPL (Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup) which also covers environment management and monitoring plan, dated 12 December 2017. The SPPL comprise plan to manage and monitors: avoid oil palm development/land clearing on conservation/protected area (river riparian or area with steep slope); to plant legume cover crop; to control soil erosion and surface run off; to prevent loss of biodiversity; to monitor the flora and fauna on the smallholder location; no hunting in KMD area; efficient use of fertilizer and herbicide; to report environment management performance on 6 monthly base.
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> was relative new to the RSPO requirements. The committee has limited understanding on environment management plan and the reporting in oil palm plantation. PT. Agro Muko lack of monitoring to assess environment management plan and assisst in reporting for new KMD.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of environment protection. Awareness session was carried out on 13 December 2017 for all committee and worker (8 person attended) for <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap. The session covers policies related to environment, etc.</li> <li>- PT. Agro Muko internal audit in January 2018 by Environment and Conservation/ENC Department to ensure the established document related to environmental impact assessment document(s) and reporting to the relevant agencies. Periodic reporting to the relevant Government Agency, as required. This is evident in form of "Laporan Rencana Pengelolaan Lingkungan/Rencana Pemantauan Lingkungan (RKL/RPL), from PT. Agro Muko, period II year 2017, whrereby indicating the management and monitoring regime of smallholder plantation. Latest internal audit carried out in December 2017, report prepared dated January 2018.</li> </ul>
<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. statement letter that Kebun Masyarakat Desa/KMD committee will abide to environment policy; environment aspect-impact identification for KMD; environment management planning to KMD and

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	SPPL (Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup). Furthermore, audit team review the reporting of environment management and monitoring report and internal audit checklist, as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. However, audit team will review the effectiveness and consistency of corrective action implementation for NC Minor close out during subsequent surveillance assessment.		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-N8	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 December 2018 (Subsequent visit)</b>
<b>Closed (Yes / No)</b>	<b>No (remains open)</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate that KMD has appointed official(s) responsible for consultation and communications with stakeholders.		
<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 6.2.2 The company shall have official(s) who is responsible for consultation and communications with parties.		
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), it was known that KMD has not appointed official(s) responsible for consultation and communications with stakeholders.		
<b>Corrections:</b>	Each Kebun Masyarakat Desa/KMD Mundam Marap has appointed their official, repsonsible for consultation and communication with stakeholders. Kebun Masyarakat Desa/KMD Mundam Marap has appointed Mr. Abdul Gapur (chairman); KMD Serami Baru–Air Masad appointed Mr. Sarmedi; KMD Lubuk Talang appointed Mr. Fauji – as the official responsible for consultation and communications with stakeholders. However, the chairman request help from company’s estate manager to represent in for technical discussion with stakeholder.		
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD/cooperatives</i> was relative new to the RSPO requirements. The committee has limited understanding on appointing official responsible for consultation and communications with stakeholders. PT. Agro Muko lack of monitoring to person responsible to consult and communicates with stakeholders at new KMD.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of having officer to communicate with stakeholders. Awareness session was carried out on 13 December 2017 for all committee and worker (8 person attended) for <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap.</li> <li>- PT. Agro Muko carried out regular internal audit by Environment and Conservation/ENC Department to ensure the appointed officer does carry out communication and consultation with stakeholders, dated January 2018.</li> </ul>		
<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. appointment of officer that responsible for consultation and communication with stakeholders – and internal audit documents, as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. However, audit team		

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	will review the effectiveness and consistency of corrective action implementation for NC Minor close out during subsequent surveillance assessment.		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-N9	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 December 2018 (Subsequent visit)</b>
<b>Closed (Yes / No)</b>	<b>No (remains open)</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrated that these KMD has a 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.		
<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 6.2.3 The company shall have a 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.		
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), it was known that KMD has not established a 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.		
<b>Corrections:</b>	Statement letter that Kebun Masyarakat Desa/KMD committee will follow PT. Agro Muko's procedure on consultation and communication. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataaan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&C through implementation of relevent policies and SOP from PT. Agro Muko. PT. Agro Muko's "SOP Pemberian Tanggapan Terhadap Permintaan Informasi, No.ENC/SOP/08 rev.02" – Response upon information request procedure dated 6 April 2015, available in English and Bahasa Indonesia. Any information request will be channeled to the field head assisstant <i>Kebun Masyarakat Desa/KMD</i> .		
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD</i> /cooperatives was relative new to the RSPO requirements. The committee has limited understanding on responding to information request. PT. Agro Muko lack of monitoring to provision of response to information request at new KMDs.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of responding to information request. Awareness session was carried out on 13 December 2017 for all committee and workers of <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. The session covers policies related to responding to information request, etc.</li> <li>- PT. Agro Muko carry out regular internal audit by Environment and Conservation/ENC Department to ensure the established document related to communication and consultation record. Checklist with evidence information logbook, list of stakeholder to consult with KMD seen on January 2018.</li> </ul>		

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<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. KMD statement to follow PT. Agro Muko's procedure on responding to information request, communication and consultation with stakeholders – and internal verification of availability information request logbook and stakeholder list as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. However, audit team will review the effectiveness and consistency of corrective action implementation for NC Minor close out during subsequent surveillance assessment.		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-N10	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 December 2018 (Subsequent visit)</b>
<b>Closed (Yes / No)</b>	<b>No (remains open)</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrated a procedure for calculating and distributing fair compensation has been established.		
<b>Requirement Reference:</b>	RSPO P&C INA NI September 2016, Indicator 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.		
<b>Objective Evidence:</b>	Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), it was known that a procedure for calculating and distributing fair compensation has not been established.		
<b>Corrections:</b>	Kebun Masyarakat Desa/KMD produced a statement letter that KMD committee will follow PT. Agro Muko's procedure on procedure for calculating and distributing fair compensation. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&C through implementation of relevant policies and SOP from PT. Agro Muko. PT. Agro Muko's "Prosedur Ganti Rugi Lahan, No.SOP/CA/02" – land compensation procedure dated 1 July 2012, available in English and Bahasa Indonesia. Any identification of procedure for calculating and distributing fair compensation will be identified by <i>Kebun Masyarakat Desa/KMD</i> committee and acknowledged by PT. Agro Muko.		
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD</i> /cooperatives was relative new to the RSPO requirements. The committee has limited understanding on procedure for calculating and distributing fair compensation. PT. Agro Muko lack of monitoring to assess smallholder procedure for calculation and distribution of fair compensation.		
<b>Corrective Actions:</b>	- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and Kebun Masyarakat Desa/KMD Chairman on the importance of procedure for calculating and distributing fair compensation. Awareness session was carried out on 13 December 2017 for all committee and workers of <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. The session covers policies related to		

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	<p>identifying people entitled to compensation – in form of PT. Agro Muko’s “Prosedur Ganti Rugi Lahan, No.SOP/CA/02” – land compensation procedure dated 1 July 2012;</p> <p>- PT. Agro Muko internal audit through their Environment and Conservation/ENC Department to check any report of land conflict and recorded under “Rekaman Keluh Kesah KMD Mundam Marap”. Checklist with evidence “Rekaman Keluh Kesah KMD Mundam Marap”, “Rekaman Keluh Kesah KMD Serami Baru – Air Masad”, “Rekaman Keluh Kesah KMD Lubuk Talang” seen on January 2018.</p>		
<b>Assessment Conclusion:</b>	<p>Audit team has reviewed and accepted the corrective action plan prepared by company and Kebun Masyarakat Desa/KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. KMD statement to follow PT. Agro Muko’s procedure on calculating and distributing fair compe Audit team concluded that the correction, corrective action and evidences are sufficient. However, audit team will review the effectiveness and consistency of corrective action implementation for NC Minor close out during subsequent surveillance assessment.</p>		
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1563740-201712-N11	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor NC</b>
<b>Date Issued</b>	<b>7 December 2017</b>	<b>Due Date</b>	<b>6 December 2018 (Subsequent visit)</b>
<b>Closed (Yes / No)</b>	<b>No (remains open)</b>	<b>Date of nonconformity Closure</b>	<b>23 January 2018</b>
<b>Statement of Nonconformity:</b>	<p>3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), has not established a specific grievance mechanism which respects anonymity of complainants with regards to sexual harrasment case or violation of protection of reproductive rights.</p>		
<b>Requirement Reference:</b>	<p>RSPO P&amp;C INA NI September 2016, Indicator 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.</p>		
<b>Objective Evidence:</b>	<p>Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), a specific grievance mechanism which respects anonymity of complainants with regards to sexual harrasment case or violation of protection of reproductive rights - has not established.</p>		
<b>Corrections:</b>	<p>Statement letter that Kebun Masyarakat Desa/KMD committee will follow PT. Agro Muko’s policy on prevent sexual and all other forms of harassment and violence. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee “Surat Pernyataaan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO” dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&amp;C through implementation of relevent policies and SOP from PT. Agro Muko.  PT. Agro Muko’s policy “PT. Agro Muko Sexual Harassment Policy (Kebijakan Pelecehan Seksual)” dated 1 March 2013, available in English and Bahasa Indonesia has been communicated. This includes specific grievance mechanism which respects anonymity of complainants.  Company also includes the specific grievance mechanism for reporting case of sexual harassment as in PT. Agro Muko’s “Prosedur Keluh Kesah dengan Pihak Internal, No.SOP/025/HRA rev.02” – grievance settling with internal parties procedure dated 27 March 2015, available in English and Bahasa Indonesia. And in PT. Agro Muko’s “Prosedur Keluh Kesah dengan Pihak Eksternal,</p>		

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	No.SOP/026/HRA rev.02” – grievance settling with internal parties procedure dated 27 March 2015, available in English and Bahasa Indonesia.
<b>Root Cause Analysis:</b>	The committee/management of new <i>Kebun Masyarakat Desa/KMD</i> /cooperatives was relative new to the RSPO requirements. The committee has limited understanding on how to develop specific grievance mechanism which respects anonymity of complainants where requested. PT. Agro Muko lack of monitoring to assess availability of specific grievance mechanism which respects anonymity of complainants where requested at new KMD.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT. Agro Muko carried out awareness/training session with KMD/cooperative leadership. Company has send out a letter from General Manager Office PT. Agro Muko to all Managers and <i>Kebun Masyarakat Desa/KMD</i> Chairman on the importance of preventing sexual and all other forms of harassment and violence. Awareness session was carried out on 13 December 2017 for all committee and workers for <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. The session covers policies related to prevent sexual and all other forms of harassment and violence – in form of “PT. Agro Muko Sexual Policy (Kebijakan Pelecehan Seksual)” dated 1 March 2013.</li> <li>- PT. Agro Muko internal audit in January 2018 through their Environment and Conservation/ENC Department verified the posting of preventing sexual and all other forms of harassment and violence in KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. Checklist with evidence reference has been made to “Prosedur Keluh Kesah dengan Pihak Internal, No.SOP/025/HRA rev.02” – grievance settling with internal parties procedure dated 27 March 2015.</li> </ul>
<b>Assessment Conclusion:</b>	Audit team has reviewed and accepted the corrective action plan prepared by company and KMD. Audit team has reviewed and accepted the evidence provided by the company and KMD, i.e. KMD statement to follow PT. Agro Muko’s policy on prevention sexual and all other forms of harassment and violence – and internal audit of specific grievance mechanism which respects anonymity of complainants’ availability, as part of corrective action. Audit team concluded that the correction, corrective action and evidences are sufficient. However, audit team will review the effectiveness and consistency of corrective action implementation for NC Minor close out during subsequent surveillance assessment.

<b>Opportunity for Improvements</b>	
OFI #	Description
<b>OFI 1</b>	Nil

<b>Positive Findings</b>	
PF #	Description
<b>PF 1</b>	Audit team noted company commitment for smallholder development, by developing and maintain the system for scheme smallholder. Company provides technical supports, training, capacity building for scheme smallholders.
<b>PF 2</b>	Company committed to the implementation of RSPO P&C requirements. The level of compliance at estate and mill are improved, in general.

**3.4.1 Status of Nonconformities Previously Identified and Observations**

Non-Conformity			
<b>NCR Ref #</b>	<b>1420727N1</b>	<b>Clause &amp; Category (Major / Minor)</b>	<b>RSPO P&amp;C Generic Indicator 4.4.1 (NC Minor)</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>7 December 2017</b>
<b>Statement of Nonconformity:</b>	Company has water management plan, however can not demonstrate monitoring or evaluation of ground water usage.		
<b>Requirement Reference:</b>	An implemented water management plan shall be in place.		
<b>Objective Evidence:</b>	Ground water permit No.048 Tahun 2016. It stated in permit that water debit allowed is 120 m <sup>3</sup> /day however Division I usage is >120 m <sup>3</sup> /day (average > 4,000 m <sup>3</sup> /month)		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Ensure water operator to control the amount of discharge water that distributed every day, so as not to exceed the maximum capacity that has been set in the permit.</li> <li>- Make sure to check the use of "Air Bawah Tanah" in order not to exceed the capacity of a license during the internal audit by the ENC Department.</li> </ul> <p>1. Company has obtained permit on use of water "Izin Pemanfaatan Air Bawah Tanah", as per:</p> <ul style="list-style-type: none"> <li>a. "Keputusan Kepala Dinas Energi dan Sumber Daya Mineral Propinsi Bengkulu No.25 tahun 2016 tentang Perpanjangan Surat Izin Pengambilan Air Tanah untuk Konsumsi Karyawan Air Buluh Estate" dated 26 January 2016, water debit at 100m<sup>3</sup>/day. Location in estate manager house.</li> <li>b. "Keputusan Kepala Dinas Energi dan Sumber Daya Mineral Propinsi Bengkulu No.34 tahun 2016 tentang Perpanjangan Surat Izin Pengambilan Air Tanah untuk Konsumsi Karyawan Air Buluh Estate" dated 26 January 2016, water debit at 120m<sup>3</sup>/day. Location worker hall – Nursery.</li> <li>c. "Keputusan Kepala Dinas Energi dan Sumber Daya Mineral Propinsi Bengkulu No.42 tahun 2016 tentang Perpanjangan Surat Izin Pengambilan Air Tanah untuk Konsumsi Karyawan Air Buluh Estate" dated 26 January 2016, water debit 120m<sup>3</sup>/day. Location Divisi III Sekubung.</li> <li>d. "Keputusan Kepala Dinas Energi dan Sumber Daya Mineral Propinsi Bengkulu No.284 tahun 2016 tentang Perpanjangan Surat Izin Pengambilan Air Tanah untuk Konsumsi Karyawan Malin Deman Estate" dated 1 August 2016, water debit 40m<sup>3</sup>/day. Location Air Dikit.</li> </ul> <p>2. Company has conduct monitoring and evaluation on the use of water "Pemanfaatan Air Bawah Tanah (ABT)", as verified in:</p> <ul style="list-style-type: none"> <li>a. November 2017 – Monitoring Penggunaan Air Bawah Tanah per Bulan: EM house (3,523 m<sup>3</sup>), nursery (2,076 m<sup>3</sup>), Sekubung (2,320 m<sup>3</sup>) and U17 (1,200 m<sup>3</sup>);</li> <li>b. October 2017 – Monitoring Penggunaan Air Bawah Tanah per Bulan: EM house (3,744 m<sup>3</sup>), nursery (4,983 m<sup>3</sup>), Sekubung (2,313 m<sup>3</sup>) and U17 (1,223 m<sup>3</sup>);</li> <li>c. September 2017 – Monitoring Penggunaan Air Bawah Tanah per Bulan: EM house (4,792 m<sup>3</sup>), nursery (4,713 m<sup>3</sup>), Sekubung (2,133 m<sup>3</sup>) and U17 (1,226 m<sup>3</sup>);</li> </ul> <p>3. Company has carried evaluation as recorded in "Evaluasi Terhadap Pemakaian Air Bawah Tanah dan Follow Up-nya":</p>		

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	<p>a. Issued an observation based on Internal audit RSPO dated 17-19 October 2017 related to "Penggunaan Air Bawah Tanah (ABT), No.ABE-1710-A2";</p> <p>b. Company has processed permit application for additional quota, as per:</p> <ul style="list-style-type: none"> <li>- "Surat Permohonan Pengurusan Izin Pengambilan Air Bawah Tanah di Emplacement, dari Air Buluh Estate kepada GMO", dated 20 October 2017;</li> <li>- "Surat dari GMO PT. Agromuko No.51/GMO AM-All.OU/XI-17 tentang Pengurusan Izin Pengeboran dan Izin Penggunaan Air Bawah Tanah", dated 21 November 2017;</li> </ul> <p>4. Company has consistently made payment on water extraction levy:</p> <ul style="list-style-type: none"> <li>a. in July 2017: Air Buluh Estate paid Rp. X,854,154 – actual water use 12,361 m<sup>3</sup>;</li> <li>b. in Agustus 2017: Air Buluh Estate paid Rp X,932,300 – actual water use 12,882 m<sup>3</sup>;</li> </ul>		
<b>Assessment Conclusion:</b>	<p>PT. Agro Muko – Bunga Tanjung POM and its supply base have implemented all corrective action, furthermore demonstrate data consist of implementation and evaluation regarding . Action plan has been implemented in consistent manner. NC Minor closed on 7 December 2017.</p>		
<b>Non-Conformity</b>			
<b>NCR Ref #</b>	<b>1420727N2</b>	<b>Clause &amp; Category (Major / Minor)</b>	<b>NC Minor</b>
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>7 December 2017</b>
<b>Statement of Nonconformity:</b>	<p>Environment monitoring plan document was not consistently implement as per RPL matrix.</p>		
<b>Requirement Reference:</b>	<p>Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly based.</p>		
<b>Objective Evidence:</b>	<ul style="list-style-type: none"> <li>- Based on water analysis in Teramang River "Hasil pengujian Kualitas Air No. 947-6/AS/BINA/VII/2016 Dated 22 Juni 2016" its found that parameter oil and grease is not comply with national regulation PP No. 82, year 2001. Standard as per regulation is 1 mg/L and the result was 1,44 mg/L in downstream. However organization has not been evaluate it and performed corrective action.</li> <li>- Water quality and aquatic biota have monitored for each semester in Teramang River, while in RPL matrix required to be monitored in quarterly based.</li> </ul>		
<b>Corrective Actions:</b>	<p>PT. Agro Muko have conducted:</p> <ul style="list-style-type: none"> <li>- Monitoring effluent analysis result from outlet to Teramang River. Ensure the result comply the quality standard of national regulation by optimizing oil citation in cooling pond;</li> <li>- Conduct dredging effluent ponds periodically so that retention time is maintained</li> <li>- PT. Agro Muko have send samples for analysis of wastewater Bunga Tanjung POM on 3 December 2016. The result for oil and grease meet requirement.</li> </ul> <p>PT. Agromuko has been in consultation with "Dinas Lingkungan Hidup Kabupaten Mukomuko" and "Dinas Lingkungan Hidup Provinsi Bengkulu". Based on document verification and audit team consultation with "Dinas Lingkungan Hidup Kabupaten Mukomuko" during stakeholder consultation; evident:</p> <ul style="list-style-type: none"> <li>- PT. Agromuko has consulted "Dinas Lingkungan Hidup Kabupaten Mukomuko" – environment offices; with regards to Sungai Teramang/Teramang River water quality test through letter "No.67/GMO-G/XI/17 perihal Surat Rekomendasi" on 17 November 2017.</li> <li>- "Dinas Lingkungan Hidup Kabupaten Mukomuko" – environment office, has responded formally through "Surat Kepala Dinas Lingkungan Hidup Kabupaten</li> </ul>		

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	<p>Mukomuko No.660/1971/D.13/XI/2017 perihal Surat Rekomendasi Analisa Air Hulu dan Hilir Sungai Betung dan Sungai Terawang” dated 28 November 2017. In the letter, environment office stated based on technical evaluation, the management and monitoring plan for Sungai Betung/Betung River in company, concluded that PT. Agro Muko has obligation to monitor the analyze water quality in Sungai Betung/Betung River and Terawang River two times per year – at minimum, as regulated under “Peraturan Pemerintah No.82 Tahun 2001”.</p> <p>Based on document verification upon environmental report “Laporan Pelaksanaan RKL-RPL periode semester II tahun 2016” and “Laporan Pelaksanaan RKL-RPL periode semester I tahun 2017” shows company has carried out water quality analysis on each semester (two times in 2016, and two times in 2017). Furthermore, company has added information with action plan: should any of the environment parameter exceeds regulation. During audit verified, analysis result shows no environmental parameter exceeded.</p>
<p><b>Assessment Conclusion:</b></p>	<p>PT. Agro Muko – Bunga Tanjung POM has implemented all corrective action, furthermore demonstrate data consist of implementation and evaluation. Action plan has been implemented in consistent manner. NC Minor closed on 7 December 2017.</p>

<p><b>Opportunity for Improvement</b></p>	
<p><b>OFI#</b></p>	<p><b>Description</b></p>
<p><b>OFI 1</b></p>	<p>Organization has maintained the HGU pegs periodically each semester. Based on field observation It consider for organization to replace the HGU pegs #120 which is lost in the river and repainting the HGU pegs #100 in order to make it visible in the field.</p> <p><b>Action taken:</b> PT. Agro Muko have replace HGU pegs #120 and repair HGU pegs #100. Both HGU pegs have been cleaned and visibly maintained.</p>
<p><b>OFI 2</b></p>	<p>There was an accident and investigation generate conclusion which is different with existing documentation, however risk assessment document should be reviewed anytime accident happen.</p> <p><b>Action taken:</b> All accident occured have been investigated, copy of accident reports, first aid documentation, clinic treatment record and BPJS insurance claim report have been compiled – documentation is completed.</p> <p>Bunga Tanjung POM:</p> <ul style="list-style-type: none"> <li>- Risk Assessment has prepared under document “Penilaian Resiko Bunga Tanjung POM”, dated 11 September 2017, covering for all area and latest situation.</li> <li>- Muster Chit on socialization of risk assessment, dated 6 November 2017. Attendance list available as evident.</li> </ul> <p>Air Buluh Estate:</p> <ul style="list-style-type: none"> <li>- Risk Assessment has prepared under Document “Penilaian Resiko – Air Buluh Estate” dated 15 August 2017. The risk assessment was covering for all activities in plantation includes consideration on latest injury.</li> <li>- Socialization on Risk Assessment, e.g: dated 15 November 2017 (division 1 and 2), dated 16 November 2017 (division 4, 6&amp; 7) and on 17 November 2017 (division 3 and 5).</li> </ul> <p>Malin Deman Estate:</p> <ul style="list-style-type: none"> <li>- Risk Assessment has prepared under Document “Penilaian Resiko – Malin Deman Estate” dated 14 August 2017. The risk assessment was covering for all activities in plantation, e.g: GP3 (chemical shed), office, enginee room, field (land clearing, planting, sparying, manuring harvestinhg and</li> </ul>

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	pruning, transport FFB, loading ramp, emplacement, landfill area, HSD oil tank, HCV area, warehouse fertilizer, limited hazardous waste, etc);
<b>OFI 3</b>	<p>Organization has performed dissemination related to HCV and RTE species to estate employee. Based on interview with mill employee it consider for organization to conduct and enhanced the socialization for mill employee related to HCV and RTE species.</p> <p><b>Action taken:</b> In Bunga Tanjung POM, dissemination of environment protection policy carried out on 31 August 2017, attended by 23 workers.</p>
<b>OFI 4</b>	<p>Organization has create and place the HCV signboard in all HCV area, it consider for organization to replace the corrosive and unread signboard in the field and maintained the signboard visibility.</p> <p><b>Action taken:</b> Field verification upon HCV management plan implementation in Air Buluh Estate, company has delineated the HCV area, in particular river buffer zone adjacent to replanting area; no replanting oil palm on river buffer zone; no chemical regime (fertilizer and/or herbicide) in HCV area – The no-spraying sign in form of yellow paint along the buffer zone have been re-installed. The sign for HCV area designation have been re-installed.</p>
<b>OFI 5</b>	<p>Organization has performed hazardous waste management in estate. Based on field observation it consider for organization to ensure all activity in workshop do not result the oil spill in to the ground and maintained the oil trap in workshop area.</p> <p><b>Action taken:</b> Workshop area in Air Buluh Estate have been cleaned from oil spill. Oil tray utilized to contain oil drips. Similar regime implemented in Bunga Tanjung Estate.</p>

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	CATEGORY (MAJOR/ MINOR)	ISSUED	STATUS & DATE (Closure)
CR01	Minor	01/10/2010	Closed 10/02/2012
CR02	Minor	01/10/2010	Closed 10/02/2012
A675812/1	Major	10/02/2012	Closed 10/02/2012
A675812/1	Minor	10/02/2012	Closed 01/02/2013
A675812/2	Minor	10/02/2012	Closed 01/02/2013
A675812/3	Minor	10/02/2012	Closed 01/02/2013
A675812/4	Minor	10/02/2012	Closed 01/02/2013
A675812/5	Minor	10/02/2012	Closed 01/02/2013
463917-1	Minor	01/02/2013	Closed 08/01/2014
463917-2	Minor	01/02/2013	Closed 08/01/2014
1010903M3	Major	08/01/2014	Closed 06/03/2014
1010903M7	Major	08/01/2014	Closed 06/03/2014
1010903M10	Major	08/01/2014	Closed 06/03/2014
1010903M16	Major	08/01/2014	Closed 06/03/2014
1010903M18	Major	08/01/2014	Closed 06/03/2014
1010903N1	Minor	08/01/2014	Closed 25/11/2014
1010903N6	Minor	08/01/2014	Closed 25/11/2014
1010903N8	Minor	08/01/2014	Closed 25/11/2014
1010903N9	Minor	08/01/2014	Closed 25/11/2014
1010903N13	Minor	08/01/2014	Closed 25/11/2014

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1010903N15	Minor	08/01/2014	Closed 25/11/2014
1420727M1	Major	17/12/2016	Closed 02/02/2016
1420727N1	Minor	17/12/2016	Closed 02/02/2017
1420727N2	Minor	17/12/2016	Closed 02/02/2017
1563740-201712-M1	Major	07/12/2017	Closed 23/01/2018
1563740-201712-M2	Major	07/12/2017	Closed 23/01/2018
1563740-201712-M3	Major	07/12/2017	Closed 23/01/2018
1563740-201712-M4	Major	07/12/2017	Closed 23/01/2018
1563740-201712-M5	Major	07/12/2017	Closed 23/01/2018
1563740-201712-M6	Major	07/12/2017	Closed 23/01/2018
1563740-201712-M7	Major	07/12/2017	Closed 23/01/2018
1563740-201712-M8	Major	07/12/2017	Closed 23/01/2018
1563740-201712-M9	Major	07/12/2017	Closed 23/01/2018
1563740-201712-M10	Major	07/12/2017	Closed 23/01/2018
1563740-201712-M11	Major	07/12/2017	Closed 23/01/2018
1563740-201712-M12	Major	07/12/2017	Closed 23/01/2018
1563740-201712-N1	Minor	07/12/2017	Open
1563740-201712-N2	Minor	07/12/2017	Open
1563740-201712-N3	Minor	07/12/2017	Open
1563740-201712-N4	Minor	07/12/2017	Open
1563740-201712-N5	Minor	07/12/2017	Open
1563740-201712-N6	Minor	07/12/2017	Open
1563740-201712-N7	Minor	07/12/2017	Open
1563740-201712-N8	Minor	07/12/2017	Open
1563740-201712-N9	Minor	07/12/2017	Open
1563740-201712-N10	Minor	07/12/2017	Open
1563740-201712-N11	Minor	07/12/2017	Open

**3.5. Stakeholders Consultation**

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. Agro Muko – Bunga Tanjung POM 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. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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 below.

**List of Stakeholders Contacted**

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<p><b>Internal Stakeholders</b></p> <p>Bunga Tanjung POM workers Air Buluh Estate workers Malin Deman Estate workers</p>	<p><b>Union/Contractors/Local Communities</b></p> <p>Serikat Pekerja Agromuko Mandiri Communities of Mundam Marap, Serami Baru, Lubuk Talang</p>
<p><b>Government Departments</b></p> <p>Badan Pertanahan Nasional Kabupaten Mukomuko Badan Lingkungan Hidup Kabupaten Mukomuko Dinas Perkebunan Kabupaten Mukomuko Dinas Tenaga Kerja Kabupaten Mukomuko</p>	<p><b>NGO</b></p> <p>LSM Kemilau Cahaya</p>

IS #	Description
1	<p><b>Feedbacks:</b> <b>Dinas Penanaman Modal Pelayanan Perizinan dan Tenaga Kerja Kabupaten Mukomuko (Manpower Office)</b></p> <ul style="list-style-type: none"> <li>- No negative issue related to manpower in PT. Agro Muko and PT. Mukomuko Agro Sejahtera;</li> <li>- In the last ive (5) years, there was no industrial dispute in PT. Agro Muko;</li> <li>- There has been no report related worker salary. Worker salary refers to minimum wage of Bengkulu Province;</li> <li>- PT. Agro Muko and PT. Mukomuko Agro Sejahtera has fulfil and send all compulsory reports related to manpower in consistent manner;</li> <li>- PT. Agro Muko has established collective work agreement in 2017;</li> <li>- All workers in company has been registered with insurance (BPJS Ketenagakerjaan and Kesehatan);</li> <li>- Regular monitoring on all palm oil mill machineries in Bunga Tanjung POM carried out according to regulation;</li> <li>- Regular medical check up for all workers performed on annual basis;</li> </ul> <p><b>Management Responses:</b> Positive comments.</p> <p><b>Audit Team Findings:</b> Noted as positive comments.</p>
2	<p><b>Feedbacks:</b> <b>Dinas Lingkungan Hidup Kabupaten Mukomuko (Environment Office)</b></p> <ul style="list-style-type: none"> <li>- PT. Agro Muko and PT. Mukomuko Agro Sejahtera have environmental permit, including for biogas plant;</li> <li>- Companies have consistently managed, monitor and reported the environment performance. These activities includes physical and chemical parameters, water quality parameters, air quality parameters, waste water quality parameters, hazardous waste management, etc.;</li> <li>- PT. Agro Muko and PT. Mukomuko Agro Sejahtera have permit for temporary hazardous waste store;</li> <li>- Companies have cooperates with licensed third party contractor for hazardous waste transport and disposal;</li> </ul> <p><b>Management Responses:</b> Positive comments</p> <p><b>Audit Team Findings:</b> Positive comments.</p>
3	<p><b>Feedbacks:</b> <b>Dinas Perkebunan dan Pertanian Kabupaten Mukomuko (Plantation and Agriculture Office)</b></p> <ul style="list-style-type: none"> <li>- Companies have reported the plantation performance on monthly basis. Communication between plantation and agriculture office with both companies are good;</li> </ul>

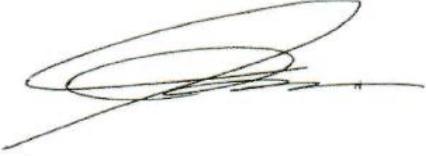
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	<ul style="list-style-type: none"> <li>- No report related land dispute/conflict noted; no report related to forest or land fire in company; report on pest infestation in the past years;</li> <li>- PT. Agro Muko and PT. Mukomuko Agro Sejahtera demonstrates commitment to development of smallholder with development of Kebun Masyarakat Desa/KMD for 56 villages with area of approximately 700 Ha;</li> <li>- Comments from communities related to extension of HGU in PT. Agro Muko, whereby communities request a portion of company HGU to be returned for village development.</li> <li>- With regards to "Surat Tanda Budidaya/STD-B" for Kebun Masyarakat Desa/KMD, up today has not been communicated by plantation and agriculture office, as government body.</li> </ul> <p><b>Management Responses:</b> There has been no direct comments from the communities or government office related to request for portion of company HGU for village development. Company stated the HGU is asset, will utilize all potential and abide to relevant regulation. Related to "Surat Tanda Daftar budidaya/STD-B" for KMD will be communicated to relevant government offices.</p> <p><b>Audit Team Findings:</b> Based on document and record verification, there has been no comment received from community and/or government related to request for portion of HGU. Audit team accept response from company.</p>
<p><b>4</b></p>	<p><b>Feedbacks:</b> <b>Kantor Pertanahan Kabupaten Mukomuko (Lands Office)</b></p> <ul style="list-style-type: none"> <li>- No report related land dispute/conflict noted;</li> <li>- There are areas occupied by communities inside HGU PT. Agro Muko. Company respect the decision and not force the landowners to release the right over the land;</li> <li>- PT. Agro Muko has applied for HGU extension, due in 2019; HGU No.31/HGU/BPN/89 dated 27 June 1989 for area of 10,000 Ha – comprised of two certificates: Certificate No.2/MU of 2,270 Ha and certificate No.3 of 7,730 Ha;</li> <li>- Comments from Air Dikit communities related to extension of HGU in PT. Agro Muko, whereby communities request a portion of company HGU to be returned for village development.</li> </ul> <p><b>Management Responses:</b> There has been no direct comments from the communities or government office related to request for portion of company HGU for village development. Company stated the HGU is asset, will utilize all potential and abide to relevant regulation.</p> <p><b>Audit Team Findings:</b> Based on document and record verification, there has been no comment received from community and/or government related to request for portion of HGU. Audit team accept response from company.</p>
<p><b>5</b></p>	<p><b>Feedbacks:</b> <b>KMD Pondok Lunang Baru</b></p> <ul style="list-style-type: none"> <li>- Pondok Lunang village has established smallholder plantation of 13 Ha, with planting year 2001, under name KMD Pondok Lunang (Lama);</li> <li>- Currently applying for new Kebun Masyarakat Desa/KMD and has submitted the potential land for oil palm plantation – currently waiting for collective measurement and administrative work;</li> <li>- The management of the smallholder Kebun Masyarakat Desa/KMD will be under estate;</li> <li>- The revenue from oil palm plantation will be used as Pondok Lunang village revenue;</li> </ul> <p><b>Management Responses:</b> Positive comments and the company will continued these issues.</p> <p><b>Audit Team Findings:</b> Positive comment noted.</p>
<p><b>6</b></p>	<p><b>Feedbacks:</b> <b>LSM Kemilau Cahaya – Serami Baru Village</b></p> <ul style="list-style-type: none"> <li>- Currently company has helped in development of KMD/scheme smallholder;</li> <li>- Economic condition is getting better;</li> <li>- The development of smallholder was coming from communities, and has been agreed by communities;</li> </ul>

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	<ul style="list-style-type: none"> <li>- No claim/conflict/dispute over land prepared for cooperative plantation;</li> <li>- FFB purchase price for smallholder following government regulation;</li> </ul> <p><b>Management Responses:</b> Positive comments</p> <p><b>Audit Team Findings:</b> Noted as positive comments.</p>
<b>7</b>	<p><b>Feedbacks:</b> <b>Gender Committee</b></p> <ul style="list-style-type: none"> <li>- Company has communicating the sexual harassment policy and respecting reproductive right policy;</li> <li>- Company has communicating specific grievance mechanism to report any violation, including guarantee the anonymity of whistleblower – upon request. No report of violation on sexual harassment and protection of reproductive right to date;</li> <li>- Company has provided periodic leave, maternal leave – for all worker, and medical check up for female sprayers;</li> <li>- Company provides facilities for worker: housing, clean water, electricity, school, school bus, religious houses, sport facility, etc.;</li> </ul> <p><b>Management Responses:</b> Positive comments</p> <p><b>Audit Team Findings:</b> Noted as positive comments.</p>
<b>8</b>	<p><b>Feedbacks:</b> <b>Worker Union</b></p> <ul style="list-style-type: none"> <li>- LKD Bipartit organization has been established, with function as mediation between company and worker;</li> <li>- All normative agreement has been incorporated into Perjanjian Kerja Bersama (PKB) – collective work agreement, which covers working hour, overtime, salary, annual leave entitlement, etc. Latest work agreement signed on 8 December 2016, and effective implementation 2017;</li> <li>- Meeting between worker union and management on monthly basis, in line with LKS Bipartit meeting;</li> <li>- No grievance from worker in 2017, except from minor repair request for housing: leaking roof, clogged closet, etc.;</li> <li>- Company provides facilities for worker: housing, clean water, electricity, school, school bus, religious houses, sport facility, etc.;</li> <li>- All workers in company has been registered with insurance (BPJS Ketenagakerjaan and Kesehatan);</li> <li>- Worker evaluation carried out on annual basis, for promotion;</li> <li>- Company has annual medical check up for all workers;</li> </ul> <p><b>Management Responses:</b> Positive comments</p> <p><b>Audit Team Findings:</b> Noted as positive comments.</p>

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<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that PT. Agro Muko – Bunga Tanjung Palm Oil Mill has complied with the RSPO Principle and Criteria Indonesia National Interpretation, September 2016 and RSPO Supply Chain Certification Standard, November 2014 and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of PT. Agro Muko – Bunga Tanjung Palm Oil Mill is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Pratama Agung Sedayu	<b>Name:</b> Mr. Olivier Tichit
<b>Company Name:</b> on behalf BSI Malaysia Services Sdn Bhd.,	<b>Company Name:</b> PT. Agro Muko
<b>Title:</b> Lead Auditor	<b>Title:</b> Director
<b>Signature:</b> 	<p><b>Signature:</b></p> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<b>Date:</b> 31 January 2018	<b>Date:</b> 31 January 2018

**Appendix A: Summary of Findings RSPO Principle and Criteria Indonesia National Interpretation, September 2016**

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 1: Commitment to Transparency</b>		
<b>Criterion 1.1:</b>		
Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1	<p>List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available.</p> <p>- Minor compliance -</p> <p>PT. Agro Muko (AM) and PT. Mukomuko Agro Sejahtera (MMAS): Company as established "Prosedur Pemberian Tanggapan Terhadap Permintaan Informasi, No.ENC/SOP/08 rev.02" dated 6 April 2015. The procedure stating manager/Department Head is the one receiving information and providing response upon information request. All operation unit prepare a list of publicly available information, as detailed in indicator 1.2.1. Direct response/answer can be given by manager/Department Head with response time max.7 working days. Request for information/disposition to higher level (to GMO or Medan HO) in max. 3 working days. GMO and/or Medan HO shall provide response in max. 7 working days. Disposition from Department Head to Top Management in max.25 working days.</p> <p>KMD (KMD Bukit Harapan, KMD Mundam Marap): PT. Agro Muko supports each <i>Kebun Masyarakat Desa/KMD</i> to establish a list of publicly available document that covers all publicly available documents. Documents will be available at General Manager Office PT. Agro Muko and/or at the estates in charge of management of the <i>Kebun Masyarakat Desa/KMD/cooperatives</i>. Sample seen: List of documents titled "Dokumen-dokumen yang tersedia untuk Umum KMD Mundam Marap" dated 13 December 2017; related to land titles/user rights; occupational health and safety plans as in "Program K3 Tahun 2018 KMD Mundam Marap"; environmental and social impacts including mitigation plans and "Rencana Pengelolaan Limbah B3"; HCV documentation as in "Laporan Identifikasi Nilai Konservasi Tinggi Smallholders Koperasi dan Kebun Masyarakat Desa PT. Agro Muko by Koompasia Enviro Institute; pollution prevention and reduction plans; details of complaints and grievances; negotiation procedures; continual improvement plans; public summary of certification assessment report; human rights policy.</p> <p>NC Minor: 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate a list of information related to criterion 1.2 that can be accessed by relevant stakeholders be available.</p>	Non-Compliance Comply

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Criterion / Indicator	Assessment Findings	Compliance
<p>1.1.2</p> <p>Records of requests for information and responses to the information requested shall be available.</p> <p>- Major compliance -</p>	<p>Company has procedure "Pemberian Tanggapan Terhadap Permintaan Informasi, (Provision of Responses to Requests for Information) No. ENC/SOP/08", rev.2, dated 6 April 2015, which regulates the mechanism of response to requests for information.</p> <p>Bunga Tanjung POM: All information request, inquiry was recorded under "Rekaman Permintaan Informasi dan Tanggapan". As recorded in 2017, Bunga Tanjung POM received 3 information requests. Sample taken and verified: on September 2017, Bunga Tanjung POM received request for permit to conduct field visit from "Kantor Lingkungan Hidup Kabupaten Mukomuko", through letter No.090/708/D.13/IX/2017 dated 4 September 2017. Bunga Tanjung POM responded directly since the request was also permission to visit the mill. Based on the visit, "Kantor Lingkungan Hidup Kabupaten Mukomuko" made minutes of visit "Berita Acara No.660/D.13/IX/2017 dated 8 September 2017 and acknowledged by Mill Manager. Information provided has been recorded under "Lampiran Pemantauan Kualitas Lingkungan Hidup – PT. Agro Muko Bunga Tanjung POM".</p> <p>Air Buluh Estate: All information request, inquiry was recorded under "Buku Permintaan Informasi dan Jawaban". As recorded in 2017, Air Buluh Estate received 7 information requests. All of information request has been responded. Sample taken and verified: On 13 February 2017, contractor from Air Buluh Village, asking possibility for building construction project, and how to be company's supplier. Administration Head responded that contractor need to follow procedure through tender process.</p> <p>Malin Deman Estate: "Buku Informasi dan Jawaban External" recorded 11 information inquiry and its respond; in 2017. Sample seen and verified: Mr. Rusdianto, Tanjung Jaya village was inquiring (via phone call) for provision of oil palm sapling to local communities. As a response, field assistant responded on the same date, Malin Deman Estate can provide oil palm sapling based on formal request. The request then will be followed up for approval to General Manager Office. Mr. Romli, contractor from Air Merah village was inquiring (via phone call) for job opportunity in Malin Deman Estate. Field Head assistant responded directly during communication by explaining no more job for end of 2017. "Recorded under Komunikasi dan Konsultasi dengan Masyarakat" recording 17 information requests and/or inquiries. Sample seen and verified: On 9 January 2017, Mr.Wahid from Talang Baru village request for permission to use road access through Malin Deman Estate. Estate manager provide permission to use road access through Malin Deman Estate, with permit prior to entering estate; before 18.00PM.</p> <p>KMD (KMD Bukit Harapan, KMD Mundam Marap): <i>Kebun Masyarakat Desa/KMD</i> conveyed the information response upon information request to the Estate Managers. In 2017, no information request noted for KMD Bukit Harapan and KMD Mundam Marap.</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance																																																			
<p><b>Criterion 1.2:</b> 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.</p>																																																					
<p>1.2.1 Publicly available documents shall include, but are not necessarily limited to:</p> <ul style="list-style-type: none"> <li>a) Land titles/user rights (Criterion 2.2)</li> <li>b) Occupational health and safety plans (Criterion 4.7)</li> <li>c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)</li> <li>d) HCV documentation (Criteria 5.2 and 7.3)</li> <li>e) Pollution prevention and reduction plans (Criterion 5.6)</li> <li>f) Details of complaints and grievances (Criterion 6.3)</li> <li>g) Negotiation procedures (Criterion 6.4)</li> <li>h) Continual improvement plans (Criterion 8.1)</li> <li>i) Public summary of certification assessment report</li> <li>j) Human Rights Policy (Criterion 6.13).</li> </ul> <p>- Major compliance -</p>	<p>Bunga Tanjung POM: "Dokumen-dokumen yang tersedia untuk publik (Publicly available document, signed by Mill Manager, dated 10 August 2017.</p> <table border="1" data-bbox="635 680 1310 1939"> <thead> <tr> <th>Document Name</th> <th>No.Document</th> <th>Year</th> </tr> </thead> <tbody> <tr> <td>Izin Usaha Tetap (Keputusan Menteri Negara Penggerak Dana Investasi/Ketua BKPM)</td> <td>No.571/T/Pertanian/1996</td> <td>1996</td> </tr> <tr> <td>Izin Usaha Perkebunan (IUP) – Plantation Business Permit</td> <td>Keputusan Bupati Mukomuko No.709 tahun 2012 tanggal 13 Desember 2012</td> <td>2012</td> </tr> <tr> <td>Analisis Dampak Lingkungan – EIA</td> <td></td> <td>2005</td> </tr> <tr> <td>Rencana Pengelolaan Lingkungan – Environment Management Plan</td> <td></td> <td>2005</td> </tr> <tr> <td>Rencana Pemantauan Lingkungan – Environment Monitoring Plan</td> <td></td> <td>2005</td> </tr> <tr> <td>Laporan Pemantauan RKL/RPL setiap semester – report on implementation of environment management and monitoring plan</td> <td></td> <td>Latest available</td> </tr> <tr> <td>Izin Pembuangan Air Limbah ke Sungai – Permit to discharge POME to river</td> <td>Kep.KKTDP Kabupaten Mukomuko No.503/06/KPTSP/IPAL/XII/2016</td> <td>2016</td> </tr> <tr> <td>Izin Penyimpanan Limbah B3 – Permit for temporary hazardous waste storage</td> <td>Kep.KPTSP Kabupaten Mukomuko No.503/D.10/IPLB 3/VII/2017</td> <td>2017</td> </tr> <tr> <td>Laporan Community Development/Corporate Social Responsibility PT. Agro Muko</td> <td></td> <td>Latest available</td> </tr> <tr> <td>Program Panitia Pembina Kesehatan dan Keselamatan Kerja Lingkungan Hidup dan Sosial (P2K3)</td> <td></td> <td>Latest available</td> </tr> <tr> <td>Penilaian Internal Dampak Sosial</td> <td></td> <td>Latest available</td> </tr> <tr> <td>Rencana Pengurangan dan Pencegahan Polusi</td> <td></td> <td>Latest available</td> </tr> <tr> <td>Rekaman keluhan-kesah internal dan eksternal</td> <td></td> <td>Latest available</td> </tr> <tr> <td>Rencana Perbaikan Berkelanjutan – Continuous Improvement Plan</td> <td></td> <td>Latest available</td> </tr> <tr> <td>Rangkuman Publik dari Laporan Penilaian Sertifikasi</td> <td></td> <td>Latest available</td> </tr> <tr> <td>Kebijakan Hak Asasi Manusia – Human Rights Policy</td> <td></td> <td>Latest available</td> </tr> </tbody> </table>	Document Name	No.Document	Year	Izin Usaha Tetap (Keputusan Menteri Negara Penggerak Dana Investasi/Ketua BKPM)	No.571/T/Pertanian/1996	1996	Izin Usaha Perkebunan (IUP) – Plantation Business Permit	Keputusan Bupati Mukomuko No.709 tahun 2012 tanggal 13 Desember 2012	2012	Analisis Dampak Lingkungan – EIA		2005	Rencana Pengelolaan Lingkungan – Environment Management Plan		2005	Rencana Pemantauan Lingkungan – Environment Monitoring Plan		2005	Laporan Pemantauan RKL/RPL setiap semester – report on implementation of environment management and monitoring plan		Latest available	Izin Pembuangan Air Limbah ke Sungai – Permit to discharge POME to river	Kep.KKTDP Kabupaten Mukomuko No.503/06/KPTSP/IPAL/XII/2016	2016	Izin Penyimpanan Limbah B3 – Permit for temporary hazardous waste storage	Kep.KPTSP Kabupaten Mukomuko No.503/D.10/IPLB 3/VII/2017	2017	Laporan Community Development/Corporate Social Responsibility PT. Agro Muko		Latest available	Program Panitia Pembina Kesehatan dan Keselamatan Kerja Lingkungan Hidup dan Sosial (P2K3)		Latest available	Penilaian Internal Dampak Sosial		Latest available	Rencana Pengurangan dan Pencegahan Polusi		Latest available	Rekaman keluhan-kesah internal dan eksternal		Latest available	Rencana Perbaikan Berkelanjutan – Continuous Improvement Plan		Latest available	Rangkuman Publik dari Laporan Penilaian Sertifikasi		Latest available	Kebijakan Hak Asasi Manusia – Human Rights Policy		Latest available	<p>Non-compliance Comply</p>
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	<p>HCV documentation as in "Laporan Identifikasi Nilai Konservasi Tinggi Smallholders Koperasi dan Kebun Masyarakat Desa PT. Agro Muko by Koompasia Enviro Institute; pollution prevention and reduction plans; details of complaints and grievances; negotiation procedures; continual improvement plans; public summary of certification assessment report; human rights policy.</p> <p>NC Major: 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate a list of publicly available documents that covers:</p> <ul style="list-style-type: none"> <li>a) Land titles/user rights (Criterion 2.2)</li> <li>b) Occupational health and safety plans (Criterion 4.7)</li> <li>c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)</li> <li>d) HCV documentation (Criteria 5.2 and 7.3)</li> <li>e) Pollution prevention and reduction plans (Criterion 5.6)</li> <li>f) Details of complaints and grievances (Criterion 6.3)</li> <li>g) Negotiation procedures (Criterion 6.4)</li> <li>h) Continual improvement plans (Criterion 8.1)</li> <li>i) Public summary of certification assessment report</li> <li>j) Human Rights Policy (Criterion 6.13).</li> </ul>	
<p><b>Criterion 1.3:</b> Growers and millers commit to ethical conduct in all business operations and transactions.</p>		

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<p>1.3.1</p> <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions along with the documentation of socialisation process of the policy to all levels of the workers and operations.</p> <p>- Minor compliance –</p>	<p>Bunga Tanjung POM: PT. Agro Muko, Bunga Tanjung POM referring to Code of Conduct – signed by President Director, dated 17 November 2014. The code of conduct consist of Commitment to the Specific Things: Management note, documents and information (confidentiality); The obligation to secure company's assets; Insider Trading Information; Conflict of Interest; Political Activities; Gifts/Souvenirs, Donations, Commission, Bribery; Reporting Violations of Code of Conduct, etc. The policy on code of conduct has been disseminated: on 14 November 2016, to 15 workers consist of sample boy, workshop mechanics, foreman, machinery operators, engine room operator, laboratory analysts, etc. On 22 November 2017 dissemination of Code of Conduct Policy to 24 Bunga Tanjung POM workers; from office clerks, laboratory analysts, sortation officer, godown clerk, security officer;</p> <p>Air Buluh Estate: PT. Agro Muko, Air Buluh Estate referring to Code of Conduct – signed by President Director, dated 17 November 2014. The code of conduct consist of Commitment to the Specific Things: Management note, documents and information (confidentiality); The obligation to secure company's assets; Insider Trading Information; Conflict of Interest; Political Activities; Gifts/Souvenirs, Donations, Commission, Bribery; Reporting Violations of Code of Conduct, etc. The policy on code of conduct has been disseminated: on 14 March 2017 for all workers in Division I (harvester, mandores, supervisor), dated 15 March 2017 for all harvesters under Division II, dated 18 March 2017 for all workers under Division VI and VII.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> KMD Mundam Marap and KMD Bukit Harapan has received dissemination related to policies relevant to RSPO P&amp;C, dated 7 July 2017. Health and safety policy, equal opportunity policy, zero-burning policy, freedom of association policy, no worker under 18 years old policy, prohibition on sexual harrasment policy, reproductive right policy, environment management policy, policy on prohibit drug and alcohol abuse, policy on human rights, complaint and grievance policy, policy to prohibit forced labour. The dissemination session, attended by 4 spraying team, 6 manuring team, 10 harvesters.</p> <p>NC Minor: 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate a written policy committing to a code of ethical conduct and integrity in all operations and transactions.</p>	<p>Non-compliance Comply</p>

**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.

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<p>2.1.1 Evidence of compliance with relevant legal requirements shall be available.</p> <p>- Major compliance –</p>	<p>PT. Agro Muko: Company has a list of legal requirement "Evaluasi Pemenuhan Peraturan Perundang Undangan", updated on 24<sup>th</sup> January 2017. The list consist of 214 rules and regulation, as listed in RSPO P&amp;C INA NI, September 2016, Appendix 1. Company has evaluated 14 categories of regulation such as 51 "Undang-undang" – National laws; 42 "Peraturan Pemerintah" - Government Regulation; 3 "Instruksi Presiden" - President Instruction; 7 "Keputusan Presiden" - President Decree; 6 "Peraturan Presiden" – President Regulations; 13 "Peraturan Menteri Pertanian" – Ministry of Agriculture Regulation; 19 "Peraturan Menteri Lingkungan Hidup" – Minister of Environment Regulation; 15 "Peraturan Menteri Tenaga Kerja" – Minister of Manpower Regulation; 7 "Peraturan Menteri Kehutanan" – Minister of Forestry Regulation; 7 "Peraturan Menteri" – other Minister Regulations; 6 "Keputusan Menteri Pertanian" – Minister of Agriculture Decree; 11 "Keputusan Menteri Lingkungan Hidup" – Minister of Environment Decree; 20 "Keputusan Menteri Tenaga Kerja" – Minister of Manpower Decree; and 7 "Keputusan Badan Pengendalian Lingkungan" – Environment Protection Body Decree. Evaluation of compliance with relevant legal requirements including review by chapter, the relation with operational activities and complemented with evidence of compliance. Evaluation carried out once per year.</p> <p>Based on document review, interview with government bodies, and field visit – company has demonstrate evidence of legal requirement fulfilment. <b>PT. Agro Muko:</b></p> <p>a. Izin Lokasi (Location permit).</p> <ul style="list-style-type: none"> <li>- No.245, dated 7 July 1989 from "Gubernur Bengkulu" for ±10,000 Ha;</li> <li>- No.156, dated 23 April 1991 from "Gubernur Bengkulu" for ±3,740 Ha;</li> <li>- No.199, dated 12 June 1989 from "Gubernur Bengkulu" Governor for ±6,000 Ha;</li> <li>- No.347/II/BKPM/1990, dated 30 January 1990 from "Gubernur Bengkulu" for ±2,500 Ha;</li> </ul> <p>b. Izin Usaha Perkebunan (Operational Plantation Permit).</p> <ul style="list-style-type: none"> <li>- No.HK.350/E.4.900/11.89, dated 8 November 1989 for ±10,000 Ha;</li> <li>- No.HK.350/E.4.247/06.88, dated 7 June 1988, for ±5,500 Ha;</li> <li>- No.HK.350/E.4.447/07.92, dated 10 July 1992 for ±2,000 Ha for oil palm plantation and ±1.800 ha for rubber plantation.</li> <li>- No.HK.350/E.4.297/06.88, dated 7 June 1988 for ±3,600 Ha for oil palm plantation from "Direrktur Jenderal Perkebunan";</li> </ul> <p>---</p>	<p><del>Non-compliance</del> Comply</p>

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	<ul style="list-style-type: none"> <li>- Revised SPUP No.571/T/Pertanian/1996, dated 17 September 1996 for mill capacity 40,000 ton CPO and SPUP No.709/2012, dated 13 December 2012 from "Bupati Mukomuko" for ±22,914 Ha and mill capacity 60 ton FFB/hour.</li> <li>c. Based on overlapping of plantation map against "Rencana Tata Ruang Wilayah Kabupaten Muko Muko tahun 2012 – 2032" and interview with "Kepala Bidang Perkebunan, Dinas Pertanian dan Perkebunan Kabupaten Mukomuko" shows that all operational area of PT. Agro Muko and located under Plantation zone.</li> <li>d. Legal ownership of the land: Company has obtained right over legal ownership of the land through "Hak Guna Usaha/HGU" – land title and "Hak Guna Bangunan/HGB" – building title. Detailed information explained in indicator 2.2.1.</li> <li>e. Legal ownership from community: Company has compensated the land. FPIC process, up to compensation payment has been documented by Legal Department. Detailed information explained in indicator 2.2.3.</li> <li>f. Environmental permits: Company has meet all requirement for environmental compliance.               <ul style="list-style-type: none"> <li>- Environment Permit: Izin AMDAL No.425, tahun 2005. AMDAL document is available and approved by "Gubernur Bengkulu";</li> <li>- Permit for temporary hazardous storage "Izin Perpanjangan TPS Limbah B3 Mukomuko Estate, Sei Jerinjing Estate, Tanah Rekah Estate, Talang Petai Estate, Sei Kiang Estate, Workshop Sentral, Sei Betung Estate dan Air Buluh Estate";</li> <li>- Bunga Tanjung POM has permit to discharge waste water onto water body as per "Surat Keputusan Kepala Kantor Pelayanan Terpadu Satu Pintu Kabupaten Mukomuko No. 503/06/KPTSP/IPAL/XII/2016" dated 30 December 2016 and valid for 2 years.</li> </ul> </li> <li>g. Other permit such as:               <ul style="list-style-type: none"> <li>- Permit for building "IMB No. FP. 015/5/13/C/TBS-04", dated 30 November 2004;</li> <li>- Permit for Bulking Station "Ijin Bulking Station No.HK-56/2/12/CTBS-2002" from Pelindo – Sumatera barat for 25 years;</li> <li>- Biogas Plant Operational Permit "Izin Operasi Generator Biogas Plant yang diterbitkan oleh Kepala Dinas Energi dan Sumberdaya Mineral Provinsi Bengkulu";</li> <li>- Permits and license for Bunga Tanjung POM machines;</li> </ul> </li> </ul> <p><b>PT. Mukomuko Agro Sejahtera (MMAS):</b></p> <ul style="list-style-type: none"> <li>a. Company has carried out procedure to obtain legal ownership of the land started from principal permit – "Izin Prinsip":               <ul style="list-style-type: none"> <li>- "Izin Prinsip berdasarkan Surat Keputusan Bupati Mukomuko No.154, dengan luas ±2,783 Ha" dated 30 April 2010;</li> <li>- "Izin Prinsip berdasarkan Surat Keputusan Bupati Mukomuko No.171, dengan luas ±3,656 Ha" dated 4 May 2010;</li> </ul> </li> </ul> <p>---</p>	

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	<ul style="list-style-type: none"> <li>- "Izin Prinsip berdasarkan Surat Keputusan Bupati Mukomuko No. 172, dengan luas ±1,613 Ha" day 4 May 2010;</li> <li>- Location permit and extension "Perpanjangan Izin Lokasi berdasarkan Surat Keputusan Bupati Mukomuko No.700-212, seluas ±1,800 Ha (lahan inti)" dated 18 March 2014;</li> <li>- Location permit and extension "Perpanjangan Izin Lokasi berdasarkan Surat Keputusan Bupati Mukomuko No.700-214, seluas ±1,167 Ha (lahan inti)" dated 18 March 2014;</li> <li>- Location permit and extension "Perpanjangan Izin Lokasi berdasarkan Surat Keputusan Bupati Mukomuko No.700-213, seluas ±656 Ha (lahan plasma KKPA)" dated 18 March 2014;</li> <li>- Location permit extension "Perpanjangan Izin Lokasi berdasarkan Surat Keputusan Bupati Mukomuko No.700-215, ±291 Ha (lahan plasma KKPA)" dated 18 March 2014;.</li> </ul> <p>Based on stakeholder consultation with "Kantor Pertanahan Kabupaten Mukomuko" stated company has sent application for legal ownership of the land/HGU to government. Currently in process of "Rapat Panitia Tanah B" and processing the application "Pengajuan Surat Keputusan HGU" onto "Kepala Badan Pertanahan Nasional Pusat".</p> <p>b. Operation permit: PT. Mukomuko Agro Sejahtera has obtained operational permit "Surat Keputusan Bupati Mukomuko No.525/535/D.7/VIII/2014, tentang Izin Usaha Perkebunan PT. Mukomuko Agro Sejahtera dengan luas ±1,464 Ha dan ±1.167 Ha", dated 7 December 2011. The permit subsequently renewed through "Surat Keputusan Bupati Mukomuko No.503/2/KPTSP/IUP/IX/2014, Lokasi I: ±1,800 Ha dan Lokasi II: ±1,167 Ha untuk Kebun Inti" dated 15 September 2014.</p> <p>c. Development of scheme smallholder KKPA has obtained permit "Surat Keputusan Bupati Mukomuko No.374, tentang Izin Usaha Perkebunan dengan luas ±656 Ha" dated 7 December 2011 and "Surat Keputusan Bupati No.375, dengan luas ±291 Ha" dated 7 December 2011;</p> <p>d. Environmental Permit: PT. Mukomuko Agro Sejahtera has obtained environmental permit "Surat Keputusan Bupati Mukomuko No.M.288 tentang Izin Lingkungan dengan Lingkup Kebun Inti dan Kebun Plasma KKPA", dated 9 September 2011;</p> <p>e. Legal ownership from community: PT. Mukomuko Agro Sejahtera has carried out the compensation process to traditional landowners inside the location permit area.</p> <ul style="list-style-type: none"> <li>- In 2010, company compensation 514 landowners with total area of 1,102.72 Ha;</li> <li>- In 2011, company compensation 101 landowners with total area of 167.90 Ha;</li> <li>- In 2012, company compensation 181 landowners with total area of 285.93 Ha;</li> </ul> <p>---</p>	

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	<ul style="list-style-type: none"> <li>- In 2013, company compensation 151 landowners with total area of 232.5 Ha;</li> <li>- In 2014, company compensation 1,225 landowners with total area of 2,142.29 Ha;</li> </ul> <p>All compensation process are documented into "Surat Keterangan Tanah/SKT", "Surat Pernyataan Penguasaan Fisik Tanah", "Peta Lokasi Lahan", "Surat Keterangan Ganti Rugi Tanah Garapan" acknowledged and witnessed by Village Head. "Surat Pelepasan Hak Menggarap atas Tanah Garapan", "Tanda Terima Pembayaran Ganti Rugi" and photographs pictures the compensation process.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> PT. Agro Muko assisted <i>Kebun Masyarakat Desa/KMDs</i> in preparing a list of all relevant laws and regulations as in "Daftar Undang-undang/Peraturan Pemerintah/Peraturan Menteri/Keputusan Menteri/Peraturan Daerah/Peraturan Internasional terkait Persyaratan Prinsip &amp; Kriteria RSPO &amp; ISPO"; evaluating relevant legal requirements for smallholders under "Evaluasi Pemenuhan Peraturan dan Perundang-undangan terkait Persyaratan Prinsip &amp; Kriteria RSPO &amp; ISPO"; assist <i>Kebun Masyarakat Desa/KMD</i> in updating the latest regulation as in "Pemantauan Penambahan atau Perubahan terhadap Persyaratan Undang-undang" – latest update December 2017.</p> <p>General Manager PT. Agro Muko has send out a letter to all Managers and <i>Kebun Masyarakat Desa/KMD</i> Chairman on the importance of the implementation to comply with RSPO P&amp;C. Letter No.27/GM-AM/ENC/M/XII/2017 dated 12 December 2017. Awareness session was carried out on 13 December 2017 for all committee and worker (8 person attended) for <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap. There was also explanation related to SOP "Prosedur Informasi Perubahan Undang-undang dan Peraturan Pemerintah No.CA/SOP/01 dated 1 November 2011.</p> <p>Another round of awareness was carried out on 15 December 2017 to <i>KMD Mundam Marap</i> related to legal requirement update procedure. The session was attended by all 8 committee of <i>KMD</i>.</p> <p>NC Major: 3 <i>Kebun Masyarakat Desa/KMDs</i> (<i>KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang</i>) cannot demonstrate evaluation of compliance with relevant legal requirements.</p>	

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<p>2.1.2 A documented system, which includes written information on legal requirements, shall be maintained.</p> <p>- Minor compliance –</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera has a procedure titled "Prosedur Informasi Perubahan Undang Undang dan Peraturan Pemerintah No.CA/SOP/01, rev.0", dated 1 November 2011. Responsible person is Corporate Affair Manager. The procedure completes with flow chart explaining the duty of each personnel. Corporate affairs responsible to accept and disseminates information on regulation updates. Department heads responsible to evaluate whether the regulation update may impact to operation; to communicates the evaluation process onto Corporate Affairs and to operation managers. Documentation prepared by special staff, appointed by management. Monitoring carried out by Department Head on monthly basis.</p> <p>The document consist of 214 rules and regulation, as listed in RSPO P&amp;C Indonesia National Interpretation, September 2016, Appendix 1. Company has evaluated 14 categories of regulation such as 51 "Undang-undang" – National laws; 42 "Peraturan Pemerintah" - Government Regulation; 3 "Instruksi Presiden" - President Instruction; 7 "Keputusan Presiden" - President Decree; 6 "Peraturan Presiden" – President Regulations; 13 "Peraturan Menteri Pertanian" – Ministry of Agriculture Regulation; 19 "Peraturan Menteri Lingkungan Hidup" – Minister of Environment Regulation; 15 "Peraturan Menteri Tenaga Kerja" – Minister of Manpower Regulation; 7 "Peraturan Menteri Kehutanan" – Minister of Forestry Regulation; 7 "Peraturan Menteri" – other Minister Regulations; 6 "Keputusan Menteri Pertanian" – Minister of Agriculture Decree; 11 "Keputusan Menteri Lingkungan Hidup" – Minister of Environment Decree; 20 "Keputusan Menteri Tenaga Kerja" – Minister of Manpower Decree; and 7 "Keputusan Badan Pengendalian Lingkungan" – Environment Protection Body Decree. Evaluation of compliance with relevant legal requirements including review by chapter, the relation with operational activities and complemented with evidence of compliance. Evaluation carried out once per year.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> PT. Agro Muko assisted <i>Kebun Masyarakat Desa/KMDs</i> in assisted <i>Kebun Masyarakat Desa</i> in preparing documented system to list, evaluate and update all relevant laws and regulations as in "Daftar Undang-undang/Peraturan Pemerintah/Peraturan Menteri/Keputusan Menteri/Peraturan Daerah/Peraturan Internasional terkait Persyaratan Prinsip &amp; Kriteria RSPO &amp; ISPO"; evaluating relevant legal requirements for smallholders under "Evaluasi Pemenuhan Peraturan dan Perundang-undangan terkait Persyaratan Prinsip &amp; Kriteria RSPO &amp; ISPO"; assist <i>Kebun Masyarakat Desa/KMD</i> in updating the latest regulation as in "Pemantauan Penambahan atau Perubahan terhadap Persyaratan Undang-undang" – latest update December 2017.</p> <p>NC Minor: 3 <i>Kebun Masyarakat Desa/KMDs</i> (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate a documented system, which includes written information on all applicable legal requirements.</p>	<p>Non-compliance Comply</p>

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<p>2.1.3 A mechanism for ensuring compliance shall be implemented.</p> <p>- Minor compliance –</p>	<p>PT. Agro Muko (AM) and PT. Mukomuko Agro Sejahtera (MMAS) has a mechanism to ensure ensure compliance and the company has updated evaluation of regulation which must comply with; regularly. The Procedure has been established, titled "Prosedur Informasi Perubahan Undang Undang dan Peraturan Pemerintah No.CA/SOP/01, rev.0", dated 1 November 2011.</p> <p>As per procedure, Corporate Affairs Manager will find information and/or participating in the socialization of the government if there are new regulations or amendment of rules and evaluated the extent to which its fulfillment, assuming there is not yet fulfilled of the regulation, it will be communicated to each unit of the Department for the changes. It is documented under "Evaluasi Pemenuhan Peraturan Perundang-undangan". The last updated on 24 January 2017. Inside the evaluation document, in detailed per chapter completed with evidence of compliance.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> PT. Agro Muko assisted Kebun Masyarakat Desa/KMDs in assisted Kebun Masyarakat Desa in preparing documented system to evaluate all relevant laws and regulations as in "Evaluasi Pemenuhan Peraturan dan Perundang-undangan terkait Persyaratan Prinsip &amp; Kriteria RSPO &amp; ISPO"- latest update December 2017. Sample seen on latest compliance related to "Undang-undang No.39 tahun 1999 tentang Hak Asasi Manusia" related to policy on human rights.</p> <p>NC Minor: 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate an implemented mechanism for ensuring compliance.</p>	<p><del>Non-compliance</del> Comply</p>

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<p>2.1.4 A system for tracking any changes in the law shall be available and implemented.</p> <p>- Minor compliance –</p>	<p>PT. Agro Muko (AM) and PT. Mukomuko Agro Sejahtera (MMAS) has established mechanism to track if any change of regulation and evaluation will be made accordingly. Examples of regulations that were evaluated under document "Evaluasi Pemenuhan Peraturan Perundang Undangan", updated on 24 January 2017, are:</p> <ul style="list-style-type: none"> <li>- "UU No.31 tahun 1999 tentang Pemberantasan tindak pidana korupsi"</li> <li>- "UU No.7 tahun 2006 tentang Pengesahan Konvensi PBB melawan Korupsi"</li> <li>- "Peraturan Pemerintah No.57 tahun 2015 tentang Perubahan Peraturan Pemerintah No.71 tahun 2014 tentang Perlindungan dan Pengolahan Ekosistem Gambut".</li> <li>- "Peraturan Pemerintah No.50 tahun 2012 tentang Penerapan Sistem Manajemen Kesehatan dan Keselamatan Kerja";</li> <li>- "Instruksi Presiden No.1 tahun 2013 tentang Aksi Pencegahan dan Pemberantasan Korupsi";</li> <li>- "Keputusan Presiden No.32 tahun 1990 tentang Pengelolaan Kawasan Lindung";</li> <li>- "Peraturan Presiden No.21 tahun 2010 tentang Pengawasan Ketenagakerjaan";</li> <li>- "Peraturan Menteri Pertanian No.98 tahun 2013 tentang Pedoman Perizinan Usaha Perkebunan";</li> <li>- "Peraturan Menteri Pertanian No.14 tahun 2013 tentang Pedoman Penetapan Harga Tandan Buah Segar Kelapa sawit Produksi Pekebun";</li> <li>- "Peraturan Menteri Tenaga Kerja No.9 tahun 2010 tentang Operator dan Petugas Pesawat Angkat Angkut";</li> </ul> <p>PT. Agro Muko (AM) and PT. Mukomuko Agro Sejahtera (MMAS) also demonstrated the record of "Pemantauan Penambahan atau Perubahan Undang-Undang/Peraturan", updated every month.</p> <p>The company has updated the regulations that must be complied provided in Indonesian Legislation relating RSPO Principles and its ratification. This document was updated on in 2017, regulations relating to "Dinas Kesehatan Kabupaten Mukomuko" which covers, e.g.: "Peraturan Menteri Kesehatan No.9 tahun 2014 tentang Klinik".</p> <p><i>Kebun Masyarakat Desa/KMD:</i>  Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Bukit Harapan and KMD Lubuk Talang), a system for tracking any changes in the law has been made available and implemented.</p> <p>NC Minor:  3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate system for tracking any changes in the law be available.</p>	<p><del>Non-compliance</del>  Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
<p><b>Criterion 2.2</b></p>		
<p>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.</p>		
<p>2.2.1</p>	<p>Documents showing legal ownership or lease, history of land tenure ownership/control, and the actual legal use of the land shall be available.</p> <p>- Major compliance -</p> <p>PT. Agro Muko (AM): Company has a legal ownership of the land, in form of "Hak Guna Usaha/HGU" – land title, as demonstrated.</p> <p>1. "Hak Guna Usaha (HGU) No.4/HGU/BPN 1994 seluas 4,313 Ha" based on "Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan Nasional No.4/HGU/BPN/94 tentang Pemberian Hak Guna Usaha atas nama PT. Tri Aqgra Persada atas tanah di Kabupaten Bengkulu Utara", dated 2 February 1994. HGU valid until 31 December 2028. "Kantor Pertanahan Kabupaten Mukomuko" then issued HGU certificates, consist of:</p> <ul style="list-style-type: none"> <li>- "Sertifikat HGU No.45", for area of 1,410 Ha dated 29 April 1998. Based on "Surat Ukur No.65.85/1991 lokasi di Desa Bunga Tanjung-Desa Air Bikuk, Kecamatan Mukomuko Selatan, Kabupaten Bengkulu Utara, Propinsi Bengkulu, dengan peta HGU skala 1:25,000";</li> <li>- "Sertifikat HGU No.47" for area of 2,903 Ha, dated 4 August 1998 based on "Surat Ukur No.2357/1998 lokasi di Desa Bunga Tanjung, Kecamatan Mukomuko Selatan, Kabupaten Bengkulu Utara, Propinsi Bengkulu". HGU certificates completed with HGU map showing boundaries;</li> </ul> <p>Air Bikuk Estate has the proportion of 1,410 Ha; out of the 4,313 Ha under HGU. The balance of 2,903 Ha comes under Bunga Tanjung Estate. Both estates are supply base to Bunga Tanjung POM.</p> <p>2. "Hak Guna Usaha (HGU) No.07/HGU/1990, seluas 2,500 Ha", dated 3 May 1990. The HGU based on "Surat Keputusan Kepala Badan Pertanahan Nasional No.07/HGU/1990 tentang Pemberian Hak Guna atas nama PT. Bumi Kakaotama Lestari, Jakarta, untuk HGU seluas 2,500 Ha di Desa Sumendam, Air Buluh, Talang Arah, Talang Batu dan Pulau Baru, Kecamatan Muko-muko Selatan, Kabupaten Bengkulu Utara, Propinsi Bengkulu" dated 3 May 1990 valid until 31 December 2020. "Kantor Pertanahan Kabupaten Mukomuko" then issued HGU certificate "Sertifikat HGU No.21, di Desa Sumendam, Talang Baru, Talang Arah, Tanjung Jaya; berdasarkan Surat Ukur No.06/PT/1990 seluas 2,500 Ha, tanggal 24 Juli 1990". All of the 2,500 Ha area under HGU No.07/HGU/1990 was allocated for Air Buluh Estate, supply base to Bunga Tanjung POM.</p>	<p>Comply</p>

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	<p>3. "Hak Guna Usaha (HGU) No.31/HGU/BPN/89", based on "Keputusan Kepala Badan Pertanahan Nasional No.31/HGU/BPN/89 tentang Pemberian Hak Guna Usaha atas Nama PT. Tri Aqgra Persada, seluas 10,315 ha di Desa Air Dikit, Pondok Lunang, Desa Baru, Sari Bulan, Penarik, Teras, Terunjam, Lubuk Sahung, Seri Bungkal, Sungai Jerinjing, Pondok Baru, Sungai Ipuh, Sungai Gading, Talang Petai dan Sungai Lintang, Kecamatan Mukomuko Utara, Kabupaten Bengkulu Utara, Propinsi Bengkulu - Seluas 10,000 Ha" dated 27 June 1989. HGU valid since registered and ends in 31 December 2019. "Kantor Pertanahan Kabupaten Mukomuko" issued HGU Certificate:</p> <ul style="list-style-type: none"> <li>- "Sertifikat HGU No.02/MU" for area of 2,270 Ha, dated 27 June 1989 valid until 31 December 2019. Based on "Surat Ukur No.04/PT/1988 seluas 2.270 ha, dilengkapi peta HGU skala 1:20,000 No.04/PT/1988", dated 1 Agustus 1988;</li> <li>- "Sertifikat HGU No.03 untuk lahan 7,730 Ha, di Desa Air Dikit, Pondok Lunang, Dusun Baru, Sari Bulan, Penarik, Teras Terunjam, Lubuk Sahung, Surian Bungkal, Sungai Jerinjing, Pondok Baru, Sungai Ipuh, Sungai Gading" dated 18 March 1991 and valid until 31 December 2019. Based on "Surat Ukur No.13/PT/1990, seluas 7,730 Ha, dilengkapi peta HGU skala 1:50,000 No.13/PT/1990", dated 9 November 1990.</li> </ul> <p>With regards to the validity of HGU in year 2019, company has applied for extension to "Kantor Pertanahan Kabupaten Mukomuko" through letter "Surat Permohonan Perpanjangan Sertifikat HGU No.G.199/2017 atas Sertifikat HGU No.02/MU" and "Surat Permohonan Perpanjangan Sertifikat HGU No.G.199/2017 atas Sertifikat HGU No.03" dated 6 March 2017.</p> <p>During assessment, the process has been progressed. The area under HGU has been re-measured "Pengukuran Bidang Tanah" by "Badan Pertanahan Nasional (BPN) Pusat" as pre-requisite for HGU extension. There is a note, related to hectarage deviation in the HGU decree and certificate, whereby in the decree written 10,350 Ha and total hectarage under HGU certificate 10,000 Ha. This occurred because the 350 Ha has been released from the HGU into "Hak Guna Bangunan/HGB Industri Pengolahan Kelapa Sawit" – see explanation on HGB Mukomuko POM.</p> <p>4. "Hak Guna Usaha (HGU) No.09/HGU/BPN/93, seluas 5,786.03 Ha" dated 8 March 1993. The HGU based on "Surat Keputusan Kepala Badan Pertanahan Nasional No.9/HGU/BPN/93 tentang Pemberian Hak Guna Usaha atas nama PT. Agronusa Raflesia atas tanah di Kabupaten Bengkulu Utara seluas 5,800 Ha dalam peta situasi tanggal 16 Desember 1988 No.12/PT/1988 tanggal 15 Mei 1989 No.09/PT/1989, tanggal 20 Desember 1989 No.23/PT/1989 (sebagian) terletak di Desa Pasar Mukomuko, Desa Tanah Rekah, Desa Lalang Luas dan Desa Penarik, Kecamatan Mukomuko Utara, Kabupaten Bengkulu Utara, Propinsi Bengkulu". The HGU valid from 8 March 1993 until 31 December 2022.</p> <p>---</p>	

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	<p>Land compensation process were documented, for example in 2013, for 1.14 Ha under landowner Mr.A*** S; and for 1.36 Ha under landowner Mr. Z***** - both from Air Merah village. Land compensation documents completed, payment made on 15 July 2013. Land compensation No.30 in 2016, for 2.51 Ha under landowner Mr.A** M***; from Talang Baru village. Land compensation documents completed, payment made on 11 February 2016.</p> <p>PT. Mukomuko Agro Sejahtera, Malin Deman Estate was utilizing area under location permit as per "Surat Keputusan Bupati Mukomuko No. 700-214, tentang Perpanjangan Izin Lokasi seluas ±1,167 Ha" dated 18 March 2014. PT. Mukomuko Agro Sejahtera has carried out land compensation to landowners and documented: in 2010, compensation made to 514 landowners with total area of 1,102.7 Ha; in 2011, compensation made to 101 landowners with total area of 167.9 Ha; in 2012, compensation made to 181 landowners with total area of 285.93 Ha; in 2013, compensation made to 151 landowners with total area of 232.5 Ha; up to this moment, company has made compensation for 1,225 landowners with total area of 2,142.29 Ha;</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Based on interview with KMD committee on 4 December 2017, it was noted that:</p> <ul style="list-style-type: none"> <li>- KMD Mundam Marap already has legal ownership of the land in form of "Surat Keterangan Tanah (SKT)" for area 12.34 Ha: "SKT No.27/SKT/DS-MM/IP/X/2017 luas 2 Ha atas nama Pemerintah Desa Mundam Marap", dated 27 September 2017; "SKT No.28/SKT/DS-MM/IP/IX/2017 luas 2 Ha atas nama Pemerintah Desa Mundam Marap", dated 26 September 2017; "SKT No.29/SKT/DS-MM/IP/IX/2017 luas 2 Ha atas nama Pemerintah Desa Mundam Marap", dated 26 September 2017; "SKT No.30/SKT/DS-MM/IP/IX/2017 luas 2 Ha atas nama Pemerintah Desa Mundam Marap", dated 26 September 2017; "SKT No.31/SKT/DS-MM/IP/IX/2017 luas 2 Ha atas nama Pemerintah Desa Mundam Marap", dated 26 September 2017; "SKT No.32/SKT/DS-MM/IP/IX/2017 luas 2 Ha atas nama Pemerintah Desa Mundam Marap", dated 26 September 2017; "SKT No.33/SKT/DS-MM/IP/IX/2017 luas 2 Ha atas nama Pemerintah Desa Mundam Marap", dated 26 September 2017;</li> <li>- KMD Bukit Harapan has been able to demonstrate the legal ownership of the land through: "SKT No.71/DS-BH/SKT/2013 luas 2 Ha atas nama Pemerintah Desa Bukit Harapan", dated 5 March 2012; "SKT No.73/DS-BH/SKT/2013 luas 2 Ha atas nama Pemerintah Desa Bukit Harapan", dated 14 March 2013; "SKT No.72/DS-BH/SKT/2013 luas 2 Ha atas nama Pemerintah Desa Bukit Harapan", dated 14 March 2013; "SKT No.70/DS-BH/SKT/2013 luas 2 Ha atas nama Pemerintah Desa Bukit Harapan", dated 14 March 2013; "SKT No.74/DS-BH/SKT/2013 luas 2 Ha atas nama Pemerintah Desa Bukit Harapan", dated 14 March 2013;</li> </ul> <p>A total of 9,81 Ha based on measurement from GIS team, dated 22 April 2014.</p>	

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2.2.2	<p>Legal boundaries are demonstrated clearly and maintained.</p> <p>- Minor compliance -</p>	<p>PT. Agro Muko – Air Buluh Estate: HGU boundary poles monitored every month by Ranger, and the result recorded under “Daftar Pemeriksaan Patok Batas Kebun (HGU). The monitoring result from 10 September 2017 in Division I shows 10 boundary poles in good condition. There is also a checklist describing the condition (good/broken) and existence (present/missing) and photograph of each poles. As of September 2017, all 50 boundary poles are in good condition. Through field visit to Division IV and Division V, to boundary poles No.04, 05, 07, 08 shows all poles sampled are maintained and can be clearly identified.</p> <p>PT. Mukomuko Agro Sejahtera – Malin Deman Estate: The monitoring on boundary poles from “Hasil Pengukuran Kadastral” carried out on monthly basis by Ranger, and reported under “Daftar Pemeriksaan Patok Batas Kebun (Patok Batas Pengukuran Kadastral)”. The monitoring result in October 2017, reported on 31 October 2017. In the report, 90 boundary poles in good condition. There is also a checklist describing the condition (good/broken) and existence (present/missing), coordinates and photograph of each poles.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> All boundary of KMD Bukit Harapan and KMD Mundam Marap can be clearly identified during field visit. Based on interview with KMD committee on 4 December 2017, it was noted that there was no dispute related to boundary in KMD Bukit Harapan and KMD Mundam Marap.</p>	Comply
2.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The company has a mechanism for land compensation “Prosedur Kompensasi Lahan No.SOP/CA/02” issued on 1 July 2012. In it procedure outlines the mechanism for compensation through the FPIC process (socialization), Document Verification and Measurement of land and Price Negotiation “Ganti Rugi Tanam Tumbuh/GRTT”. Completeness GRTT are as follows:</p> <ol style="list-style-type: none"> <li>1. Letter of Request for measurement,</li> <li>2. Minute of land surveying,</li> <li>3. Certificate of Land or “Surat Keterangan Tanah/SKT;</li> <li>4. Statement of no dispute</li> <li>5. Statement of Recognition of Rights,</li> <li>6. Statement Own Land / Land for smallholder (if any),</li> <li>7. Letter of Waiver working on arable land, arable land compensation letters</li> </ol> <p>Based on document verification, public consultation with “Kantor Pertanahan Kabupaten Mukomuko” and villagers in Pondok Lunang and Talang Petai it was known that no land dispute/land conflict between company and community. It is known some area that has not been compensated inside HGU of PT. Agro Muko since the traditional owner not willing to release the land. Company respect the decision made.</p> <p>---</p>	Comply

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	<p>Air Buluh Estate: Company has a map of area that not being released inside HGU with scale 1:24,000 shows the location and name of landowners. For example: "Lahan 21" owned by Sa****, "Lahan 7" owned by M.A**, "Lahan 13" owned by Sa*****; etc. Total area 273.33 Ha.</p> <p>Malin Deman Estate: Based on field verification in Malin Deman Estate, shows that land belong to individual that is not release their land being excised from Kadastral measurement and not being part of HGU application by PT. Mukomuko Agro Sejahtera.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Based on document verification, public consultation with "Kantor Pertanahan Kabupaten Mukomuko" and villagers/community, it was known that no land conflict for area allocated for Kebun Masyarakat Desa/KMD. For example: in KMD Mundam Marap, "Surat Pernyataan Penguasaan Fisik Tanah", under name As****, whereby handed over the user right over 2 Ha land back to "Pemerintah Desa Mundam Marap", dated 26 September 2017. The history of land right/user right: 1979 user right under name "Husin Ba****"; 2013 user right under name "Suh****" (purchase); 2015 user right under "Pemerintah Desa Mundam Marap" (purchase) dated 26 January 2015.</p>	
2.2.4	<p>There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved.</p> <p>- Major compliance –</p> <p>PT. Agro Muko – Air Buluh Estate: Based on document verification, public consultation with "Kantor Pertanahan Kabupaten Mukomuko" and villagers in Pondok Lunang and Talang Petai it was known that no land dispute/land conflict between company and community. It is known some area that has not been compensated inside HGU of PT. Agro Muko since the traditional owner not willing to release the land. Company respect the decision made. The land compensation process carried out with negotiation between both parties. For example in 2016, Air Buluh Estate made compensation for six (6) landowners inside HGU PT. Agro Muko with total 11.18 Ha. Sample taken: - The FPIC process documented under "Dokumen Ganti Rugi Tanam Tumbuh/GRTT No.30". The compensation request made from Mr.A** M****, people of Talang Baru village, for land of 2.51 Ha. The participatory measurement map scale 1:1,500 acknowledged by Talang Baru village head, dated 27 January 2016. The process document covers "Surat Keterangan Ganti Rugi Tanah Garapan" signed by both parties and witnessed by both parties representative, acknowledged by village head and district head on 11 February 2016. "Surat Pelepasan Menggarap atas Tanah Garapan" signed by both parties on 11 February 2016, acknowledged by village head and district head. The negotiation process of "Ganti Rugi Tanam Tumbuh", including the value has been agreed on 11 February 2016. Compensation payment made through "Bank Bengkulu Cabang Pembantu Ipuh" on 11 February 2016. The document also complemented with photograph of the event.</p> <p>---</p>	Comply

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Criterion / Indicator	Assessment Findings	Compliance
	<p>- The FPIC process documented under "Dokumen Ganti Rugi Tanam Tumbuh/GRTT No.15". The compensation request made from Mr.E** M*****, people of Talang Baru village, for land of 0.65 Ha. The participatory measurement map scale 1:1,500 acknowledged by Talang Baru village head, dated 26 January 2016. The process document covers "Surat Keterangan Ganti Rugi Tanah Garapan" signed by both parties and witnessed by both parties representative, acknowledged by village head and district head on 11 February 2016. "Surat Pelepasan Menggarap atas Tanah Garapan" signed by both parties on 11 February 2016, acknowledged by village head and district head. The negotiation process of "Ganti Rugi Tanam Tumbuh", including the value has been agreed on 11 February 2016. Compensation payment made through "Bank Bengkulu Cabang Pembantu Ipuh" on 11 February 2016.</p> <p>PT. Mukomuko Agro Sejahtera – Malin Deman Estate: Based on document verification, public consultation with "Kantor Pertanahan Kabupaten Mukomuko" and villagers in Pondok Lunang and Talang Petai it was known that no land dispute/land conflict between PT. Mukomuko Agro Sejahtera and community. Company has documented all land compensation process to community since 2009 up to October 2017. Company has made compensation for 1,225 landowners with total area of 2,142.29 Ha;</p> <p>- The FPIC process documented under "Dokumen Ganti Rugi Tanam Tumbuh/GRTT No.58". The compensation request made by Mr.Asm***, people of Talang Arah village, Malin Deman district for land of 2.9 Ha. The map scale 1:1,500 issued by Talang Arah village. The land ownership document: "Surat Keterangan Tanah No.590/055/17.06.15/2013 untuk tanah seluas 9,000 m<sup>3</sup> yang berada di Desa Talang Arah, yang diterbitkan oleh Kepala Desa Talang Arah" dated 30 April 2013; "Surat Keterangan Tanah No.590/39/17.0.15.01/2013, untuk tanah seluas 20,000 m<sup>3</sup> yang diterbitkan oleh Kepala Desa Talang Arah dan diketahui oleh Camat Malin Deman", dated 30 April 2013. The process document covers "Surat Keterangan Ganti Rugi Tanah Garapan" signed by both parties and witnessed by both parties representative, acknowledged by village head and district head on 30 April 2013. "Surat Pelepasan Menggarap atas Tanah Garapan" signed by both parties on 30 April 2013, acknowledged by village head and district head. The negotiation process of "Ganti Rugi Tanam Tumbuh", including the value has been agreed on 30 April 2013. Compensation payment made through "Bank Bengkulu" on 30 April 2013, with connote No.005/GRTT-MMAS/I/2013.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> One of example seen, company assisted to purchase land for <i>Kebun Masyarakat Desa/KMD</i>. The process for land compensation with <i>Kebun Masyarakat Desa</i> Tanjung Jaya, whereby land of 7.83 Ha located inside area proposed for HGU. The agreement was <i>Kebun Masyarakat Desa</i> Tanjung Jaya to release the land inside HGU and exchanged with.</p> <p>---</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		PT. Mukomuko Agro Sejahtera assist to purchase land outside proposed HGU area of 14.516 Ha. In addition, the balance of debt accounted as paid during the agreement, 11 August 2017 KMD Mundam Marap made compensation to individual landowner, in order to develop Kebun Masyarakat Desa/KMD. Document seen: "Surat Pernyataan Penguasaan Fisik Tanah", under name As*****, whereby handed over the user right over 2 Ha land back to "Pemerintah Desa Mundam Marap", dated 26 September 2017. The history of land right/user right: 1979 user right under name "Husin Ba***"; 2013 user right under name "Suh****" (purchase); 2015 user right under "Pemerintah Desa Mundam Marap" (purchase) dated 26 January 2015.	
2.2.5	<p>For any conflict or dispute over the land, the evidence of the extent of disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities and local government where applicable), shall be available.</p> <p>- Minor compliance –</p>	<p>Based on document verification, public consultation with "Kantor Pertanahan Kabupaten Mukomuko" and villagers in Pondok Lunang and Talang Petai it was known that no land dispute/land conflict between company and community. It is known some area that has not been compensated inside HGU of PT. Agro Muko since the traditional owner not willing to release the land. Company respect the decision made.</p> <p>The company has a mechanism for land compensation "Prosedur Kompensasi Lahan No.SOP/CA/02" issued on 1 July 2012. Eventough the land was legally under company's HGU or Izin Lokasi, since it is still under traditional owner and has not been compensated, company policy is to negotiate and offer compensation. The mechanism for conflict settlement:</p> <ul style="list-style-type: none"> <li>- Company communicating the license/HGU to community;</li> <li>- If there is claim from community, company will accept the claim, if completed with evidence of land ownership;</li> <li>- Verification upon claimed land. If accepted, continue with field verification and measurement;</li> <li>- Field verification and measurement, with participation from respective claimant, village authority, government and company;</li> <li>- Based on field verification and measurement, producing minutes, identifying the hectarage and land coordinates – signed by all parties;</li> <li>- Final verification base on measurement result and maps to ensure the said land is not overlapping with other parties.</li> </ul> <p>Air Buluh Estate: Company has a map of area that not being released inside HGU with scale 1:24,000 shows the location and name of landowners. For example: "Lahan 21" owned by Sal****, "Lahan 7" owned by M.A**, "Lahan 13" owned by Sa*****, etc. Total area 273.33 Ha.</p> <p>Malin Deman Estate: Based on field verification in Malin Deman Estate, shows that land belong to individual landowners that has not been released their land; are being excised from "Kadastral" measurement and not being part of HGU application by PT. Mukomuko Agro Sejahtera. Map of 1:33,700 identifying the name and location, totalling 87.53 Ha.</p> <p>---</p>	Comply

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Criterion / Indicator		Assessment Findings	Compliance
		<p><i>Kebun Masyarakat Desa/KMD:</i> Based on document verification, public consultation with "Kantor Pertanahan Kabupaten Mukomuko" and villagers/community, it was known that no land conflict for area allocated for Kebun Masyarakat Desa/KMD.</p>	
2.2.6	<p>To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and/or planned operations.</p> <p>- Major compliance -</p>	<p>Based on document verification, public consultation with "Kantor Pertanahan Kabupaten Mukomuko" and villagers in Pondok Lunang and Talang Petai it was known that no land dispute/land conflict between companies (PT. Agro Muko and PT Mukomuko Agro Sejahtera) and communities. It is known some area that has not been compensated inside HGU of PT. Agro Muko since the traditional owner not willing to release the land. Company respect the decision made.</p> <p>In addition, community stated that companies have never made any intimidation, coercion and/or use violence in handling land conflict/land compensation.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Based on interview with KMD committee on 4 December 2017, it was noted that there was no land conflict in KMD.</p>	Comply
<p><b>Criterion 2.3</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
2.3.1	<p>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).</p> <p>- Major compliance -</p>	<p>Based on document verification, public consultation with "Kantor Pertanahan Kabupaten Mukomuko" and villagers in Pondok Lunang and Talang Petai it was known that no land dispute/land conflict between company and community. It is known some area that has not been compensated inside HGU of PT. Agro Muko since the traditional owner not willing to release the land. Company respect the decision made.</p> <p>Air Buluh Estate: Company has a map of area that not being released inside HGU of PT. Agro Muko with scale 1:24,000 shows the location and name of landowners. For example: "Lahan 21" owned by Sa****, "Lahan 7" owned by M.A**, "Lahan 13" owned by Sa*****, etc. Total area 273.33 Ha.</p> <p>Malin Deman Estate: Based on field verification in Malin Deman Estate, shows that land belong to individual landowners that has not been released their land; are being excised from "Kadastral" measurement and not being part of HGU application by PT. Mukomuko Agro Sejahtera. Map of 1:33,700 identifying the name and location, totalling 87.53 Ha, sighted.</p> <p>---</p>	Comply

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Criterion / Indicator		Assessment Findings	Compliance
		<p><i>Kebun Masyarakat Desa/KMD:</i> Based on document verification, public consultation with “Kantor Pertanahan Kabupaten Mukomuko” and villagers/community, it was known that no Kebun Masyarakat Desa/KMD that was developed on individual landowners/customary land/individual user rights. It was also known that the process for development of Kebun Masyarakat Desa has been acknowledged and supported by communities. The people of Mundam Marap, Serami Baru and Lubuk Talang villages strongly support the existence of KMD as they see the development progress of other village which already has KMD.</p>	
2.3.2	<p>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:</p> <ul style="list-style-type: none"> <li>a) Evidence of consultation</li> <li>b) Statement of transfer of rights</li> <li>c) Evidence of compensation</li> </ul> <p>See specific guidance 2.3.2 - Minor compliance -</p>	<p>As explained under indicator 2.2.3 and 2.2.4, PT. Agro Muko and PT. Mukomuko Agro Sejahtera has documented all land compensation process since the beginning. The process includes evidence of consultation, statement of transfer of rights, evidence of compensation to demonstrate free, prior and informed consent. Sample taken for PT. Agro Muko:</p> <ul style="list-style-type: none"> <li>- The negotiated agreement process documented under “Dokumen Ganti Rugi Tanam Tumbuh/GRTT No.30”. The compensation made to Mr.A** M****, people of Talang Baru village, for land of 2.51 Ha. The participatory measurement map scale 1:1,500 acknowledged by Talang Baru village head, dated 27 January 2016. Evidence of consultation: The process document covers “Surat Keterangan Ganti Rugi Tanah Garapan” including the value signed by both parties and witnessed by both parties representative, acknowledged by village head and district head on 11 February 2016. Statement of transfer of right: “Surat Pelepasan Menggarap atas Tanah Garapan” signed by both parties on 11 February 2016, acknowledged by village head and district head. Evidence of compensation: payment made through “Bank Bengkulu Cabang Pembantu Ipuh” on 11 February 2016. The document also complemented with photograph of the event.</li> </ul> <p>PT. Mukomuko Agro Sejahtera – Malin Deman Estate:</p> <ul style="list-style-type: none"> <li>- The FPIC process documented under “Dokumen Ganti Rugi Tanam Tumbuh/GRTT No.58”. The compensation made to Mr.Asm***, people of Talang Arah village, Malin Deman district for land of 2.9 Ha. The map scale 1:1,500 issued by Talang Arah village. The negotiation process/evidence of consultation as in “Ganti Rugi Tanam Tumbuh”, including the value has been agreed on 30 April 2013. Statement transfer of rights: “Surat Pelepasan Menggarap atas Tanah Garapan” signed by both parties on 30 April 2013, acknowledged by village head and district head. Evidence of payment made through “Bank Bengkulu” on 30 April 2013, with connote No.005/GRTT-MMAS/I/2013.</li> </ul> <p>---</p>	Comply

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Criterion / Indicator	Assessment Findings	Compliance
	<p><i>Kebun Masyarakat Desa/KMD:</i> KMD Mundam Marap made compensation to individual landowner, in order to develop Kebun Masyarakat Desa/KMD. Document seen: "Surat Pernyataan Penguasaan Fisik Tanah", under name As*****, whereby handed over the user right over 2 Ha land back to "Pemerintah Desa Mundam Marap", dated 26 September 2017. Inside the statement letter, can be seen the evidence of consultation process, transfer of rights. The compensation evidence/payment was assisted by company.</p>	
<p>2.3.3 Relevant information shall be available in appropriate forms and languages, including analysis of impacts, proposed benefit sharing, and legal arrangements.  - Minor compliance -</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera has provided all relevant information, including the impact analysis, proposed benefit sharing and legal arrangement – in Bahasa Indonesia. One of example seen, company assisted to purchase land for <i>Kebun Masyarakat Desa/KMD</i> Desa Tanjung Jaya. <i>Kebun Masyarakat Desa</i> Tanjung Jaya, was part of smallholder assisted by PT. Agro Muko, has land of 7.83 Ha located inside area proposed for HGU of PT. Mukomuko Agro Sejahtera. After series of consultation and meeting; the agreement was <i>Kebun Masyarakat Desa</i> Tanjung Jaya to release the 7.83 Ha land inside HGU and exchanged with PT. Mukomuko Agro Sejahtera assist to purchase land outside proposed HGU area of 14.516 Ha. In addition, the balance of debt <i>Kebun Masyarakat Desa</i> Tanjung Jaya to PT. Agro Muko accounted paid as part of the agreement, 11 August 2017. This is documented under documents:</p> <ul style="list-style-type: none"> <li>- Agreement involving the KMD committee and landowners as in "Surat Kesepakatan Pelaksanaan Kesepakatan yang Dihadiri oleh 12 Peserta yang Mewakili Pemerintah Desa Tanjung Jaya maupun Pemilik Lahan" dated 11 August 2017;</li> <li>- Evidence of compensation "Bukti Pembayaran (Kwitansi) dari manajemen PT MMAS kepada KMD Tanjung Jaya" dated 14 August 2017;</li> <li>- Statement on release of user right "Surat Keterangan dari Koperasi Tanjung Jaya Agro Muko yang menyatakan pelepasan hak atas tanah garapan yang ada di dalam Izin Lokasi PT. Mukomuko Agro Sejahtera" dated 11 August 2017;</li> <li>- Evidence of legal ownership "Surat Keterangan Tanah (SKT)" from landowners being compensated;</li> </ul> <p>All documents available in Bahasa Indonesia.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> KMD Bukit Harapan and KMD Mundam Marap has already sign Memorandum of Understanding with PT. Agro Muko regarding development and upkeep of oil palm plantation. The agreement was established in appropriate forms and languages, including analysis of impacts, proposed benefit sharing, and legal arrangements.</p>	<p>Comply</p>

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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 verification, public consultation with "Kantor Pertanahan Kabupaten Mukomuko" and villagers in Pondok Lunang and Talang Petai it was known that no land dispute/land conflict between company and community. It is known that all negotiation, benefit sharing, agreement, compensation being made was between individual landowners and PT. Agro Muko or PT. Mukomuko Agro Sejahtera. However the process is monitored and acknowledged by village authority and district authority. ---	Comply																																																						
		<i>Kebun Masyarakat Desa/KMD:</i> Kebun Masyarakat Desa/KMD are able to demonstrate that local communities are represented and participated during the meeting of KMD formation/development. Attendance list is available, the meeting involving all relevant stakeholders, institution and representative of surrounding communities, e.g. "Kepala Dusun, Badan Pertimbangan Desa, Karang Taruna, Pertahanan Sipil, Bendahara, Kepala Urusan Umum, Kepala Urusan Pemerintahan", etc.																																																							
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Criterion 3.1																																																									
<b>There is an implemented management plan that aims to achieve long-term economic and financial viability.</b>																																																									
3.1.1	A documented management plan, a minimum of three years shall be available, including, where appropriate, plan for scheme smallholders. - Major compliance-	<p>PT. Agro Muko has prepared a business plan for period 2018 – 2022. The business plan indicating the projected production of FFB, CPO and PK; cost of production, revenue and profit estimation. This figures including from the supply base of PT. Mukomuko Agro Sejahtera’s Estate.</p> <p>Company also demonstrated independent financial audit report from "Deloitte Satrio Bing Eny", dated April 2017. The financial audit report for financial statements for year ended 31 December 2016.</p> <p>Available under "Business Plan of FFB, CPO/PK, and Processing Cost 2018 – 2022":</p> <table border="1"> <thead> <tr> <th></th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>Own FFB</td> <td>121,177</td> <td>110,494</td> <td>108,281</td> <td>104,787</td> <td>92,204</td> </tr> <tr> <td>Group FFB</td> <td>20,380</td> <td>18,427</td> <td>19,440</td> <td>20,509</td> <td>21,637</td> </tr> <tr> <td>KMD</td> <td>4315</td> <td>4933</td> <td>5204</td> <td>5490</td> <td>5792</td> </tr> <tr> <td>CPO</td> <td>33,551</td> <td>27,354</td> <td>26,827</td> <td>26,006</td> <td>23766</td> </tr> <tr> <td>PK</td> <td>7,439</td> <td>5,969</td> <td>5,854</td> <td>5,675</td> <td>5,186</td> </tr> </tbody> </table> <p>Air Buluh Estate:</p> <table border="1"> <thead> <tr> <th></th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>54,400</td> <td>53,171</td> <td>52,105</td> <td>51,197</td> <td>46,314</td> </tr> <tr> <td>Area</td> <td>2148.89</td> <td>2170.79</td> <td>2,170.79</td> <td>2,170.79</td> <td>2,014.11</td> </tr> </tbody> </table>		2018	2019	2020	2021	2022	Own FFB	121,177	110,494	108,281	104,787	92,204	Group FFB	20,380	18,427	19,440	20,509	21,637	KMD	4315	4933	5204	5490	5792	CPO	33,551	27,354	26,827	26,006	23766	PK	7,439	5,969	5,854	5,675	5,186		2018	2019	2020	2021	2022	FFB	54,400	53,171	52,105	51,197	46,314	Area	2148.89	2170.79	2,170.79	2,170.79	2,014.11	Comply
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		<p><i>Kebun Masyarakat Desa/KMD:</i> Koperasi Perkebunan Desa Air Buluh Agromuko (135.1 Ha) 2,848 tons. Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera 3,204 tons. KMD Air Buluh 390 tons (26 tons/Ha); KMD Talang Baru 300 tons (20 tons/ha); KMD Talang Arah 225 tons (15 tons/ha); KMD Semundam 294 tons (21 tons/ha); KMD Dusun Pulau 130 tons (13 tons/ha); KMD Talang Rio 150 tons (15 tons/ha); KMD Serami Baru 100 tons (10 tons/ha); KMD Tanjung Jaya 144 tons (16 tons/ha); KMD Pulau Baru 207 tons (23 tons/ha); KMD Medan Jaya 144 tons (16 tons/ha); KMD Tanjung Harapan 144 tons (16 tons/ha); KMD Bukit Harapan 48 tons (4.9 tons/ha).</p>																																																																												
3.1.2	<p>An annual replanting program projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.  - Minor compliance-</p>	<p>PT. Agro Muko - Air Buluh Estate: Replanting Plan in hectare</p> <table border="1"> <thead> <tr> <th>Planned replanting</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>OP 1998</td> <td>156.68</td> <td></td> <td></td> <td></td> </tr> <tr> <td>OP 1999</td> <td></td> <td>286.21</td> <td>341.70</td> <td>294.38</td> </tr> <tr> <td>Total</td> <td>156.68</td> <td>286.21</td> <td>341.70</td> <td>294.38</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Planned replanting</th> <th>2026</th> <th>2027</th> <th>2028</th> <th>2029</th> </tr> </thead> <tbody> <tr> <td>OP 1998</td> <td>163.69</td> <td></td> <td></td> <td></td> </tr> <tr> <td>OP 1999</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>OP 2000</td> <td></td> <td>202.84</td> <td>200.18</td> <td></td> </tr> <tr> <td>OP 2001</td> <td></td> <td>34.28</td> <td></td> <td>68.94</td> </tr> <tr> <td>OP 2002</td> <td></td> <td></td> <td></td> <td>63.43</td> </tr> <tr> <td>OP 2004</td> <td>32.28</td> <td></td> <td></td> <td></td> </tr> <tr> <td>OP 2005</td> <td>100.84</td> <td></td> <td></td> <td></td> </tr> <tr> <td>OP 2007</td> <td></td> <td></td> <td></td> <td>54.15</td> </tr> <tr> <td>OP 2009</td> <td></td> <td>36.21</td> <td>53.67</td> <td>58.07</td> </tr> <tr> <td>Total</td> <td>296.81</td> <td>273.33</td> <td>253.85</td> <td>244.59</td> </tr> </tbody> </table> <p>Malin Deman Estate: No replanting plan for Malin Deman Estate, since immature plant.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> No replanting plan for <i>Kebun Masyarakat Desa/KMD</i> in the next five (5) years.</p>	Planned replanting	2022	2023	2024	2025	OP 1998	156.68				OP 1999		286.21	341.70	294.38	Total	156.68	286.21	341.70	294.38	Planned replanting	2026	2027	2028	2029	OP 1998	163.69				OP 1999					OP 2000		202.84	200.18		OP 2001		34.28		68.94	OP 2002				63.43	OP 2004	32.28				OP 2005	100.84				OP 2007				54.15	OP 2009		36.21	53.67	58.07	Total	296.81	273.33	253.85	244.59	Comply
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<p>4.1.1 Standard Operating Procedures (SOPs) for estates (land clearing to harvesting) and SOP for mills (reception of FFB to dispatch of CPO and PKO) shall be available.</p> <p>- Major compliance -</p>	<p>Bunga Tanjung POM:            To ensure CPO production running well, PT. Agro Muko established a working procedure and working instruction for processing of FFB as in "Prosedur Pengolahan dan Operasional", datum 2007 covers:</p> <ul style="list-style-type: none"> <li>A. <i>Prosedur Jembatan Timbang</i> - Weighbridge;</li> <li>B. <i>Prosedur Loading Ramp</i>;</li> <li>C. <i>Prosedur Rebusan – Sterilizer</i>;</li> <li>D. <i>Prosedur Stasiun Threshing</i>;</li> <li>E. <i>Prosedur Stasiun Klarifikasi – Clarification Station</i>;</li> <li>F. <i>Prosedur Stasiun Kernel Recovery</i>;</li> <li>G. <i>Prosedur Stasiun Boiler</i>;</li> <li>H. <i>Prosedur Stasiun Engine Room</i>;</li> <li>I. <i>Prosedur Stasiun Water Treatment Plant</i>;</li> <li>J. <i>Prosedur Processing and Quality Control</i>;</li> <li>K. <i>Prosedur Stasiun FFB Plant</i>;</li> </ul> <p>Work instructions compiled under document No.AMPOM-MR/010109/003(A), covers:</p> <ul style="list-style-type: none"> <li>1. Weighing FFB and Loose Fruit, No.AMPOM-WI/PROD/001A;</li> <li>2. Weighing CPO truck, No.AMPOM-WI/PROD/001B;</li> <li>3. Weighing Kernel truck, No.AMPOM-WI/PROD/001C;</li> <li>4. Loading FFB into Sterilizer Lorry, No.AMPOM-WI/PROD/002A;</li> <li>5. Sterilizer operation, No.AMPOM-WI/PROD/003B;</li> <li>6. Hoisting Crane operation, No.AMPOM-WI/PROD/004A;</li> <li>7. Tippler operation, No.AMPOM-WI/PROD/004B;</li> <li>8. Threshing Machine operation, No.AMPOM-WI/PROD/005A;</li> <li>9. Digester operation, No.AMPOM-WI/PROD/006A;</li> <li>10. Screw Press operation, No.AMPOM-WI/PROD/006B;</li> <li>11. Sand trap tank and vibrating screen operation, No.AMPOM-WI/PROD/007A;</li> <li>12. Crude oil tank operation, No.AMPOM-WI/PROD/007B;</li> <li>13. Continuous settling tank operation, No.AMPOM-WI/PROD/007C;</li> <li>14. Clean oil tank operation, No.AMPOM-WI/PROD/007D;</li> <li>15. Sludge tank operation, No.AMPOM-WI/PROD/007E;</li> <li>16. Oil Purifier operation, No.AMPOM-WI/PROD/007F;</li> <li>17. Sludge centrifuge operation, No.AMPOM-WI/PROD/007H;</li> <li>18. Ripple mill operation, No.AMPOM-WI/PROD/008A;</li> <li>19. Claybath Separator operation, No.AMPOM-WI/PROD/008C;</li> <li>20. Winnowing I &amp; II operation, No.AMPOM-WI/PROD/008D;</li> <li>21. Kernel Silo Drier operation, No.AMPOM-WI/PROD/008F;</li> <li>22. Steam Boiler operation, No.AMPOM-WI/PROD/009A;</li> <li>23. Genset operation, No.AMPOM-WI/PROD/010A;</li> <li>24. Steam turbine operation, No.AMPOM-WI/PROD/010B;</li> <li>25. Clarifier Tank operation, No.AMPOM-WI/PROD/011A;</li> <li>26. EFB Plant operation, No.AMPOM-WI/PROD/013A;</li> <li>27. CPO Storage Tank operation, No.AMPOM-WI/PROD/014A;</li> <li>28. Kernel Bin Storage operation, No.AMPOM-WI/PROD/015</li> </ul> <p>---</p>	<p>Comply</p>

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	<p>Work instruction for workshop:</p> <ol style="list-style-type: none"> <li>1. Electric welding operation, No.AMPOM-WI/WS/001;</li> <li>2. Lathe machine operation, No.AMPOM-WI/WS/003;</li> <li>3. Drilling machine operation, No.AMPOM-WI/WS/004;</li> <li>4. Portable grinding machine operation, No.AMPOM-WI/WS/006;</li> <li>5. Cut off machine operation, No.AMPOM-WI/WS/007;</li> <li>6. Hand grinder machine operation, No.AMPOM-WI/WS/009;</li> <li>7. Milling machine operation, No.AMPOM-WI/WS/011;</li> <li>8.</li> </ol> <p>PT. Agro Muko has established CPO specification inside "Specification CPO AMPOM-SPEC/002 rev.4" dated 12 June 2015. CPO quality standard:</p> <ul style="list-style-type: none"> <li>- FFA &lt; 5,00%,</li> <li>- Moisture &lt; 0,18%,</li> <li>- Dirt &lt; 0,02%,</li> <li>- Peroxide value &lt; 5,00 m.e/kg.</li> <li>- DOBI value &gt;2,5</li> </ul> <p>PT. Agro Muko has established palm kernel quality standard as per "Specification CPO AMPOM-SPEC/003 rev.0" dated 1 January 2009:</p> <ul style="list-style-type: none"> <li>- FFA &lt; 1,00%,</li> <li>- Moisture &lt; 8,00%,</li> <li>- Dirt &lt; 8,00%,</li> <li>- Broken kernel &lt; 15,00%.</li> </ul> <p>Air Buluh Estate, Malin Deman Estate and <i>Kebun Masyarakat Desa/KMD</i>: The procedures documented in "Agricultural Manual Oil Palm" (October 2009 and revised 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 function. Such as:</p> <ol style="list-style-type: none"> <li>1. Biological aspects of Practical Importance No.01/SOP/Oil Palm/ESD – Karakteristik Vegetatif Tanaman Kelapa Sawit</li> <li>Pembibitan Kelapa Sawit: No.02/SOP/Oil Palm/ESD - nursery</li> <li>3. Land Clearing: No.03/SOP/Oil Palm/ESD rev.2</li> <li>4. Field Planting: No.04/SOP/Oil Palm/ESD rev.1</li> <li>5. Palm Supplying: No.05/SOP/Oil Palm/ESD</li> <li>6. Palm Thinning Out: No.06/SOP/Oil Palm/ESD</li> <li>7. Ablasi: No.07/SOP/Oil Palm/ESD - Ablation</li> <li>8. Frond Pruning: No.08/SOP/Oil Palm/ESD</li> <li>9. Kumbang E. Camerunensis: No.09/SOP/Oil Palm/ESD – <i>E. Camerunensis</i> beetle</li> <li>10. Sistem Pengelolaan Air: No.10/SOP/Oil Palm/ESD – water management</li> </ol> <p>---</p>	

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	<p>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 – road construction            15. Pemakaian, Penyimpanan Pemusnahan Kemasan Bekas Pesticida: No.15/SOP/Oil Palm/ESD – pesticide handling;</p> <p><i>Kebun Masyarakat Desa/KMD</i> was fully-managed by each estate under PT. Agro Muko or PT. Mukomuko Agro Sejahtera, therefore, using the same policy, manual, procedure and work instruction.</p>	
<p>4.1.2 Checking or monitoring of operations procedures is conducted at least once a year.  - Minor compliance -</p>	<p>PT. Agro Muko (AM) - Bunga Tanjung POM:            "Laporan Harian Digester/Screw Press" dated 2 December 2017: Digester No.2 start time 12.30; stop time 15.00 temperature 30<sup>0</sup> C. Screw Press No.1 start time 12.30; stop time 15.00; pressure 50 bar; ampere motor 30 A. Cake breaker conveyor No.1 start time 12.30; stop time 15.00. Threshing Machine No.2, start time 12.30; stop time 15.00. Fruit Elevator No.1 start time 12.30; stop time 15.00. Vibrating screen No.3, start time 12.30; stop time 15.00.            "Laporan Harian Sterilizer" dated 2 December 2017 (hourly basis): at 15.00 Inlet steam pressure 2.25; sterilizer No.1 start in 3.00; out 3.00; Total 24 lorries, in 3 sterilizing cycles.            Director of Engineering visited Bunga Tanjung POM on 13 April 2017. Based on the visit, some comments and findings were reported. The comment and finding was related to general condition and upkeep of the mill, mill's store/godown condition and upkeep, effluent ponds condition, mill worker's housing inspection, etc.            Bunga Tanjung POM has prepared action plan for some of the comments and findings, and further take action to rectify the condition; others remain under planning for implementation. Comments that has been followed up: effluent ponds has large amount of silt; action taken: effluent pond cleaning has been done on 12-19 April 2017, using third party contractor (Surat Perintah Kerja No.074/BT.POM-EDB/2017);            Some of FFB cages for sterilizer were seen to be in poor condition and should be removed for repair or write off; action taken: 5 unit cages have been disposed off as of 14 June 2017; The vibrating screen at the sludge tank is leaking onto the platform; Action taken: The leaking outlet pipe has replaced. Routine cleaning has been performed as of 15 June 2017.</p> <p>Air Buluh Estate:            Director Estate Department Visit Report dated 15 February 2017, comments made related to improving harvester productivity, increased paths, etc. Aim for overall labour ration of 6Ha/mandays. No data for reading/comparison of harvester productivity per person.            ---</p>	<p>Comply</p>

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		<p>Malin Deman Estate: Director Estate Department Visit report dated 20 February 2017, identifying outstanding action such as provision of harvesting beds. Harvesting interval, harvesting standard, to reduce to <i>restan</i> 20% or below.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> "Buku Visit KMD Mundam Marap" records comment received from QC Department, with regards to smallholder operation, upkeep, field condition, work progress, etc. On 28 October 2017, visit made by BJ Sihombing, Cipto W, Junaidi and Panitia KMD to plantation of KMD Mundam Marap. The comments made related to planing for access road, planning for land clearing.</p>																																													
4.1.3	<p>Records of monitoring and any follow-up actions shall be available.</p> <p>- Minor compliance -</p>	<p>PT. Agro Muko - Bunga Tanjung POM: Mill throughput 2017</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB processed (tons)</th> <th>Actual run hours</th> <th>Throughput (ton FFB/hour)</th> </tr> </thead> <tbody> <tr> <td>Jan 2017</td> <td>10,932.68</td> <td>355.72</td> <td>30.79</td> </tr> <tr> <td>Feb 2017</td> <td>9,858.12</td> <td>323.50</td> <td>30.52</td> </tr> <tr> <td>Mar 2017</td> <td>10,886.03</td> <td>352.84</td> <td>30.92</td> </tr> <tr> <td>Apr 2017</td> <td>9,535.04</td> <td>296.76</td> <td>32.21</td> </tr> <tr> <td>May 2017</td> <td>11,475.52</td> <td>390.94</td> <td>29.42</td> </tr> <tr> <td>Jun 2017</td> <td>7,888.84</td> <td>238.99</td> <td>33,14</td> </tr> <tr> <td>Jul 2017</td> <td>11,582.53</td> <td>376.59</td> <td>30.80</td> </tr> <tr> <td>Aug 2017</td> <td>11,645.55</td> <td>381.58</td> <td>30.56</td> </tr> <tr> <td>Sep 2017</td> <td>11,359.50</td> <td>347.60</td> <td>32.73</td> </tr> <tr> <td>Oct 2017</td> <td>13,013.14</td> <td>409.52</td> <td>31.81</td> </tr> </tbody> </table> <p>Air Buluh Estate: Director Estate Department Visit Report dated 15 February 2017, comments made related to improving harvester productivity, increased paths, etc. Action plan: Upkeep cross path, harvesting path, harvesting bed, etc. Aim for overall labour ration of 6Ha/mandays. Action plan: to date April 2017 5.7 Ha/mandays. No data for reading/comparison of harvester productivity per person. Action plan: monitoring of harvester productivity has been carried out since March 2017. FA Quality Control in Air Buluh Estate, dated 13-14 September 2017: FFB quality block 99A01A, 173 bunches, normal: 149 bunches (86%); underripe 13 bunches (7%); unripe 7 bunches (4%); overripe 4 bunches (2%); long stalk 1 bunches (1%).</p> <p>Malin Deman Estate: Director Estate Department Visit report dated 20 February 2017, identifying outstanding action such as provision of harvesting beds. Harvesting interval, harvesting standard, to reduce to <i>restan</i> 20% or below.</p> <p>---</p>	Month	FFB processed (tons)	Actual run hours	Throughput (ton FFB/hour)	Jan 2017	10,932.68	355.72	30.79	Feb 2017	9,858.12	323.50	30.52	Mar 2017	10,886.03	352.84	30.92	Apr 2017	9,535.04	296.76	32.21	May 2017	11,475.52	390.94	29.42	Jun 2017	7,888.84	238.99	33,14	Jul 2017	11,582.53	376.59	30.80	Aug 2017	11,645.55	381.58	30.56	Sep 2017	11,359.50	347.60	32.73	Oct 2017	13,013.14	409.52	31.81	Comply
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		<p>Action plan:            Harvesting interval – ablation has been ceased. Loose fruit collection from free labour, starting in May 2017; Harvesting standard – ongoing effort to improve ripeness 71-75%, loose fruit separation from FFB, undripe &lt;2% in June 2017.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>            “Buku Visit KMD Mundam Marap” records comment received from QC Department, with regards to smallholder operation, upkeep, field condition, work progress, etc. On 28 October 2017, visit made by BJ Sihombing, Cipto W, Junaidi and Panitia KMD to plantation of KMD Mundam Marap. The comments made related to planing for access road, planning for land clearing.            “Management Improvement/Tindakan Perbaikan Plasma Air Buluh”, visit on 11 July 2017, Estate manager visited and made comment such as community’s cattle entering the plantation, main road maintenance was lacking, to reduce harvesting round/rotation into &lt;10 days. Action plan: community’s cattle entering the plantation – communicate directly to cattle owners and cooperative committee to prohibit cattle entering plantation; main road maintenance was lacking: Requesting heavy machinery for road maintenance to Air Buluh Estate; to reduce harvesting round/rotation into &lt; 10 days: Through add hectarage base and conduct recovery harvest (on Sunday) – dated 13 July 2017.</p>	
4.1.4	<p>Records of the origins of all third-party FFB sourced (collector, deliver, Cooperative, Farmers Association and outgrower) shall be available.</p> <p>- Minor compliance -</p>	<p>Bunga Tanjung POM:            There is no supply from non-certified FFB. During this visit, Bunga Tanjung POM planned to have additional supply base from <i>Kebun Masyarakat Desa/KMD</i>. Information related to location, plantation coordinates, hectarage, potential crop, productivity, production – from all <i>Kebun Masyarakat Desa/KMD</i> has been identified.</p>	Comply
<p><b>Criterion 4.2</b>            Practices maintain soil fertility at, or where possible improve soil fertility to a level that ensures optimal and sustained yield.</p>			
4.2.1	<p>A record of SOP implementation to maintain soil fertility that ensures optimal and sustained yield, shall be available.</p> <p>- Major compliance -</p>	<p>Company has a procedure for good agriculture practices to maintain soil fertility, as available under “Pemupukan No.11/SOP/Oil Palm/ESD” – fertilizer placement. Fertilizer is applied to maintain and increase soil fertility, fertilizer applied following the fertilizer recommendation which created based on soil and leaf analysis. Fertilizer application record in “Monthly Manuring Program Sheet”.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>  <i>Kebun Masyarakat Desa/KMD</i> follows the fertilizer regime, as planned and regulated by PT. Agro Muko and PT. Mukomuko Agro Sejahtera.</p>	Comply

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4.2.2	Records of fertilizer inputs shall be available. - Minor compliance -	<p>PT. Agro Muko - Air Buluh Estate:            Block 05Y04A – Division I, planting year 2005, 35.21 Ha, recommended to apply NPK with dosage 2 kg/palm – total 7,740 kg, equal to 155 bags on October 2017. Actual fertilizer implementation 120 bags on 13 October 2017, continued on 17 October 2017 for 35 bags. Store requisition dated 13 October 2017 6,000 kg NPK for block 05Y04A; and Store requisition dated 17 October 2017 for 1,750 kg NPK for block 05Y04A.</p> <p>Block 99M02A – Division I, planting year 1999, 22.23 Ha, recommended to apply NPK with dosage 1.5 kg/palm – total 2,904 kg, equal to 58 bags on October 2017. Actual fertilizer implementation 58 bags on 26 October 2017.</p> <p>PT. Mukomuko Agro Sejahtera - Malin Deman Estate:            Block 12G03, planting year 2012, 18.61 Ha, recommended to apply Urea 2 kg/palm, total 4.59 tons/92 bags in Semester I, 2017; and to apply 1.5 kg Rock Phosphate, total 3.443 tons/69 bags in June 2017. Actual application Urea 38 bags in 24 January 2017 and 26 bags in 25 January 2017; Rock Phosphate applied 69 bags dated 12 June 2017.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>            KMD Bukit Harapan, 10 Ha, recommendation to have 2.5 kg NPK 16.10.19/palm – total 3,253 kg. Actual implementation on 21 bags on 25 April 2017.            KMD Talang Baru, 15 Ha, recommendation to have 2.5 kg NPK 16.10.19/palm – total 4,425 kg. Actual implementation 44 bags on 22 April 2017 and 44 bags on 26 April 2017.</p>	Comply
4.2.3	Records of periodical leaf, soil and visual analysis shall be available. - Minor compliance -	<p>PT. Agro Muko - Air Buluh Estate:            Record of periodic leaf sampling was reported under "Oil Palm Fertilizer Recommendations for PT. Agromuko – Air Buluh Estate (2<sup>nd</sup> Semester 2017, 1<sup>st</sup> and 2<sup>nd</sup> Semester 2018) from Verdant Bioscience.</p> <p>PT. Mukomuko Agro Sejahtera - Malin Deman Estate:            Record of periodic leaf sampling was reported under "Oil Palm Fertilizer Recommendations for PT. Mukomuko Agro Sejahtera – Malin Deman Estate (2<sup>nd</sup> Semester 2017, 1<sup>st</sup> and 2<sup>nd</sup> Semester 2018) from Verdant Bioscience. Leaf and rachis sampling carried out in August 2016.            Soil analysis carried out on 11 April 2017. The soil analysis result in Malin Deman Estate, indicating steep slope is the major constraint to maximizing high FFB yield.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>            Record of periodic leaf sampling was reported under "Oil Palm Fertilizer Recommendations for PT. Agromuko – Air Buluh Estate (2<sup>nd</sup> Semester 2017, 1<sup>st</sup> and 2<sup>nd</sup> Semester 2018) from Verdant Bioscience. This analysis also includes 12 KMD, including KMD Serami Baru.</p>	Comply

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 -	PT. Agro Muko – Air Buluh Estate: Application of empty fruit bunches applicable in estate, “Program Aplikasi Janjang Kosong 2017”, in block 89A03a, of 15 ha, with rate 35 tons/Ha - totals 529.5 tons. Application up to March 2017 is 3.25 Ha totalling 113.78 tons.  PT. Mukomuko Agro Sejahtera - Malin Deman Estate and <i>Kebun Masyarakat Desa/KMD</i> : No application of empty fruit bunches, main source of nutrient recycling strategy from palm fronds.	Comply
<b>Criterion 4.3</b>			
Practices minimise and control erosion and degradation of soils.			
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	PT. Agro Muko has a semi detail soil map with scale 1:60,000. The map consists of different information such as soil type, soil texture identification, elevation and slope percentage; for each estate. The soil map indicates areas with steep slope and peat soil.  Air Buluh Estate: Air Buluh Estate has a semi detail map with scale 1:30,000 as in soil survey reportt under “Semi detail soil survey report PT. Agro Muko” dated back March and June 2010. The map consists of different information such as soil type, soil texture identification, elevation and slope percentage; for each estate. The soil map indicates areas with steep slope and peat soil From the soil analysis, it is estimated 2,120 Ha of the surveyed area are hilly to steep slope between 12 to 25 <sup>0</sup> and 1,114 Ha are steep to very steep, with slope more than 20 <sup>0</sup> – are considered major limitation to oil palm performance. Soil map of Air Buluh Estate is available with scale 1:30,000, indicating the dominant soil type is <i>Berlian Jaya/Muko muko</i> (1,503 Ha), <i>Berlian Jaya</i> (474 Ha) and <i>Berlian Jaya/Jaro/Paser</i> (557 Ha). There is also topographic map for Air Buluh Estate with scale 1:30,000. The map indicates the area with slope 0-2 <sup>0</sup> is 20 Ha, 2-12 <sup>0</sup> is 230 Ha, 6-20 <sup>0</sup> is 1,742 Ha, 12-25 <sup>0</sup> is 343 Ha and 20 <sup>0</sup> up to more than 25 <sup>0</sup> is 219 Ha.  Malin Deman Estate: PT. Mukomuko Agro Sejahtera – Malin Deman Estate is able to presented map, consist of information related to soil type and topographic condition of Malin Deman Estate. Based on identified soil type, the plantation located on mineral soil – limiting factor identified was steep slope.  <i>Kebun Masyarakat Desa/KMD</i> : The soil type map, topographic map is available for <i>Kebun Masyarakat Desa/KMD</i> inside planting plan. KMD Bukit Harapan: Land location map (9.81 Ha); from Soil map noted consist of Haplohumults and Dystrudepts (relatively stabil and less erosion prone), no peat; from Topographic map: elevation 95-125 m asl; no steep area (>25 <sup>0</sup> ). ---	Comply

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	<p>KMD Mundam Marap: consist of Inceptisols – Endoaquepts and Inceptisols – Dystrudepts; not prone to erosion, no peat soil; Topographic map: elevation 20-30 meters asl; slope 0° – 6° and 20° – 25°; no steep area (&gt;25°).            Generally located on mineral soil, planted with oil palm but limited fertility – the other limiting factor identified was slope.</p>	
<p>4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific).            - Minor compliance -</p>	<p>Air Buluh Estate:            Based the soil analysis, it is estimated 2,120 Ha of the surveyed area are hilly to steep slope between 12 to 25° and 1,114 Ha are steep to very steep, with slope more than 20° – are considered major limitation to oil palm performance. The solution offered is establishment of vigorous legume ground cover such as <i>Mucuna bracteata</i> is effective in the conservation of top soil, improve organic matters and reduce surface run off of applied fertilizer. To overcome the limitation, construct soil and water conservation terrace or planting terrace to control soil erosion.            It is a company policy to stop land clearing for area with slope more than 25°. Based on field visit and document review, the current management for area with slope up to 25° is to apply terrace contour and/or platform.            Management strategy for replanting plan is to take into consideration the current planting map, soil type map, topographic map, HCV map, rainfall data and activity schedule. There was topographic map for Air Buluh Estate with scale 1:30,000. The map indicates the area with slope 0-2° is 20 Ha, 2-12° is 230 Ha, 6-20° is 1,742 Ha, 12-25° is 343 Ha and 20° up to more than 250 is 219 Ha.</p> <p>Malin Deman Estate            PT. Mukomuko Agro Sejahtera – Malin Deman Estate is not opening up area with slope more than 25°.            - Topography of the area ranges from low lying flat to very steep hill.            - It is estimated about 4,268 Ha (53%) of the area are undulating to hill and 1,372 Ha (17%) are steep to very steep.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>            The soil type map, topographic map is available for <i>Kebun Masyarakat Desa/KMD</i> inside planting plan. KMD Bukit Harapan: from soil map noted consist of <i>Haplohumults</i> and <i>Dystrudepts</i> (relatively stabil and less erosion prone), no peat; from Topographic map: no steep area (&gt;25°). Contour, road and drainage planning: 1,000 m contour/Ha – total 9,810 meters; road 1,100 meters; drain 363 meters.            KMD Mundam Marap: consist of <i>Inceptisols – Endoaquepts</i> and <i>Inceptisols – Dystrudepts</i>; not prone to erosion, no peat soil; Topographic map: slope 0° – 6° and 20° – 25°; no steep area (&gt;25°). Contour, road and drainage planning: new road 1,974 meters; main drain 375 meters; collection drain 317.75 meters, field drain 904 meters; boundary drains 1,740 meters; terrace contour construction 9,830 meters.</p>	<p>Comply</p>

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4.3.3	<p>A road maintenance program shall be in place.</p> <p>- Minor compliance –</p>	<p>PT. Agro Muko able to demonstrate a road maintenance programme – along with the progress.</p> <p>Air Buluh Estate:            In Air Buluh Estate, Road Maintenance Program in 2017, such as:</p> <ul style="list-style-type: none"> <li>- In Division IV: June (3,600 meters), July (4,450 meters), August (3,250 meters), September (3,050 meters), October (7,325 meters)</li> <li>- In Division III: June (1,000 meters), July (800 meters), August (700 meters), September (700 meters), October (1,000 meters), November (900 meter), December (800 meters)</li> </ul> <p>Implemented road maintenance in 2017:</p> <ul style="list-style-type: none"> <li>- In Division IV: In June 2017 total realization 2,500 meters in block O06, block O09, block O11, block O12, block O19, block P01, etc.</li> <li>- In Division III: In September total realization 650 meters.</li> </ul> <p>Malin Deman Estate:            Program dan Realisasi Perawatan Jalan tahun 2017:</p> <ul style="list-style-type: none"> <li>- Up keep main road: in January plan 3,000 meter - realization 2,800 meters, in September plan 4,000 meters – realization 1,000 meters.</li> <li>- Up keep collection road: In June plan 3,000 meters – realization 5,000 meters, in August plan 4,000 meters – realization 1,000 meters.</li> <li>- Road stoning: in February realization 15,000 meters, in August realization 1,000 meters.</li> <li>- Concrete road: realization in January 12 meters.</li> </ul> <p><i>Kebun Masyarakat Desa/KMD:</i>            “Program Perawatan Jalan KMD 2017” for KMD realization on road maintenance in June 2017: 2.3 Km.            KMD:            Program &amp; Realization Perawatan Jalan Tahun 2017:</p> <ul style="list-style-type: none"> <li>- Upkeep main road: in April plan 300 meters – realization 800 meters, in May plan 250 meters – realization 800 meters, in June – realization 730 meters</li> <li>- Upkeep collection road: in April plan 100 meters – realization 200 meters</li> <li>- Road stoning: in July – realization 300 meters.</li> </ul>	Comply
4.3.4	<p>Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.</p> <p>- Major compliance –</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera has a set of procedure for water management (for peat soil), in line with Indonesia’s guideline for peat management.</p> <p>In Air Buluh Estate and Malin Deman Estate there is no peat soil identified.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>            KMD Bukit Harapan: from soil map noted consist of <i>Haplohumults</i> and <i>Dystrudepts</i> (relatively stabil and less erosion prone), no peat.            KMD Mundam Marap: consist of <i>Inceptisols – Endoaquepts</i> and <i>Inceptisols – Dystrudepts</i>; not prone to erosion, no peat soil.</p>	Comply

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<p>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.</p> <p>- Minor compliance –</p>	<p>A replanting review is carried out prior to replanting, taking into consideration the FFB production trends, soil suitability, HCV assessment, etc. The soil suitability (for area with peat soil) does cover peat soil best practices, in line with company procedures.</p> <p>The area of Air Buluh Estate of PT. Agro Muko; and Malin Deman Estate of PT. Mukomuko Agro Sejahtera is located on mineral soil. In Air Buluh Estate and Malin Deman Estate there is no peat soil identified.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> KMD Bukit Harapan: from soil map noted consist of <i>Haplohumults</i> and <i>Dystrudepts</i> (relatively stabil and less erosion prone), no peat. KMD Mundam Marap: consist of <i>Inceptisols – Endoaquepts</i> and <i>Inceptisols – Dystrudepts</i>; not prone to erosion, no peat soil.</p>	<p>Comply</p>
<p>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).</p> <p>- Minor compliance –</p>	<p>PT. Agro Muko has prepares all necessary procedures to maintain area with fragile soil. These procedures and guidelines then implemented on the field. Air Buluh Estate implementing terrace contour, planting <i>Mucuna bracteata</i> and maintains the conservation forest for area with steep slope. Additionally, Air Buluh Estate plant <i>Vertiver</i> grass on location with water crossing and river buffer zone – to minimize erosion.</p> <p>In order to protect the drainage ditch, PT. Mukomuko Agro Sejahtera – Malin Deman Estate plant 978 <i>vertiver</i> grass at water crossing, nursery and pre-nursery.</p> <p>Record seen:</p> <ul style="list-style-type: none"> <li>- <i>Daftar Tanaman Restorasi ABE/MDE</i> with date of planting restoration plant 8 June 2017 i.e: <i>Gaharu</i>-sandalwood (11), <i>mahoni</i>-mahogany (9), <i>bawang</i> (11),</li> <li>- Monitoring of restoration planting “Form Pemantauan Tanaman Restorasi” for July 2017, block F02 in Malin Deman Estate;</li> <li>- Location map of restoration area “Peta lokasi restorasi”, scale 1:4,000</li> </ul> <p><i>Kebun Masyarakat Desa/KMD:</i> <i>Kebun Masyarakat Desa/KMD</i> suggested to develop infrastructure to minimize soil erosion.</p> <p>KMD Bukit Harapan: from soil map noted consist of <i>Haplohumults</i> and <i>Dystrudepts</i> (relatively stabil and less erosion prone), no peat; from Topographic map: no steep area (&gt;25°). Contour, road and drainage construction: 1,000 m contour/Ha – total 9,810 meters; road 1,100 meters; drain 363 meters to further minimize erosion.</p> <p>KMD Mundam Marap: soil type consist of <i>Inceptisols – Endoaquepts</i> and <i>Inceptisols – Dystrudepts</i>; not prone to erosion, no peat soil; Topographic map: slope 0° – 6° and 20° – 25°; no steep area (&gt;25°). Contour, road and drainage construction: main drain 375 meters; collection drain 317.75 meters, field drain 904 meters; boundary drains 1,740 meters; terrace contour construction 9,830 meters.</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>Criterion 4.4</p> <p><b>Practices maintain the quality and availability of surface and groundwater</b></p>		
<p>4.4.1</p> <p>An implemented water management plan shall be in place.</p> <p>- Minor compliance -</p>	<p>The company has prepared the document of Water Management Plan, revision 02, effective date on 4 July 2017. Water management plan includes use of water for mill processing and biogas plant; and domestic use. Water source coming from Betung river and ground water located near Bunga Tanjung POM.</p> <p>Evidences seen:</p> <ul style="list-style-type: none"> <li>- Permit to use water: "Izin Penggunaan Air – Keputusan Menteri Pekerjaan Umum nomor 407/KPTS/M/2013 tentang Pemberian Izin Sumber Daya Air dari Sungai Bantal kepada PT. Agromuko". As written in the permit, average max. debit (Q) sets at 25 liters/second, dated 8 October 2013, valid until 5 years.</li> <li>- Water Management Plan – revision 2, dated 4 July 2017. Step for filtered water such as:               <ul style="list-style-type: none"> <li>• Water Intake: coagulation, flocculant, and sedimentation;</li> <li>• Water need to mill processing and domestic consumption;</li> <li>• Water saving;</li> <li>• Maintain water quality by filtration on water treatment plant;</li> <li>• Water quality analysis;</li> <li>• Monitoring water pump running time;</li> </ul> </li> <li>- Water quality testing "Hasil Pemeriksaan Air Bersih" (annualy), last testing was conducted on 5 January 2017, certificate number 443.5/30/Labkes.III by "Laboratorium Kesehatan Daerah Propinsi Bengkulu".</li> </ul> <p><i>Kebun Masyarakat Desa/KMD:</i> There was no water source identified in the KMD Bukit Harapan nor KMD Mundam Marap. Water management plan for <i>Kebun Masyarakat Desa/KMD</i> in form of agrochemical regime and maintain erosion, to minimize surface runoff – that may affect surface water quality.</p>	<p>Comply</p>
<p>4.4.2</p> <p>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.</p> <p>- Major compliance -</p>	<p>The company has "Pengelolaan Sempadan Sungai, Danau dan Waduk Doc.No.16 SOP/Oil Palm/ESD rev.0, adted 1<sup>st</sup> October 2009 for riparian zone management</p> <p>The company is maintaining and protecting the water courses. Management has sets aside the area for river buffer zone, in line with requirement written in ANDAL and government regulation. This is implemented on the field; management does not apply agrochemical for palm located near river/water course, management also planted <i>Mucuna bracteata</i> and <i>Vertiver</i> grass to minimize surface run-off.</p> <p>Air Buluh Estate: Restoration of riparian zone with planted Mahogany, e.g. 356 trees along the river Air Buluh and Massad.</p> <p>---</p>	<p>Comply</p>

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	<p>Malin Deman Estate: Monitoring of water courses is conducted monthly to ensure that no any activities along the riparian zone, e.g. the last report 20 November 2017 conducted by Ranger.</p> <p>Record seen:</p> <ul style="list-style-type: none"> <li>- "Daftar Tanaman Restorasi Air Buluh Estate/Malin Deman Estate date of planting 8 June 2017 i.e: <i>Gaharu</i>/sandalwood (11), <i>Mahoni</i>/mahogany (9), <i>Bawang</i> (11) trees;</li> <li>- "Form Pemantauan Tanaman Restorasi bulan Juli 2017", block F02 in Malin Deman Estate;</li> <li>- "Peta lokasi restorasi" restoration map, scale 1:4,000;</li> </ul> <p><i>Kebun Masyarakat Desa</i>/KMD: There was no water source identified in the KMD Bukit Harapan nor KMD Mundam Marap. Water management plan for <i>Kebun Masyarakat Desa</i>/KMD in form of agrochemical regime and maintain erosion, to minimize surface runoff – that may affect surface water quality.</p>																																																																																																															
<p>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).</p> <p>- Minor compliance –</p>	<p>PT. Agro Muko - Bunga Tanjung POM has monitored the palm oil mill effluent quality, to ensure minimum impact to the environment. On regular base, Bunga Tanjung POM sent the palm oil mill effluent for laboratory analysis. The analysis report analysis recorded and evaluated:</p> <table border="1" data-bbox="632 1151 1273 1525"> <thead> <tr> <th>Parameter</th> <th>Jan 2017</th> <th>Feb 2017</th> <th>Mar 2017</th> <th>Apr 2017</th> <th>May 2017</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>57.41</td> <td>91.60</td> <td>26.04</td> <td>26.92</td> <td>44.4</td> </tr> <tr> <td>COD</td> <td>145.52</td> <td>183.46</td> <td>68.70</td> <td>68.55</td> <td>135.29</td> </tr> <tr> <td>TSS</td> <td>42.33</td> <td>24.00</td> <td>41.63</td> <td>35.27</td> <td>51.17</td> </tr> <tr> <td>Oil and Grease</td> <td>1.75</td> <td>5.74</td> <td>4.40</td> <td>4.48</td> <td>3.20</td> </tr> <tr> <td>NH<sub>3</sub></td> <td>22.23</td> <td>12.48</td> <td>30.75</td> <td>28.16</td> <td>11.70</td> </tr> <tr> <td>pH</td> <td>8.20</td> <td>8.00</td> <td>7.8</td> <td>7.8</td> <td>7.7</td> </tr> <tr> <td>Nitrogen Total (as N)</td> <td>33.72</td> <td>14.13</td> <td>41.63</td> <td>41.7</td> <td>38.41</td> </tr> <tr> <td>CPO production, month</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>POME Flowrate/month</td> <td>2,690.3</td> <td>2,796.6</td> <td>3,213.0</td> <td>2,504.2</td> <td>3,159.0</td> </tr> </tbody> </table> <table border="1" data-bbox="632 1563 1177 1937"> <thead> <tr> <th>Parameter</th> <th>Jul 2017</th> <th>Aug 2017</th> <th>Sep 2017</th> <th>Oct 2017</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>23.45</td> <td>8.86</td> <td>85.00</td> <td>41.10</td> </tr> <tr> <td>COD</td> <td>71.43</td> <td>73.45</td> <td>195.00</td> <td>82.00</td> </tr> <tr> <td>TSS</td> <td>2.00</td> <td>3.75</td> <td>42.80</td> <td>14.00</td> </tr> <tr> <td>Oil and Grease</td> <td>4.00</td> <td>5.60</td> <td>0.50</td> <td>1.30</td> </tr> <tr> <td>NH<sub>3</sub></td> <td>20.75</td> <td>17.02</td> <td>3.91</td> <td>11.10</td> </tr> <tr> <td>pH</td> <td>8.4</td> <td>7.1</td> <td>7.79</td> <td>7.83</td> </tr> <tr> <td>Nitrogen Total (as N)</td> <td>31.63</td> <td>35.77</td> <td>6.06</td> <td>3.75</td> </tr> <tr> <td>CPO production, month</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>POME Flowrate/month</td> <td>3,571.4</td> <td>3,648.2</td> <td>3,685.5</td> <td>3,668.3</td> </tr> </tbody> </table> <p>From the analysis report and evaluation, the BOD and other parameter comply with legal requirement.</p>	Parameter	Jan 2017	Feb 2017	Mar 2017	Apr 2017	May 2017	BOD	57.41	91.60	26.04	26.92	44.4	COD	145.52	183.46	68.70	68.55	135.29	TSS	42.33	24.00	41.63	35.27	51.17	Oil and Grease	1.75	5.74	4.40	4.48	3.20	NH <sub>3</sub>	22.23	12.48	30.75	28.16	11.70	pH	8.20	8.00	7.8	7.8	7.7	Nitrogen Total (as N)	33.72	14.13	41.63	41.7	38.41	CPO production, month						POME Flowrate/month	2,690.3	2,796.6	3,213.0	2,504.2	3,159.0	Parameter	Jul 2017	Aug 2017	Sep 2017	Oct 2017	BOD	23.45	8.86	85.00	41.10	COD	71.43	73.45	195.00	82.00	TSS	2.00	3.75	42.80	14.00	Oil and Grease	4.00	5.60	0.50	1.30	NH <sub>3</sub>	20.75	17.02	3.91	11.10	pH	8.4	7.1	7.79	7.83	Nitrogen Total (as N)	31.63	35.77	6.06	3.75	CPO production, month					POME Flowrate/month	3,571.4	3,648.2	3,685.5	3,668.3	<p>Comply</p>
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4.4.4	Monitoring of mill water use per ton of FFB shall be recorded.  - Minor compliance –	<p>PT. Agro Muko - Bunga Tanjung POM has monitored the use of water per tonne FFB processed. The monitoring report as shown below indicating the performance was maintained – to budget: 1 m<sup>3</sup> water for 1 MT FFB processed.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB Processed (MT)</th> <th>Water usage (m<sup>3</sup>)</th> <th>Water to FFB</th> </tr> </thead> <tbody> <tr><td>Dec 2016</td><td>13,147</td><td>11,179</td><td>0.85</td></tr> <tr><td>Jan 2017</td><td>10,702</td><td>9,660</td><td>0.90</td></tr> <tr><td>Feb 2017</td><td>9,942</td><td>8,413</td><td>0.85</td></tr> <tr><td>Mar 2017</td><td>10,832</td><td>8,799</td><td>0.81</td></tr> <tr><td>Apr 2017</td><td>9,422</td><td>8,035</td><td>0.85</td></tr> <tr><td>May 2017</td><td>11,563</td><td>10,472</td><td>0.91</td></tr> <tr><td>Jun 2017</td><td>7,885</td><td>6,952</td><td>0.88</td></tr> <tr><td>Jul 2017</td><td>11,624</td><td>9,988</td><td>0.86</td></tr> <tr><td>Aug 2017</td><td>11,699</td><td>9,645</td><td>0.82</td></tr> <tr><td>Sept 2017</td><td>11,026</td><td>9,275</td><td>0.84</td></tr> <tr><td>Oct 2017</td><td>13,330</td><td>10,523</td><td>0.79</td></tr> </tbody> </table>	Month	FFB Processed (MT)	Water usage (m <sup>3</sup> )	Water to FFB	Dec 2016	13,147	11,179	0.85	Jan 2017	10,702	9,660	0.90	Feb 2017	9,942	8,413	0.85	Mar 2017	10,832	8,799	0.81	Apr 2017	9,422	8,035	0.85	May 2017	11,563	10,472	0.91	Jun 2017	7,885	6,952	0.88	Jul 2017	11,624	9,988	0.86	Aug 2017	11,699	9,645	0.82	Sept 2017	11,026	9,275	0.84	Oct 2017	13,330	10,523	0.79	Comply
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<p><b>Criterion 4.5</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate integrated Pest Management (IPM) techniques.</p>																																																			
4.5.1	Monitoring of Integrated Pest Management (IPM) plan implementation shall be available.  - Major compliance -	<p>PT. Agro Muko - Air Buluh Estate: "Program Pengendalian Hama Terpadu Tahun 2017", consist of: Monitoring of barn owl box, on monthly basis; construction of barn owl box; identification of beneficial weeds grow in estate area; ganoderma census; planting <i>Turnera</i>, <i>Antigonon</i> and <i>Cassia tora</i> 5,000 trees; Identification of natural predator and leaf eating pest on monthly basis. Implementation: <i>Turnera</i> planting 2017 for Division I: 200 trees in block 99M03A, 18 July 2017, 350 trees in block 07X05A dated 18 October 2017, 200 trees on block 04Y01A; 250 trees on block 05Y02A, planting 200 trees on block 99N01A, 500 trees of <i>Turnera</i> in block 99E02A dated 3 May 2017. Barn owl boxes monitoring on 14 July 2017 for 1 barn owl box in 99M03A; 6 barn owl boxes in block 99D02A, 99G02, 99H02A, 99G02A; 6 barn owl boxes in block 98O01A, 00R01A, 09T01A, 00S02A, 00Q01A, 98P02A.</p> <p>PT. Mukomuko Agro Sejahtera - Malin Deman Estate: "Program Pengendalian Hama Terpadu Tahun 2017", consist of: Identification of beneficial weeds grow in estate area; pest and disease census, Upkeep <i>Turnera</i>, <i>Antigonon</i> and <i>Cassia tora</i>. Census form period January – November 2017 for leaf eating pest – no heavy infestation; rat attack census – no heavy rat attack; termite attack census – no heavy infestation; boar attack identification – no heavy attack.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Ganoderma census, rat attack census, termite attack census, boar attack, leaf eating caterpillar for KKMD Bukit Harapan and KMD Mundam Marap – carried out on November 2017. The census result shows no pest attack. Rat census result shows no rat infestation.</p>	Comply																																																

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4.5.2	<p>Training records of Integrated Pest Management (IPM) shall be available.</p> <p>- Minor compliance –</p>	<p>PT. Agro Muko (AM) - Air Buluh Estate: Training on integrated pest management provided for 5 field assistants, 1 documentation clerk, 4 spraying team mandores, 4 fertilizer application mandores; dated 12 October 2017. Estate has provided training for integrated pest management, dated 9 November 2017 for 5 spraying team: Mr. Ab***G****, Mr. E**, Mr. M****, Mr. I*** related to introduction of beneficial weeds – and guidance on not to eradicate the beneficial weeds. The training includes assistant, mandores and spraying team which assigned for <i>Kebun Masyarakat Desa/KMD</i>.</p> <p>PT. Mukomuko Agro Sejahtera (MMAS) - Malin Deman Estate: Training on integrated pest management, "Training PHT" dated 11 July 2017, attended by spraying mandores, field assistant. Training module verified, the content related to integrated pest management aspect-impact: identification and status of pest, study the component and factors in ecosystem, determining economical threshold, developing pest monitoring system, developing pest control strategy, developing organization for effective integrated pest management system, etc.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Assistant and mandores which assigned for <i>Kebun Masyarakat Desa/KMD</i> has received training on integrated pest management dated 12 October 2017. Training for spraying team in <i>Kebun Masyarakat Desa/KMD</i> dated 9 November 2017 for 5 spraying team: Mr. Ab***G****, Mr. E**, Mr. M****, Mr. I*** related to introduction of beneficial weeds – and guidance on not to eradicate the beneficial weeds..</p>	Comply
<p><b>Criterion 4.6</b> Pesticides are used in ways that do not endanger health or the environment.</p>			
4.6.1	<p>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.</p> <p>- Major compliance -</p>	<p>Air Buluh Estate and Malin Deman Estate and <i>Kebun Masyarakat Desa/KMD</i>: The use of pesticide is under strict requirement, only in the case of pest attack surpassed above 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.</p> <p>Visit to chemical store and record review shows company chemical product for specific target species (weed).</p>	Comply

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<p>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 available.</p> <p>- Major compliance -</p>	<p>Air Buluh 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.</p> <table border="1" data-bbox="632 573 1310 916"> <thead> <tr> <th>Description</th> <th>Usage up to October 2017)</th> <th>Active ingredients per Ha (gram/Ha)</th> </tr> </thead> <tbody> <tr> <td>INTEAM 150 SL (Amonium Glufosinat)</td> <td>410 Liters</td> <td>0.03</td> </tr> <tr> <td>SMART 486 SL (Glifosat)</td> <td>2,760 liters</td> <td>0.62</td> </tr> <tr> <td>METSULINDO 20 WP (Metil Metsulfuron)</td> <td>73,500 gram</td> <td>0.68</td> </tr> <tr> <td>BASTA 150 SL @20 Ltr</td> <td>260 liters</td> <td>0.02</td> </tr> <tr> <td>GARLON/Kenlon (Triklpir)</td> <td>132 liters</td> <td>0.03</td> </tr> <tr> <td>AGRISTICK @5 LTR (Alkaril Poliglikol Eter)</td> <td>20 liters</td> <td>0.0000</td> </tr> <tr> <td>VULGAR 865 AS @400 ML (dimetil amina)</td> <td>2 liters</td> <td>0.001</td> </tr> </tbody> </table> <p>Note that the record has includes data for <i>Kebun Masyarakat Desa/KMD</i>.</p> <p>Malin Deman 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.</p> <table border="1" data-bbox="632 1149 1310 1413"> <thead> <tr> <th>Description</th> <th>2017 (up to October 2017)</th> <th>Active ingredients per Ha (gram/Ha)</th> </tr> </thead> <tbody> <tr> <td>INTEAM 150 SL (Amonium Glufosinat)</td> <td>289.99 liters</td> <td>0.03</td> </tr> <tr> <td>SMART 486 SL (Glifosat)</td> <td>2,211.73 liters</td> <td>0.003</td> </tr> <tr> <td>METSULINDO 20 WP (Metil Metsulfuron)</td> <td>49,372.11 gram</td> <td>12</td> </tr> <tr> <td>GARLON/Kenlon (Triklpir)</td> <td>24 liters</td> <td>0.0004</td> </tr> <tr> <td>VULGAR 865 AS @400 ML (dimetil amina)</td> <td>16 liters</td> <td>0.001</td> </tr> </tbody> </table> <p>Note that the record has includes amount used in <i>Kebun Masyarakat Desa/KMD</i>.</p>	Description	Usage up to October 2017)	Active ingredients per Ha (gram/Ha)	INTEAM 150 SL (Amonium Glufosinat)	410 Liters	0.03	SMART 486 SL (Glifosat)	2,760 liters	0.62	METSULINDO 20 WP (Metil Metsulfuron)	73,500 gram	0.68	BASTA 150 SL @20 Ltr	260 liters	0.02	GARLON/Kenlon (Triklpir)	132 liters	0.03	AGRISTICK @5 LTR (Alkaril Poliglikol Eter)	20 liters	0.0000	VULGAR 865 AS @400 ML (dimetil amina)	2 liters	0.001	Description	2017 (up to October 2017)	Active ingredients per Ha (gram/Ha)	INTEAM 150 SL (Amonium Glufosinat)	289.99 liters	0.03	SMART 486 SL (Glifosat)	2,211.73 liters	0.003	METSULINDO 20 WP (Metil Metsulfuron)	49,372.11 gram	12	GARLON/Kenlon (Triklpir)	24 liters	0.0004	VULGAR 865 AS @400 ML (dimetil amina)	16 liters	0.001	<p>Comply</p>
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<p>4.6.3 Any use of pesticides shall be minimized 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 Indonesia Best Practice guidelines.</p> <p>- Major compliance -</p>	<p>There is no used of prophylactic use of pesticides throughout PT. Agro Muko, PT. Mukomuko Agro Sejahtera and in <i>Kebun Masyarakat Desa/KMD</i>. In general there is no use of pesticide to control pest in PT. Agro Muko and PT. Mukomuko Agro Sejahtera.</p>	<p>N/A</p>																																										

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<p>4.6.4</p> <p>The evidence shall be available to demonstrate that use of Pesticides, categorized in Class 1A or 1B by World Health Organization, or those are listed in the Stockholm and Rotterdam Conventions, and paraquat are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p> <p>- Minor compliance -</p>	<p>The company not using pesticide Class I and Class II. Despite paraquat is not prohibited in Indonesia, company committed to avoid use of Paraquat. The company has commitment to eliminated using Paraquat since 1 January 2017 based on General Manager letter No.35/GMAM-Est/XII/2015, dated 8 December 2015.</p> <p>It is confirmed through the pesticide record.</p> <p>Based on review of "Rekaman Pengguna Pestisida Per Metrix Ton FFB tahun 2017", interview with spraying team, and visit in chemical storage in Air Buluh Estate and Malin Deman Estate, there were confirmed that no paraquat using since January 2017. Visit to chemical store and record review shows company chemical product for specific target species (weed), and no paraquat.</p>	<p>Comply</p>
<p>4.6.5</p> <p>Evidence of pesticide application by trained person and in accordance with application guidelines in product label and storage guidelines shall be available. Appropriate safety equipment shall be provided and utilized. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p>- Major compliance -</p>	<p>Agrochemicals 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.</p> <p>Air Buluh Estate, Malin Deman Estate and <i>Kebun Masyarakat Desa/KMD</i>: Based on interview and visit to spraying activities auditor confirmed that all of sprayers were using appropriate safety equipment (apron, mask, glove, overall). Evidences seen: Record of training on handling pesticide, e.g: Air Buluh Estate: - Mrs. Rosmanita, Mrs.Nurhayati, Mr. Saut Waldemar joined "Pelatihan Pestisida Terbatas" on – 7 May 2014. - Evident of Spraying Training as in Employee Training and Education Record was conducted on 3 March 2017 namely for Mrs Rosmaina, Mrs. Siti Yaminah, Mrs. Lasmiatun, Mrs. Yatimah, Mrs. Sukeni, etc. Note the same sprayer performed herbicide application in <i>Kebun Masyarakat Desa/KMD</i>.</p> <p>Malin Deman Estate: Mrs. Gusdawati, Mrs. Nila, Mrs. Eni, joined "Pelatihan Pestisida Terbatas" on 7 May 2015. "Pelatihan Penggunaan Pestisida Terbatas secara Tepat dan Aman" dated 9 March 2015. Note the same sprayer performed herbicide application in <i>Kebun Masyarakat Desa/KMD</i>.</p>	<p>Comply</p>

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4.6.6	<p>Storage of pesticides shall be according to recognised best practices. All pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers (see criterion 5.3).</p> <p>- Major compliance -</p>	<p>Air Buluh Estate, Malin Deman Estate, and <i>Kebun Masyarakat Desa/KMD</i>:  The storage for all pesticide is in good condition. A standard storage system appears to be implemented across PT. Agro Muko and PT. Mukomuko Agro Sejahtera. Double lock storage dedicated for WHO II chemical is available. The storage is equipped with sufficient air ventilation to provide air circulation. Hazard signs, emergency shower, secondary containment, spill kit, appropriate PPE (overall, face shield, impermeable rubber gloves, apron and mask) is 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.</p>	Comply
4.6.7	<p>Application of pesticides shall be by proven methods that minimize risk and negative impacts.</p> <p>- Minor compliance -</p>	<p>Air Buluh Estate, Malin Deman Estate and <i>Kebun Masyarakat Desa/KMD</i>:  Pesticides used were mixed accordingly as per mixing instructions. "Standarisasi Aplikasi Pestisida" related pesticides usage, storage, mixing and handling of container properly to minimise risk and impact.  Application 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 survey.  Working instruction for pre-mixing, stacking and storing pesticide is current, MSDS is also readily available.</p>	Comply
4.6.8	<p>Pesticides may only be applied aerially where there is a documented justification. Surrounding communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.</p> <p>- Major compliance -</p>	<p>Air Buluh Estate, Malin Deman Estate and <i>Kebun Masyarakat Desa/KMD</i>:  There is no aerial application of pesticide throughout PT. Agro Muko, PT. Mukomuko Agro Sejahtera and <i>Kebun Masyarakat Desa/KMD</i>.</p>	N/A

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4.6.9	<p>Evidence of training on handling pesticide for workers and scheme smallholder (if any) shall be available.</p> <p>- Minor compliance -</p>	<p>Agrochemicals 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.</p> <p>Air Buluh Estate, Malin Deman Estate and <i>Kebun Masyarakat Desa/KMD</i>:            Based on interview and visit to spraying activities auditor confirmed that all of sprayers were using appropriate safety equipment (apron, mask, glove, wear pack).            Evidences seen:            Record of training on handling pesticide, e.g:            Air Buluh Estate:            - Mrs. Rosmanita, Mrs.Nurhayati, Mr. Saut Waldemar joined "Pelatihan Pestisida Terbatas" on – 7 May 2014.            - Evident of Spraying Training as in Employee Training and Education Record was conducted on 3 March 2017 namely for Mrs Rosmanta, Mrs Siti Yaminah, Mrs Lasmiatun, Mrs Yatimah, Mrs Sukeni.            Note the same sprayer performed herbicide application in <i>Kebun Masyarakat Desa/KMD</i>.</p> <p>Malin Deman Estate:            Mrs. Gusdawati, Mrs. Nila, Mrs. Eni, joined "Pelatihan Pestisida Terbatas" on 7 May 2015.            "Pelatihan Penggunaan Pestisida Terbatas secara Tepat dan Aman" dated 9 March 2015.            Note the same sprayer performed herbicide application in <i>Kebun Masyarakat Desa/KMD</i>.</p>	Comply
4.6.10	<p>Proof that pesticide waste has been handled as per legal regulations and understood by worker and manager, shall be demonstrated.</p> <p>- Minor compliance -</p>	<p>Chemical storekeeper in Air Buluh Estate and Malin Deman Estate 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.</p> <p>Waste storage was separately and clearly identification 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.</p> <p>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 Estate and Mill activities, contaminated materials, etc. Monitoring was recorded in document "Neraca Limbah B3"</p> <p>Air Buluh Estate and Malin Deman Estate and <i>Kebun Masyarakat Desa/KMD</i>:            ---</p>	Comply

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		<ul style="list-style-type: none"> <li>- Permit seen as in "Keputusan Kepala Dinas Penanaman Modal, Pelayanan Perizinan dan Tenaga Kerja Kabupaten Mukomuko No.503/19/D.10/IPLB3/XI/2017 tentang Pemberian Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun kepada PT. Agro Muko (Air Buluh Estate)", dated 21 November 2017 valid until 5 years;</li> <li>- Permit as in "Keputusan Kepala Dinas Penanaman Modal, Pelayanan Perizinan dan Tenaga Kerja Kabupaten Mukomuko nomor 503/07/D.10/IPLB3/VII/2017 tentang Pemberian Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun kepada PT. Mukomuko Agro Sejahtera (Malin Deman Estate)", dated 21 July 2017 valid until 5 years.</li> </ul> <p><i>Kebun Masyarakat Desa/KMD:</i>            The empty chemical container from work performed upon <i>Kebun Masyarakat Desa/KMD</i> plantation stored in temporary hazardous waste store Air Buluh Estate or Malin Deman Estate. Treatment are uniform.</p>	
4.6.11	<p>Annual medical records of pesticide operators, and follow-up treatment of medical results, shall be available.</p> <p>- Major compliance -</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera (MMAS) are able to demonstrate programmed medical checkup for chemical storekeeper, spraying mandors, sprayer gangs, fertilizer mandors and fertilizer applicators. The medical checkup provided covers blood test, urine test and spirometric test.</p> <p>Air Buluh Estate, Malin Deman Estate and Kebun Masyarakat Desa:            Medical Check Up for 25 workers involved with chemical work dated 30 July 2017. Example: Mr. Ismail Marzuki, chemical storage clerk, Mr. Noprianto, Mrs. Asni, Mrs. Fatimah, Mrs. Hawa from Plasma Air Merah; Mr. B Tarigan, Mrs. Nila, Mrs. Eni, Mrs. Lili, Mrs. Gusdawati. All found to be fit for work. Note the same sprayer performed herbicide application in <i>Kebun Masyarakat Desa/KMD</i>.</p> <p>3 monthly check up for Mr. Ismail Marzuki, Mr. Noprianto, Mrs. Asni, Mrs. Fatimah from Plasma Air Merah; Mr. B Tarigan, Mrs. Nila, Mrs. Eni, Mrs. Lili, Mrs. Gusdawati dated 2 November 2017.</p> <p>Based on record review on sampled workers, doctor concluded there is no worker with signs of intoxication detected.</p>	Comply

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<p>4.6.12</p> <p>Records shall be available to show that spraying is not conducted by pregnant or breast-feeding women.</p> <p>- Major compliance -</p>	<p>Air Buluh Estate, Malin Deman Estate and <i>Kebun Masyarakat Desa/KMD</i>:</p> <p>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 Air Buluh Estate Estate.</p> <p>Air Buluh Estate:</p> <ul style="list-style-type: none"> <li>- "Checklist tenaga spraying tidak hamil dan tidak menyusui" in November 2017, division F3, e.g: Mrs. Yatimah, Mrs. Nurhayati, Mrs. Nani, Mrs. Sulastri, Mrs. Lasmiatun, Mrs. Patonah – shows not pregnant and/or breastfeeding. Note the same sprayer performed herbicide application in <i>Kebun Masyarakat Desa/KMD</i>.</li> <li>- "Checklist tenaga manuring tidak hamil dan tidak menyusui", divisi F1 in November 2017, e.g: Mrs. Maryati, Mrs. Tuyem, Mrs. Sri Rezeki, Mrs. Harneli, Mrs. Didis Sriani – not pregnant and/or breastfeeding. Note the same worker performed fertilizer application in <i>Kebun Masyarakat Desa/KMD</i>.</li> </ul> <p>Malin Deman Estate:</p> <ul style="list-style-type: none"> <li>- "Checklist tenaga spraying tidak hamil dan tidak menyusui tidak hamil dan tidak menyusui", in November 2017 division inti, e.g: Mrs. Winda, Mrs. Elvida, Mrs. Kortiana, Mrs. Eni Z – not pregnant and/or breastfeeding. Note: the same sprayer performed herbicide application in <i>Kebun Masyarakat Desa/KMD</i>.</li> <li>- "Checklist tenaga manuring tidak hamil dan tidak menyusui tidak hamil dan tidak menyusui", in November 2017 division inti, e.g: Mrs. Aminah, Mrs. Anisa F, Mrs. Yenti R, Mrs. Eli Astuti – not pregnant and/or breastfeeding. Note the same worker performed fertilizer application in <i>Kebun Masyarakat Desa/KMD</i> and KKPA.</li> </ul>	<p>Comply</p>
<p><b>Criterion 4.7</b></p> <p>An occupational health and safety plan is documented, effectively communicated and implemented.</p>		

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<p>4.7.1 A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored.</p> <p>- Major compliance -</p>	<p>The company has established a health and safety policy that signed by President Director, dated 1 March 2013. In point 1 mentioned that PT. Agro Muko supports the implementation of all relevant laws and regulations pf the Republic of Indonesia, and of applicable international agreements and standards. In point 2.b mentioned that the company committed to provision of adequate resources for effective implementation of the occupational health and safety (OHS) program and procedure, including strict compliance reviews.</p> <p>The company has prepared the document of "Pedoman Sistem Management Keselamatan dan Kesehatan Kerja (SMK3)", No.TTI/PSMK3/01, dated 1 July 2009. The document consist of:</p> <ol style="list-style-type: none"> <li>1. Commitment and policy for health and safety – "Komitmen dan Kebijakan K3" – document No. TTI/PROS/KOM/01;</li> <li>2. Health and safety plan "Perencanaan Keselamatan dan Kesehatan Kerja" – document No.TTI/PROS/REN/02               <ol style="list-style-type: none"> <li>a. Tujuan dan Sasaran K3 (Objective and target);</li> <li>b. Perencanaan Identifikasi Bahaya, Penilaian dan Pengendalian Resiko (Planning on hazard identification, assessment and risk control);</li> </ol> </li> <li>3. Implementation of health and safety "Penerapan Keselamatan dan Kesehatan Kerja" – document No.TTI/PROS/IMP/05;               <ol style="list-style-type: none"> <li>a. Tanggung jawab dan tanggap darurat (responsibility and emergency response);</li> <li>b. Pelatihan K3 dan kompetensi kerja (training and competence);</li> <li>c. Komunikasi (communication);</li> <li>d. Pelaporan K3 (reporting health and safety performance);</li> <li>e. Prosedur menghadapi insiden, pelaporan dan penyelidikan kecelakaan kerja/penyakit akibat kerja (Procedure against incident, reporting and investigation of work related incident/work related disease);</li> </ol> </li> <li>4. Measurement and evaluation "Pengukuran dan Evaluasi" – document No.TTI/PROS/IMP/27;               <ol style="list-style-type: none"> <li>a. Inspeksi dan pengujian (inspection and test plan);</li> <li>b. Audit SMK3 (health and safety audit);</li> <li>c. Tindakan Perbaikan dan pencegahan (corrective action and preventive action);</li> </ol> </li> <li>5. Management review "Tinjauan Ulang atau Peningkatan oleh Manajemen" – document No.TTI/PROS.IMP/31;</li> </ol> <p>Bunga Tanjung POM:            Bunga Tanjung POM also has prepared a health and safety plan as in "Bunga Tanjung POM Program 2017", dated 14 January 2017, that covering for:</p> <ol style="list-style-type: none"> <li>1. Meeting of P2K3 (monthly);</li> <li>2. P2K3 Report to DISNAKER on three monthly;</li> <li>3. Routine maintenance program for APAR and hydrant (monthly);</li> <li>4. Fire Drill (annually);</li> </ol> <p>---</p>	<p>Non-Compliance</p> <p>Comply</p>

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	<p>5. Training on OHS including for first aider; 6. Medical check up for workers under high risk area; 7. Training for first aider; 8. Socialization on hazardous waste;</p> <p>Health and safety Program (P2K3LHS) Air Buluh Estate and Malin Deman Estate: Estate also has prepared a health and safety plan as in "Program P2K3LHS 2017 – Air Buluh Estate", dated 2 January 2017, that covering for:</p> <ol style="list-style-type: none"> <li>1. Meeting of P2K3 (monthly) and OHS inspection;</li> <li>2. P2K3 Report to DISNAKER on three monthly;</li> <li>3. Sanitation on worker housing;</li> <li>4. Medical check up for sprayer, chemical store officer and hazardous waste storage keeper in polyclinic;</li> <li>5. Water quality testing by "Labkesda Bengkulu";</li> <li>6. Communication of company policy on environmental, health and safety - "Sosialisasi Kebijakan Perusahaan, Penilaian Resiko dan Aspek-Dampak Lingkungan";</li> <li>7. Monitoring and repair of health and safety signs;</li> </ol> <p><i>Kebun Masyarakat Desa/KMD:</i> Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committees "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to relevant policies and SOP to comply with RSPO P&amp;C requirements, as implemented by PT. Agro Muko, including health and safety policy and health and safety plan. PT. Agro Muko Occupational Health and Safety Policy (Kebijakan Keselamatan dan Kesehatan Kerja) dated 1 March 2013, available in English and Bahasa Indonesia.</p> <p>NC Major: 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate that a health and safety policy is in place; health and safety plan has not been documented and implemented, and its effectiveness monitored.</p>	
<p>4.7.2 A documented risk assessment shall be available and its implementation shall be recorded.  - Major compliance -</p>	<p>The company has prepared the procedure of risk assessment under "Prosedur Identifikasi Bahaya dan Penilaian Resiko No.TTI/PROS/REN/02", issued date 1 November 2009. Bunga Tanjung POM:</p> <ul style="list-style-type: none"> <li>- Risk Assessment has prepared under document "Penilaian Resiko Bunga Tanjung POM", dated 11 September 2017, covering for all area e.g: EFB discharge, emplacement, effluent pond, house keeping, water treatment plant, enginee room, steam boiler, klarifikasi, kernel plant, screw press,hoisting crane, chain/capstand, sterilizer, loading ramp, security, hazardouse waste storage, warehouse, workshop, laboratorium, office and weighbridge,</li> <li>- Muster Chit on socialization of risk assessment, dated 6 November 2017. Attendance list available as evident.</li> <li>- Based on visit in Bunga Tanjung POM there was confirmed that all safety measures has been implemented, such as covering all moving parts/machinery;</li> </ul> <p>---</p>	<p>Comply</p>

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	<p>Air Buluh Estate:</p> <ul style="list-style-type: none"> <li>- Risk Assessment has prepared under Document "Penilaian Resiko – Air Buluh Estate" dated 15 August 2017. The risk assessment was covering for all activities in plantation, e.g: GP3 (chemical shed), office, enginee room, field (land clearing, planting, sparying, manuring harvestinhg and pruning, transport FFB, loading ramp, emplacement, landfill area, HSD oil tank, HCV area, warehouse fertilizer, limited hazardouse waste, etc)</li> <li>- Socialization on Risk Assessment, e.g: dated 15 November 2017 (division 1 and 2), dated 16 November 2017 (division 4, 6&amp;7) and on 17 November 2017 (division 3 and 5)</li> </ul> <p>Malin Deman Estate:</p> <ul style="list-style-type: none"> <li>- Risk Assessment has prepared under Document "Penilaian Resiko – Malin Deman Estate" dated 14 August 2017. The risk assessment was covering for all activities in plantation, e.g: GP3 (chemical shed), office, enginee room, field (land clearing, planting, sparying, manuring harvestinhg and pruning, transport FFB, loading ramp, emplacement, landfill area, HSD oil tank, HCV area, warehouse fertilizer, limited hazardouse waste, etc);</li> <li>- Socialization on Risk Assessment, e.g: dated 25 November 2017 (division Inti MDE), dated 16 November 2017 (division 4, 6 &amp; 7) and on 17 November 2017 (division 3 and 5);</li> </ul> <p><i>Kebun Masyarakat Desa/KMD:</i> Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataaan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to relevent policies and SOP to comply with RSPO P&amp;C requirements, as implemented by PT. Agro Muko, including health and safety policy and health and safety plan. PT. Agro Muko Occupational Health and Safety Policy (Kebijakan Keselamatan dan Kesehatan Kerja) dated 1 March 2013, available in English and Bahasa Indonesia. PT. Agro Muko assissted <i>Kebun Masyarakat Desa/KMD</i> to update the health and safety plans of relevent estates to include the KMD/cooperatives. "Program K3 Tahun 2018 explains the health and safety plan for KMD, including safety meeting on quarterly basis, emergency response plan simulation for tacking forest fire, and prepare safety signages in KMD plantation.</p>	

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<p>4.7.3 Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.</p> <p>- Major compliance -</p>	<p>The company has Provided the training related to OHS and PPE in accordance with the result of risk assessment. Evidences seen:</p> <ul style="list-style-type: none"> <li>- Training related to OHS in Bunga Tanjung POM 2017, dated 14 January 2017. E.g: Training of MSDS, training OHS, hazardous waste handling training;</li> <li>- Training on MSDS, dated 22 March 2017 – was attended by 11 workers, e.g; Mr. Cuncun (opr WTP), Mr. Erianto (opr WTP), Mr. Wahyudin (laboratorium), Mr. Saeful A (laboratorium), Mr. Muslimawan (kernel plant);</li> <li>- OHS training, dated 2-6 October 2017, was attended by 78 workers. E.g: Mr. Budiono (bolier station), Mr. Ibad (kernel plant), Mr. Heri (enginee room), Mr. Zulkarnain (pressing station).</li> <li>- Socialization on hazardous waste handing on 21 and 28 October 2017, was attended by 83 workers;</li> <li>- <i>Daftar Pemeriksaan Alat Pemadam Api ringan</i> (54 APAR and 9 hydrant testing checklist) - monthly e.g dated 2 December 2017, 8 November 2017, 9 October 2017.</li> <li>- Report on PPE Handover to all employee, e.g: on 24 November 2017 to Mr. SHM (safety shoes), on 24 November 2017 – ear plug for operator boiler (Mr. Bahal, Mr. Ivan, Mr. Bursin).</li> <li>- PPE using inspection (monthly) – e.g on 10 October 2017 in Laboratorium, loading ramp, strerilizer, station capstand, press station;</li> <li>- General Medical CheckUp Report (annually) for all employee dated 17 November 2016;</li> <li>- Special Medical Check up report (annually) for 30 workers, dated 1 August 2017;</li> <li>- The result of medical check up; for both of general worker and worker with specific risk were communitated to all employees, e.g: document on socialization of MCU result dated 30 November 2017 was attended by 22 workers,</li> <li>- “Daftar Pemeriksaan Kesehatan Pekerja Tidak Berisiko Tinggi” implemented on 15 October 2017, was attended by 55 workers;</li> <li>- Crane Operator – SIO/license No.12.12848.OPK3-PAA/XII/2012, namely Mr. Zulkarin valid until 18 December 2017;</li> <li>- OHS Boiler operator – certificate No.12.P.09.913 OPK3-PUBT-B.II/XI/2012, namely Mr. Aris Fatma, dated 30 November 2017 – valid until 5 years;</li> <li>- OHS Boiler operator – certificate No.12.P.08.587 OPK3-PUBT-B.II/XI/2012, namely Mr. II Sumaras, dated 30 November 2017 – valid until 5 years;</li> <li>- Welder Certificacte, No.00289.0721.0002874.2014 namely Mr. Hardi Risdianto dated 4 July 2014, valid until 5 years;</li> <li>- Operator Enginee Room – certificate No.14.063OP.TU.K3-PTP/IV/2014 namely Mr. Agus Sumitro, dated 29 April 2014 valid until 5 years;</li> <li>- Operator Enginee Room – certificate No.14.064OP.TU.K3-PTP/IV/2014 namely Mr. Suhairun, dated 29 April 2014 valid until 5 years;</li> </ul> <p>---</p>	<p>Comply</p>

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	<p>Air Buluh Estate:</p> <ul style="list-style-type: none"> <li>- Fire Drill and "BAKORTIBA", was conducted on 6 September 2017, attended by 28 personnels. Scenario, photograph, evaluation and attendance list were available as evident;</li> <li>- Training related to pesticide handling (limited pesticide application) and MSDS to sprayer and operator in chemical storage was conducted on 3 March 2017, e.g: Mr. Sarto, Mrs. Siti, Mrs. Sumiyati, Mrs. Sri Yanti.</li> <li>- Training to New Harvester (subject: OHS policy, PPE), e.g: on 17 September 2017 for Mr. Saipudin, on 10 September 2017 for Mr. Dede Wiranto, on 8 October 2017 for Mr. Aksa, Mr. Karut Baharudin and Mr. Evan Arisani.</li> <li>- PPE handover record, dated 16 October 2017 for operator of FFB transport (fire extinguisher, helm and triangularity sign), e.g for Mr. Datar, Mr. Ayesta, Mr. Rocky.</li> <li>- PPE handover for AP shoes for period semester I year 2017, e.g: namely Mr. Agus Siswanto, Mr. Yanpuji, Mr. Jaskani, Mrs. Sunadi, Mr. Sitiono.</li> <li>- Medical check up was conducted on 31 July 2017 conducted by Klinik Spesialis Anugerah Ibu – Medan, e.g namely Mr. Zulman Harpandi, Mrs. Anisa Suprihartini, Mr. Azwari, Mrs. Winda Sari.</li> <li>- The result fo medical check up has been communicated to all employee dated 7 October 2017, e.g: namely Mrs. Watini, Mr. Amir Bara, Mrs. Sriyani, Mrs. Suryani.</li> </ul> <p>Malin Deman Estate:</p> <ul style="list-style-type: none"> <li>- Fire Drill and "BAKORTIBA", was conducted on 17 September 2017, attended by 20 personnel. Scenario, photograph, evaluation and attendance list were available as evident.</li> <li>- Training related OHS and PPE to harvester in Malin Deman Estate, on 27 February 2017 in Plasma Air Merah was attended by 22 harvesters, on 20 March 2017 in Malin Deman Inti was attended by 19 harvesters.</li> <li>- Training related to pesticide handling (limited pesticide application) and MSDS to sprayer and operator in chemical storage was conducted on 19 April 2017, e.g: namely Mr. Rifki Jaundri, Mr. Sunandi, Mr. Suyahman, Mr. Mugiono.</li> <li>- Medical check up was conducted on 31 July 2017 conducted by Klinik Spesialis Anugerah Ibu – Medan, e.g namely Mrs. Kortiana, Mrs. Nia, Mr. Abe Boedino, Mrs. Siti Asriani.</li> <li>- The result from medical check up has communicated to all employee dated 7 October 2017, e.g: namely Mr. Hendra Sonang, Mrs. Asni, Mrs. Yantima, Mrs. Kormita.</li> </ul> <p><i>Kebun Masyarakat Desa/KMD:</i> PT. Agro Muko and PT. Mukomuko Agro Sejahtera has provided training to worker whose performed spraying activity for <i>Kebun Masyarakat Desa/KMD</i> plantation. Training related to pesticide handling (limited pesticide application) and MSDS to sprayer and operator in chemical storage was conducted on 3 March 2017, e.g: Mr. Sarto, Mrs. Siti, Mrs. Sumiyati, Mrs. Sri Yanti – in Air Buluh Estate.</p> <p>---</p>	

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		In Malin Deman Estate, training related to pesticide handling (limited pesticide application) and MSDS to sprayer and operator in chemical storage was conducted on 19 April 2017, e.g: namely Mr. Rifki Jaundri, Mr. Sunandi, Mr. Suyahman, Mr. Mugiono, etc.;	
4.7.4	<p>The responsible person(s) for occupational health and safety shall be identified and there shall be records of periodical meetings on health and safety issues.</p> <p>- Major compliance -</p>	<p>The company has a safety committee under (P2K3) and Safety officer at each Estate and Mill. The records of periodical meetings on health and safety issues were available.</p> <p>Bunga Tanjung POM:</p> <ul style="list-style-type: none"> <li>- P2K3LHS (Safety and Health – Environmental – Social Relationship Committee) has been registered in “Dinas Tenaga Kerja Kabupaten Mukomuko” (in process statement) – letter to PMP2TSP Bengkulu Province, No.66/GMO-G/XI/17, dated 27 November 2017;</li> <li>- Safety officer Mr. Indra Mulia – appointed by Pembinaan Pengawasn tenaga kerja – Labour and Transmigration Ministry No.KEP. P.2123/M/DJPPK&amp;K3/XI/2015, dated 23 November 2015, valid until 3 years;</li> <li>- Record P2K3LHS Meeting (monthly) – minute of meeting on 25 October 2017, was attended by 14 members of P2K3LHS. Agenda: progress review of the last meeting result (September 2017), review of OHS inspection report, review of accident report and the other issues;</li> <li>- Report of P2K3LHS to “Dinas Tenaga Kerja Kabupaten Mukomuko” and to “Dinas Tenaga Kerja Bengkulu Province”, last report was conducted on 31 October 2017;</li> </ul> <p>Air Buluh Estate and <i>Kebun Masyarakat Desa/KMD</i>:</p> <ul style="list-style-type: none"> <li>- Establishment of safety committee as per “Surat Keterangan Pendaftaran nomor 560/12/D.3/IV/2017 tentang P2K3LHS di PT. Agro Muko - Air Buluh Estate” (Safety and Health – Environmental – Social Relationship Committee);</li> <li>- Safety meeting as in “Notulen Rapat P2K3 – LHS” (monthly), last meeting on 3 November 2017, location in ABE – meeting room, was attended by all of P2K3 team. Agenda: Progress review of last previous meeting, bimbingan teknis, environment impact issues, HCV area, monitoring of safety sign, accident report;</li> <li>- Appointment of safety officer as per “Keputusan Menteri Tenaga Kerja R.I nomor KEP.P.3796/NAKER-BINWASK3/V/2017 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum”, namely Mr. Sudiro, dated 31 March 2017 valid until 3 years. He is also responsible for health and safety for work activity in <i>Kebun Masyarakat Desa/KMD</i>;</li> <li>- Health and safety activity and performance report “Laporan Kegiatan 3 bulanan P2K3LHS periode August – October 2017”, to “Dinas Tenaga Kerja dan Transmigrasi Propinsi Bengkulu” on 15 October 2017, accepted by the manpower office staff (Mr. Randy) on 1 November 2017.</li> </ul> <p>---</p>	Comply

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	<p>Malin Deman Estate and <i>Kebun Masyarakat Desa</i>/KMD:</p> <ul style="list-style-type: none"> <li>- Establishment of safety committee as per "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Propinsi Bengkulu, No.503/9.83/86/DPMPSTP tentang Surat Keputusan Kepala Dinas tentang Pembentukan Panitia Keselamatan dan Kesehatan Kerja PT. Mukomuko Agro Sejahtera – Malin Deman Estate, dated 28 November 2017;</li> <li>- Appointment of safety officer as per "Keputusan Menteri Tenaga Kerja Republik Indonesia No. KEP.P.6195/NAKER-BINWASK3/IX/2017 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum", namely Mr. Mugiono, dated 20 September 2017 valid until 3 years. He is also responsible for health and safety for work activity in <i>Kebun Masyarakat Desa</i>/KMD.</li> <li>- Minutes of safety meeting "Notulen Rapat P2K3 – LHS (monthly)", last meeting on 30 November 2017, location in MDE division office, was attended by all of P2K3 team. Agenda: Progress review of last previous meeting, MCU result, P2K3 permit, monitoring of safety sign, accident report.</li> <li>- Health and safety activity and performance report "Laporan Kegiatan 3 bulanan P2K3LHS periode August – October 2017", to "Dinas Tenaga Kerja dan Transmigrasi Propinsi Bengkulu" on 15 October 2017 (Report number No.226/MDE-DISNAKER/IX/2017) accepted by manpower office staff (Mr Randy);</li> </ul>	

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<p>4.7.5</p> <p>A procedure for emergency and work accident shall be available in Indonesian Language; and the workers, who have attended First Aids training, are available in the working areas.</p> <p>- Minor compliance -</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera has prepared the procedure for emergency "Tanggap Darurat untuk POM", dated 18 January 2010. Covering incident such as: CPO spillage in the palm oil mill, CPO spillage in bulking tank, CPO spillage uring transportation from mill to tank terminal, CPO tank fire, fuel tank fire, overflowing POME from waste water ponds, overflowing POME from pipes, kernel transport accident, spillage of soda ash, acid spillage, spillage of CPO from pipe/hose, fire in factory, earthquake, and tsunami.</p> <p>The company has appoint the personel who have attended First Aids training. Refresh training for PIC of first aider on 7 March 2017, conducted by CV. Wijaya Bina Sakti (Safety Training Organizer), was attended by 111 workers . Such as: Bunga Tanjung POM:</p> <ul style="list-style-type: none"> <li>- Record of first aider training (7 March 2017) e.g: Mr. Hendri Rahmad (processsing), Mr. Junkamain (office), Mr. Ehenejeros (processing operator);</li> <li>- Simulasi Tanggap Darurat – Fire drill simulation, dated 20 February 2017. Scenario, documentation, attendance list, evaluation and recommendation were available as evident. The simulation was attended by 42 personnel in Bunga Tanung POM;</li> </ul> <p>Air Buluh Estate: First aider namely M Yulis (mandor) - No 560/009/D.3/IV/P3K/2015, Saut (mandor), Haryono (mandor), Dudu (mandor), Sujarwo (mandor), Marta Garetti (paramedic);</p> <p>Malin Deman Estate and <i>Kebun Masyarakat Desa/KMD</i>: First aider namely D Nababan (mandor) – No 560/077/D.3/IV/P3K/2015. He is also responsible for health and safety for work activity in <i>Kebun Masyarakat Desa/KMD</i>;</p> <p><i>Kebun Masyarakat Desa/KMD</i>: PT. Agro Muko helped <i>Kebun Masyarakat Desa/KMD</i> to update the health and Safety plans of relevent estates to include the KMD/cooperatives. "Program K3 Tahun 2018" explains the health and safety plan for KMD, including safety meeting on quarterly basis, emergency response plan simulation for tackling forest fire, and prepare safety signages in KMD plantation. Monitoring of the aspects of the Health and safety plans relevant to the KMD/cooperatives is included in the Health/Safety/Environmental/Social Committee (P2K3 LHS) proceedings. Identification and risk assessment as in document "Resiko K3/OHS di area rencana penanaman Desa Mundam Marap. The plan covering activities of heavy machinery, felling and clearing, terrace construction, road constuction, planting hole preparation, etc. – including work schedule.</p>	<p>Comply</p>

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<p>4.7.6 All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3). - Minor compliance –</p>	<p>All workers has provided with medical care, and covered by accident insurance. The company also has provided clinic for all workers. Referral are made to nearest hospital should the case is severe in Mukomuko Region Hospital based on new regulation in Indonesia (BPJS kesehatan). The company also providing social and accident insurance in form of Jamsostek (BPJS Ketenagakerjaan) for all workers.</p> <p>Bungo Tanjung POM:</p> <ul style="list-style-type: none"> <li>- Levy collection for insurance "Iuran BPJS Tenaga Kerja August 2017" document No.JV17090016, dated 30 September 2017, of Rp **.642.253;</li> <li>- Sample of insurance card: "Kartu BPJS Kesehatan No. 0001616914*** namely Mr. Met****; No.0001616914*** namely Mr. Pon****; No.0001616914*** namely Mr. E** R*****;</li> <li>- Work accident report "Laporan kasus kecelakaan kerja (formulir 3 KK 1 – BPJS Ketenagakerjaan)", namely Mr ZHR dated 23 October 2017 – BPJS card No.01610024***;</li> <li>- Processing of insurance "Laporan Kecelakaan Tahap I – Bentuk K.K.2 – Jamsostek", dated 5 May 2017 namely Mr. MLY- nomor Jamsostek KPA 94G10019***;</li> </ul> <p>Air Buluh Estate:</p> <ul style="list-style-type: none"> <li>- Sample of insurance card: "Kartu BPJS Kesehatan No. 0001489947***", namely Mr. Mus***; No.000161686****, namely Mr. N S*****; No.000161686****, namely Mr. Sug***;</li> <li>- Levy collection for insurance "Iuran BPJS Tenaga Kerja September 2017 (SKU)" document BV17100299, dated 20 October 2017, of Rp **.601.540;</li> <li>- Levy collection for insurance "Iuran BPJS Tenaga Kerja September 2017 (PKWT)" document No.BV17100299, dated 20 October 2017, of Rp **.758.919;</li> </ul> <p>Malin Deman Estate:</p> <ul style="list-style-type: none"> <li>- Levy collection "Iuran BPJS Tenaga Kerja August 2017 (SKU)" document No.JV17090057, dated 15 September 2017, sebesar Rp **.807.172 dan Iuran BPJS Tenagakerja August 2017 PKWT document JV17090057, dated 15 September 2017, of Rp *.356.138;</li> <li>- Sample of insurance card: "Kartu BPJS Kesehatan No.0001616917***; namely Mr. A** Ih*** Raf****; No.000161691761*** namely Mr. D N*****; No. 00016169117*** namely Mr Sas*****.</li> </ul> <p><i>Kebun Masyarakat Desa/KMD:</i> Workers perfroming plantation upkeep in <i>Kebun Masyarakat Desa/KMD</i> plantation was worker from PT. Agro Muko and/or PT. Mukomuko Agro Sejahtera. The insurance for worker has been covered by company.</p>	<p>Comply</p>

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<p>4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance</p>	<p>The accident records are compiled under "Rekapitulasi Laporan Kehilangan Waktu" loss time injury on monthly basis, indicating the Lost Time Accident information.</p> <p>Bunga Tanjung POM: In 2017 there were 2 cases of accident where 26 mandays reported as lost time by accident. Record seen:</p> <ul style="list-style-type: none"> <li>- Supervisor Investigation Accident Report, dated 23 October 2017 namely Mr ZHR (mechanic);</li> <li>- Supervisor Investigation Accident Report, dated 5 May 2017, namely Mr MLY (mill assistant);</li> </ul> <p>Air Buluh Estate: In 2017 there were 10 cases of accident where 2 mandays reported as lost time by accident. Record see:</p> <ul style="list-style-type: none"> <li>- Supervisor Investigation Accident Report, dated 8 November 2017, namely Mr Iwan S (harvester);</li> </ul> <p>Main Deman Estate: Based on Laporan Kehilangan Waktu Kerja Akibat Kecelakaan Kerja (LTA) in 2017 there were no lost time by accidents were reports.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Workers performing plantation upkeep in <i>Kebun Masyarakat Desa/KMD</i> plantation was worker from PT. Agro Muko and/or PT. Mukomuko Agro Sejahtera. The lost time calculated as per company.</p>	<p>Comply</p>
<p><b>Criterion 4.8</b> All staff,workers, smallholders and contract workers are appropriately trained.</p>		

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4.8.1	Records of training program related to the aspects of RSPO Principles and Criteria shall be available. - Major compliance -	<p>Air Buluh Estate:            Training Plan Air Buluh Estate 2017:            Harvesting training (incl. OHS and EIA) and FFB Quality: January, February and May 2017;            Spraying training (incl. OHS and EIA) and calibration: March and May 2017;            Manuring training (incl. OHS and EIA): January, May, August and September 2017;            Safety briefing for contractors from time to time;            Operating vehicle, heavy machinery and genset: January 2017;            Integrated Pest Management Training: October 2017;</p> <p>Malin Deman Estate:            Training Plan Malin Deman Estate 2017:            Harvesting quality maintenance training and Pruning Quality Training: March 2017;            Spraying technique training (incl. OHS and EIA): March 2017;            Manuring training (incl. OHS and EIA): March 2017;            Dissemination of company policies: April 2017;            MSDS and NFPA hazard label: April 2017;            Emergency Response Plan – Simulation: October 2017</p> <p><i>Kebun Masyarakat Desa/KMD:</i>            Based on interview with KMD committees on 4 December 2017, KMD Bukit Harapan and KMD Mundam Marap has received several training regarding best agriculture practices.</p>	Comply
4.8.2	Records of training for each employee shall be maintained. - Minor compliance –	<p>Air Buluh Estate:            Iwan Simare-mare, harvester, provided with training as recorded in 2013. Latest training harvesting training dated 20 September 2016; FFB quality training on 21 January 2017.            Maskina, FFB transport driver, provided with training as recorded in 2014. Latest training on safety driving for driver and helper, dated 23 January 2016; Safety driving dated 27 July 2016.            Andi Fahmianto, FFB transport helper, provided with training as recorded since 2016. Latest training on safety driving for driver and helper, dated 27 July 2016.</p> <p>Malin Deman Estate:            In Malin Deman Estate, training related to pesticide handling (limited pesticide application) and MSDS to sprayer and operator in chemical storage was conducted on 19 April 2017, e.g: namely Mr. Rifki Jaundri, Mr. Sunandi, Mr. Suyahman, Mr. Mugiono. Cross checked with individual training record of Mr. Rifki Jaundri, Mr. Sunandi, Mr. Suyahman and Mr.Mugiono.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>            Based on interview with KMD committee on 4 December 2017, KMD Mundam Marap has received several training regarding best agriculture practices.</p>	Comply

Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

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<p>Criterion 5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>		
<p>5.1.1</p>	<p>Environmental impact assessment document(s) shall be available. - Major compliance -</p> <p>PT. Agro Muko (AM): Company has granted with environmental permit in form "Surat Kelayakan Dokumen AMDAL" as per Surat Keputusan Gubernur Bengkulu No.425 tahun 2005 tentang Kelayakan Lingkungan Kegiatan Perkebunan dan Pabrik Pengolahan Kelapa Sawit dan Karet PT Agro Muko di Kecamatan Mukomuko Utara, Kecamatan Lubuk Pinang, Kecamatan Teras Terunjam dan Kecamatan Pondok Suguh Kabupaten Mukomuko Propinsi Bengkulu" dated 14 November 2005. The analysis for environmental impact identified under "Dokumen Analisis Dampak Lingkungan (AMDAL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit dan Karet di Kecamatan Mukomuko Utara, Kecamatan Lubuk Pinang, Kecamatan Teras Terunjam dan Kecamatan Pondok Suguh, Kabupaten Mukomuko, Propinsi Bengkulu, tahun 2005". The document was prepared by "Fakultas MIPA, Universitas Bengkulu". The assessment team comprise of Drs. Welly Darwis (biology); Drs. Yunofrizal (biology with "Sertifikat AMDAL A dan B"); Drs. Bambang Trihadi (chemical with "Sertifikat AMDAL A"); Dr. Suhardi (soil and water conservation, with "Sertifikat AMDAL A"); Drs. Suwarsono, MS (geophysics); Drs. Wahyudi Arianto (forest biology); Ir. Nusril, MBA (social, economy, cultural). The team has meet regulation requirement with the "Sertifikat AMDAL".</p> <p>The scope of assessment covers: impact analysis on oil palm plantation, rubber plantation and cocoa plantation development with area of 22,928 Ha; impact analysis on construction of 2 units palm oil mill with capacity 60 tons FFB/hour and 1 unit crumb rubber factory with capacity 0.5 tons/hour. The environmental impact assessment covers environmental impact management and monitoring plan: including type of impact, source of impact, relevant impact parameter, management and monitoring plan, management and monitoring location, person in charge, etc.</p> <p>As for Air Buluh Estate, under PT. Agro Muko there was an environmental permit, which separated as per "Dokumen Pengelolaan Lingkungan Hidup (DPLH)", approved as "Surat Keputusan Kepala Kantor Lingkungan Hidup Kabupaten Mukomuko Melalui Surat Keputusan No. 660/237.2/F.4/IX/2011" dated 29 September 2011. The document was prepared by PT. Survindo Link, certified as in "Sertifikat Lembaga Penyedia Jasa Penyusun Dokumen AMDAL, No.0001/LPJ/AMDAL-1/LRK/KLH" dated 31 December 2009. The assessment team comprise of: Drs. Yunofrizal; Drs. Wahyudi Arianto, M.Si; Mr. Jarulis, S.Si, M.Si.</p> <p>Specific for Malin Deman Estate, under PT. Mukomuko Agro Sejahtera; the environmental management and monitoring document and planning was approved as per: ---</p>	<p>Non-Compliance Comply</p>

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	<p>"Surat Keputusan Gubernur Bengkulu No.M.288.XXX.Tahun 2011 tentang Kelayakan Lingkungan Kegiatan Perkebunan Kelapa Sawit seluas 6,298 Ha, di Kecamatan Malin Deman, Kecamatan Ipuh dan Kecamatan V Koto, Kabupaten Mukomuko, Provinsi Bengkulu oleh PT. Mukomuko Agro Sejahtera" dated 9 September 2011.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> PT. Agro Muko and PT. Mukomuko Agro Sejahtera helped <i>Kebun Masyarakat Desa/KMD</i> to prepare an environmental impact assessment document(s) covering the KMD/cooperatives location, endorsed by the relevant government agencies. The document presented in SPPL (Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup). Sample seen: "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL" KMD Mundam Marap dated 12 December 2017; "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL" KMD Serami Baru – Air Masad dated 12 December 2017; "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL" KMD Tunggal Jaya dated 12 December 2017.</p> <p>NC Major: 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate that environmental impact assessment document(s) has been established.</p>	

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<p>5.1.2</p>	<p>Environment management plan document to prevent negative impacts, its implementation report and revision (if the identification of impact requires changes in current company's practices) shall be available. The company's management shall appoint the responsible person(s) for the implementation of the document.</p> <p>- Minor compliance -</p> <p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera:  The type of environmental aspect and impact identified, and recommended to managed, as per environmental document: management of air quality (including odor), management of noise (including vibration), soil erosion management, management of water quality (ground and surface water), management of flora, management of animal/wildlife, management of aquatic ecosystem, management of hazardous waste, management of stone mining/ quarry, management and monitoring of peat area subsidence, monitoring of mill water use for process, management of solid waste, etc.  The management plans has been including type of impact, source of impact, relevant impact parameter, management and plan, management location, person in charge for such management. The appointed responsible person is top management/General manager.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>  PT. Agro Muko and PT. Mukomuko Agro Sejahter helped <i>Kebun Masyarakat Desa/KMD</i> to prepare an environmental impact assessment document(s) covering the KMD/cooperatives location. The document presented in "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL". Sample seen: "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL" KMD Serami Baru – Air Masad dated 12 December 2017 including aspect – impact management plan for erosion, change in vegetation composition and biodiversity due to land conversion, etc. The management plan covers: no planting on area with slope &gt;40°; practicing terrace contour; efficient use of fertilizer and pesticide; planting ground cover to minimize surface runoff, etc. Based on field visit to KMDs, no planting on area with slope &gt;40°; ground cover is using <i>Mucuna</i>.</p> <p>NC Minor:  3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate that environment management plan document has been established.</p>	<p>Non-Compliance Comply</p>

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<p>5.1.3 Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly basis.</p> <p>- Minor compliance –</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera: The type of enviromental aspect identified, and recommended to be monitored, as per environmental management and monitoring document: monitoring on air quality (including odor), monitoring on noise (and vibration), mointoring on soil erosion, monitoring of water quality (ground and surface water), monitoring of flora, monitoring of animal/wildlife, monitoring of aquatic ecosystem, monitoring of hazardous waste, monitoring on stone mining/ quarry impact, monitoring of peat area subsidence, monitoring of mill water use for process, monitoring of solid waste emitted, etc.</p> <p>Based on "Laporan Pelaksanaan Rencana Pengelolaan dan Pemantauan Lingkungan" PT. Agro Muko and PT. Mukomuko Agro Sejahtera, all monitoring plan has been implemented for period: semester I and II, year 2017. The result demonstrates no parameter violated. Sample seen: "Laporan Pelaksanaan RKL-RPL periode semester 1 tahun 2017" – has been reported to "Dinas Lingkungan Hidup Kabupaten Mukomuko" on 25 July 2017. The document has reported the management and monitoring on environmental impact: air quality; Monitoring result: (Ambient air test result) in Loading Ramp Bunga Tanjung POM (dated 5 June 2017):</p> <table border="1" data-bbox="630 1064 1310 1422"> <thead> <tr> <th>Parameter</th> <th>Result</th> <th>Permitted</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate</td> <td>72 µg/Nm<sup>3</sup> per hour</td> <td>-</td> </tr> <tr> <td>Sulphure dioxide (SO<sub>2</sub>)</td> <td>74 µg/Nm<sup>3</sup> per hour</td> <td>900 µg/Nm<sup>3</sup> per hour</td> </tr> <tr> <td>Nitrogen dioxide (NO<sub>2</sub>)</td> <td>68 µg/Nm<sup>3</sup> per hour</td> <td>400 µg/Nm<sup>3</sup> per hour</td> </tr> <tr> <td>Carbon monoxide</td> <td>&lt;1145 µg/Nm<sup>3</sup> per hour</td> <td>30,000 µg/Nm<sup>3</sup> per hour</td> </tr> <tr> <td>Ozone</td> <td>45 µg/Nm<sup>3</sup> per hour</td> <td>235 µg/Nm<sup>3</sup> per hour</td> </tr> <tr> <td>Hydrocarbon</td> <td>&lt;13 µg/Nm<sup>3</sup></td> <td>-</td> </tr> <tr> <td>Lead (Pb)</td> <td>&lt;0.05 µg/Nm<sup>3</sup></td> <td>-</td> </tr> </tbody> </table> <p><i>Kebun Masyarakat Desa/KMD:</i> PT. Agro Muko helped <i>Kebun Masyarakat Desa/KMD</i> to prepare an environmental impact assessment document(s) covering the KMD/cooperatives location, endorsed by the relevant government agencies. The document presented in "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL". Sample seen: "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL" KMD Serami Baru – Air Masad dated 12 December 2017 including aspect – impact monitoring plan for erosion, mointoring plan for change in vegetation composition and biodiversity due to land conversion, etc. The monitoring plan covers: no planting on area with slope &gt;40<sup>0</sup>; practicing terrace contour; efficient use of fertilizer and pesticide; planting ground cover to minimize surface runoff, etc. Monitoring has been carried out once per annum, result for 2017 in process of report preparation.</p> <p>---</p>	Parameter	Result	Permitted	Total suspended particulate	72 µg/Nm <sup>3</sup> per hour	-	Sulphure dioxide (SO <sub>2</sub> )	74 µg/Nm <sup>3</sup> per hour	900 µg/Nm <sup>3</sup> per hour	Nitrogen dioxide (NO <sub>2</sub> )	68 µg/Nm <sup>3</sup> per hour	400 µg/Nm <sup>3</sup> per hour	Carbon monoxide	<1145 µg/Nm <sup>3</sup> per hour	30,000 µg/Nm <sup>3</sup> per hour	Ozone	45 µg/Nm <sup>3</sup> per hour	235 µg/Nm <sup>3</sup> per hour	Hydrocarbon	<13 µg/Nm <sup>3</sup>	-	Lead (Pb)	<0.05 µg/Nm <sup>3</sup>	-	<p>Non-Compliance Comply</p>
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		<p>NC Minor:            3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate that environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) has been made available.</p>	
<p><b>Criterion 5.2</b></p> <p>The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>			
5.2.1	<p>Record(s) on the results of High Conservation Value (HCV assessment) that includes both the planted area and the relevant wider landscape-level considerations (such as wildlife corridors) shall be available.</p> <p>- Major compliance -</p>	<p>PT. Agro Muko:            HCV assessment of PT. Agro Muko carried out in 2010 has been undertaken by appropriately qualified and experienced expert from "Yayasan Sawit Berkelanjutan (Indonesia Sustainable Palm Oil Foundation – YASBI Foundation)" using the guidance of Indonesia HCV Toolkit 2008 to monitor the possible extent of HCV inside the estates as well as area adjacent to it. All HCV's are mapped and identified. The assessment team comprise of Ir. Purwo Susanto (lead assessor – RSPO approved HCV assessor); Dr. Kunkun Jaka Gurmaya (biodiversity – RSPO approved HCV assessor); Neny Indrayana Shut. MT (ecology – RSPO approved HCV assessor); Ir. Hery Prasetyo (social impact); M. Setyawan N (GIS); Amirul Ikhsan (GIS); Asep Ridwan Anaribowo (biodiversity); Abdillah Luhur Nuratmaja Ssi (biodiversity); Arief Wahyu Candra Susilo, Ssos. (social-cultural); Sofyan Ansori (anthropology).</p> <p>The HCV assessment report concluded that PT. Agro Muko has already set aside conservation areas of a total of 2,304.9 Ha consisting of natural vegetation in between palm planting to provide habitat and corridors for wildlife. During the assessment HCV 1 identified in company totalling an area of 2,169.47 Ha (9.47%) in all estates;            HCV 2 of 200.78 Ha (0.88%) in Sei Betung Estate, Sei Kiang Estate, and Bunga Tanjung Estate;            HCV 3 of 494.73 Ha (2.16%) in Tanah Rekah Estate;            HCV 4 of 1,529.96 Ha (6.68%) in Tanah Rekah Estate, Sei betung Estate, Sei Kiang Estate, Talang Petai Estate, Bunga Tanjung Estate, Air Bikuk Estate, and Air Buluh Estate;            No HCV 5, and;            HCV 6 of 1.56 Ha in Tanah Rekah Estate, Mukomuko Estate, Sei Betung Estate, Sei Kiang Estate, Air Bikuk Estate, and Air Buluh Estate.</p> <p>As supply base to Bunga Tanjung POM: HCV area under Bunga Tanjung Estate: a proportion of HCV 1, HCV 2 and HCV 4. HCV area to Air Buluh Estate: a proportion of HCV 1, HCV 4 and HCV 6.</p> <p>---</p>	Comply

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	<p>In 2012, PT. Agro Muko has exercised ground verification against HCV assessment report upon all HCV area and reported under "Laporan Hasil Verifikasi Penilaian NKT PT Agro Muko". The activity was carried out to analyze the field condition, whereby a number of deviation from initial HCV assessment found. The ground verification has been agreed with YASBI foundation and become integral part of the HCV assessment report – and becomes guidance in management and monitoring plan for HCV area.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> PT. Agro Muko and PT. Mukomuko Agro Sejahtera has accommodated an HCV assessment in cooperation with Kompas Enviro Institut against 10 KMD in 2017. Report presented under "Laporan Identifikasi Nilai Konservasi Tinggi Rantai Supli PT Agro Muko untuk KMD Serami Baru dan KMD Lubuk Talang, Kecamatan Malindeman, KMD Bumi Mulya, KMD Suka Maju dan KMD Bukit Makmur Kecamatan Penarik, KMD Mundam Marap Kecamatan Ipuh, KMD Tunas Muda Tunggal Jaya dan KMD Pondok Lunang Kecamatan Teras Terunjam, KSU Agro Muko Sungai Ipuh kecamatan Selagan Raya, KSU Agro Muko Sungai Kiang Kecamatan V Koto Kabupaten Mukomuko, Provinsi Bengkulu". The assessment team comprise of Sigit Budhi Setyanto (social-cultural; ALS15024SB); Wibowo A Djatmiko (ecology and biodiversity); Riswan (environmental service); Amirul Ikhsan (GIS and landscaping); Pradipta Wijaya (GIS); Chyntia Lestari (social-cultural).</p> <p>The assessment carried out on 6-16 March 2017. Public consultation was carried out on 13 March 2017, attended by 31 individuals: villagers, KMD committee, traditional leaders/Kepala kaum.</p> <p>Based on the HCV assessment, there was HCV identified in KMD Lubuk Talang in form of riparian area Ipuh river of 37.52 Ha and area with secondary forest vegetation of 9.79 Ha. No HCV in area of KMD Mundam Marap and KMD Serami Baru – Air Masad.</p>	

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<p>5.2.2</p> <p>Where rare, threatened or endangered (RTE) species and or other HCVs are present or affected by the plantation and mill operations, an appropriate measures that are expected to maintain or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>In area of PT. Agro Muko was identified rare-threatened-endangered species such as Sumatran tiger (<i>Panthera tigris sumatrae</i>), and other species protected by Indonesian regulation.</p> <p>In order to protect the HCV area and wildlife, company has established environment protection policy – “Kebijakan Perlindungan Lingkungan” dated 1 March 2013. In point stated protection of endangered and protected animals. In implementation, the effort to protect wildlife was managed through:</p> <ul style="list-style-type: none"> <li>- No conversion on area identified as HCV;</li> <li>- Company has installed signboards on HCV identity; no-hunting, no poaching, no fishing warning signs; signboards with identified/potential rare-threatened-endangered or protected animals;</li> <li>- Company has create posters with information of type of rare-threatened-endangered or protected animal on the field and office premises;</li> <li>- Company has appointed personnel responsible to manage and monitor the HCV areas – called conservation ranger;</li> <li>- Company has communicated the HCV areas and status/presence of rare-threatened-endangered or protected animals in the region – to local communities and its workers;</li> <li>- Company has cooperation with Zoological Society of London (ZSL), Bogor to provide SMART software training to its worker/conservation rangers;</li> <li>- Company through conservation rangers made HCV patrol periodically to monitor the flora and fauna. This is through installation of camera trap such as in Air Buluh Estate.</li> </ul> <p>---</p>	<p>Comply</p>

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	<p>PT. Agro Muko has appointed conservation ranger for each estate, as per "Surat General Manager No.21/SMA-AM/ENC/M/VII/2013 perihal Pembentukan Ranger untuk Pemantauan dan Pengamanan Areal Konservasi PT. Agro Muko" dated 19 July 2013. The duty of ranger: monitoring conservation area, prepare report and fill checklist related to HCV area condition, provide comments and evaluation based on findings, carried out continuous improvement.</p> <p>In PT. Agro Muko, based on 2016 identification plants identified such as <i>Alstonia scholaris</i> (Milkwood pine), <i>Artocarpus elasticus</i> (Terap), <i>Archidendron jiringa</i> (Jering beans), etc. It was also identified wildlife such as 14 species of mammals, such as: <i>Felis bengalensis</i> (Leopard cat), <i>Symphalangus syndactylus</i> (black furred gibbon), <i>Macaca nemestrina</i> (Southern pig-tailed macaque). 22 species of birds such as: <i>Elanus caeruleus</i> (Black-winged kite), <i>Haliaeetus leucogaster</i> (White-bellied fish eagle), <i>Ictinaetus malayensis</i> (Black eagle), <i>Buceros bicornis</i> (Great hornbill). 5 species of reptiles, such as: <i>Varanus salvator</i> (Water monitor lizard), <i>Xenopeltis unicolor</i> (Sunbeam snake), <i>Python reticulatus</i> (Reticulated python), <i>Ophiophagus hannah</i> (King cobra).</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Based on the HCV assessment, there was HCV identified in KMD Lubuk Talang in form of riparian area Ipuh river of 37.52 Ha and area with secondary forest vegetation of 9.79 Ha. Based on document verification, it was found 25 mammals species, such as <i>Nycticebus coucang</i> (Sunda slow loris), <i>Neofelis diardii</i> (Clouded leopard), etc.; 54 species of birds such as <i>Argusianus argus</i> (The great argus), <i>Halcyon smyrnensis</i> (White-throated kingfisher), etc.; 10 species of reptiles such as <i>Ophiophagus hannah</i> (King cobra), etc.; 8 types of amphibia such as <i>Leptobrachium sp.</i> (Pelobatid frog) etc.; 12 species of fish such as <i>Barbodes cf binotatus</i> (Spotted barb), etc.</p> <p>The HCV report from Kompasnia Enviro Institut has been integral part in preparing "planting plan" – to avoid conversion of HCV area in smallholder block.</p>	

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<p>5.2.3 Program(s) to socialize the status of protected, rare, threatened or endangered (RTE) to all workers shall be available, including records of appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance –</p>	<p>In order to protect the HCV area and wildlife, company has established environment protection policy – “Kebijakan Perlindungan Lingkungan” dated 1 March 2013. In point stated protection of endangered and protected animals. In implementation, the effort to protect wildlife was managed through:</p> <ul style="list-style-type: none"> <li>- No conversion on area identified as HCV;</li> <li>- Company has installed signboards on HCV identity; no-hunting, no poaching, no fishing warning signs; signboards with identified/potential rare-threatened-endangered or protected animals;</li> <li>- Company has create posters with information of type of rare-threatened-endangered or protected animal on the field and office premises;</li> <li>- Company has appointed personnel responsible to manage and monitor the HCV areas – called conservation ranger;</li> <li>- Company has communicated the HCV areas and status/presence of rare-threatened-endangered or protected animals in the region – to local communities and its workers;</li> <li>- Company has cooperation with Zoological Society of London (ZSL), Bogor to provide SMART software training to its worker/conservation rangers;</li> <li>- Company through conservation rangers made HCV patrol periodically to monitor the flora and fauna. This is through installation of camera trap such as in Air Buluh Estate.</li> </ul> <p>Inside the policy also stipulated sanction such as warning letter up to reporting to authority is in place should any worker and/or community member is found to capture, harm, collect or kill animal on company concession.</p> <p>Records reviewed and field verification:            In Bunga Tanjung POM, dissemination of environment protection policy carried out on 31 August 2017, attended by 23 workers.            In Air Buluh Estate, dissemination of environment protection policy carried out on 24 October 2017 in Division I – VI, workshop and attended by 222 workers.</p> <p>From Air Buluh Estate, dissemination of environment protection policy carried out on 7 July 2017 in Talang Baru Village and attended by 23 villagers workers.            Based on interview with villagers it was found that they understand RTE species and committed to no-hunt/harm/kill policy from PT. Agro Muko.            Field visit to worker house, audit team found that no house collect/keep bird as pet.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>            Based on interview with committee from KMD Mundam Marap, KMD Serami Baru – Air Masad and KMD Lubuk Talang, it was found that committees understood the importance of HCV area and committed to follow no hunting-no killing wildlife policy from PT. Agro Muko---</p>	<p>Comply</p>

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5.2.4	Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan.  - Minor compliance –	The monitoring result has been compiled and reported on annual basis. HCV management and monitoring report 2017 sighted. Field verification upon HCV management plan implementation, company has delineated the HCV area, in articular river buffer zone adjacent to replanting area; no replanting on river buffer zone; no chemical regime (fertilizer and/or herbicide) in HCV area – The no-spray sign in form of yellow paint along the buffer zone. Company has re-plant forest trees along river buffer zone and HCV area.  <i>Kebun Masyarakat Desa/KMD:</i> Document called "Rencana Pengelolaan dan Pemantauan Areal HCV" has been prepared to manage and monitor HCV area in smallholder plantation blocks. The current progress in form of delineation to avoid conversion during replanting.	Comply
5.2.5	Where HCV areas overlapped with an identified local community's land, there shall be evidence of a negotiated agreement that optimally safeguard their HCVs and the local community's rights.  - Minor compliance –	There was no overlapping HCV area in PT. Agro Muko. All HCV located within the concession/HGU of PT. Agro Muko. This is confirmed through document review and consultation with villagers of Lubuk Talang.  <i>Kebun Masyarakat Desa/KMD:</i> There was no HCV area in KMD, except in KMD Lubuk Talang. The HCV area of Ipuh river buffer zone 35.72 Ha and area with secondary forest vegetation 9.79 Ha was located under village's property. Documetation on smallholder meeting with village authority has been demonstrated. A minutes of meeting provided, implying village approval to maintain identified HCV area.	Comply
<b>Criterion 5.3</b> Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			

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5.3.1	<p>A documented identified source of all waste and pollution, shall be available.</p> <p>- Major compliance -</p>	<p>The company has a waste management plan, identifying type and source of waste which documented in "Daftar Aspek dan Pengaruh Lingkungan".</p> <p>Bunga Tanjung POM:</p> <ul style="list-style-type: none"> <li>- Environmental aspect and impact list, updated in 13 September 2017. Covering for indentification source of all waste and pollution in area gas enginee, enginee room, weighbridge, EFB dircharge, steam boiler, emplacement, effluent ponds, etc.;</li> <li>- EFB application report "Laporan Pengiriman Janjang Kosong ke Estate", period September 2017. E.g: on 2 December 2017 total delivery to Tanah Rekah Esatate 80.60 ton EFB;</li> <li>- Landfill report "Laporan Pemantauan TPA (tempat pembuangan akhir)" for domestic waste – last delivery on 3 December 2017, 29 November 2017 and 16 November 2017 – every two weeks.</li> </ul> <p>Air Buluh Estate dan Malin Deman Estate: A documented identified source of all waste and pollution available under Envriornmental Apect and Impact List (MDE updated on 14 August 2017 – Air Buluh Estate updated on 19 August 2017). Indentification was covering for all station/workplace in plantation, e.g: office area, workshop and enginee room, warehouse and hazardous waste limited storage, emplacement, HCV area, nursery OP, manuring, spraying, land clearing, etc.</p>	Comply

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<p>5.3.2</p> <p>There shall be evidence that all chemicals and their empty containers are disposed of responsibly.</p> <p>- Major compliance -</p>	<p>The company store hazardous waste in temporary storage with permit, The hazardous waste is sent to the registered collector which approved by Environmental Ministry, namely PT. Amindy Barokah.</p> <p>Bunga Tanjung POM:</p> <ul style="list-style-type: none"> <li>- Temporary hazardous waste storage permit: "Keputusan Kepala Dinas Penanaman Modal Pelayanan Perizinan dan Tenaga Kerja Kabupaten Mukomuko nomor 503/05/D.10/IPLB3/VII/2017, tentang Pemberian Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun kepada PT. Agromuko – Bunga Tanjung Palm Oil Mill", dated 21 July 2017, valid until 5 years.</li> <li>- Hazardous waste balance "Lembar Neraca Limbah Bahan Berbahaya dan Beracun" for period November 2017. Initial stock waste oil (40 liters), received waste oil (dated 5 November 2017: 40 liters, and in 26 November 2017: 40 liters);</li> <li>- Minutes of disposal/transport "Berita Acara Serah Terima Barang – LB3 no document 001/BT.POM/LB3/X/2017", to CV AMindy Barakah e.g (wasete oil: 596 liters; fuel filter: 11 Kg; fluorescent lamp: 6 Kg; contaminated rags: 49 Kg; empty chemical container: 82 Kg)</li> <li>- Manifest No.AVT 0003251 for oil used (0,5121 ton), dated 2 December 2017;</li> </ul> <p>Air Buluh Estate and Malin Deman Estate</p> <ul style="list-style-type: none"> <li>- Temporary hazardous waste store permit: "Keputusan Kepala Dinas Penanaman Modal, Pelayanan Perizinan dan Tenaga Kerja Kabupaten Mukomuko nomor 503/19/D.10/IPLB3/XI/2017 tentang Pemberian Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun kepada PT. Mukomuko Agro Sejahtera (Malin Deman Estate)", dated 21 November 2017 valid until 5 years;</li> <li>- Extension of the permit: "Keputusan Kepala Dinas Penanaman Modal, Pelayanan Perizinan dan Tenaga Kerja Kabupaten Mukomuko nomor 503/07/D.10/IPLB3/VII/2017 tentang Pemberian Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun kepada PT Mukomuko Agro Sejahtera (Malin Deman Estate)", dated 21 July 2017 valid until 5 years;</li> <li>- Minutes of disposal/transport "Berita Acara Serah Terima Limbah B3 kepada CV Amindy Barakah" dated 3 October 2017, i.e: waste oil (200 liters), waste oil filters (4 pieces), empty chemical storage (40 pieces) and contaminated rag 1.5 Kg;</li> <li>- Manifest No.AVT 0001991 for waste filter (3 Kg), Manifest No.AVT 0001993 for contaminated container (70 Kg);</li> <li>- Minuts of diposal/transfer "Berita Acara Serah Terima Limbah B3 kepada CV Amindy Barakah" dated 3 October 2017, i.e: waste oil (1,220 liters), waste filter (68 kg), empty chemical container (35 kg), medical waste 2 Kg and contaminated rag 6 Kg;</li> <li>- Manifest No.AVT 0003280 for contaminated container 35 Kg, Manifest No.0003279 for waste filter (68 Kg), Manifest No.AVT 0003026 for medical waste (2 Kg)</li> </ul>	<p>Comply</p>

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5.3.3	<p>A documented waste management plan to avoid or reduce pollution and its implementation shall be available.</p> <p>- Minor compliance –</p>	<p>Waste management plan is documented in procedure “Pengelolaan Sampah” and “Rencana Pengelolaan Limbah”. Waste management consists of domestic waste, to reduce pollution to the environment.</p> <p>Organic and inorganic waste sent to landfill and then covered with soil.</p> <p>For medical waste, and other type hazardous waste (waste oil, empty chemical container, contaminated material, battery, etc) regulated as per procedure “Penyimpanan Limbah Bahan Berbahaya dan Beracun (Limbah B3) dan Tanggap Darurat”. The hazardous waste stored in a dedicated storage completed with alarm, spill kit, secondary containment and PPE for operation.</p> <p>Bunga Tanjung POM: “Rencana Pengelolaan Limbah”, updated on 3 January 2017 e.g: domestic waste water, sharp instrument and medical waste, solid domestic waste (organic and inorganic), hazardous waste, EFB and palm oil mill effluent.</p> <p>Air Buluh Estate and Malin Deman Estate: “Rencana Pengelolaan Limbah Tahun 2017”, updated 4 January 2017: domestic waste water, sharp and medical waste, solid domestic waste (organic and inorganic), hazardous waste,</p>	Comply
<p><b>Criterion 5.4</b> Efficiency of fossil fuel use and the use of renewable energy is optimized.</p>			

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5.4.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy shall be in place and monitored.</p> <p>- Minor compliance –</p>	<p>As part of company commitment to improve the efficiency of fossil fuel used, Bunga Tanjung POM optimized the use of fibre and kernel. In addition, the mill have recorded and also calculated the fuel saving. This means the total volume of HSD fuel; Bunga Tanjung POM could have been used for generating similar energy to process FFB, as recorded in "Equivalent to HSD fuel saving".</p> <p>Similar with POM, the estate also records their HSD fuel use, compared to the FFB production.</p> <p>Bunga Tanjung POM: The use of fibre and shell as renewable energy in Bunga Tanjung POM:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB Processed (MT)</th> <th>Fibre (MT)</th> <th>NCV of Fibre (Kcal)</th> </tr> </thead> <tbody> <tr><td>Jan 2017</td><td>10,702</td><td>1,339</td><td>3,081,857,021</td></tr> <tr><td>Feb 2017</td><td>9,942</td><td>1,244</td><td>2,862,999,106</td></tr> <tr><td>Mar 2017</td><td>10,832</td><td>1,356</td><td>3,119,456,282</td></tr> <tr><td>Apr 2017</td><td>9,422</td><td>1,179</td><td>2,713,421,164</td></tr> <tr><td>May 2017</td><td>11,563</td><td>1,447</td><td>3,329,761,821</td></tr> <tr><td>Jun 2017</td><td>7,885</td><td>983</td><td>2,262,012,188</td></tr> <tr><td>Jul 2017</td><td>11,624</td><td>1,455</td><td>3,347,313,847</td></tr> <tr><td>Aug 2017</td><td>11,699</td><td>1,464</td><td>3,368,967,287</td></tr> <tr><td>Sept 2017</td><td>11,026</td><td>1,711</td><td>3,935,865,947</td></tr> <tr><td>Oct 2017</td><td>13,330</td><td>2,068</td><td>4,758,430,293</td></tr> </tbody> </table> <p>Continues:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB Processed (MT)</th> <th>Shell (MT)</th> <th>NCV of Shell (Kcal)</th> </tr> </thead> <tbody> <tr><td>Jan 2017</td><td>10,702</td><td>562</td><td>1,914,013,997</td></tr> <tr><td>Feb 2017</td><td>9,942</td><td>522</td><td>1,778,089,874</td></tr> <tr><td>Mar 2017</td><td>10,832</td><td>569</td><td>1,937,364,778</td></tr> <tr><td>Apr 2017</td><td>9,422</td><td>495</td><td>1,685,193,224</td></tr> <tr><td>May 2017</td><td>11,563</td><td>608</td><td>2,067,976,816</td></tr> <tr><td>Jun 2017</td><td>7,885</td><td>413</td><td>1,404,841,852</td></tr> <tr><td>Jul 2017</td><td>11,624</td><td>611</td><td>2,078,877,651</td></tr> <tr><td>Aug 2017</td><td>11,699</td><td>615</td><td>2,092,325,704</td></tr> <tr><td>Sept 2017</td><td>11,026</td><td>579</td><td>1,971,902,359</td></tr> <tr><td>Oct 2017</td><td>13,330</td><td>701</td><td>2,384,014,101</td></tr> </tbody> </table> <p>---</p>	Month	FFB Processed (MT)	Fibre (MT)	NCV of Fibre (Kcal)	Jan 2017	10,702	1,339	3,081,857,021	Feb 2017	9,942	1,244	2,862,999,106	Mar 2017	10,832	1,356	3,119,456,282	Apr 2017	9,422	1,179	2,713,421,164	May 2017	11,563	1,447	3,329,761,821	Jun 2017	7,885	983	2,262,012,188	Jul 2017	11,624	1,455	3,347,313,847	Aug 2017	11,699	1,464	3,368,967,287	Sept 2017	11,026	1,711	3,935,865,947	Oct 2017	13,330	2,068	4,758,430,293	Month	FFB Processed (MT)	Shell (MT)	NCV of Shell (Kcal)	Jan 2017	10,702	562	1,914,013,997	Feb 2017	9,942	522	1,778,089,874	Mar 2017	10,832	569	1,937,364,778	Apr 2017	9,422	495	1,685,193,224	May 2017	11,563	608	2,067,976,816	Jun 2017	7,885	413	1,404,841,852	Jul 2017	11,624	611	2,078,877,651	Aug 2017	11,699	615	2,092,325,704	Sept 2017	11,026	579	1,971,902,359	Oct 2017	13,330	701	2,384,014,101	Comply
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<p><b>Criterion 5.5</b> Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>																																																			
5.5.1	<p>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.</p> <p>- Major compliance -</p>	<p>Prosedur Pencegahan dan Pengendalian Kebakaran Lahan No.ENC/SOP/10 dated 1 February 2014. The procedure explains method for fire risk status: precipitation data, water management data (for peat area), contour map, Provincial fire risk (if any). Low risk: no risk; Medium risk: no rain day 6-9 days for peat area; 14-21 days for mineral area, precipitation &lt;10mm; High risk: no rain day more than 10 days for peat area; no rain in more than 21 days for mineral area; Extreme risk: no rain in prolonged period, strong wind, hot spot on boundary.</p> <p>Air Buluh Estate: Laporan Kebakaran Lahan Air Buluh Estate, period January – November 2017, no burning. List of fire fighting tools documented under “Peralatan Pemadam Kebakaran”, 16 fire extinguishers; 1 water tank with capacity 3,500 liters.</p> <p>Malin Deman Estate: Buku Kejadian Kebakaran Tahun 2014 – 2017 – Malin Deman Estate. This include result of fire patrol to Koperasi Perkebunan Sejahtera Bersama and Koperasi Perkebunan Desa Air Buluh. Based on fire patrol result, there is no fire break in these estates.</p> <p>---</p>	Comply																																																

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		<p>KMD (Mundam Marap/Serami Baru – Air Masad/ Tunggal Jaya):            “Rekaman Kebakaran Lahan Tahun 2017” for KMD Talang Arah, KMD Pulau Baru, KMD Medan Jaya, KMD Tanjung Harapan, KMD Bukit Harapan, KMD Mundam Marap, KMD Air Buluh, KMD Talang Rio, KMD Dusun Pulau, KMD Semundam, KMD Talang Baru – no burning.            Land clearing activity in KMD Mundam Marap were controlled by the company, which committed to zero burning policy, there was no fire used during land clearing.</p>	
5.5.2	<p>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.</p> <p>- Minor compliance -</p>	<p>PT. Agro Muko (AM):            PT. Mukomuko Agro Sejahtera (MMAS):            Air Buluh Estate:            Malin Deman Estate:</p> <p>KMD (Mundam Marap/Serami Baru – Air Masad/ Tunggal Jaya):            Land clearing activity in KMD Mundam Marap were controlled by the company, which committed to zero burning policy, there was no fire used during land clearing.</p>	Comply
<p><b>Criterion 5.6</b></p> <p>Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>			
5.6.1	<p>Document(s) assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent, shall be available. (see Criterion 4.4)</p> <p>- Major compliance -</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera have developed pollution and emission reduction plan. The plan covers planning, implementing plans and monitoring activities generating pollution and emission.            Identification of pollution and emission sources recorded under Environmental Aspect &amp; Impact List (Daftar Aspek &amp; Dampak Lingkungan). The latest review dated 1 November 2017. The identification listed all relevant activities that generate pollution and emission from office, plantations, palm oil mill, mill effluent treatment up to workers activities.            Sample seen: the operation of tractors and vehicle in Air Buluh Estate generates emission, noise, and possibly spillage during fuel filling; the lubricant replacement for tractor and vehicle in Air Buluh Estate generates oil spillage, waste oil, contaminated filter, contaminated rags, etc.</p>	Comply
5.6.2	<p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plan to reduce or minimize them implemented.</p> <p>- Major compliance -</p>	<p>Identification of pollutant and mitigation plan, included GHG is documented in “Rencana Pengurangan Emisi Gas Rumah Kaca (GHG Emission) as defined in procedure of “Mitigasi Gas Rumah Kaca” No.ENC/GHG/01. GHG emissions have been identified and plan for mitigation of GHG has been established.</p>	Comply

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<p>5.6.3 A monitoring plan and results of regular reporting on emission and pollutants from estate and mill operations using appropriate methods, shall be available.</p> <p>- Minor compliance –</p>	<p>The company has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and power generator, water quality test for surface and ground water, effluent water quality, noise level, etc. The monitoring result is incorporated in RKL/RPL (environmental management and monitoring plan) and reported regularly to the government. GHG emission calculated base on RSPO PalmGHG Toolkit, it was seen that the total emission is 0.25 tCO<sub>2</sub>e/ton CPO in 2017.</p> <p>Monitoring result: Ambient air test result in Loading Ramp (5 June 2017):</p> <table border="1" data-bbox="630 831 1232 1205"> <thead> <tr> <th>Parameter</th> <th>Result</th> <th>Permitted</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate</td> <td>72 µg/Nm<sup>3</sup> per hour</td> <td>-</td> </tr> <tr> <td>Sulphure dioxide (SO<sub>2</sub>)</td> <td>74 µg/Nm<sup>3</sup> per hour</td> <td>900 µg/Nm<sup>3</sup> per hour</td> </tr> <tr> <td>Nitrogen dioxide (NO<sub>2</sub>)</td> <td>68 µg/Nm<sup>3</sup> per hour</td> <td>400 µg/Nm<sup>3</sup> per hour</td> </tr> <tr> <td>Carbon monoxide</td> <td>&lt;1145 µg/Nm<sup>3</sup> per hour</td> <td>30,000 µg/Nm<sup>3</sup> per hour</td> </tr> <tr> <td>Ozone</td> <td>45 µg/Nm<sup>3</sup> per hour</td> <td>235 µg/Nm<sup>3</sup> per hour</td> </tr> <tr> <td>Hydrocarbon</td> <td>&lt;13 µg/Nm<sup>3</sup></td> <td>-</td> </tr> <tr> <td>Lead (Pb)</td> <td>&lt;0.05 µg/Nm<sup>3</sup></td> <td>-</td> </tr> </tbody> </table> <p>Ambient air test result in Worker Housing (5 June 2017):</p> <table border="1" data-bbox="630 1263 1232 1615"> <thead> <tr> <th>Parameter</th> <th>Result</th> <th>Permitted</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate</td> <td>69 µg/Nm<sup>3</sup> per hour</td> <td>-</td> </tr> <tr> <td>Sulphure dioxide (SO<sub>2</sub>)</td> <td>70 µg/Nm<sup>3</sup> per hour</td> <td>900 µg/Nm<sup>3</sup> per hour</td> </tr> <tr> <td>Nitrogen dioxide (NO<sub>2</sub>)</td> <td>63 µg/Nm<sup>3</sup> per hour</td> <td>400 µg/Nm<sup>3</sup> per hour</td> </tr> <tr> <td>Carbon monoxide</td> <td>&lt;1145 µg/Nm<sup>3</sup> per hour</td> <td>30,000 µg/Nm<sup>3</sup> per hour</td> </tr> <tr> <td>Ozone</td> <td>39 µg/Nm<sup>3</sup> per hour</td> <td>235 µg/Nm<sup>3</sup> per hour</td> </tr> <tr> <td>Hydrocarbon</td> <td>&lt;13 µg/Nm<sup>3</sup></td> <td>-</td> </tr> <tr> <td>Lead (Pb)</td> <td>&lt;0.05 µg/Nm<sup>3</sup></td> <td>-</td> </tr> </tbody> </table> <p>Odor test result in Loading Ramp (2 June 2017):</p> <table border="1" data-bbox="630 1673 1232 1756"> <thead> <tr> <th>Parameter</th> <th>Result</th> <th>Permitted</th> </tr> </thead> <tbody> <tr> <td>Hydrogen sulphide (H<sub>2</sub>S)</td> <td>0.007 ppm</td> <td>0.02 ppm</td> </tr> <tr> <td>Ammonia (NH<sub>3</sub>)</td> <td>0.037 ppm</td> <td>2 ppm</td> </tr> </tbody> </table> <p>Odor test result in Worker Housing (2 June 2017):</p> <table border="1" data-bbox="630 1814 1232 1897"> <thead> <tr> <th>Parameter</th> <th>Result</th> <th>Permitted</th> </tr> </thead> <tbody> <tr> <td>Hydrogen sulphide (H<sub>2</sub>S)</td> <td>&lt;0.005 ppm</td> <td>0.02 ppm</td> </tr> <tr> <td>Ammonia (NH<sub>3</sub>)</td> <td>&lt;.03 ppm</td> <td>2 ppm</td> </tr> </tbody> </table> <p>---</p>	Parameter	Result	Permitted	Total suspended particulate	72 µg/Nm <sup>3</sup> per hour	-	Sulphure dioxide (SO <sub>2</sub> )	74 µg/Nm <sup>3</sup> per hour	900 µg/Nm <sup>3</sup> per hour	Nitrogen dioxide (NO <sub>2</sub> )	68 µg/Nm <sup>3</sup> per hour	400 µg/Nm <sup>3</sup> per hour	Carbon monoxide	<1145 µg/Nm <sup>3</sup> per hour	30,000 µg/Nm <sup>3</sup> per hour	Ozone	45 µg/Nm <sup>3</sup> per hour	235 µg/Nm <sup>3</sup> per hour	Hydrocarbon	<13 µg/Nm <sup>3</sup>	-	Lead (Pb)	<0.05 µg/Nm <sup>3</sup>	-	Parameter	Result	Permitted	Total suspended particulate	69 µg/Nm <sup>3</sup> per hour	-	Sulphure dioxide (SO <sub>2</sub> )	70 µg/Nm <sup>3</sup> per hour	900 µg/Nm <sup>3</sup> per hour	Nitrogen dioxide (NO <sub>2</sub> )	63 µg/Nm <sup>3</sup> per hour	400 µg/Nm <sup>3</sup> per hour	Carbon monoxide	<1145 µg/Nm <sup>3</sup> per hour	30,000 µg/Nm <sup>3</sup> per hour	Ozone	39 µg/Nm <sup>3</sup> per hour	235 µg/Nm <sup>3</sup> per hour	Hydrocarbon	<13 µg/Nm <sup>3</sup>	-	Lead (Pb)	<0.05 µg/Nm <sup>3</sup>	-	Parameter	Result	Permitted	Hydrogen sulphide (H <sub>2</sub> S)	0.007 ppm	0.02 ppm	Ammonia (NH <sub>3</sub> )	0.037 ppm	2 ppm	Parameter	Result	Permitted	Hydrogen sulphide (H <sub>2</sub> S)	<0.005 ppm	0.02 ppm	Ammonia (NH <sub>3</sub> )	<.03 ppm	2 ppm	<p>Comply</p>
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**Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and mills**

**Criterion 6.1**

Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.

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<p>6.1.1</p> <p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>- Major compliance -</p>	<p>Social aspect-impact in PT. Agro Muko has been studied as per government document:</p> <ul style="list-style-type: none"> <li>- "Analisis Dampak Lingkungan (ANDAL) dan Rencana Pengelolaan dan Pemantauan Lingkungan (RKL-RPL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit dan Karet di Kecamatan Mukomuko Utara, Kecamatan Lubuk Pinang, Kecamatan Teras Terunjam dan Kecamatan Pondok Sughu, Kabupaten Mukomuko, Propinsi Bengkulu, tahun 2005";</li> <li>- "Dokumen Pengelolaan Lingkungan Hidup (DPLH) Perkebunan Kelapa Sawit Air Buluh (luas 2,500 Ha) di Desa Semundam, Talang Baru, Talang Arah dan Tanjung Jaya, Kecamatan Malin Deman dan Kecamatan Ipuh (Pemekaran Kecamatan Mukomuko Selatan) Kabupaten Mukomuko tahun 2011". The document was approved based on "Surat Bupati No.660/237.2/F.4/IX/2011" dated 29 September 2011.</li> </ul> <p>Aside from that, company has prepared a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI), in 2010 and 2011. The scope of social impact assessment covers 15 villages around company including Kebun Masyarakat Desa/KMD of 524 Ha from 38 surrounding villages.</p> <p>PT. Mukomuko Agro Sejahtera has prepared the document, identifying social impact under document:</p> <ul style="list-style-type: none"> <li>- "Dokumen AMDAL untuk Kegiatan Perkebunan Kelapa Sawit seluas 6,298 Ha di Kecamatan Malin Deman, Kecamatan Ipuh dan Kecamatan V Koto, Kabupaten Mukomuko, Provinsi Bengkulu". The document was approved by "Surat Keputusan Gubernur Bengkulu No. M.288.XXX Tahun 2011" dated 9 September 2011.</li> </ul> <p>Aside from that, company has prepared a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI). The report under "Dokumen Laporan Final Penilaian Dampak Sosial dan Lingkungan yang dilaksanakan oleh Yayasan Kelapa Sawit Berkelanjutan (YASBI) pada tahun 2011 yang dilakukan terhadap dampak sosial dari pemabngunan kebun inti dan rencana pembangunan Kebun Masyarakat Desa (KMD)".</p> <p><i>Kebun Masyarakat Desa/KMD:</i></p> <p>In 2010, company has prepared a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI). The scope of social impact assessment covers 15 villages around company including <i>Kebun Masyarakat Desa/KMD</i> of 524 Ha from 38 surrounding villages.</p> <p>In 2017, social impact assessment held in cooperation with Koompasia Enviro Institut for scope of 10 KMDs. The social impact assessment was done between 8-16 March 2017 with scope of 15 villages around KMD with focus group discussion (FGD).</p>	<p>Comply</p>

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<p>6.1.2</p> <p>There shall be evidence that the assessment has been conducted with the participation of affected parties.</p> <p>- Major compliance -</p>	<p>From the social impact assessment document: "Analisis Dampak Lingkungan (ANDAL) dan Rencana Pengelolaan dan Pemantauan Lingkungan (RKL-RPL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit dan Karet di Kecamatan Mukomuko Utara, Kecamatan Lubuk Pinang, Kecamatan Teras Terunjam dan Kecamatan Pondok Sugu, Kabupaten Mukomuko, Propinsi Bengkulu, tahun 2005"; and "Dokumen Pengelolaan Lingkungan Hidup (DPLH) Perkebunan Kelapa Sawit Air Buluh (luas 2,500 Ha) di Desa Semundam, Talang Baru, Talang Arah dan Tanjung Jaya, Kecamatan Malin Deman dan Kecamatan Ipuh (Pemekaran Kecamatan Mukomuko Selatan) Kabupaten Mukomuko tahun 2011" – it was found that the document prepared with public consultation process, involving stakeholders from surrounding community, government bodies, traditional leaders, etc.</p> <p>Company has a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI), in 2010 and 2011. The social impact assessment involving peoples from 15 villages around company; including Kebun Masyarakat Desa/KMD from 38 surrounding villages.</p> <p>For PT. Mukomuko Agro Sejahtera, the social impact document, "Dokumen AMDAL untuk Kegiatan Perkebunan Kelapa Sawit seluas 6,298 Ha di Kecamatan Malin Deman, Kecamatan Ipuh dan Kecamatan V Koto, Kabupaten Mukomuko, Provinsi Bengkulu" was prepared with involvement from surrounding village under Malin Deman District and V Koto District.</p> <p>To demonstrate commitment, company keeps monitor all social aspects as identified in the documents. Monitoring and reporting carried out on 6 monthly basis.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> In 2010, company has prepared a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI). The scope of social impact assessment covers 15 villages around company including <i>Kebun Masyarakat Desa/KMD</i> of 524 Ha from 38 surrounding villages. In 2017, social impact assessment held in cooperation with Koompasia Enviro Institut for scope of 10 KMDs. The social impact assessment was done between 8-16 March 2017 with scope of 15 villages around KMD with focus group discussion (FGD).</p>	<p>Comply</p>

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<p>6.1.3</p> <p>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.</p> <p>- Major compliance -</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera: Within the AMDAL documents, 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. Under the document, the social aspect identified covers source of livelihood, community's revenue, community mobility, community perception on company activity, social conflict, social-cultural changes, community health status.</p> <p>The Social Impact Assessment documents have explained the recommendation that should be done by company to minimize negative impact and promote positive impact from social impact management. This document covers social aspect, i.e. job opportunity, business opportunity, contribution to regional economic, public and social facility, source of natural resources – related to HCV 5, cultural value – related to HCV 6.</p> <p>The social impact management plan from documents have lined out program to manage and monitors social impact, timeframe and person in charge. The plan was consulted through questionnaire/survey to surrounding communities on 6-monthly basis. Progress of implementation was monitored, evaluated and reported to government on 6-monthly basis.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> For management plans in KMD, the social impact was carried out as part of company activity, because the smallholder plantation was managed by company. As for the 2017 documents, the management and monitoring of social impact comprise of review upon KMD development to ensure no internal conflict at village level; prepare human resources to manage the smallholder plantation (financial, organizational, capacity building, etc.); socialization of KMD development plans; review the location of smallholder plantation location – to ensure consensus and involvement of all parties within village scope; coordination with government related to SPPL.</p>	<p>Comply</p>

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6.1.4	<p>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.</p> <p>- Minor compliance –</p>	<p>Companies have carried out social impact evaluation on annual basis through social survey. The survey was conducted by ENC-AM/MMAS and being part of environment management and monitoring report - "Laporan Pelaksanaan RKL-RPL".</p> <p>The company PT. Agro Muko and PT. Mukomuko Agro Sejahtera have a form for interview with community to capture social aspects, dated 19 – 26 June 2017 to 135 responden in 31 villages. From the survey result, the current social management plan is still relevant.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> For management plans in KMD, the social impact was carried out as part of company activity, because the smallholder plantation was managed by company. As explained from PT. Agro Muko and PT. Mukomuko Agro Sejahtera’s social monitoring, the current management plan is still relevant – in terms of smallholder management.</p> <p>In addition, in 2017, social impact assessment held in cooperation with Koompasia Enviro Institut for scope of 10 KMDs. The social impact assessment was done between 8-16 March 2017 with scope of 15 villages around KMD with focus group discussion (FGD).</p>	Comply
6.1.5	<p>Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme).</p> <p>- Minor compliance –</p>	<p>Both PT. Agro Muko and PT. Mukomuko Agro Sejahtera are fully managing the scheme smallholder in form of Kebun Masyarakat Desa/KMD. Companies has put all resources (human resources, manpower resources, financial resources, knowledge sharing, technical support, guidance on HCV, SIA, etc.) to support the development of smallholder plantation.</p> <p>In 2010, company has prepared a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI). The scope of social impact assessment covers 15 villages around company including <i>Kebun Masyarakat Desa/KMD</i> of 524 Ha from 38 surrounding villages.</p> <p>In 2017, social impact assessment held in cooperation with Koompasia Enviro Institut for scope of 10 KMDs. The social impact assessment was done between 8-16 March 2017 with scope of 15 villages around KMD with focus group discussion (FGD).</p> <p>This was evident in form of minutes of meeting, attendance list of FGD in each village – parts of assessment scope.</p>	Comply
<p><b>Criterion 6.2</b></p> <p>There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.</p>			

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6.2.1	<p>Communication and consultation procedures shall be documented.</p> <p>- Major compliance -</p>	<p>The company has a mechanism that regulates the activities of communication and consultation with stakeholders and set in the procedure, such as:</p> <ol style="list-style-type: none"> <li>1. Procedure: <i>Pemberian dan Tanggapan terhadap Permintaan Informasi</i>; No.ENC/SOP/08 dated 5 September 2014 which regulates the complete procedure for submission and responding to requests for information from stakeholders.</li> <li>2. Procedure: <i>Keluh Kesah dengan Pihak Internal</i>, Rev II No.SOP/025/Dept dated 27 March 2015, which has been described in detail the procedures related to complaints and redress submitted by the parties, incorporating internal flow chart in response to complaints</li> <li>3. Procedure: <i>Keluh Kesah dengan Pihak Eksternal</i>, Rev II No.SOP/026/HRA dated 27 March 2015 which has been describe in detail the procedures related to complaints and redress submitted by external parties that are equipped with a flow chart in response to complaints.</li> </ol> <p>Responsible person in conducting responses to information requests in accordance with its authority (Manager Unit, GMO and Department Head), system response times to requests for information that is set up to 7 days if the responses are in authority Manager Unit, or a maximum of 25 working days if the information requires consultation of other departments or higher management levels associated with authority provide feedback information.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>  All the activity of smallholder plantation was carried out by each estate under PT. Agro Muko and PT. Mukomuko Agro Sejahtera. Therefore, KMD requested any information request will be channeled to the field head assisstant <i>Kebun Masyarakat Desa/KMD</i> in each estate. KMD referring to procedure lined out by PT. Agro Muko and/or PT. Mukomuko Agro Sejahtera.  Based on interview with KMD committee, the company has disseminated procedure regarding communication and consultation. Logbooks for consultation and communication sighted.</p> <p>NC Major:  3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate that documented communication and consultation procedures has been established.</p>	<p>Non-Compliance Comply</p>

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<p>6.2.2 The company shall have official(s) who is responsible for consultation and communications with parties.</p> <p>- Minor compliance -</p>	<p>Based on SOP No.ENC/SOP/08 (procedure of information request and response) revision 02, dated 6 April 2016 that according to the structure of the organization that is responsible to receive and make responses to requests for information or complaints internally/externally is Manager. However, in the operations in each of the Estate indicates that an FHA also appointed Senior Manager (Field Head Assistant) and OA (Office Assistant) for communication with the surrounding community.</p> <p><b>Bunga Tanjung POM:</b>  The responsible person is mill manager, Mr. Sariman Sihombing.</p> <p><b>Air Buluh Estate:</b>  Management appointed Estate Manager, Field head assistant and office assistant as responsible official to communicate and consultation with stakeholders.</p> <p><b>Malin Deman Estate:</b>  Management appointed Estate Manager, Field head assistant and office assistant as responsible official to communicate and consultation with stakeholders.</p> <p><b>Kebun Masyarakat Desa/KMD:</b>  Each Kebun Masyarakat Desa/KMD Mundam Marap has appointed their official, responsible for consultation and communication with stakeholders. KMD leaders can communicate and consult to KMD assistant or Estate Manager. Based on interview with KMD leader, the company has disseminated procedure regarding communication and consultation.</p> <p><b>NC Minor:</b>  3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrate that KMD has appointed official(s) responsible for consultation and communications with stakeholders.</p>	<p><del>Non-Compliance</del>  Comply</p>

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<p>6.2.3</p> <p>The company shall have a 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.</p> <p>- Minor compliance -</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera have lists of stakeholders, updated when changes occurred. Communication record available under "Buku Komunikasi dan Konsultasi dengan Masyarakat".</p> <p>Bunga Tanjung POM:            "Daftar Pemangku Kepentingan PT. Agro Muko Bunga Tanjung POM", update dated 29 September 2017. Consist of 6 Regency level authorities, 3 police and army offices, 4 villages, 6 "kepala kaum" – cultural leaders, 6 NGOs, 4 worker union, 6 contractors, 22 Kebun Masyarakat Desa/Koperasi Serba Usaha/Koperasi Plasma. All information completed with the contact person, address and phone number. Communication record available under "Buku Komunikasi dan Konsultasi dengan Masyarakat".</p> <p>Air Buluh Estate:            Daftar Pemangku Kepentingan PT. Agro Muko Air Buluh Estate, dated 23 October 2017. Consist fo 7 Regency level authorities, 6 police and army offices, 9 villages, 15 "kepala kaum" – cultural leaders, NGO Desa Talang Baru, 1 worker union, 4 contractors. All information completed with the contact person, address and phone number. Communication record available under "Buku Komunikasi dan Konsultasi dengan Masyarakat".</p> <p>Malin Deman Estate:            Daftar Pemangku Kepentingan PT. Mukomuko Agro Sejahtera Malin Deman Estate, dated 1 June 2017. Consist fo 6 Regency level authorities, 6 police and army offices, 9 villages, 15 "kepala kaum" – cultural leaders, NGO Desa Talang Baru, 2 contractors. "Buku Komunikasi dan Konsultasi dengan Masyarakat", in 2017, recorded communication and consultation effort with stakeholders. Sample taken and verified: on 7 March 2017, Field head assisstant meeting with Mr. Sapri and Mr.Soleh from Lubuk Talang village. The communities wishes to sell their land, in the scope of PT. Mukomuko Agro Sejahtera – Malin Deman Estate, Rp.100 million/Ha.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>            Each Kebun Masyarakat Desa/KMD has information request logbook and stakeholder list.</p> <p>NC Minor:            3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrated that these KMD has a 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.</p>	<p>Non-Compliance Comply</p>

**Criterion 6.3**

There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.

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<p>6.3.1</p> <p>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.</p> <p>- Major compliance -</p>	<p>Based on document verification, PT. Agro Muko and PT. Mukomuko Agro Sejahtera have a mechanism for external complaint/grievance, as per "Prosedur Keluh Kesah dengan Pihak Eksternal" Doc. No. SOP/025/Dept, dated 27 March 2015.</p> <p>Internal complaint will be settled as per "Prosedur Keluh Kesah dengan Pihak Internal" No.SOP/025/Dept dated 27 March 2015.</p> <p>Mechanism to resolve land disputes as in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. The procedure shows company has prepared effective land dispute resolution mechanism: Company being transparent on permits, licenses including land title to the community; In case of claim from community, company will cater as long as valid land ownership evidence presented; Status verification – when valid land ownership evidence presented, continued with field visit/survey and measurement; Field visit/survey and measurement will involve company representative, complainant and government representatives; Based on field visit/survey and measurement, a minutes will be produced, attaching the hectare and coordinates of the claimed land – signed by all interested parties; Final verification to ensure no overlapping with other party; Once final verification can justified no overlapping occurred, company will propose land compensation/negotiation. Payment will be done once agreement between parties made.</p> <p>Inside these procedures, company provides in Bahasa Indonesia and stipulates the commitment to protect the anonymity of complainant/whistleblower (point 6.2) – if requested.</p> <p>---</p>	<p>Non-Compliance Comply</p>

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	<p><i>Kebun Masyarakat Desa/KMD:</i> Scheme smallholder committees agreed to follow the company mechanism, for dispute resolution. Company and Kebun Masyarakat Desa/KMD agreed that Kebun Masyarakat Desa/KMD committee will follow PT. Agro Muko's procedure on complaint/grievance/dispute resolution mechanism. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committees "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&amp;C through implementation of relevent policies and SOP from PT. Agro Muko.</p> <p>PT. Agro Muko's "Prosedur Keluh Kesah dengan Pihak Internal, No.SOP/025/HRA rev.02" – grievance settling with internal parties procedure dated 27 March 2015, available in English and Bahasa Indonesia.</p> <p>PT. Agro Muko's "Prosedur Keluh Kesah dengan Pihak Eksternal, No.SOP/026/HRA rev.02" – grievance settling with internal parties procedure dated 27 March 2015, available in English and Bahasa Indonesia.</p> <p>Any information on complaint/grievance/dispute will be channeled to the field head assisstant <i>Kebun Masyarakat Desa/KMD</i>.</p> <p>NC Major: 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrated that dispute resolution mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.</p>	

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6.3.2	<p>There shall be records of process and outcome of dispute resolution.</p> <p>- Major compliance -</p>	<p>Bunga Tanjung POM: Complaint recorded under "Rekaman Keluh-Kesah Internal &amp; Eksternal". In 2017, there was 18 internal complaints while no external complaint was received. Complaint from Mr. M****, on 12 July 2017 related to broken water torrent in housing, followed up and repaired by mill management on 19 July 2017. Internal complaint from S**** S*****, dated 18 August 2017 related to broken ceiling has been followed up and repair completed on 28 August 2017.</p> <p>Air Buluh Estate: Complaint recorded under "Rekaman Keluh-Kesah Internal &amp; Eksternal". In 2017, there was 20 internal complaints while no external complaint was received. Complaint from Mrs. M****, on 16 January 2017 related to broken water closet in housing, followed up and repaired by civil work Department on 26 January 2017. Complaint from Mr. R****, on 10 July 2017 related to broken housing poles, followed up and repaired by civil work Department on same day.</p> <p>Air Buluh Estate: Complaint recorded under "Rekaman Keluh-Kesah Internal &amp; Eksternal". In 2017, there was 20 internal complaints while 3 external complaints was received. Internal complaint from Mrs. M****, on 16 January 2017 related to broken water closet in housing, followed up and repaired by civil work Department on 26 January 2017. Internal complaint from Mr. R****, on 10 July 2017 related to broken housing poles, followed up and repaired by civil work Department on same day.</p> <p>---</p>	Comply

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	<p>External complaint noted from Mr. X, dated 21 April 2017 related to piece price for road maintenance project. It was responded on same date with response on piece rate for road maintenance project.</p> <p>Malin Deman Estate: Complaint recorded under "Rekaman Keluh-Kesah Internal &amp; Eksternal". In 2017, there was 12 internal complaints while 6 external complaints was received in Malin Deman Estate. Internal complaint from Mr. Z*****, on 20 July 2017 related to housing for workers. The issues has been followed up several times, the latest respond on 27 October 2017 stating housing construction is in progress, build in phases up to 2020. External complaint noted from Mr. A* S*****, dated 9 November 2017 related to construction of boundary moat, making farmer's FFB transport difficult. It was responded on same date with response that boundary moat construction is to improve FFB losses, however, communities are allowed to transport their FFB through with prior permit. Bridge over the boundary moat also acceptable, with certain requirements, as explained. It has been accepted.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Based on document review and interview with the "Panitia KMD" from 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang), it was known that a dispute resolution mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested - has been established.</p>	

**Criterion 6.4**

Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

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<p>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.</p> <p>- Major compliance –</p>	<p>Mechanism to identify legal, customary or user rights and identify people entitled to compensation available in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. The procedure shows company has prepared dispute resolution mechanism: Company being transparent on permits, licenses including land title to the community; In case of claim from community, company will cater as long as valid land ownership evidence presented; Status verification – when valid land ownership evidence presented, continued with field visit/survey and measurement; Field visit/survey and measurement will involve company representative, complainant and government representatives; Based on field visit/survey and measurement, a minutes will be produced, attaching the hectare and coordinates of the claimed land – signed by all interested parties; Final verification to ensure no overlapping with other party; Once final verification can justified no overlapping occurred, company will propose land compensation/negotiation. Payment will be done once agreement between parties made.</p> <p>This procedure is available in Bahasa Indonesia.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Company and <i>Kebun Masyarakat Desa/KMD</i> agreed that <i>Kebun Masyarakat Desa/KMD</i> committee will follow PT. Agro Muko's procedure on identifying people entitled to compensation. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&amp;C through implementation of relevant policies and SOP from PT. Agro Muko. PT. Agro Muko's "Prosedur Ganti Rugi Lahan, No.SOP/CA/02" – land compensation procedure dated 1 July 2012, available in English and Bahasa Indonesia. Any identification of people entitled for land compensation will be identified by <i>Kebun Masyarakat Desa/KMD</i> committee and acknowledged by PT. Agro Muko. Based on interview with KMD committees, the committee has understood and acknowledge the mechanism.</p> <p>NC Major: 3 <i>Kebun Masyarakat Desa/KMDs</i> (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrated procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, has been made available, referring to decision of the Constitution Court.</p>	<p>Non-Compliance Comply</p>

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<p>6.4.2</p> <p>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.</p> <p>- Minor compliance –</p>	<p>Mechanism to identify legal, customary or user rights and identify people entitled to compensation available in “Prosedur Ganti Rugi Lahan” No.SOP/CA/02, dated 1 July 2012. The procedure shows company has prepared dispute resolution mechanism: Company being transparent on permits, licenses including land title to the community; In case of claim from community, company will cater as long as valid land ownership evidence presented; Status verification – when valid land ownership evidence presented, continued with field visit/survey and measurement; Field visit/survey and measurement will involve company representative, complainant and government representatives; Based on field visit/survey and measurement, a minutes will be produced, attaching the hectare and coordinates of the claimed land – signed by all interested parties; Final verification to ensure no overlapping with other party; Once final verification can justified no overlapping occurred, company will propose land compensation/negotiation. Payment will be done once agreement between parties made. This procedure is available in Bahasa Indonesia.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Company and <i>Kebun Masyarakat Desa/KMD</i> agreed that <i>Kebun Masyarakat Desa/KMD</i> committee will follow PT. Agro Muko’s procedure on calculating and distributing fair compensation. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee “Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO” dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&amp;C through implementation of relevant policies and SOP from PT. Agro Muko. PT. Agro Muko’s “Prosedur Ganti Rugi Lahan, No.SOP/CA/02” – land compensation procedure dated 1 July 2012, available in English and Bahasa Indonesia. Any identification for calculating and distributing fair compensation will be identified by <i>Kebun Masyarakat Desa/KMD</i> committee and acknowledged by PT. Agro Muko. Based on interview with KMD committees, the committee has understood and acknowledge the mechanism.</p> <p>NC Minor: 3 <i>Kebun Masyarakat Desa/KMDs</i> (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) cannot demonstrated a procedure for calculating and distributing fair compensation has been established.</p>	<p>Non-Compliance Comply</p>

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<p>6.4.3 Compensation claims, process and outcome of any negotiated agreements shall be documented, with evidence of the participation of affected parties.</p> <p>- Major compliance –</p>	<p>The compensation is calculated using government guidelines for land and crop values. This is already implemented. Details of negotiation settlements, including detail of compensation (land compensation, improvement compensation, crops compensation) are held in file "Agro Muko Land Compensation" since the development of the estate in 1990s.</p> <p>The company holds the records of all compensation payments including amounts, statement letter, receipt, negotiation record, progress of complaint, details of witness and photograph of recipient.</p> <p>PT. Agro Muko: Land compensation process were documented, for example in 2013, for 1.14 Ha under landowner Mr.A*** S; and for 1.36 Ha under landowner Mr. Z***** - both from Air Merah village. Land compensation documents completed, payment made on 15 July 2013.</p> <p>In Air Buluh Estate, land compensation No.30 in 2016, for 2.51 Ha under landowner Mr.A** M***; from Talang Baru village. Land compensation documents completed, payment made on 11 February 2016. The documents comprise of "Surat Keterangan Ganti Rugi Tanah Garapan" – statement letter of compensation, dated 11 February 2016; "Surat Pelepasan Hak Menggarap Atas Tanah Garapan" – release on user right, 11 February 2016. All process signed by both parties and acknowledged by Talang Baru Village Head and Malin Deman District Head. Participatory maps scale 1:1,500 dated 27 January 2016. Negotiation minutes that has been signed, dated 11 February 2016 – explaining the negotiation chronology. Compensation payment for Rp.1**,***,*** for Mr.A** M***, dated 11 February 2016. All completed with photograph.</p> <p>Land compensation No.15 in 2016, for 0.65 Ha under landowner Mr.E** M****; from Talang Baru village. Land compensation documents completed, payment made on 11 February 2016. The documents comprise of "Surat Keterangan Ganti Rugi Tanah Garapan" – statement letter of compensation, dated 11 February 2016; "Surat Pelepasan Hak Menggarap Atas Tanah Garapan" – release on user right, 11 February 2016. All process signed by both parties and acknowledged by Talang Baru Village Head and Malin Deman District Head. Participatory maps scale 1:1,500 dated 26 January 2016. Negotiation minutes that has been signed, dated 11 February 2016 – explaining the negotiation chronology. Compensation payment for Rp.*,***,*** for Mr.E** M****, dated 11 February 2016. All completed with photograph.</p> <p>---</p>	<p>Comply</p>

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	<p>PT. Mukomuko Agro Sejahtera: PT. Mukomuko Agro Sejahtera has carried out land compensation to landowners and documented: in 2010, compensation made to 514 landowners with total area of 1,102.7 Ha; in 2011, compensation made to 101 landowners with total area of 167.9 Ha; in 2012, compensation made to 181 landowners with total area of 285.93 Ha; in 2013, compensation made to 151 landowners with total area of 232.5 Ha; up to this moment, company has made compensation for 1,225 landowners with total area of 2,142.29 Ha; Land compensation in 2013, for 2.9 Ha under landowner Mr.As****; from Talang Arah village. Completed with Surat Keterangan Tanah/SKT No.590/055/17.05.15/2013 for 0.9 Ha and No.590/039/17.05.15/2013 for 2 Ha, dated 30 April 2013. Land compensation documents completed, payment made on 30 April 2013. The documents comprise of "Surat Keterangan Ganti Rugi Tanah Garapan" – statement letter of compensation, dated 30 April 2013; "Surat Pelepasan Hak Menggarap Atas Tanah Garapan" – release on user right, 30 April 2013. All process signed by both parties and acknowledged by two witnesses from Talang Arah Village Head and Malin Deman District Head. Negotiation minutes that has been signed, dated 30 April 2013 – explaining the negotiation chronology. Compensation payment for Rp.1**,**,** for Mr.A****, dated 30 April 2013. All completed with photograph.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> The development of KMD was through proposal, initiated from village meeting to seek consent from community. For example, in KMD Mundam Marap, meeting dated 20 August 2017 attended by 24 communities agreed on few aspects: village will proposed the development of smallholder plantation to PT. Agro Muko; the plantation will use location/land resource under Mundam Marap village; the committee has been sitting, chairman Mr. Abdul Gapur. Chronology of land acquisition: "Surat Pernyataan Penguasaan Fisik Tanah", under name Aswanto, whereby handed over the user right over 2 Ha land, back to "Pemerintah Desa Mundam Marap", dated 26 September 2017. The history of land right/user right: 1979 user right under name Mr. Husin basri; 2013 user right under name Mr.Suharto (purchase); 2015 user right under "Pemerintah Desa Mundam Marap" (purchase) dated 26 January 2015.</p>	
<p><b>Criterion 6.5</b> 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.</p>		

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<p>6.5.1 Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.</p> <p>- Major compliance -</p>	<p>The company determines minimum wages as regulated by government every year, minimum wages in Kabupaten Mukomuko Tahun 2017 base on "Surat Keputusan Gubernur Bengkulu No.N.144/Disnakertrans Tahun 2017 tentang Upah Minimum Sektor Provinsi Bengkulu tahun 2017", dated 4 April 2017. The decree stipulates minimum wages Rp. 1,800,000 per month.</p> <p>Company and worker union has made collective work agreement stated permanent worker and temporary worker will be paid in accordance to consensus between management and worker union (Serikat Pekerja Agro Mandiri).</p> <p>Company then issued letter "Surat GM Agro Muko No.12/GMO AM-All-OU/IV-17 perihal Penetapan Upah Minimum Sektor Provinsi Bengkulu sektor Pertanian dan Perkebunan Tahun 2017", dated 7 April 2017. It is lined out the minimum wage in Bengkulu Rp.1,800,000/month; minimum wage per mandays was Rp.72,000/manday (divided 25 working days); minimum wage per manhour was Rp.10,286/manhour (7 hours).</p> <p>Random sample taken:</p> <ul style="list-style-type: none"> <li>- Bunga Tanjung POM: Worker Register #01***. Permanent worker, on October 2017 received Rp.2,766,297. Consist of basic salary Rp.1,810,000; Rice benefit Rp.133,500; <i>BPJS Ketenagakerjaan</i>/insurance Rp.88,100; <i>BPJS Kesehatan</i>/healthcare Rp.72,400; <i>BPJS Pensiun</i>/pension fund Rp.38,810; Overtime Rp.623,487.</li> <li>Worker register No.01***. Permanent worker, on June 2017 received Rp.4,421,356. Consist of basic salary Rp. 1,737,413; Rice benefit Rp.124,500; <i>BPJS Ketenagakerjaan</i>/insurance Rp.84,804; <i>BPJS Kesehatan</i>/health care Rp.69,497; <i>BPJS Pensiun</i>/pension fund Rp.37,358; Overtime Rp.505,871. Additional Bonus and religious day fee Rp.1,861,913.</li> <li>- Air Buluh Estate: Worker Register #7*FL. Temporary worker, on June 2017 received basic salary Rp. 1,800,000. Worker Register No.04***. Temporary worker, on September 2017 received basic salary Rp.1,800,000.</li> <li>- Malin deman Estate: Worker No.BL***. Pekerja Semprot Temporary worker, on October 2017 received basic salary Rp. 1,800,000. Worker Register No.04***. Temporary worker, on September 2017 received basic salary Rp.1,800,000. Worker register No.0**, Temporary worker, on September 2017 received basic salary Rp. 1,800,000.</li> </ul> <p>Based on review of payments slip, there is no worker's salary below minimum wages, e.g.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> All activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker, pay and condition are following company regulation.</p>	<p>Comply</p>

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<p>6.5.2 Collective Labor 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.</p> <p>- Major compliance -</p>	<p>Company and worker union has made collective work agreement stated permanent worker and temporary worker will be paid in accordance to consensus between management and worker union (Serikat Pekerja Agro Mandiri). The collective work agreement has been approved by manpower office: "Surat Keputusan Kepala Dinas Sosial, Tenaga Kerja dan Transmigrasi Kabupaten Mukomuko No.21 Tahun 2016 tentang Perjanjian Kerja Bersama antara PT. Agro Muko dengan Pengurus Unit Kerja Serikat Pekerja Agro Mandiri (SPAM) PT. Agro Muko" dated 3 October 2016. The collective work agreement has been registered under "Dinas Sosial, Tenaga Kerja dan Transmigrasi Kabupaten Mukomuko, No.560/21/D.3/IV/2016. Available in Bahasa Indonesia. The collective work agreement valid from 1 October 2016 up to 31 October 2018.</p> <p>The work agreement has stipulates:</p> <ul style="list-style-type: none"> <li>- Salary: in form of monetary as consensus, in compliance with government regulation. Salary can be provided in form of natura/rice 15 kg for registered worker, 9 kg for spouse, 7.5 kg for children (up to 3 child);</li> <li>- Chapter III: working hour,regulating the weekly working hour, change and adjustment of working hours, weekly rest day, government official holiday, working hour for female workers;</li> <li>- Chapter IX: Overtime, regulating overtime work, overtime rate – refer to "Keputusan Menteri Tenaga Kerja No.Kep-102/Men/VI/2004";</li> <li>- Facility provided by company (housing, clean water, electricity, medical clinic, school, etc.);</li> <li>- Freedom of association;</li> <li>- Dispute settlement; etc.</li> </ul> <p>The collective work agreement has been communicated through worker union and prior to work agreement signing with new worker.</p> <p>Bunga Tanjung POM: Based on document verification and interview, during promotion from temporary to permanent worker: "Memorandum Senior Technical Manager Bunga Tanjung Palm Oil Mill No.017/JWB-BTPOM/I/15 perihal Pengangkatan PKWT ke SKUH (1 orang) atas nama Hendri Rahmad, pengangkatan SKUH ke SKUB (1 orang) atas nama Andi Suprianto", dated 5 January 2015. The promoted workers have been explained on their right and obligation as per collective work agreement. Interview with said workers, they understood and have access to the work agreement.</p> <p>Air Buluh Estate: Based on document verification and interview, during promotion from temporary to permanent worker: "Pengangkatan Tenaga Kerja atas nama Rosida dari PKWT menjadi SKU-H (Baby Sitter/Register No.406) dated 1 November 2011. The promoted workers have been explained on their right and obligation as per collective work agreement. Interview with said workers, they understood and have access to the work agreement.</p> <p>---</p>	<p>Comply</p>

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	<p>Malin Deman Estate: Based on document verification and interview, during contract for temporary worker: "Perjanjian Kerja Waktu Tertentu atas nama Siti Asriani (Register No.BL207), sprayer" and "Perjanjian Kerja Waktu Tertentu atas nama Indra (Register No.077), harvester" dated 15 January 2015. The contract workers have been explained on their right and obligation as per collective work agreement. Interview with said workers, they understood and have access to the work agreement.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> All activities (planting, upkeep, manuring, harvesting, etc.) at KMD plantation block are performed by the company worker, pay and condition are following company regulation.</p>	
<p>6.5.3</p>	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where such public facilities are unavailable or inaccessible.</p> <p>- Minor compliance –</p> <p>The company has prepared facilities for their workers, such as: Bunga Tanjung POM: Based on field verification, Bunga Tanjung POM provides housing 7 units for staff and 104 worker housing (with free water and electricity supplied), consist of 1 living room, 2 bed rooms, 1 toilet, 1 kitchen; 1 elementary school; 1 creche/daycare; 3 school buses; sport fields; 1 worker hall; 1 polyclinic; religious house (mosque and church); 1 ambulance. Any housing problem will be followed up accordingly by Civil Engineering Division.</p> <p>Air Buluh Estate dan Malin deman Estate: Based on field verification, Air Buluh Estate and Malindeman Estate shared the facility for their workers. The estates have prepared 100 housing for workers (with free water and electricity supplied), consist of 1 living room, 2 bed rooms, 1 toilet, 1 kitchen; 1 elementary school; 1 school bus; 1 sport field; 1 worker hall; 1 polyclinic; religious house (masjid and church).</p> <p>As explained in indicator 4.7.6, all workers has provided with medical care, and covered by accident insurance. The company also has provided clinic for all workers, located in each estate. Referral are made to nearest hospital should the case is severe in Mukomuko Region Hospital based on new regulation in Indonesia (BPJS kesehatan). Ambulance is standing by. The company also providing social and accident insurance in form of Jamsostek (BPJS Ketenagakerjaan) for all workers.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> All activities (planting, upkeep, manuring, harvesting, etc.) at KMD plantation block are performed by the company workers. The workers are using company facility – as provided.</p>	<p>Comply</p>

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<p>6.5.4</p> <p>There shall be demonstrable efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera: The employees able to access traditional market and also there is cooperative to providing affordable food. In addition, PT. Agro Muko and PT. Mukomuko Agro Sejahtera has encourage the establishment of employee cooperative "Koperasi Serba Usaha Karyawan Agromuko" which purpose is to help worker in meet their basic food need.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> All activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker. The access to adequate, sufficient and affordable food for workers are following condition sets by company. The KMD committees are villagers from surrounding village, having their own access to affordable food.</p>	<p>Comply</p>
<p><b>Criterion 6.6</b></p> <p>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.</p>		
<p>6.6.1</p> <p>A record of the company's policy in understandable language recognising freedom of association, shall be available.</p> <p>- Major compliance –</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera has a policy of recognizing freedom association in "Kebijakan Kebebasan Berserikat", signed by President Director on 1 March 2014, which stated the company recognizes the role of lawful and independent workers and employees. Representative organization in creating a constructive working environment.</p> <p>To demonstrate commitment, PT. Agro Muko have facilitated the forming of worker union, "Serikat Pekerja AgroMuko Mandiri (SPAM)", whereby the organization has been registered "Dinas Sosial, Tenaga Kerja dan Transmigrasi No.D.3/560/53/SPAM-AG/IV/2015", dated 20 October 2015. There is a list of worker union member.</p> <p>Bunga Tanjung POM: In 2017, there was a change in worker union committee, as per "Surat Keputusan Pengurus Induk Serikat Pekerja Agromuko Mandiri No.Kep.07/SK/SPAM-AM/X/2017 tentang Pengesahan Susunan Pengurus Tingkat Koordinator Estate Serikat Pekerja Agro Mandiri (SPAM) PT. Agro Muko-Bunga Tanjung Palm Oil Mill", dated 25 October 2017.</p> <p>In PT. Mukomuko Agro Sejahtera, the worker union has not been formed, because there has been lack of initiative from the worker lately. Company have demonstrate support to encourage forming of worker union.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> All activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker, freedom of association are following company policy. Based on interview with KMD committees, they are respecting the sovereignty of company workers in their plantation and recognize their freedom of association.</p>	<p>Comply</p>

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<p>6.6.2 Records of meetings with labor unions or workers representatives shall be available.</p> <p>- Minor compliance –</p>	<p>Meeting with the company and labour union is conducted regularly, several meetings were held.</p> <p>“Perundingan antara PT. Agro Muko and Serikat Pekerja Agromuko Mandiri” dated 19 April 2017 in clubhouse PT. Agro Muko. The meeting discussing the increment/raise following government regulation on minimum salary 2017 – applicable to permanent, contract and temporary worker. The meeting resulted in consensus, signed by 2 management representative and 3 worker union representative. The result: the salary raise effective (retrospective) since 1 January 2017; the salary raise will be according to each grade; worker union committed to disseminates the meeting result to all of its workers and to encourage worker to improve productivity and abide to working hour.</p> <p>Bunga Tanjung POM: In Bunga Tanjung POM, company has documented the meeting with worker union:</p> <ul style="list-style-type: none"> <li>- Meeting between management and worker union (SPAM) dated 24 October 2017, related to preparation of bipartite committee period 2017 – 2019;</li> <li>- Meeting between management and worker union (SPAM) dated 15 August 2016 regarding independence day celebration;</li> <li>- Meeting between management and worker union (SPAM) dated 14 July 2016 related to request from one of the worker to be re-instated in former position (Processing station);</li> </ul> <p>Air Buluh Estate and Malin Deman Estate: Meeting in Bukittinggi, dated 14-17 March 2017 with representative of worker union (SPAM) from other estate, for preliminary discussion related to (incoming) salary increment for year 2017.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> All activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker, freedom of association are following company policy. Based on interview with KMD committees, they are respecting the sovereignty of company workers in their plantation and recognize their freedom of association. KMD committees respect the worker rights to attend meeting with company management.</p>	<p>Comply</p>
<p><b>Criterion 6.7</b> Children are not employed or exploited.</p>		

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6.7.1	<p>There shall be documented evidence that minimum age requirements are met.</p> <p>- Major compliance –</p>	<p>The company has policy related minimum ages, under “Kebijakan Pekerja Anak” signed by President Director dated 1 March 2014. The policy stipulates, the company committed to ensuring that children, under the age of 18 years are not employed. The minimum age of 18 years also regulated under recruitment procedure No.Ref GA 7 dated 19 September 1997.</p> <p><b>Bunga Tanjung POM:</b> Based on field visit and document verification, for period October 2017 shows no worker under age of 18 years old. The youngest worker Mr. Sak*** Khas**** born 2 March 1992, employed on 1 May 2013 (at 21 years old).</p> <p><b>Air Buluh Estate:</b> Based on field visit and document verification, for period October 2017 shows no worker under age of 18 years old. The youngest worker Mrs.Ros***, born 5 June 1978, employed on 3 March 2011 (at 33 years old).</p> <p><b>Kebun Masyarakat Desa/KMD:</b> All activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker, minimum age requirements are following company policy. Interview with KMD committees, they understand the minimum age policy and confirm no underage worker at smallholder plantation. Based on field visit and document review, there was no worker for KMD under 18 years old. Sampled worker Mr. Dj*** B*** born 3 March 1971, employed on 3 March 2015 (at 44 years old).</p>	Comply
<p><b>Criterion 6.8</b></p> <p>Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p>			
6.8.1	<p>A company’s policy on equal opportunity and treatment for work shall be available and documented.</p> <p>- Major compliance –</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera have a policy for equal opportunities, under “Kebijakan Persamaan Kesempatan Kerja”, which stipulates the company is not discriminating against anyone in the recruitment practice or in the performance of the company business operation dated 1 March 2013, signed by President Director. The policy communicated through posting in notice boards located in mills, estate offices, division office, worker hall, etc. Other means for dissemination was through morning musters.</p> <p><b>Bunga Tanjung POM:</b> Communication to worker shift A (23 workers) and shift B (23 workers), Bunga Tanjung POM on 31 August 2017. Communication to 24 office workers and workshop foremen, Bunga Tanjung POM on 26 September 2017.</p> <p>---</p>	<p><del>Non-Compliance</del> Comply</p>

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	<p>Air Buluh Estate: Communication of equal opportunity policy to Division I – VI workers on 24 October 2017, attended by 222 workers. Interview with harvester, sprayers and fertilizer applicators in Air Buluh Estate, the policy has been understood. The workers felt company has committed to policy – through worker evaluation and grade rise regularly, based on performance.</p> <p>Malin Deman Estate: Communication to Malin Deman Estate workers, dated 13 July 2017, attended by 78 workers.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> All activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker, equal opportunity and treatment for work are following company policy. Kebun Masyarakat Desa/KMD committee made a statement to follow PT. Agro Muko’s policy on equal opportunity and treatment for work. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee “Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO” dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&amp;C through implementation of relevant policies and SOP from PT. Agro Muko. PT. Agro Muko’s policy “PT. Agro Muko Equal Employment Opportunity Policy (Kebijakan Persamaan Kesempatan Kerja)” dated 1 March 2013, available in Bahasa Indonesia has been made available in KMD Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. Awareness session was carried out on 13 December 2017 for all committee and workers of <i>Kebun Masyarakat Desa/KMD</i> Mundam Marap, KMD Serami Baru – Air Masad, KMD Lubuk Talang. The session covers policies related to equal opportunity and treatment for work.</p> <p>NC Major: 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), cannot demonstrated a documented policy on equal opportunity and treatment for work has not been established.</p>	

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6.8.2	<p>Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated.</p> <p>- Major compliance –</p>	<p><b>Bunga Tanjung POM:</b> Based on document verification against worker register period July – October 2017, no indication of gender, race, religion, tribe, ethic discrimination. The workers are coming from all part of Indonesia (Sumatera Utara Province, Sumatera Barat Province, Bengkulu Province, etc.).</p> <p><b>Air Buluh Estate:</b> Based on document verification against worker register period July – October 2017, no indication of gender, race, religion, tribe, ethic discrimination. Interview with harvester, sprayers and fertilizer applicators in Air Buluh Estate, the policy has been understood. The workers stated company has committed to policy – no worker discrimination. All treated equally, promotion made through worker evaluation and grade rise regularly, based on performance. ---</p>	Comply
		<p><b>Malin Deman Estate:</b> Based on document verification against worker register period July – October 2017, no indication of gender, race, religion, tribe, ethic discrimination. Interview with harvester, FFB transporter, upkeep worker and fertilizer applicators in Malin Deman Estate, the policy has been understood. The workers stated company has committed to policy – no worker discrimination. All workers have been provided with appropriate working tools.</p> <p><b>Kebun Masyarakat Desa/KMD:</b> All activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker, equal opportunity and treatment for work are following company policy. Interview with upkeep workers in KMD, the policy has been understood. Workers have been provided with appropriate working tools for their job.</p>	

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<p>6.8.3 Records of evidence that equal opportunity and treatment for work shall be available.</p> <p>– Minor compliance -</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera have sets a clear human resources system: organization structure, job description, career path, incentive pattern, training plan and implementation, provision of manpower with required qualification, etc. The company has procedure hiring workers, dated 25 April 2007, regulated that hiring and promotion of workers based on skill, work experiences, interview/evaluation, and medical check up.</p> <p>The collective work agreement regulates under Chapter 15, Recruitment, Transfer, Promotion and Work Termination.</p> <p>In addition, company posted job vacancy in local newspaper, "Radar Mukomuko" and company website.</p> <p><b>Bunga Tanjung POM:</b> Based on document verification against worker register period July – October 2017, no indication of gender, race, religion, tribe, ethic discrimination. Medical check up result for all workers – sighted. PPE distribution and handover checklist – sighted.</p> <p><b>Air Buluh Estate:</b> Based on document verification against worker register period July – October 2017, no indication of gender, race, religion, tribe, ethic discrimination. PPE distribution and working tools distribution checklist for all worker sighted.</p> <p><b>Malin Deman Estate:</b> Based on document verification against worker register period July – October 2017, no indication of gender, race, religion, tribe, ethic discrimination. PPE distribution and working tools distribution checklist for all worker sighted. Medical check up result for all workers – sighted; the result have been communicated back to each worker.</p> <p><b>Kebun Masyarakat Desa/KMD:</b> All activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker, equal opportunity and treatment for work are following company policy.</p>	<p>Comply</p>
<p><b>Criterion 6.9</b> There is no harassment or abuse in the work place, and reproductive rights are protected.</p>		

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<p>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.</p> <p>- Major compliance –</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera have a sets policy to prevent sexual harassment under “Kebijakan Pelecehan Seksual”, signed by President director on 1 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.</p> <p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera have established gender committee to solve sexual harassment cases and protect reproductive right for women workers.</p> <p>Bunga Tanjung POM: Communication to worker shift A (23 workers) and shift B (23 workers), Bunga Tanjung POM on 31 August 2017. Communication to 24 office workers and workshop foremen, Bunga Tanjung POM on 26 September 2017. Interview with gender committee, chapter Bunga Tanjung POM, it is understood that female workers are protected, gender committee meeting was held regularly, and zero tolerance sanction is in place for sexual harassment case. Until ASA1_2 no case of sexual harassment occurred in Bunga Tanjung POM.</p> <p>Air Buluh Estate: Communication of sexual harrassment prevention policy to Division I – VI workers on 24 October 2017, attended by 222 workers. Interview with harvester, sprayers and fertilizer applicators in Air Buluh Estate, the policy has been understood.</p> <p>Malin Deman Estate: Communication of sexual harrassment prevention policy to Malin Deman Estate workers, dated 13 July 2017, attended by 78 workers. Communication of sexual harrassment prevention policy to Malin Deman Estate workers, dated 3 November 2017, attended by 34 workers. Interview with harvester, FFB loaders in Malin Deman Estate, the policy has been understood.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> All activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker, prevention of sexual and all other forms of harassment and violence are following company policy.</p> <p>---</p>	<p>Non-Compliance Comply</p>

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	<p>Kebun Masyarakat Desa/KMD committee follows PT. Agro Muko's policy on prevent sexual and all other forms of harassment and violence. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&amp;C through implementation of relevent policies and SOP from PT. Agro Muko.</p> <p>KMD also follows specific grievance mechanism for reporting case of sexual harassment as in PT. Agro Muko's "Prosedur Keluh Kesah dengan Pihak Internal, No.SOP/025/HRA rev.02" – grievance settling with internal parties procedure dated 27 March 2015, available in Bahasa Indonesia. And in PT. Agro Muko's "Prosedur Keluh Kesah dengan Pihak Eksternal, No.SOP/026/HRA rev.02" – grievance settling with internal parties procedure dated 27 March 2015, available in Bahasa Indonesia. Awareness session was carried out on 13 December 2017 for all committee and workers for <i>Kebun Masyarakat Desa/KMD</i>. The session covers policies related to prevent sexual and all other forms of harassment and violence.</p> <p>NC Major: 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), cannot demonstrated a documented policy to prevent sexual and all other forms of harassment and violence has been established.</p>	

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<p>6.9.2 A policy to protect the reproductive rights, shall be documented, implemented and communicated to all levels of the workforce.</p> <p>- Major compliance –</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera have a sets policy to protect reproductive rights under “Kebijakan Perlindungan Hak-hak Reproduksi”, signed by President director on 1 March 2013. The policy stated: The policy covers provision of counseling related to sexuality, 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 <i>ante-natal</i> treatment; Baby and infant health service; Encourage male participation in sharing responsibility related to sexual behavior, during maternal period, HIV/AIDS and domestic violence.</p> <p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera have established gender committee to protect reproductive right for female workers.</p> <p>Bunga Tanjung POM: Communication to worker shift A (23 workers) and shift B (23 workers), Bunga Tanjung POM on 16 September 2017. Interview with gender committee, chapter Bunga Tanjung POM, it is understood that reproductive rights are uphold, female workers are entitled to maternal leave and period (monthly) leave – as regulated in the collective work agreement.</p> <p>Air Buluh Estate: Communication of reproductive rights protection policy to Division I – VI workers on 24 October 2017, attended by 222 workers. Interview with harvester, sprayers and fertilizer applicators in Air Buluh Estate, the policy has been understood. All female sprayers and female fertilizer applicator interviewed understood the policy, confirmed to have pregnant test regularly and not allowed to handle any chemical/hard work when identified to be pregnant and/or breastfeeding. Pregnancy/breastfeeding checklist for female workers period January – November 2017 sighted.</p> <p>---</p>	<p>Non-Compliance Comply</p>

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	<p>Malin Deman Estate: Communication of reproductive rights protection policy to Malin Deman Estate workers, dated 13 July 2017, attended by 78 workers. Communication of reproductive rights protection policy to Malin Deman Estate workers, dated 3 November 2017, attended by 34 workers. All female sprayers and female fertilizer applicator interviewed understood the policy, confirmed to have pregnant test regularly and not allowed to handle any chemical/hard work when identified to be pregnant and/or breastfeeding.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> All activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker, protection of reproductive rights are following company policy. Kebun Masyarakat Desa/KMD committee refers to PT. Agro Muko's policy on protection of the reproductive rights. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataaan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&amp;C through implementation of relevent policies and SOP from PT. Agro Muko. PT. Agro Muko's policy "PT. Agro Muko Kebijakan Perlindungan Hak-Hak Reproduksi (Protection of Reproductive Rights Policy)" dated 1 March 2013, available in Bahasa Indonesia; has been communicated.</p> <p>NC Major: 3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) has not established a policy to protect the reproductive rights.</p>	

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<p>6.9.3</p> <p>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.</p> <p>- Minor compliance –</p>	<p>Based on document review upon “Pedoman Pengelolaan Gender No.ENC/Pedoman/GC/01 dated 21 April 2011 point 52.7 stipulates mechanism for grievance for cases related to sexual harrassment or other form of violence, including protect the anonymity of complainant. Interview with gender committee, chapter Bunga Tanjung POM, and Air Buluh Estate it is understood that female workers are protected, gender committee meeting was held regularly, zero tolerance sanction is in place for sexual harassment case, and a specific grievance mechanism and anonymity of complainant is in place for reporting/complaint on gender issue case.</p> <p>Bunga Tanjung POM: Interview with female workers at mill, they understood the sexual harrassment policy and mechanism for reporting such case. They understood the contact person in gender committee.</p> <p>Air Buluh Estate: Interview with female workers (sprayers and fertilizer applicators), they understood the sexual harrassment policy and mechanism for reporting such case. They understood the contact person in gender committee.</p> <p>Malin Deman Estate: Interview with female workers (sprayers), they understood the sexual harrassment policy and mechanism for reporting such case. They understood the contact person in gender committee.</p> <p>---</p>	<p>Non-Compliance Comply</p>

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	<p><i>Kebun Masyarakat Desa/KMD:</i> All activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker, prevention of sexual and all other forms of harassment and violence are following company policy. <i>Kebun Masyarakat Desa/KMD</i> committee refers to PT. Agro Muko's policy on prevent sexual and all other forms of harassment and violence. Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&amp;C through implementation of relevant policies and SOP from PT. Agro Muko - sighted.</p> <p>KMD also follows specific grievance mechanism for reporting case of sexual harassment, which respects anonymity as in PT. Agro Muko's "Prosedur Keluh Kesah dengan Pihak Internal, No.SOP/025/HRA rev.02" – grievance settling with internal parties procedure dated 27 March 2015, available in Bahasa Indonesia. And in PT. Agro Muko's "Prosedur Keluh Kesah dengan Pihak Eksternal, No.SOP/026/HRA rev.02" – grievance settling with internal parties procedure dated 27 March 2015, available in Bahasa Indonesia. Awareness session was carried out on 13 December 2017 for all committee and workers for <i>Kebun Masyarakat Desa/KMD</i>. The session covers policies related to prevent sexual and all other forms of harassment and violence.</p> <p>NC Minor: 3 <i>Kebun Masyarakat Desa/KMDs</i> (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), has not established a specific grievance mechanism which respects anonymity of complainants with regards to sexual harassment case or violation of protection of reproductive rights.</p>	
<p><b>Criterion 6.10</b> Growers and millers deal fairly and transparently with smallholders and other local businesses.</p>		

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.10.1 Current and past prices paid for Fresh Fruit Bunches (FFB), shall be publicly available.</p> <p>- Minor compliance -</p>	<p>FFB price determined in accordance with an agreed formula as contained in Appendix 1 of the agreement between the company and the <i>Kebun Masyarakat Desa/KMD/cooperative</i> that supplies FFB. Price is updated weekly and reported by specialized staff in charge small holders company/supplier. Record of current and past prices for FFB available in smallholder manager, GMO office. <i>Kebun Masyarakat Desa/KMD/cooperative</i> are given short message service on the price change.</p> <p>In addition, companies are announcing the FFB paid for each entity (<i>Kebun Masyarakat Desa/KMD/cooperative</i>) on local newspaper "Radar Mukomuko" on regular basis.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>  Based on interview with KMD committee, they have understood and accepted the FFB price updates from PT. Agro Muko and/or PT. Mukomuko Agro Sejahtera. Price usually changes/moves every week. They receive the FFB price through short message services.  Record review on KMD, the price paid also stated in the invoice.  To demonstrate responsibility and accountability to its stakeholder, KMD bought newspaper whereby PT. Agro Muko has indicated the price, tonnage and amount of money paid.</p>	<p>Comply</p>
<p>6.10.2 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).</p> <p>- Major compliance -</p>	<p>FFB price determined in accordance with an agreed formula as contained in Appendix 1 of the agreement between the company and the <i>Kebun Masyarakat Desa/KMD/cooperative</i> that supplies FFB. Basically the price mechanism refers to government regulation, Peraturan Menteri Pertanian No.14 tahun 2013 tentang Pedoman Penetapan Harga Tandan Buah Segar Kelapa sawit Produksi Pekebun".</p> <p><i>Kebun Masyarakat Desa/KMD:</i>  Based on interview with KMD committee, they have understood and accepted the FFB price determination mechanism from PT. Agro Muko and/or PT. Mukomuko Agro Sejahtera. They receive the FFB price through short message services.  Record review on KMD, the price paid also stated in the invoice.  To demonstrate responsibility and accountability to its stakeholder, KMD bought newspaper whereby PT. Agro Muko has indicated the price, tonnage and amount of money paid.</p>	<p>Comply</p>

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<p>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.</p> <p>- Minor compliance -</p>	<p>Air Buluh Estate: "Surat Perjanjian Kerja No.02/GM-ABE/TBS/2017" between PT. Agro Muko – Air Buluh Estate and CV. Chantika, for work of transport of FFB from loading ramp to Bunga Tanjung POM, dated 12 January 2017. The work agreement explained scope of work, requirement and work, payment terms, sanctions, dispute settlement, etc. Contractor has signed the agreement after reading the clauses.</p> <p>Malin Deman Estate: "Surat Perjanjian Kerja No.SPK.058/MMAS-MDE/ED-AM/2017" between PT. Mukomuko Agro Sejahtera and CV. Putra Mundam, dated 13 March 2017 – for the scope of work, provision of stone and sand for road-stoning. The agreement explains scope of work/provision, price per unit, requirement and work rules, payment term, dispute. Agreement signed by contractor, Estate Manager, Head of Estate Department and President Director of PT. Mukomuko Agro Sejahtera.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Smallholder also committed to make a good corporate governance organization, by provision of work agreement prior to job being done. Sample seen: "Perjanjian Kerjasama No.18/SPKL/KMDMJ/PPP/VIII/2017" dated 1 August 2017 between KMD and UD. Zen, for supplemental harvesting and transport. The agreement explained clause related to scope of work, timeframe of agreement, detail of work, license and permits, work implementation, fulfillment of obligation to workers, status of worker, working tools, dispute settlement, and others. Signed by KMD and director of CV.Zen.</p>	<p>Comply</p>

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6.10.4	<p>Agreed payments shall be made in a timely manner.</p> <p>- Minor compliance -</p>	<p>Air Buluh Estate: "Surat Perjanjian Kerja No.02/GM-ABE/TBS/2017" between PT. Agro Muko – Air Buluh Estate and CV. Chantika, for work of transport of FFB from loading ramp to Bunga Tanjung POM, dated 12 January 2017. The work agreement explained scope of work, requirement and work, payment terms, sanctions, dispute settlement, etc. Invoice from CV. Chantika, No.01/CA/FFB-ABE/2017 dated 25 January 2017. Payment date 31 January 2017.</p> <p>Malin Deman Estate: "Surat Perjanjian Kerja No.SPK.058/MMAS-MDE/ED-AM/2017" between PT. Mukomuko Agro Sejahtera and CV. Putra Mundam, dated 13 March 2017 – for the scope of work, provision of stone and sand for road-stoning. The work being done on 13 June 2017 and paid on 1 July 2017.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Smallholder also committed to comply with payment upon contractual agreement. Sample seen: "Perjanjian Kerjasama No.18/SPKL/KMDMJ/PPP/VIII/2017" dated 1 August 2017 between KMD and UD. Zen, for supplemental harvesting and transport. The agreement explained clause related to scope of work, timeframe of agreement, detail of work, license and permits, work implementation, fulfillment of obligation to workers, status of worker, working tools, dispute settlement, and others. Signed by KMD and director of CV.Zen. CV. Zen made and send invoice to KMD (Invoice No.08, dated 25 August 2017, for Rp.4,***,***). KMD made request to PT. Agro Muko to pay the bill, on behalf of KMD and be noted as KMD debt. Proforma invoice titled "Document Persetujuan Biaya Pekerjaan bulan Agustus 2017, No.WC0000003134", dated 25 August 2017. The invoice consist of cost for harvesting, cost of transport FFB to Bunga Tanjung POM. Payment made on 28 August 2017.</p>	Comply
<p><b>Criterion 6.11</b> Growers and millers contribute to local sustainable development where appropriate.</p>			
6.11.1	<p>Records of contributions to local development based on the results of consultation with local communities shall be available.</p> <p>- Minor compliance -</p>	<p>The Company has established a program of "Community Development and Corporate Social Responsibility 2017" consists of 8 types of activities covering the infrastructure, sports event, agriculture, micro business, art, religious event and social-economy.</p> <p>Air Buluh Estate:</p> <ul style="list-style-type: none"> <li>- Provision of building material for masjid in Talang Baru Village, 14 January 2017;</li> <li>- Provision of material for parking lot construction at Talang Arah Village's Office dated 6 June 2017.</li> <li>- Operational aid for NGO Kemilau Cahaya, Serami Baru Village dated 6 June 2017;</li> <li>- Aid for art performance at "Sanggar Tari Desa" Serami Baru Village, dated 20 June 2017;</li> </ul> <p>---</p>	Comply

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		<p>Malin Deman Estate:</p> <ul style="list-style-type: none"> <li>- Donation for "Uhang Aok Draft Championship Gerakan Pramuka Gugus Depan MAN I Mukomuko" – boyscout event, dated 14 October 2017;</li> <li>- Donation for event "Musabaqoh Tilawatil Quran Kecamatan Malin Deman" dated 19 September 2017 in Malin Deman District;</li> <li>- Aid for operational activity of "LSM KCBI" dated 7 August 2017;</li> <li>- Donation for fire disaster in Pulau Baru Village, dated 30 April 2017;</li> </ul> <p><i>Kebun Masyarakat Desa/KMD:</i>            Smallholder also committed to the community development of their villages/region. This commitment was implemented into the work agreement between Kebun Masyarakat Desa/KMD/cooperative PT. Agro Muko and/or PT. Mukomuko Agro Sejahtera. Chapter 13 stipulates that revenue from the FFB sales will be allocated: 50% for construction and development of village infrastructure (road for agriculture, bridge, culvert, sport field, art events, etc.); 5% for social donation; 15% for service of KMD/cooperative's committee; 1.5% for District's operation; etc.            To demonstrate responsibility and accountability to its stakeholder, KMD involved in posting financial report into newspaper whereby PT. Agro Muko has indicated the price, tonnage and amount of money paid – therefore KMD being transparent on the financial resources they managed.</p>	
6.11.2	<p>Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve scheme smallholder productivity.</p> <p>- Minor compliance -</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera is helping the development of Kebun Masyarakat Desa/KMD. Companies provides technical guidance, financial credit, fertilizer support and accepting the FFB production from certified (as scheme smallholder) KMD into Bunga Tanjung POM.            Aside from that, gradually, in several phases, company guides smallholder/Kebun Masyarakat Desa/KMD/cooperatives to be RSPO-certified.</p>	Comply
<p><b>Criterion 6.12</b>            No forms of forced or trafficked labor are used.</p>			

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<p>6.12.1</p> <p>There shall be evidence that no forms of forced or trafficked labor are used.</p> <p>- Major compliance -</p>	<p>The company has had a policy against Forced Labour or Labour traded (Company Policy on Trafficked Against Forced Labour) adopted by President Director dated 1 March 2014, that is:</p> <ul style="list-style-type: none"> <li>- The company does not use forced labor or trafficked workers either directly or through a third party.</li> <li>- 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.</li> <li>- 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.</li> <li>- Other party that do business with PT. Agro Muko and PT. Mukomuko Agro Sejahtera required adhere to the policy.</li> <li>- Violation of this policy, if proven, would result in disciplinary action up to termination of employment and may result in legal action.</li> </ul> <p>Bunga Tanjung POM:            Communication company policy on Trafficked Against Forced Labour to worker shift A (23 workers) and shift B (23 workers), Bunga Tanjung POM on 31 August 2017. Based on document verification against worker register period July – October 2017, all worker have appointment letter and/or work agreement signed. Interview with processing, workshop worker, and office clerks, the policy has been understood and no forced labor and/or trafficked labor employed.</p> <p>Air Buluh Estate:            Communication of Company Policy on Trafficked Against Forced Labour to Division I – VI workers on 24 October 2017, attended by 222 workers. Based on document verification against worker register period July – October 2017, all worker have appointment letter and/or work agreement signed. Interview with harvester, sprayers and fertilizer applicators in Air Buluh Estate, the policy has been understood and no forced labor and/or trafficked labor employed.</p> <p>Malin Deman Estate:            Communication of Company Policy on Trafficked Against Forced Labour to Malin Deman Estate workers, dated 3 November 2017, attended by 34 workers. Interview with harvester, FFB loaders in Malin Deman Estate, the policy has been understood. Based on document verification against worker register period July – October 2017, all worker have appointment letter and/or work agreement signed. Interview with harvester, FFB loaders in Malin Deman Estate, the policy has been understood and admitted no debt bond, no forced labor and/or trafficked labor practised.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>            All activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker, there is no forms of forced or trafficked labor used for KMD works.</p>	<p>Comply</p>

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6.12.2	<p>It shall be demonstrated that no contract substitution has occurred.</p> <p>- Minor compliance -</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera have sets a clear human resources system: organization structure, job description, career path, incentive pattern, training plan and implementation, provision of manpower with required qualification, etc. All work has been sets to work as per procedure, requirement and performed by qualified worker. Based on document review and interview with workers and labour union, confirmed that no contract substitution was noted.</p> <p>Bunga Tanjung POM:            Based on document verification against worker register period July – October 2017, all worker have appointment letter and/or work agreement signed. Interview with processing, workshop worker, and office clerks, there was no contract substitution case.</p> <p>Air Buluh Estate:            Communication of Company Policy on Trafficked Against Forced Labour to Division I – VI workers on 24 October 2017, attended by 222 workers. Based on document verification against worker register period July – October 2017, all worker have appointment letter and/or work agreement signed. Interview with harvester, sprayers and fertilizer applicators in Air Buluh Estate, there was no contract substitution case.</p> <p>Malin Deman Estate:            Communication of Company Policy on Trafficked Against Forced Labour to Malin Deman Estate workers, dated 3 November 2017, attended by 34 workers. Interview with harvester, FFB loaders in Malin Deman Estate, the policy has been understood. Based on document verification against worker register period July – October 2017, all worker have appointment letter and/or work agreement signed. Interview with harvester, FFB loaders in Malin Deman Estate, there was no contract substitution case.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>            All activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker. There is no forms of contract substitution used for KMD works.</p>	Comply
6.12.3	<p>Where migrant/foreign/honorary workers are employed, a special worker policy and procedures and the evidence of implementation shall be available.</p> <p>- Major compliance -</p>	<p>The agreement for temporary workers is available and signed by workers. There is no migrant worker.</p>	Comply
<p><b>Criterion 6.13</b>            Growers and millers respect human rights.</p>			

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6.13.1	<p>A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations.</p> <p>- Major compliance -</p> <p>A policy to respect human rights has been established and documented by PT. Agro Muko and PT. Mukomuko Agro Sejahtera. The policy was sign by President Director on 1 March 2013, mentioned that:</p> <ul style="list-style-type: none"> <li>- PT. Agro Muko and PT. Mukomuko Agro Sejahtera acknowledges human rights are universal; thus applicable to all operation.</li> <li>- PT. Agro Muko and PT. Mukomuko Agro Sejahtera supports implementation of human rights and ILO declaration related to principles and basic rights in working place that has been ratified by Republic of Indonesia.</li> <li>- Accusations against violation of human rights, if proven, resulted in disciplinary action up to termination of work relation, and could cause legal action.</li> </ul> <p><i>Kebun Masyarakat Desa/KMD:</i>            In KMD Mundam Marap, KMD Serami Baru, KMD Lubuk Talang - all activities (planting, upkeep, manuring, harvesting, etc.) at KMD area are performed by the company worker, policy to respect human right are following company policy.            Based on interview with committee and workers, for example; workers are free to have "Shalat Jumat" on Friday – as form of religious freedom.</p> <p>NC Major:            3 Kebun Masyarakat Desa/KMDs (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang), has not established policy to respect human rights.</p>	<p>Non-Compliance Comply</p>

**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.

There was new planting (after November 2005) in PT. Mukomuko Agro Sejahtera. Under PT. Mukomuko Agro Sejahtera, Malin Deman Estate was a supply base to Bunga Tanjung POM (RSPO 646338), while Air Manjuntto Estate was a supply base to Mukomuko POM. The RSPO NPP has been done in 2012 by Mr. Allan Thomas.

There was new planting for 10 new Kebun Masyarakat Desa/KMD/cooperative as scheme smallholder to PT. Agro Muko and PT. Mukomuko Agro Sejahtera. There are 4 Kebun Masyarakat Desa/KMD, planned to supply FFB into PT. Agro Muko's Bunga Tanjung POM. Kebun Masyarakat Desa/KMD/cooperative has demonstrate effort to meet the requierements from principle 7. The fulfillment of HCV assessment, SEIA, GHG assessment, LUC Analysis, soil and topographic survey, and FPIC is evident. The fulfillment of principle 7 has been reported to RSPO, on May 2017 as form of RSPO NPP – served as information only.

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<p>7.1.1</p> <p>An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented.</p> <p>- Major compliance –</p>	<p>Malin Deman Estate, under PT. Mukomuko Agro Sejahtera; the environmental management and monitoring document and planning was approved as per "Surat Keputusan Gubernur Bengkulu No.M.288.XXX.Tahun 2011 tentang Kelayakan Lingkungan Kegiatan Perkebunan Kelapa Sawit seluas 6,298 Ha, di Kecamatan Malin Deman, Kecamatan Ipuh dan Kecamatan V Koto, Kabupaten Mukomuko, Provinsi Bengkulu oleh PT. Mukomuko Agro Sejahtera" dated 9 September 2011.</p> <p>In the environmental document: management of air quality (including odor), management of noise (including vibration), soil erosion management, management of water quality (ground and surface water), management of flora, management of animal/wildlife, management of aquatic ecosystem, management of hazardous waste, management of stone mining/ quarry, management and monitoring of peat area subsidence, monitoring of mill water use for process, management of solid waste, etc.</p> <p>Aside from that, company has prepared a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI), 2011. The report under "Dokumen Laporan Final Penilaian Dampak Sosial dan Lingkungan yang dilaksanakan oleh Yayasan Kelapa Sawit Berkelanjutan (YASBI) pada tahun 2011 yang dilakukan terhadap dampak sosial dari pembangunan kebun inti dan rencana pembangunan Kebun Masyarakat Desa (KMD)". Under the document, the social aspect identified covers source of livelihood, community's revenue, community mobility, community perception on company activity, social conflict, social-cultural changes, community health status.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Kebun Masyarakat Desa/KMD/cooperative has demonstrate effort to meet the requirements from principle 7. The fulfillment of HCV assessment, SEIA, GHG assessment, LUC Analysis, soil and topographic survey, and FPIC is evident. PT. Agro Muko and PT. Mukomuko Agro Sejahtera assisted <i>Kebun Masyarakat Desa/KMD</i> to prepare an environmental impact assessment document(s) covering the KMD/cooperatives location, endorsed by the relevant government agencies. The document presented in SPPL (Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup). Document seen: "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL" KMD Mundam Marap dated 12 December 2017; "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL" KMD Serami Baru – Air Masad dated 12 December 2017; "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL" KMD Tunggal Jaya dated 12 December 2017; including aspect – impact management plan for erosion, change in vegetation composition and biodiversity due to land conversion, etc. The document prepared through series of meeting with government, traditional leaders/Kepala Kaum and community at each village.</p> <p>---</p>	<p>Comply</p>

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Criterion / Indicator		Assessment Findings	Compliance
		In 2017, social impact assessment held in cooperation with Koompasia Enviro Institut for scope of 10 KMDs. The social impact assessment was done between 8-16 March 2017 with scope of 15 villages around KMD with focus group discussion (FGD).	
7.1.2	<p>Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts.</p> <p>- Minor compliance -</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera: The type of enviromental aspect and impact identified, and recommended to managed, as per environmental document: management of air quality (including odor), management of noise (incuding vibration), soil erosion management, management of water quality (ground and surface water), management of flora, management of animal/wildlife, management of aquatic ecosystem, management of hazardous waste, management of stone mining/ quarry, management and monitoring of peat area subsidence, monitoring of mill water use for process, management of solid waste, etc. The management plans has been including type of impact, source of impact, relevant impact parameter, management and plan, management location, person in charge for such management, etc.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Kebun Masyarakat Desa/KMD/cooperative has demonstrate effort to meet the requiriements from principle 7. The fulfillment of HCV assessment, SEIA, GHG assessment, LUC Analysis, soil and topographic survey, and FPIC is evident. PT. Agro Muko and PT. Mukomuko Agro Sejahtera helped <i>Kebun Masyarakat Desa/KMD</i> to prepare an environmental impact assessment document(s) covering the KMD/cooperatives location. The document presented in "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL". Sample seen: "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL" KMD Serami Baru – Air Masad dated 12 December 2017 including aspect – impact management plan for erosion, change in vegetation composition and biodiversity due to land conversion, etc. The management plan covers: no planting on area with slope &gt;40<sup>0</sup>; practicing terrace contour; efficient use of fertilizer and pesticide; planting ground cover to minimize surface runoff, etc. Based on field visit to KMDs, no planting on area with slope &gt;40<sup>0</sup>; ground cover is using <i>Mucuna</i>. For managing the social impact, KMD has assisted by company to have training on good bookkeeping, financial records, capacity building for organization. To demonstrate responsibiity and accountability to its stakeholder, KMD involved in posting financial report into newspaper whereby PT. Agro Muko has indicated the price, tonnage and amount of money paid – therefore KMD being transparent on the financial resources they managed.</p>	Comply

Criterion / Indicator	Assessment Findings	Compliance
<p>7.1.3</p> <p>Where the development includes an outgrower scheme (<i>skema kemitraan</i>), the impacts of the scheme and the implications of the way it is managed shall be given particular attention.</p> <p>- Minor compliance -</p>	<p>Kebun Masyarakat Desa/KMD: Kebun Masyarakat Desa/KMD/cooperative has demonstrate effort to meet the requiriements from principle 7. The fulfillment of HCV assessment, SEIA, GHG assessment, LUC Analysis, soil and topographic survey, and FPIC is evident. PT. Agro Muko and PT. Mukomuko Agro Sejahtera helped <i>Kebun Masyarakat Desa/KMD</i> to prepare an environmental impact assessment document(s) covering the KMD/cooperatives location, endorsed by the relevant government agencies. The document presented in "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL". Sample seen: "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL" KMD Mundam Marap dated 12 December 2017; "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL" KMD Serami Baru – Air Masad dated 12 December 2017; "Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL" KMD Tunggal Jaya dated 12 December 2017.</p> <p>The documenta has identified aspect – impact management and monitoring plan for soil erosion, plan for change in vegetation composition and biodiversity due to land conversion, etc. The management and monitoring plan covers: no planting on area with slope &gt;40<sup>0</sup>; practicing terrace contour; efficient use of fertilizer and pesticide; planting ground cover to minimize surface runoff, etc.</p> <p>Based on field visit to KMDs, management of such aspect-impat in form of: no planting on area with slope &gt;40<sup>0</sup>; ground cover is using <i>Mucuna</i>. Monitoring has been carried out once per annum, result for 2017 in process of report preparation.</p> <p>For managing the social impact, KMD has assisted by company to have training on good bookkeeping, financial records, capacity building for organization.</p> <p>To demonstrate responsibiity and accountability to its stakeholder, KMD involved in posting financial report into newspaper whereby PT. Agro Muko has indicated the price, tonnage and amount of money paid – therefore KMD being transparent on the financial resources they managed.</p>	<p>Comply</p>
<p><b>Criterion 7.2</b></p> <p>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.</p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>7.2.1</p> <p>Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations.</p> <p>- Major compliance -</p>	<p>Malin Deman Estate: PT. Mukomuko Agro Sejahtera – Malin Deman Estate is able to presented map, consist of information related to soil type and topographic condition of Malin Deman Estate. Based on identified soil type, the plantation located on mineral soil – limiting factor identified was steep slope. The verdict from consultant was suitable for oil palm plantation given appropriate management for area with slope.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> The soil type map, topographic map is available for <i>Kebun Masyarakat Desa/KMD</i> inside planting plan. KMD Bukit Harapan: Land location map (9.81 Ha); from Soil map noted consist of Haplohumults and Dystrudepts (relatively stabil and less erosion prone), no peat; KMD Mundam Marap: consist of Inceptisols – Endoaquepts and Inceptisols – Dystrudepts; not prone to erosion, no peat soil; Generally located on mineral soil, planted with oil palm but limited fertility – the other limiting factor identified was slope.</p>	<p>Comply</p>
<p>7.2.2</p> <p>Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available.</p> <p>- Minor compliance -</p>	<p>Malin Deman Estate: PT. Mukomuko Agro Sejahtera – Malin Deman Estate is able to presented map, consist of information related to soil type and topographic condition of Malin Deman Estate. Based on identified soil type, the plantation located on mineral soil – limiting factor identified was steep slope.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> The soil type map, topographic map is available for <i>Kebun Masyarakat Desa/KMD</i> inside planting plan. KMD Bukit Harapan: Land location map (9.81 Ha); from Soil map noted consist of Haplohumults and Dystrudepts (relatively stabil and less erosion prone), no peat; from Topographic map: elevation 95-125 m asl; no steep area (&gt;25°). KMD Mundam Marap: consist of Inceptisols – Endoaquepts and Inceptisols – Dystrudepts; not prone to erosion, no peat soil; Topographic map: elevation 20-30 meters asl; slope 0° – 6° and 20° – 25°; no steep area (&gt;25°).</p>	<p>Comply</p>
<p><b>Criterion 7.3</b></p> <p>New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.</p>		

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Criterion / Indicator	Assessment Findings	Compliance
<p>7.3.1</p> <p>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).</p> <p>- Major compliance –</p>	<p>The new planting principle (after November 2005) is applicable to plantation of PT. Mukomuko Agro Sejahtera – Malin Deman Estate.</p> <p>HCV assessment of PT. Mukomuko Agro Sejahtera carried out in 2010 has been undertaken by appropriately qualified and experienced expert from “Yayasan Sawit Berkelanjutan (Indonesia Sustainable Palm Oil Foundation – YASBI Foundation)” using the guidance of Indonesia HCV Toolkit 2008 to monitor the possible extent of HCV inside the estates as well as area adjacent to it. The HCV assesment reported under “Laporan Penilaian HCV PT. Mukomuko Agro Sejahtera, Provinsi Bengkulu, Juli 2010 terhadap lahan ijin lokasi seluas 8,052.29 Ha” dated July 2010. The scope of assessment has included all scheme smallholder area. The assessment team comprise of Ir. Purwo Susanto (lead assessor – RSPO approved HCV assessor); Dr. Kunkun Jaka Gurmaya (biodiversity – RSPO approved HCV assessor); Gurnita, Ssi (ecology); Drs. Bambang Suseno (social, economic and cultural); Ir. Imam Subagyo (social, economy and environmental services); Arto Seto ST (GIS); Asep Ridwan Anaribowo (biodiversity); Abdillah Luhur Nuratmaja Ssi (biodiversity).</p> <p>The HCV assessment report concluded that PT. Mukomuko Agro Sejahtera has HCV 1, HCV 3 and HCV in area of 196.09 Ha consisting of 167 Ha conservation forest and 20.79 Ha of drain riparian/buffer zone and corridor.</p> <p>HCV 6 of 1.56 Ha in Tanah Rekah Estate, Mukomuko Estate, Sei Betung Estate, Sei Kiang Estate, Air Bikuk Estate, and Air Buluh Estate.</p> <p>The HCV report has been peer reviewed on 2 April 2013, as per “HCV Toolkit Indonesia, 2008”.</p> <p>Based on the HCV assessment report, it was known that no conversion of primary forest and/or HCV area in plantation area of PT. Mukomuko Agro Sejahtera.</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>7.3.2</p> <p>Reports of comprehensive HCV assessment, which involves stakeholder consultation and includes record of land-use change since November 2005, shall be available. This HCV assessment shall be conducted prior to any conversion or new planting.</p> <p>- Major compliance –</p>	<p>HCV assessment of PT. Mukomuko Agro Sejahtera carried out in 2010 has been undertaken by appropriately qualified and experienced expert from “Yayasan Sawit Berkelanjutan (Indonesia Sustainable Palm Oil Foundation – YASBI Foundation)” using the guidance of Indonesia HCV Toolkit 2008 to monitor the possible extent of HCV inside the estates as well as area adjacent to it. The HCV assesment reported under “Laporan Penilaian HCV PT. Mukomuko Agro Sejahtera, Provinsi Bengkulu, Juli 2010 terhadap lahan ijin lokasi seluas 8,052.29 Ha” dated July 2010. The scope of assessment has included all scheme smallholder area. The assessment team comprise of Ir. Purwo Susanto (lead assessor – RSPO approved HCV assessor); Dr. Kunkun Jaka Gurmaya (biodiversity – RSPO approved HCV assessor); Gurnita, Ssi (ecology); Drs. Bambang Suseno (social, economic and cultural); Ir. Imam Subagyo (social, economy and environmental services); Arto Seto ST (GIS); Asep Ridwan Anaribowo (biodiversity); Abdillah Luhur Nuratmaja Ssi (biodiversity).</p> <p>The HCV assessment report concluded that PT. Mukomuko Agro Sejahtera has HCV 1, HCV 3 and HCV in area of 196.09 Ha consisting of 167 Ha conservation forest and 20.79 Ha of drain riparian/buffer zone and corridor.</p> <p>Stakeholder consultation carried out on 9 July 2010 in “Kantor Kecamatan Malin Deman” and “Kantor Kecamatan V Koto”. The public consultation was attended by 41 individuals in Malin Deman; and 49 individuals in V Koto. Type of stakeholders: district head/<i>Camat</i>, village head/<i>Kepala Desa</i>, <i>Kepala Dusun</i>, traditional leaders/<i>Kepala Kaum</i>, individuals, workers, government offices delegation, etc.</p> <p>In 2012, PT. Mukomuko Agro Sejahtera carried out ground verification against HCV assessment report upon all HCV area and reported under “Laporan Hasil Verifikasi Penilaian NKT PT. Mukomuko Agro Sejahtera”. The activity was carried out to analyze the field condition, whereby a number of deviation from initial HCV assessment found. The ground verification has been agreed with YASBI foundation and become integral part of the HCV assessment report – and becomes guidance in management and monitoring plan for HCV area.</p> <p>The HCV report has been peer reviewed on 2 April 2013, as per “HCV Toolkit Indonesia, 2008”.</p> <p>---</p>	<p>Comply</p>

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	<p><i>Kebun Masyarakat Desa/KMD:</i>            PT. Agro Muko and PT. Mukomuko Agro Sejahtera has accommodated an HCV assessment in cooperation with Kompasnia Enviro Institut against 10 KMD in 2017. Report presented under "Laporan Identifikasi Nilai Konservasi Tinggi Rantai Supli PT Agro Muko untuk KMD Serami Baru dan KMD Lubuk Talang, Kecamatan Malindeman, KMD Bumi Mulya, KMD Suka Maju dan KMD Bukit Makmur Kecamatan Penarik, KMD Mundam Marap Kecamatan Ipuh, KMD Tunas Muda Tunggal Jaya dan KMD Pondok Lunang Kecamatan Teras Terunjam, KSU Agro Muko Sungai Ipuh kecamatan Selagan Raya, KSU Agro Muko Sungai Kiang Kecamatan V Koto Kabupaten Mukomuko, Provinsi Bengkulu". The assessment team comprise of Sigit Budhi Setyanto (social-cultural; ALS15024SB); Wibowo A Djatmiko (ecology and biodiversity); Riswan (environmental service); Amirul Ikhsan (GIS and landscaping); Pradipta Wijaya (GIS); Chyntia Lestari (social-cultural).</p> <p>The assessment carried out on 6-16 March 2017. Public consultation was carried out on 13 March 2017, attended by 31 individuals: villagers, KMD commitee, traditional leaders/Kepala kaum, etc.</p> <p>Based on the HCV assessment, there was HCV identified in KMD Lubuk Talang in form of riparian area Ipuh river of 37.52 Ha and area with secondary forest vegetation of 9.79 Ha. No HCV in area of KMD Mundam Marap and KMD Serami Baru – Air Masad.</p>	
7.3.3	<p>Records of land preparation and clearing dates shall be available.</p> <p>- Minor compliance –</p>	Comply
7.3.4	<p>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)</p> <p>- Major compliance –</p>	Comply

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	<p>In order to protect the wildlife, company has established environment protection policy – “Kebijakan Perlindungan Lingkungan” dated 1 March 2013. In point stated protection of endangered and protected animals. In implementation, the effort to protect wildlife was managed through:</p> <ul style="list-style-type: none"> <li>- No conversion on area identified as HCV;</li> <li>- Company has installed signboards on HCV identity; no-hunting, no poaching, no fishing warning signs; signboards with identified/potential rare-threatened-endangered or protected animals;</li> <li>- Company has create posters with information of type of rare-threatened-endangered or protected animal on the field and office premises;</li> <li>- Company has appointed personnel responsible to manage and monitor the HCV areas – called conservation ranger;</li> <li>- Company has communicated the HCV areas and status/presence of rare-threatened-endangered or protected animals in the region – to local communities and its workers;</li> <li>- Company has cooperation with Zoological Society of London (ZSL), Bogor to provide SMART software training to its worker/conservation rangers;</li> <li>- Company through conservation rangers made HCV patrol periodically to monitor the flora and fauna. This is through installation of camera trap such as in Air Buluh Estate.</li> </ul> <p>The monitoring result has been compiled and reported on annual basis. HCV management and monitoring report 2017 sighted.</p> <p>Records reviewed and field verification: In Malin Deman Estate, dissemination of environment protection policy carried out on 3 November 2017, attended by 34 workers. Another dissemination of environment protection policy carried out earlier on 13 July 2017, attended by 78 workers.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Based on the HCV assessment, there was HCV identified in KMD Lubuk Talang in form of riparian area Ipuh river of 37.52 Ha and area with secondary forest vegetation of 9.79 Ha. Based on document verification, it was found 25 mammals species, such as <i>Nycticebus coucang</i> (Sunda slow loris), <i>Neofelis diardii</i> (Clouded leopard), etc.; 54 species of birds such as <i>Argusianus argus</i> (The great argus), <i>Halcyon smyrnensis</i> (White-throated kingfisher), etc.; 10 species of reptiles such as <i>Ophiophagus hannah</i> (King cobra), etc.; 8 types of amphibia such as <i>Leptobrachium sp.</i> (Pelobatid frog) etc.; 12 species of fish such as <i>Barbodes cf binotatus</i> (Spotted barb), etc.</p> <p>The HCV report from Kompas Enviro Institut has been integral part in preparing “planting plan” – to avoid conversion of HCV area in smallholder block.</p>	

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Criterion / Indicator		Assessment Findings	Compliance
7.3.5	Evidence of consultation with the affected community shall be available in order to identify the area required by such community to fulfill its basic needs, by considering the positive and negative changes to the livelihood as a result of plantation operations. Such matters shall be included in the HCV analysis and management plan (see Criteria 5.2).  - Minor compliance –	Stakeholder consultation carried out on 9 July 2010 in “Kantor Kecamatan Malin Deman” and “Kantor Kecamatan V Koto”. The public consultation was attended by 41 individuals in Malin Deman; and 49 individuals in V Koto. Type of stakeholders: district head/ <i>Camat</i> , village head/ <i>Kepala Desa</i> , <i>Kepala Dusun</i> , traditional leaders/ <i>Kepala Kaum</i> , individuals, workers, government offices delegation, etc. As reflected in the HCV assessment report for PT. Mukomuko Agro Sejahtera, there was no HCV 5 and HCV 6 identified on plantation blocks.	Comply
<b>Criterion 7.4</b> Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.			
7.4.1	Indicative maps showing marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided.  - Major compliance –	Malin Deman Estate: PT. Mukomuko Agro Sejahtera – Malin Deman Estate is able to presented map, consist of information related to soil type and topographic condition of Malin Deman Estate. Based on identified soil type, there is no area with excessive gradients, no peat soil in Malin Deman Estate.  <i>Kebun Masyarakat Desa/KMD:</i> Based on identified soil type, there is no area with excessive gradients, no peat soil in <i>Kebun Masyarakat Desa/KMD</i> .	Comply
7.4.2	Where limited planting on fragile and marginal soils, including peat, is proposed, a documented plan shall be developed and implemented to protect them without incurring adverse impacts. - Major compliance –	Malin Deman Estate: PT. Mukomuko Agro Sejahtera – Malin Deman Estate is able to presented map, consist of information related to soil type and topographic condition of Malin Deman Estate. Based on identified soil type, there is no area with excessive gradients, no peat soil in Malin Deman Estate.  <i>Kebun Masyarakat Desa/KMD:</i> Based on identified soil type, there is no area with excessive gradients, no peat soil in <i>Kebun Masyarakat Desa/KMD</i> .	Comply
<b>Criterion 7.5</b> No new plantings are established on local people’s 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.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>7.5.1 Evidence shall be available that affected local peoples understand they have the right to say 'yes' or '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 (see Criteria 2.2, 2.3, 6.2, 6.4 and 7.6)</p> <p>- Major compliance –</p>	<p>Malin Deman Estate: PT. Mukomuko Agro Sejahtera – Malin Deman Estate has a mechanism for land compensation "Prosedur Kompensasi Lahan No.SOP/CA/02" issued on 1 July 2012. Eventough the land was legally under company's HGU or Izin Lokasi, since it is still under traditional owner and has not been compensated, company policy is to wait. Once the landowner wishes to release the land, only company follows up. Sample seen: The FPIC process documented under "Dokumen Ganti Rugi Tanam Tumbuh/GRTT No.58". The compensation application from Mr. Asm***, people of Talang Arah village, Malin Deman district for land of 2.9 Ha. The map scale 1:1,500 issued by Talang Arah village. The land ownership document: "Surat Keterangan Tanah No.590/055/17.06.15/2013 untuk tanah seluas 9,000 m<sup>3</sup> yang berada di Desa Talang Arah, yang diterbitkan oleh Kepala Desa Talang Arah" dated 30 April 2013; "Surat Keterangan Tanah No.590/39/17.0.15.01/2013, untuk tanah seluas 20,000 m<sup>3</sup> yang diterbitkan oleh Kepala Desa Talang Arah dan diketahui oleh Camat Malin Deman", dated 30 April 2013. The process document covers "Surat Keterangan Ganti Rugi Tanah Garapan" signed by both parties and witnessed by both parties representative, acknowledged by village head and district head on 30 April 2013. "Surat Pelepasan Menggarap atas Tanah Garapan" signed by both parties on 30 April 2013, acknowledged by village head and district head. The negotiation process of "Ganti Rugi Tanam Tumbuh", including the value has been agreed on 30 April 2013. Compensation payment made through "Bank Bengkulu" on 30 April 2013, with connote No.005/GRTT-MMAS/I/2013.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> One of example seen, company assisted to purchase land for <i>Kebun Masyarakat Desa/KMD</i>. The process for land compensation with <i>Kebun Masyarakat Desa</i> Tanjung Jaya, whereby land of 7.83 Ha located inside area proposed for HGU. The agreement was <i>Kebun Masyarakat Desa</i> Tanjung Jaya to release the land inside HGU and exchanged with PT. Mukomuko Agro Sejahtera assist to purchase land outside proposed HGU area of 14.516 Ha. In addition, the balance of debt accounted as paid during the agreement, 11 August 2017.</p> <p>KMD Mundam Marap made compensation to individual landowner, in order to develop <i>Kebun Masyarakat Desa/KMD</i>. Document seen: Minutes of meeting between landowners and village authority; Compensation application; "Surat Pernyataan Penguasaan Fisik Tanah", under name As*****, whereby handed over the user right over 2 Ha land back to "Pemerintah Desa Mundam Marap", dated 26 September 2017. The history of land right/user right: 1979 user right under name "Husin Ba***"; 2013 user right under name "Suh*****" (purchase); 2015 user right under "Pemerintah Desa Mundam Marap" (purchase) dated 26 January 2015.</p>	<p>Comply</p>

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<p><b>Criterion 7.6</b> 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.</p>		
<p>7.6.1 Records of identification and assessment of legal, customary and user rights shall be available.  - Major compliance –</p>	<p>PT. Mukomuko Agro Sejahtera (MMAS): Company has utilized the area under location permit: "Surat Keputusan Bupati Mukomuko No.700-212 tentang Perpanjangan Izin Lokasi seluas 1,167 Ha" dated 18 March 2014. Company has identified all landowners that possess valid user right inside the concession and negotiated to compensated the land. Based on document review and interview, PT. Mukomuko Agro Sejahtera, up to this moment, has identified and made compensation for 1,225 landowners with total area of 2,142.29 Ha.</p> <p><i>Kebun Masyarakat Desa/KMD:</i> Each KMD has identified the landowners, with legal rights and/or user rights upon land parcel to be compensated. Because the potential land is within their village boundary. Sample seen: KMD Mundam Marap identified 7 landowners whose land planned for smallholder plantation, before made compensation to individual landowner.</p>	<p>Comply</p>

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<p>7.6.2</p> <p>A procedure for identifying people entitled to compensation shall be available.</p> <p>- Major compliance –</p>	<p>PT. Mukomuko Agro Sejahtera has a mechanism for land compensation "Prosedur Kompensasi Lahan No.SOP/CA/02" issued on 1 July 2012. In the procedure outlines the mechanism for identifying, verifying people entitled to compensation through the FPIC process (socialization). Document Verification and Measurement of land and Price Negotiation "Ganti Rugi Tanam Tumbuh/GRTT". Completeness GRTT are as follows:</p> <ol style="list-style-type: none"> <li>1. Letter of Request for measurement,</li> <li>2. Minute of land surveying,</li> <li>3. Certificate of Land or "Surat Keterangan Tanah/SKT;</li> <li>4. Statement of no dispute</li> <li>5. Statement of Recognition of Rights,</li> <li>6. Statement Own Land / Land for smallholder (if any),</li> <li>7. Letter of Waiver working on arable land, arable land compensation letters.</li> </ol> <p><i>Kebun Masyarakat Desa/KMD:</i>            Kebun Masyarakat Desa/KMD committee refers to PT. Agro Muko's procedure on identifying people entitled to compensation. Evidence sighted: Statement Letter from the <i>Kebun Masyarakat Desa/KMD</i> committee "Surat Pernyataan Kepatuhan terhadap Pemenuhan Persyaratan Prinsip dan Kriteria RSPO" dated 12 December 2017; stating that the organization is a committed to comply to RSPO P&amp;C through implementation of relevant policies and SOP from PT. Agro Muko.            PT. Agro Muko's "Prosedur Ganti Rugi Lahan, No.SOP/CA/02" – land compensation procedure dated 1 July 2012, available in Bahasa Indonesia. Any identification of people entitled for land compensation will be identified by <i>Kebun Masyarakat Desa/KMD</i> committee and acknowledged by PT. Agro Muko.</p> <p>NC Major:            3 <i>Kebun Masyarakat Desa/KMDs</i> (KMD Mundam Marap, KMD Serami Baru - Air Masad, KMD Lubuk Talang) has not established procedure for identifying people entitled to compensation.</p>	<p>Non-Compliance Comply</p>
<p>7.6.3</p> <p>Records of calculation system and distribution of fair compensation shall be available.</p> <p>- Major compliance –</p>	<p>PT. Mukomuko Agro Sejahtera has a mechanism for land compensation "Prosedur Kompensasi Lahan No.SOP/CA/02" issued on 1 July 2012. In the procedure outlines the mechanism for identifying, verifying people entitled to compensation through the FPIC process (socialization). Record of calculation system (based on participatory mapping and measurement) for compensation recorded in minutes of negotiation.</p> <p>One of example seen, company assisted to purchase land for <i>Kebun Masyarakat Desa/KMD</i>. The process for land compensation with <i>Kebun Masyarakat Desa</i> Tanjung Jaya, whereby land of 7.83 Ha located inside area proposed for HGU. The agreement was <i>Kebun Masyarakat Desa</i> Tanjung Jaya to release the land inside HGU and exchanged with PT. Mukomuko Agro Sejahtera assist to purchase land outside proposed HGU area of 14.516 Ha. In addition, the balance of debt accounted as paid during the agreement, 11 August 2017.</p> <p>---</p>	<p>Comply</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p><i>Kebun Masyarakat Desa/KMD:</i>            Kebun Masyarakat Desa/KMD committee refers to PT. Agro Muko's procedure on calculating compensation. Record of calculation/negotiation sighted in the minutes of meeting between KMD with community and individual landowners. Sample seen: KMD Mundam Marap made compensation to individual landowner, in order to develop Kebun Masyarakat Desa/KMD. Document seen: Minutes of meeting between KMD, community, traditional leader/Kepala Kaum, and individual landowners; "Surat Pernyataan Penguasaan Fisik Tanah", under name As*****, whereby handed over the user right over 2 Ha land back to "Pemerintah Desa Mundam Marap", dated 26 September 2017. The history of land right/user right: 1979 user right under name "Husin Ba***"; 2013 user right under name "Suh****" (purchase); 2015 user right under "Pemerintah Desa Mundam Marap" (purchase) dated 26 January 2015.</p>	
<p>7.6.4</p> <p>Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development.</p> <p>- Minor compliance –</p>	<p>PT. Mukomuko Agro Sejahtera opens to possibilities of providing opportunities to benefit from plantation development. In one case, the compensation made to exchange with assistance to sets up smallholder. Company assisted to purchase land for <i>Kebun Masyarakat Desa/KMD</i>. The process for land compensation with <i>Kebun Masyarakat Desa/KMD</i> Tanjung Jaya, whereby land of 7.83 Ha located inside area proposed for HGU. The agreement was <i>Kebun Masyarakat Desa</i> Tanjung Jaya to release the land inside HGU and exchanged with PT. Mukomuko Agro Sejahtera assist to purchase land outside proposed HGU area of 14.516 Ha. In addition, the balance of debt accounted as paid during the agreement, 11 August 2017.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>            Kebun Masyarakat Desa/KMD committee refers to PT. Agro Muko's procedure on calculating compensation. Record of calculation/negotiation sighted in the minutes of meeting between KMD with community and individual landowners.</p>	<p>Comply</p>
<p>7.6.5</p> <p>The process and outcome of any compensation claims shall be documented and made available to the affected communities and their representatives.</p> <p>- Minor compliance –</p>	<p>PT. Mukomuko Agro Sejahtera maintain complete records of negotiation process, participatory mapping and measurement, user right release and compensation payment.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>            Kebun Masyarakat Desa/KMD committee assisted by PT. Agro Muko and PT. Mukomuko Agro Sejahtera to maintain records of process and outcome upon land compensation.</p>	<p>Comply</p>

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7.6.6	<p>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.</p> <p>- Minor compliance –</p>	Comply
<p><b>Criterion 7.7</b></p> <p>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.</p>		
7.7.1	<p>Records of zero burning implementation on land clearing, referring to the ASEAN Policy on zero burning (2003) and recognised techniques based on the existing regulations shall be available.</p> <p>- Major compliance –</p>	Comply

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<p>7.7.2</p> <p>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 on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>- Minor compliance –</p>	<p>There is no fire used for land preparation. The company implements their policy of "Zero Burning" and it was noted during field visit that there is no signs of burning for land preparation. Records show that there is no burning activity in land preparation at company Estate. Field observation at Malind Deman Estate demonstrated that there is no sign of burning activity in land preparation.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>  Record of land clearing available on "Laporan Mingguan Progress Kerja LC". Description of work are chipping, filling, clearing, stacking, making road, making terrace contour, making drain, making boundary drain, leveling, making sewer, spraying, making planting hole, planting LCC, planting oil palm, etc. Records show that there is no burning activity in land preparation at KMD.</p>	<p>Comply</p>
<p><b>Criterion 7.8</b></p> <p>New plantation developments are designed to minimize net greenhouse gas emissions.</p>		
<p>7.8.1</p> <p>The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated.</p> <p>- Major compliance –</p>	<p>Identification of pollutant and mitigation plan, included GHG is documented in "Rencana Pengurangan Emisi Gas Rumah Kaca (GHG Emission) as defined in procedure of "Mitigasi Gas Rumah Kaca" No.ENC/GHG/01. GHG emissions have been identified and plan for mitigation of GHG has been established.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>  PT. Agro Muko and PT. Mukomuko Agro Sejahtera has provides complete information on planting plan – including avoiding area with high carbon stock for development. Based on interview with KMD committees and document review upon "Planting Approval" document, KMD have agreed on the approach. From the HCV report, carbon stock assessment stated area that contain high carbon stock was sets aside. In KMD Lubuk Talang, the HCV area of Ipuh river buffer zone 35.72 Ha and area with secondary forest vegetation 9.79 Ha was not going to be planted.</p>	<p>Comply</p>
<p>7.8.2</p> <p>Records of a plan to minimize net GHG emissions shall be available.</p> <p>- Minor compliance –</p>	<p>From the "Hectare Statement", recording the land preparation and planting realization, no planting on primary forest and/or peat area for Malin Deman Estate. HCV area and the vegetation are maintained.</p> <p><i>Kebun Masyarakat Desa/KMD:</i>  PT. Agro Muko and PT. Mukomuko Agro Sejahtera has provide complete information on planting plan – including avoiding area with high carbon stock for development. Based on interview with KMD committees and document review upon "Planting Approval" document, KMD have agreed on the approach. Based on soil survey, no peat soil identified in the smallholder land.</p> <p>From the HCV report, carbon stock assessment stated area that contain high carbon stock was sets aside. In KMD Lubuk Talang, the HCV area of Ipuh river buffer zone 35.72 Ha and area with secondary forest vegetation 9.79 Ha was not going to be planted. Based on field visit, the area was not opened.</p>	<p>Comply</p>

Criterion / Indicator	Assessment Findings	Compliance																																										
<b>Principle 8: Commitment to continuous improvement in key areas of activity</b>																																												
<b>Criterion 8.1</b>																																												
Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.																																												
8.1.1	<p>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:</p> <ul style="list-style-type: none"> <li>• Reduction in use of certain chemicals (Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);</li> <li>• Optimising the yield of FFB production (Criterion 4.2)</li> </ul> <p>- Major compliance –</p> <p>A continuous improvement plan has been prepared and internal audit conducted to identify environmental and social activities, such as:</p> <ul style="list-style-type: none"> <li>- (Biogas plant) for methane capture.</li> <li>- Applied EFB as fertilizer, fibre and shell are burned in boiler for electricity, organic and an-organic from domestic waste is separated, where an-organic wastes go through to the landfill.</li> <li>- Continuing dispose hazardous waste to the approval collector.</li> <li>- Increasing planting beneficial plant (Tunera subulata and Cassia Tora) host plant for natural predator.</li> <li>- Develop KMD and Plasma KKPA for local communities surrounding company area.</li> </ul> <p>Sample taken:</p> <ul style="list-style-type: none"> <li>- Visit Report in BT POM, conducted on 29-30 September 2017, there were 4 minor NC and 7 observation for improvement were raised. Audit has conducted by team of Internal interna auditor, e.g: Mr Eka Bima Sitorus, Mr Deny A Sirait</li> <li>- Report of water Use per Ton FFB process year 2016 vs 2017 (HSD Oil for Electricity/MT)</li> </ul> <table border="1" data-bbox="630 1283 1233 1659"> <thead> <tr> <th>Month</th> <th>2016 (M<sup>3</sup>/MT FFB)</th> <th>2017 (M<sup>3</sup>/MT FFB)</th> </tr> </thead> <tbody> <tr><td>January</td><td>1.31</td><td>0.90</td></tr> <tr><td>February</td><td>1.25</td><td>0.85</td></tr> <tr><td>March</td><td>1.18</td><td>0.81</td></tr> <tr><td>April</td><td>1.32</td><td>0.85</td></tr> <tr><td>May</td><td>0.97</td><td>0.91</td></tr> <tr><td>June</td><td>0.81</td><td>0.88</td></tr> <tr><td>July</td><td>0.81</td><td>0.86</td></tr> <tr><td>August</td><td>0.88</td><td>0.82</td></tr> <tr><td>September</td><td>0.84</td><td>0.84</td></tr> <tr><td>October</td><td>0.84</td><td>0.79</td></tr> <tr><td>November</td><td>0.79</td><td></td></tr> <tr><td>December</td><td>0.85</td><td></td></tr> <tr><td>Todate</td><td>0.96</td><td>0.85</td></tr> </tbody> </table>	Month	2016 (M <sup>3</sup> /MT FFB)	2017 (M <sup>3</sup> /MT FFB)	January	1.31	0.90	February	1.25	0.85	March	1.18	0.81	April	1.32	0.85	May	0.97	0.91	June	0.81	0.88	July	0.81	0.86	August	0.88	0.82	September	0.84	0.84	October	0.84	0.79	November	0.79		December	0.85		Todate	0.96	0.85	Comply
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**Appendix B: Approved Time Bound Plan**

Name of company	Name of Mill	Locatiom	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
	Bunga Tanjung Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Bunga Tanjung estate, Air Bikuk estate, Air Buluh estate and KMD	2011	Certified
			PT. Mukomuko Agro Sejahtera: - Air Majunto estate - Malin Deman estate	2014	Certified
PT. Tolan Tiga	Bukit Maradja Mill	Simalungun Regency, North Sumatera, Indonesia	- Bukit Maradja Estate (PT. Eastern Sumatra Indonesia) - Kerasaan Estate (PT. Kerasaan Indonesia) - PT. Timbang Deli Indonesia	2010	Certified May 2010
	Perlabian Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	Perlabian estate and Tolan estate.	2018 2010	Plant to certify Certified May 2010
PT. Umbul Mas Wisesa	Umbul Mas Wisesa Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South estate, UMW North estate and Toton Usaha Mandiri estate	2014	Certified in March 2015
PT. Agro Kati Lama		Musirawas Regency, South Sumatera, Indonesia		2021	developed (It has been RSPO NPP), RSPO public Notification on 31 <sup>st</sup> March 2014.
PT. Agro Rawas Ulu		Musirawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 <sup>st</sup> March 2014.
PT. Agro Muara Rupit		Musirawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 <sup>st</sup> March 2014.
Hargy Oil Palm Limited (HOPL)	Hargy Mill	East of Bialla, West New Britain Province, PNG	Hargy Estate	2009	Certified in April 2009
	Navo Mill	50 Kms East of Bialla, West New Britain Province, PNG	Navo Estate, Bakada Estate and Mengen Estate	2009	Certified in April 2009
	Barema Mill	30 km East of Bialla, West New Britain Province, PNG	Barema Estate	2014	RSPO Certified in April 2014
PT. Dendy Maker Indah Lestari		Musirawas Utara Regency, South Sumatera Province, Indonesia			The most recent acquisition on 1 August 2017. RSPO certified in 2015.

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2017** for **Bunga Tanjung Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2017** for **Bunga Tanjung Palm Oil Mill** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.25
PKO	0.25

Extraction	%
OER	22.73
KER	5.3

Production	t/yr
FFB Process	135231.76
CPO Produced	30732.95
PKO Produced	7168.61

Land Use	Ha
OP Planted Area	6871.54
OP Planted on peat	0
Conservation (forested)	1018.74
Conservation (non-forested)	0
<b>Total</b>	<b>6871.54</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	45063.36	0.36	0	0	3846.42	0.43	48909.8	0.79
CO <sub>2</sub> Emission from fertilizer	9772.46	0.08	0	0	677.13	0.07	10449.6	0.15
NO <sub>2</sub> Emmission	9625.29	0.08	0	0	613.08	0.07	10238.40	0.15
Fuel Consumption	2515.12	0.02	0	0	0	0	2515.12	0.02
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-59270.45	-0.47	0	0	-5059.08	-0.56	-64,329.53	-1.03
Conservation	-9321.29	-0.07	0	0	0	0	-9321.29	-0.07

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Sequestration								
<b>Total</b>	<b>-1615.51</b>	<b>0.00</b>	<b>0</b>	<b>0</b>	<b>77.55</b>	<b>0.01</b>	<b>-1537.90</b>	<b>0.01</b>

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	26507.72	0.2
Fuel Consumption	310.72	0
Grid Electricity Utilisation	0	0
<b>Credit</b>		
Export of Grid Electricity	-146.28	0
Sales of PKS	-15770.96	-0.12
Sales of EFB	0	0
<b>Total</b>	<b>10901.2</b>	<b>0.08</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

Emissions	tCO <sub>2</sub> e
PK from own mill	7168.617
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

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

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**Appendix D**

**: CPO Mill Supply Chain Assessment Report (Module D - CPO Mills: Identity Preserved)**

Requirements	Compliance
<b>D.1 Definition</b>	
<p>D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme. 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. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.</p>	<p>Management decided PT. Agro Muko – Bunga Tanjung POM, to implement RSPO Supply Chain Module D CPO Mills: Identity Preserved. With the implementation of Module D CPO Mills: Identity Preserved, Bunga Tanjung POM only received and process FFB from certified company-owned estate and certified smallholder/KMD.</p> <p>Agro Muko Tank Terminal (AMTT) is deemed as part of the palm oil mill. The control over tank terminal (bulking station) is under PT Agro Muko. Agro Muko Tank Terminal is only receiving CPO from certified palm oil mills under PT Agromuko, which is Mukomuko POM and Bunga Tanjung POM.</p> <p>AMTT implemented the procedure of supply chain and traceability based on "Prosedur Rantai Pasok dan Mampu Telusur" (No.ENC/SCC/01 rev.03) dated 26 March 2015". Procedure completed with the flow diagram of FFB acceptance, processing in POM, CPO shipping to tank terminal; Receiving and shipping of CPO from tank terminal.</p> <p>Person responsible for implementation of RSPO Supply Chain standard at the tank terminal is the manager, Mr. Subhan.</p>
<b>D.2 Explanation</b>	
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The 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 Bunga Tanjung Estate, Air Bikuk Estate, Air Buluh Estate; Malin Deman Estate, certified KMD, certified cooperative.</p>
<p>D.2.2 The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p>	<p>Company holds PalmTrace registration under PT. Agro Muko Bunga Tanjung POM. Bunga Tanjung POM registered all the transactions within PalmTrace NO.RSPO_PO1000001279.</p>
<b>D.3 Documented procedures</b>	
<p>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:</p>	<p>Company has a procedure "Rantai Pasok dan Mampu Telusur No.ENC/SCC/01 rev.3". 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,</p>

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<p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p>	<p>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;</p> <p>4.2.1 Weighing of FFB truck;</p> <p>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;</p> <p>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;</p> <p>4.3 Sales of CPO and PK;</p> <p>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.</p> <p>Agro Muko Tank Terminal has implemented a supply chain and traceability procedure under "Prosedur Rantai Pasok dan Mampu Telusur" (No.ENC/SCC/01 rev.03) dated 26 March 2015". The procedure explains in all aspects of supply chain and traceability scope in PT. Agro Muko, starting from FFB harvesting, harvest recording and delivery to Palm Oil Mill; FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for export, Shipping instruction and preparation, CPO stock balancing post-shipment.</p> <p>AMTT has documented work instruction related to tank terminal activity, e.g.:</p> <ul style="list-style-type: none"> <li>- Reception and Weighbridge (AMTT-WI/RW/01 – Rev.1) dated 19 November 2013</li> <li>- FFA level checking, "Pemeriksaan FFA Level" (AMTT-WI/Lab/01 – Rev.0) dated 1 March 2010</li> <li>- CPO unloading, "Pembongkaran CPO" (AMTT-WI/UL/01 – Rev.0) dated 3 January 2010</li> <li>- Boiler Mechmar operation, "Pengoperasian Boiler Mechmar" (AMTT-WI/SHIPMENT/001 – Rev.1) dated 19 November 2013</li> <li>- Despatch Pump operation, "Pengoperasian Despatch Pump" (AMTT-WI/SHIPMENT/005 – Rev.1) dated 19 November 2013.</li> </ul> <p>Sample 1: CPO dispatch from Mukomuko POM and receiving in storage tank: Dispatch Slip No.23/12/AM-MS/17 dated 4 December 2017, quantity 18.600 MT from Mukomuko POM with truck No. BA9559RZ – sustainable product IP, Transporter PT Mutia Mulia. Receiving Slip No.23/12/AM-MS/17 Ticket No.CPO17006328W, dated 5 December 2017 for 18.590 MT CPO from Mukomuko POM. Unloading ticket for truck No.BA9559RZ to Tank #7.</p>
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	<p>Storage tank daily reporting: Daily Stock Position Report for 5 December 2017 MM-POM: receive today: 76.430 MT; month to date: 825.160 MT; year to date: 49,094.860 MT. Despatch year to date: 45,027.880 MT; adjustment: 48.671 MT. End stock: 7,124.069 MT at tank #1: 1,935.200 MT; tank #2: 2,347.839 MT; Tank #6: 1,656.733 MT; tank #7: 900.377 MT; tank #8: 283.920 MT.</p> <p>Storage tank monthly reporting: Sample: Stock, Receiving, Despatch at Fiscal Year 2017, Month 11 (01/11/2017 – 30/11/2017). Stock per 31 October 2017: MM-POM: 3,064.884 MT and BT-POM: 648,485 MT. Received in November 2017: MM-POM: 5,113.520 MT and BT-POM: 3,176.840 MT. Adjustment MM-POM: 2.284 MT and BT-POM: 1.789 MT. Despatch for shipping under contract No. CPO000074 (PMMO-10108, PMMO-10111, PMMO-10114, PMMO-10120, PMMO-10122 BAL, PMMO-10123, PMMO-10125, and PMMO-10126), vessel MT Tiger Tenacity; MM-POM: 1,881.779 MT and BT-POM: 2,518.185 MT. End stock per 30 November 2017 are MM-POM: 6,298.909 MT and BT-POM: 1,308.929 MT.</p> <p>Storage tank shipping records MM-POM: - Shipping Instruction No. 2017/AM-OE/SI/02 dated 14 February 2017 described commodity: Indonesian Crude Sustainable Palm Oil SG; contract/quantity: PMMO-10052 (500 MT), PMMO-10063 (500 MT), PMMO-10072 (1,000 MT), PMMO-10075 (500 MT), PMMO-10078 (500 MT) and PMMO-10080 (500 MT), total 3,500 MT. Notify Address: AAK (UK) Ltd. King George Dock, Hull, England; Shipper: PT Agro Muko, Gedung Bank Sumut Lt.7, Jl. Imam Bonjol Mo.18, Madras Hulu – Medan Polonia; Vessel MT MID Osprey, eta 23-27 February 2017; port of loading: Teluk Bayur, Padang, Indonesia; port of discharge: Hull, UK. Bill of Lading (B/L) No. MOS 1702 0901; quantity: 3,499.942 MT; Clean on Board. PalmTrace Shipping Announcement: PMMO-10052 – TR-e151aaa7-8da4; PMMO-10063 – TR-e9ddcb82-9ddf; PMMO-10072 – TR-d5eea82b-4c8b; PMMO-10075 – TR-1b6482a7-22fa; PMMO-10078 – TR-8a04c105-1f3e; PMMO-10080 – TR-733da43e-1f53</p> <p>It was note that all documents, e.g. Shipping Instruction, Bill of Lading, Cargo Manifest, Shipping Document, etc have stated RSPO SG, RSPO Certificate RSPO 556042 and RSPO 646338, valid until 21 February 2018.</p> <p>Based on “Prosedur Rantai Pasok dan Mampu Telusur” (No.ENC/SCC/01 rev.03) dated 26 March 2015, the company has appointed the responsible person for handling supply chain along their supply chain process, e.g. in estate (Estate Manager) in Mill (Mill Manager) and AMTT Bulking is Tank Terminal Manager as described “Diagram alir” (Flow Chart) Section 6.</p>
<p>b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable</p>	<p>Based on “Prosedur Rantai Pasok dan Mampu Telusur” (No.ENC/SCC/01 rev.03) dated 26 March 2015, the company has appointed the responsible person for handling supply</p>

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<p>requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.</p>	<p>chain along their supply chain process, e.g. in estate (Estate Manager) in Mill (Mill Manager) and AMTT Bulking is Tank Terminal Manager as described "Diagram alir" (Flow Chart) Section 6. Person responsible for implementation of RSPO Supply Chain standard at Bunga Tanjung POM is the manager, Sariman Sihombing. Person responsible for implementation of RSPO Supply Chain standard at the Agro Muko Tank Terminal is the manager, Mr. Subhan.</p>
<p>D.3.2 The site shall have documented procedures for receiving and processing certified FFBs.</p>	<p>Company has a procedure "Rantai pasok dan Mampu Telusur No.ENC/SCC/01 rev.3" dated 26 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.</p>
<p><b>D.4 Purchasing and goods in</b></p>	
<p>D.4.1 The site shall verify and document the tonnage and sources of certified FFBs received.</p>	<p>Bunga Tanjung POM referring to procedure "Rantai pasok dan Mampu Telusur No.ENC/SCC/01 rev.3" dated 26 March 2015. Section 4.1 stated the identification of certified FFB and the means of verification in the weighbridge. Sampled: Delivery of FFB from Malin Deman Estate, No.MDE/01***4, dated 5 December 2017, with 863 bunches from block N14. The weighbridge operator checks on stamp consist of RSPO certificate "RSPO 646338"; certified IP.</p>
<p>D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>Company has a procedure "Rantai pasok dan Mampu Telusur No.ENC/SCC/01 rev.3" dated 26 March 2015. The procedure explains Marketing Department in coordination with ENC Department to report any projected overproduction;  During this annual surveillance assessment, Bunga Tanjung POM was not over sold the CPO and PK production.</p>
<p><b>D.5 Record keeping</b></p>	
<p>D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p>	<p>Record seen: Daily Production report; Monthly CPO and PK production report; Three monthly CPO and PK production for period January – March 2017; April – June 2017; July – September 2017; signed by mill manager.  Sample 2: CPO dispatch from Bunga Tanjung POM and receiving in storage tank: Dispatch Slip No.11/12/BT-CPO/2017 dated 4 December 2017, quantity 22.610 MT from Bunga Tanjung POM with truck No. BA8617OU – sustainable product IP, Transporter PT Mutia</p>

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Mulia. Receiving Slip No.11/12/BT-CPO/2017 Ticket No.CPO17006323W, dated 5 December 2017 for 22.730 MT CPO from Muko-Muko POM. Unloading ticket for truck No.BA8617BU to Tank #7.

BT-POM: receive today: 382.430 MT; month to date: 434.460 MT; year to date: 26,969.830 MT. Despatch year to date: 26,761.605 MT; adjustment: 27.005 MT. End stock: 1,743.389 MT at tank #1: 262.805 MT; Tank #6: 734,090 MT; tank #7: 436.249 MT; tank #8: 310.245 MT.

Storage tank monthly reporting:

Sample: Stock, Receiving, Despatch at Fiscal Year 2017, Month 11 (01/11/2017 – 30/11/2017).

Stock per 31 October 2017: MM-POM: 3,064.884 MT and BT-POM: 648,485 MT. Received in November 2017: MM-POM: 5,113.520 MT and BT-POM: 3,176.840 MT. Adjustment MM-POM: 2.284 MT and BT-POM: 1.789 MT. Despatch for shipping under contract No. CPO000074 (PMMO-10108, PMMO-10111, PMMO-10114, PMMO-10120, PMMO-10122 BAL, PMMO-10123, PMMO-10125, and PMMO-10126), vessel MT Tiger Tenacity; MM-POM: 1,881.779 MT and BT-POM: 2,518.185 MT. End stock per 30 November 2017 are MM-POM: 6,298.909 MT and BT-POM: 1,308.929 MT.

Storage tank shipping records BT-POM:

- Shipping Instruction No. 2017/AM-OE/SI/15 dated 26 September 2017 described commodity: Indonesian Crude Sustainable Palm Oil SG; contract/quantity: PMMO-10102 Bal (320 MT), PMMO-10105 (1,500 MT), PMMO-10115 (1,000 MT), PMMO-10116 (500 MT), and PMMO-10117 (500 MT), total 3,820 MT. Notify Address: AAK (UK) Ltd. King George Dock, Hull, England; Shipper: PT Agro Muko, Gedung Bank Sumut Lt.7, Jl. Imam Bonjol Mo.18, Madras Hulu – Medan Polonia; Vessel MT Bunga Lavender eta 26-30 September 2017; port of loading: Teluk Bayur, Padang, Indonesia; port of discharge: Rotterdam, Netherlands. Bill of Lading (B/L) No.BLVV201703/PDG-01; quantity: 3,819.847 MT; Clean on Board. PalmTrace Shipping Announcement: PMMO-10102 Bal – TR-a30a9ea0-0fa8.
- Shipping Instruction No. 2017/AM-OE/SI/05 dated 8 March 2017 described commodity: Indonesian Crude Sustainable Palm Oil SG; contract/quantity: PMMO-10053 (500 MT), PMMO-10064 (500 MT), PMMO-10073 (1,000 MT), PMMO-10076 (500 MT), PMMO-10079 (500 MT) and PMMO-10081 (500 MT), total 3,500 MT. Notify Address: AAK (UK) Ltd. King George Dock, Hull, England; Shipper: PT. Agro Muko, Gedung Bank Sumut Lt.7, Jl. Imam Bonjol Mo.18, Madras Hulu – Medan Polonia; Vessel MT Tern Ocean eta 21-27 March 2017; port of loading: Teluk Bayur, Padang, Indonesia; port of discharge: Hull, England. Bill of Lading (B/L) No.PDG/HUL-01; quantity: 3,499.944 MT; Clean on Board. PalmTrace Shipping Announcement: PMMO-10081 – TR-153844-6b8d.

It was note that all documents, e.g. Shipping Instruction, Bill of Lading, Cargo Manifest, Shipping Document, etc have

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	stated RSPO SG, RSPO Certificate RSPO 556042 and RSPO 646338, valid until 21 February 2018.
<b>D.6 Processing</b>	
D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm product including during transport and storage to strive for 100% separation.	<p>Procedure in Bunga Tanjung POM:            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.</p> <p>Procedure in Agro Muko Tank Terminal (AMTT):            Agro Muko Tank Terminal has implemented a supply chain and traceability procedure under "Prosedur Rantai Pasok dan Mampu Telusur" (No.ENC/SCC/01 rev.03) dated 26 March 2015". The procedure explains in all aspects of supply chain and traceability scope in receiving in storage tank for export, Shipping instruction and preparation, CPO stock balancing post-shipping.            AMTT has documented work instruction related to tank terminal activity, e.g.:</p> <ul style="list-style-type: none"> <li>- Reception and Weighbridge (AMTT-WI/RW/01 – Rev.1) dated 19 November 2013.</li> <li>- CPO unloading, "Pembongkaran CPO" (AMTT-WI/UL/01 – Rev.0) dated 3 January 2010.</li> <li>- Despatch Pump operation, "Pengoperasian Despatch Pump" (AMTT-WI/SHIPMENT/005 – Rev.1) dated 19 November 2013.</li> </ul> <p>Bunga Tanjung POM did not process any non-certified product. Therefore, no non-certified FFB being entered the process, no non-certified CPO and PK being produced, no non-certified product being dispatched. Storage tank for CPO dedicated only for certified oil. Silo for PK used to store certified product.</p>
D.6.2 The objective is for 100 % segregated material to be reached.	<p>Bunga Tanjung POM has prepared the armada for shipping. A checklist on tanker cleanliness was used to inspect the cleanliness – in order to reach 100% IP.</p> <p>Agro Muko Tank Terminal has three dedicated tank to received CPO from Bunga Tanjung POM. Currently Tank No.1 and Tank No.2 (capacity 2,500 MT each), Tank no. 6, Tank No. 7 and Tank No. 8 (capacity 3,000 MT each) are used to received CSPO model IP. To prevent commingling with CPO from other source, AMTT has a designated piping system to pump the CPO from Agro Muko to the tanks. Receiving station using dedicated pipe number 3, 4 and 5 for CSPO IP, whilst pipe number 1 and 2 are for other source CPO.</p> <p>Based on field observation and document review (pipe line design and blowing up checklist) that the site was able to reach 100% segregated material through ensuring that non-certified material will always be segregated from unloading material (PK) up to the dispatching products (PKO).</p>

**Supply Chain Declaration**

**A. Monthly Records of Certified and Uncertified FFB Received since the last audit**

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No.	Month - Year	Volume of FFB from certified supply bases (MT)	Volume of FFB from uncertified supply bases (MT)	Total FFB/ Month (MT)
1	Jan 2017	10,932.68	0	10,932.68
2	Feb 2017	9,858.12	0	9,858.12
3	Mar 2017	10,886.03	0	10,886.03
4	Apr 2017	9,535.04	0	9,535.04
5	May 2017	11,475.52	0	11,475.52
6	Jun 2017	7,888.84	0	7,888.84
7	Jul 2017	11,582.53	0	11,582.53
8	Aug 2017	11,645.55	0	11,645.55
9	Sept 2017	11,359.50	0	11,359.50
10	Oct 2017	13,013.14	0	13,013.14
11	Nov 2017	11,815.26	0	11,815.26
12	Dec 2017	10,630.38	0	10,630.38
		<b>130,622.59</b>	<b>0</b>	<b>130,622.59</b>

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>				
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)	
1	Jan 2017	2,449.09	554.44	
2	Feb 2017	2,236.02	537.40	
3	Mar 2017	2,470.37	616.00	
4	Apr 2017	2,196.71	519.19	
5	May 2017	2,656.21	589.61	
6	Jun 2017	1,787.18	394.12	
7	Jul 2017	2,594.76	592.45	
8	Aug 2017	2,597.09	595.49	
9	Sept 2017	2,455.61	577.95	
10	Oct 2017	3,044.85	715.46	
11	Nov 2017	2,689.47	686.41	
12	Dec 2017	2,403.46	680.42	
		<b>29,580.82</b>	<b>7,058.94</b>	

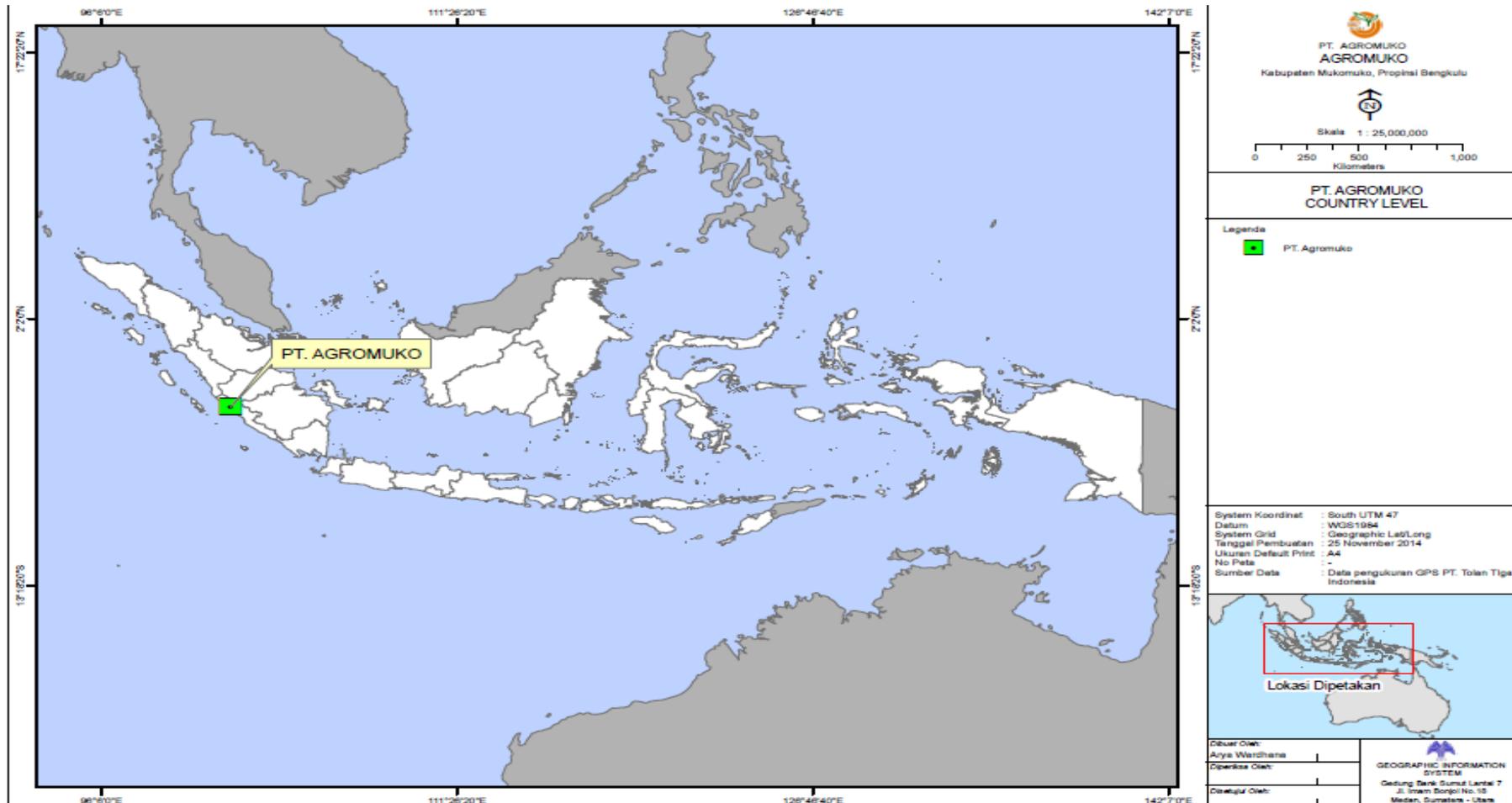
<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit</b>				
No.	Buyers Name	Palmtrace Trading No	Certified CPO Sold (MT)	Certified PK Sold (MT)

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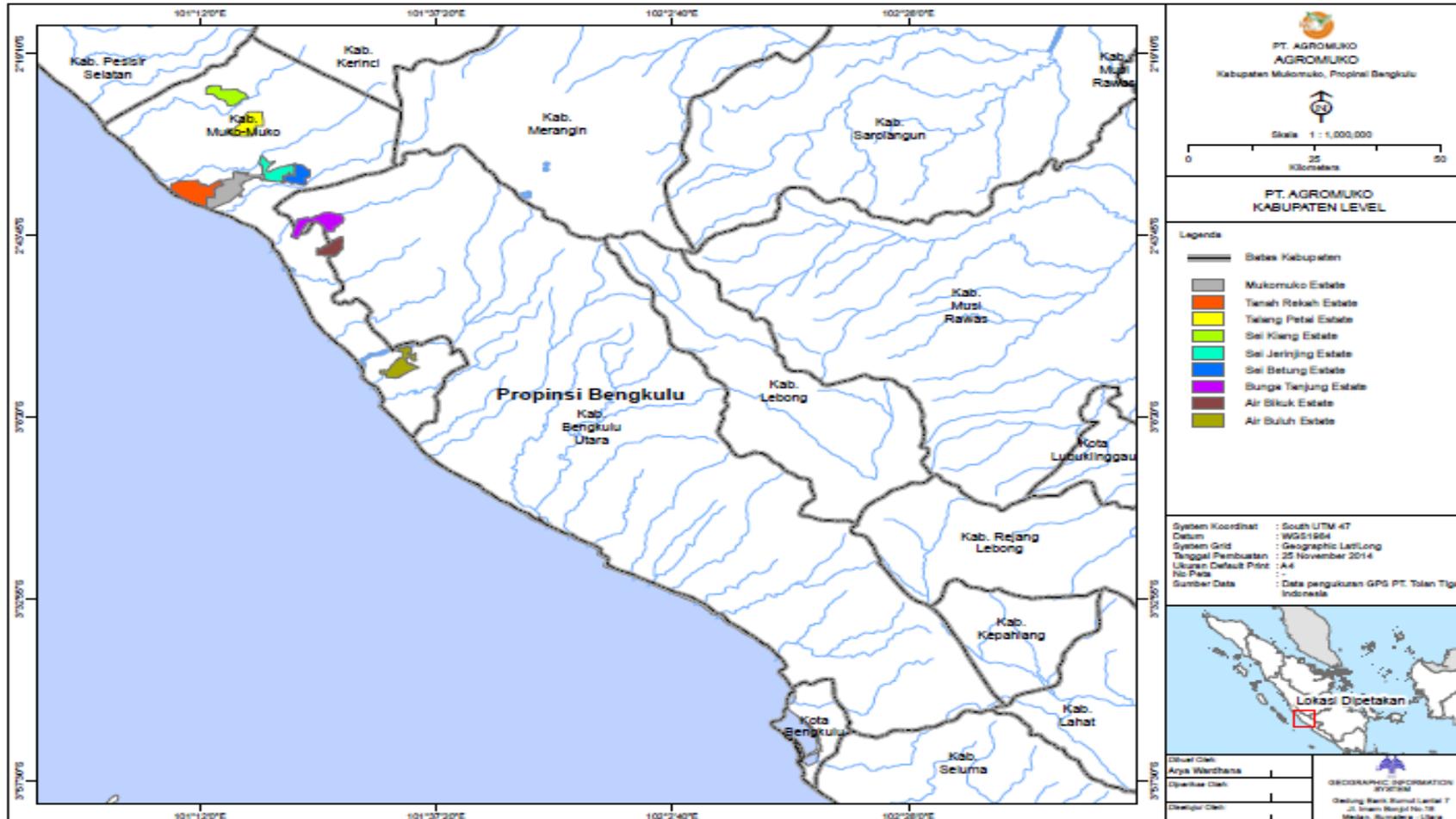
1	Buyer A	TR-fcb4a08e-4636 dated 26 April 2017	500	-
2	Buyer A	TR-b0eeaaaf4-eb7d dated 26 April 2017	500	-
3	Buyer A	TR-c911cd91-b17a dated 26 April 2017	1000	-
4	Buyer A	TR-09b1e27c-4971 dated 26 April 2017	500	-
5	Buyer A	TR-ffdfd073-e2ef dated 26 April 2017	500	-
6	Buyer A	TR-15364434-6b8d dated 26 April 2017	499.94	-
7	Buyer A	TR-030a9ea0-0fa8 dated 30 September 2017	320	-
8	Buyer A	TR-e9ec34fb-d145 dated 30 September 2017	1,500	-
9	Buyer A	TR-25baee2b-bb8a dated 30 September 2017	1,000	-
10	Buyer A	TR-aea740b9-7ef2 dated 30 September 2017	499.85	-
11	Buyer A	TR-1c837737-e50f dated 28 October 2017	500	-
12	Buyer A	TR-d106a1c0-3bab dated 28 October 2017	500	-
13	Buyer A	TR-6294260b-28d7 dated 28 October 2017	500	-
14	Buyer A	TR-283f9cfa-7e0a dated 28 October 2017	500	-
15	Buyer A	TR-3462284c-e629 dated 28 October 2017	1,000	-
16	Buyer A	TR-677159de-2035 dated 28 October 2017	1,000	-
17	Buyer A	TR-9d694a32-e610 dated 28 October 2017	500	-
18	Buyer A	TR-f1c32037-0eaa dated 28 October 2017	500	-
19	Buyer A	TR-833596ee-b92d dated 28 October 2017	500	-
20	Buyer A	TR-a0419dca-db1c dated 28 October 2017	100	-
21	Buyer A	TR-2360efc9-e1bf dated 28 October 2017	499.94	-
22	Buyer A	TR-52fe17d7-60db dated 17 November 2017	500	-
23	Buyer A	TR-4b696ec6-203f dated 17 November 2017	500	-
24	Buyer W	TR-c32d53d4-519c dated 26 January 2017	-	732
25	Buyer W	TR-11dfa8df-d1f1 dated 16 February 2017	-	606
26	Buyer W	TR-e644b4dd-93bc dated 27 April 2017	-	570
27	Buyer W	TR-6537db6d-40f5 dated 27 April 2017	-	636
28	Buyer W	TR-da711af0d521 dated 6 June 2017	-	562
29	Buyer W	TR-1c001cf6-0375 dated 13 June 2017	-	587
30	Buyer W	TR-8e19ae1e0-6ce6 dated 19 July 2017	-	428
31	Buyer W	TR-ec4a3d4d-10be dated 6 September 2017	-	534
32	Buyer W	TR-3a9691c3-0ead dated 25 September 2017	-	567
33	Buyer W	TR-3ae158f8-0d77 dated 10 October 2017	-	521
34	Buyer W	TR-030e6f81-b434 dated 10 November 2017	-	620
	Total		13,919.73	6,363

<b>D. Records of Certified CPO &amp; PK Sold under RSPO Credits to Buyers since the last audit</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading No</b>	<b>RSPO Credits of Certified CPO Sold (MT)</b>
<b>Nil</b>			

**Appendix G: Location Map of Certification Unit and Supply bases**



**Appendix H: Estate Field Map**



**Appendix I: List of Smallholder Sampled**

KMD Mundam Marap
KMD Serami Baru – Air Masad
KMD Lubuk Talang
KMD Bukit Harapan

## Appendix J: List of Abbreviations

AMTT	Agro Muko Tank Terminal
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
ISCC	International Sustainable Carbon Certification
KMD	Kebun Masyarakat Desa
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
PT.AM	PT. Agro Muko
PT. MMAS	PT. Mukomuko Agro Sejahtera
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SG	Segregation
SIA	Social Impact Assessment
SOP	Standard Operating Procedure