

**RSPO PRINCIPLE AND CRITERIA –
4th ANNUAL SURVEILLANCE ASSESSMENT (ASA1_4)
Public Summary Report**

Sime Darby Plantation Berhad
Client company Address: Level 3A, Main Block, Plantation Tower No, 2, Jalan PJU 1A/7 47301 Ara Damansara Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 20) Chaah Palm Oil Mill and supply base Location of Certification Unit: 85400 Chaah, Johor, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	06/09/2004
Parent Company Name	Sime Darby Plantation Berhad		
Address	Level 3A, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
Subsidiary (Certification Unit Name)	Strategic Operating Unit (SOU 20) – Chaah Palm Oil Mill		
Address	85400, Chaah, Johor, Malaysia		
Contact Name	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr Muhammad Saufi Bin Baharudin (Mill Manager)		
Website	www.simedarbyplantation.com	E-mail	kks.chaah@simedarby.com
Telephone	+603-78484379 (Head Office)	Facsimile	+603-78484356 (Head Office)

2. Certification Information			
Certificate Number	RSPO 548299	Date of First Certification	18/11/2010
		Certificate Start Date	18/11/2015
		Certificate Expiry Date	17/11/2020
Scope of Certification	Palm oil and Palm Kernel Production		
Applicable Standards	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D: Identity Preserved)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 685287	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	27/12/2022
MSPO 692047	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		
MSPO 714134	MSPO Supply Chain Certification: 2018		03/09/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Chaah Palm Oil Mill	Chaah Palm Oil Mill 85400 Chaah, Johor, Malaysia	2° 10' 40" N	102° 59' 47" E
Chaah Estate	Pejabat Ladang Chaah 85400 Chaah, Johor, Malaysia	2° 10' 31" N	102° 59' 53" E
North Labis Estate	Ladang North Labis, 85300 Labis, Johor, Malaysia	2° 23' 00" N	103° 03' 00" E
Simpang Kiri Estate	Ladang Sg Simpang Kiri, 85400 Chaah, Johor, Malaysia	2° 08' 54" N	103° 00' 10" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Chaah Estate	2,730.34	0.47	64.55	2,795.36	97.74
North Labis Estate	3,238.42	40.80	316.72	3,595.94	91.05
Simpang Kiri Estate	2,095.25	29.42	246.99	2,371.66	88.35
Total	8,064.01	70.69	628.26	8,762.96	92.11

**Total planted area reduced due to re-survey during replanting*

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Chaah Estate	260.03	34.70	2,160.12	271.53	3.96	2,470.31	260.03
North Labis Estate	729.87	1,026.61	1,236.16	245.78	0.00	2,508.55	729.87
Simpang Kiri Estate	354.48	346.19	1,394.58	0	0	1,740.77	354.48
Total (ha)	1,344.38	1,407.5	4,790.86	517.31	3.96	6,719.63	1,344.38

**Total planted area reduced due to re-survey during replanting*

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (Nov 18 – Oct 19)	Actual (Sept 18 – July 19)	Forecast (Nov 19 – Oct 20)
Chaah Estate	63,714.26	50,190.45	62,435.01
North Labis Estate	52,354.71	46,647.56	57,428.13

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Simpang Kiri Estate	38,179.15	35,222.39	38,150.53
Total	154,248.12	132,060.40	158,013.67

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (Nov 18 – Oct 19)	Actual (Sept 18 – July 19)	Forecast (Nov 19 – Oct 20)
NIL	N/A		N/A
Total			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (Nov 18 – Oct 19)	Actual (Sept 18 – July 19)	Forecast (Nov 19 – Oct 20)
	Nil		
Total	Nil		

10. Certified Tonnage			
Mill Capacity: 30 MT/hr	Estimated (Nov 18 – Oct 19)	Actual (Sept 18 – July 19)	Forecast (Nov 19 – Oct 20)
	FFB	FFB	FFB
	154,248.12 mt	132,060.40 mt	158,013.67 mt
SCC Model: IP	CPO (OER: 20.56%)	CPO (OER: 20.80%)	CPO (OER: 20.95%)
	31,867.11 mt	27,473.027 mt	33,103.86 mt
	PK (KER: 5.18%)	PK (KER: 5.11%)	PK (KER: 5.50%)
	7,994.04 mt	6,756.18 mt	8,690.75 mt

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	16,647.01	0	0	10,500	27,147.01

Conventional product = product that is produced using certified FFB but sold without RSPO claim.

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12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	1,500	0	0	4,560	6,060

Conventional product = product that is produced using certified FFB but sold without RSPO claim.

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	-	-
IS-CSPKO	-	-
IS-CSPKE	-	-

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29 The Gardens North Tower,
Lingkaran Syed Putra, Mid Valley City,
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted from 19-23/08/2019. 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 03/10/2019. 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 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 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 minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- 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 meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between

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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 initial assessment/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 Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Chaah Palm Oil Mill	√	√	√	√	√
Chaah Estate		√	√	√	√
North Labis Estate	√		√	√	√
Simpang Kiri Estate	√	√		√	√

Tentative Date of Next Visit: July 27, 2020 – July 30, 2020

Total No. of Mandays: 13.0 mandays including one day SC audit for mill

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Mohamed Hidir Zainal Abidin	Team Leader	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead

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		Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.
Ronnie Tan	Team Member	Ronnie Tan is a Social Compliance and Security Auditor for more than 15 years. He is a qualified Lead Auditor for SMETA 2 & 4 Pillar, Responsibility Business Alliance (RBA), C-TPAT, TAPA FSR & TSR and other code of conduct audits scheme. He is a National Social Compliance Manager during his past employment and manages a pool of social auditors on social and security audits. He has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Singapore, Vietnam and Philippines. He has been trained in the RSPO P&C standards, BSCI standard, RBA standards, McDonalds SWA, Disney ILS and has been actively involved in RSPO audits & 2 nd party audits within Malaysia. During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.
Amir Bahari	Team Member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English.

Accompanying Persons:

No.	Name	Role
	Nil	

2.3 Assessment Plan

The assessment plan was sent to client prior to the assessment.

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PRELIMINARY AGENDA					
Date	Time	Subjects	MH	RT	AB
Sunday 18/8/19	PM	Audit team travel to Yong Peng. Check in at MH hotel, Yong Peng	√	√	√
Monday 19/8/2019 Chaah Palm Oil Mill	0730	Audit Team travelling Chaah POM.	√	√	√
	0830	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). • Verification on previous audit findings 			
	09.00 – 13.00	Chaah Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	√
	10.00 – 13.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	13.00 – 14.00	Lunch	√	√	√
	14.00 – 16.30	Chaah Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	16.30-17.00	Interim Closing briefing and end of day 1	√	√	√
Tuesday 20/8/2019 Simpang Kiri Estate	08.30 – 13.00	Simpang Kiri Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	10.00 – 12.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	13.00 – 14.00	Lunch	√	√	√
	14.00 – 16.30	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√

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PRELIMINARY AGENDA					
Date	Time	Subjects	MH	RT	AB
	16.30-17.00	Interim Closing Briefing and end of day 2	√	√	√
Wednesday 21/8/2019	8.30 – 13.00	North Labis Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
North Labis Estate	10.00 – 12.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	13.00 – 14.00	Lunch	√	√	√
	14.00 – 16.30	Continue with unfinished elements Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30-17.00	Interim Closing Briefing and end of day 3	√	√	√
Thursday 22/8/19	08.30 –13.00	Chaah Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
Chaah Estate	10.00 – 13.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	13.00 – 14.00	Lunch	√	√	√
	14.00 – 16.30	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30-17.00	Interim Closing Briefing and end of day 4	√	√	√
Friday 23/8/2019	08.30 – 13.00	Supply chain audit for Chaah POM <ul style="list-style-type: none"> • General COC for supply chain • RSPO rules communication and claim 	√	-	-
Chaah POM	13.00 - 14.30	Lunch break & Friday prayer	√	-	-
	1430 – 16.00	Module D: Identity Preserved	√	-	-
	16.00	Closing meeting. Presentation of finding	√	-	-
	PM	Audit team travel back to KL	√	-	-

PRELIMINARY AGENDA		
Time	Subjects	Mohd Hidhir
PM	Audit Team travelling to Chaah. Check-in at MH Hotel, Yong Peng.	√
0730 AM	Travelling to Chaah Estate	√
08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Briefing on site verification plan 	
09.00 – 13.00	Chaah Estate – Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	√
13.00 – 14.00	Lunch break and travel to Kamunting	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Sime Darby Plantation Berhad Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	The time bound plan includes all SOUs in Malaysia and Indonesia. Malaysia - Effectively 34 SOUs: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. Indonesia - Effectively 25 SOUs. For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019.	Yes

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	Based on the latest information, the unit will be surrender to government. The negotiation process is still on going.	
Have all the estates and mills certified within five years after obtaining RSPO membership?	For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	<p>In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified.</p> <p>*RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in completed. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going.</p> <p>SDPL (Liberia Operation) has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was only completed conducted and put on-hold due to security & safety issue. After due consideration on the current engagement with the House of Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going.</p>	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Sime Darby Plantation's time bound plan for certification is initially 3 years, starting 2008-2011. SDP has had all its SOUs (Malaysian & Indonesian) and all Malaysian SOUs have been RSPO certified including 2 new mills have been in Jan and Feb 2014.	Yes

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	<p>For Indonesian operations, currently, 1 SOU in Indonesia (PT MAS) is pending for RSPO Certification due to social legacy issues. SDP's is actively working on its certification targets given the span across a large geographical location and over 200 estates and mills in operation.</p> <p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes and a new oil mill in Liberia has been commissioned in Feb 2016. SDP's time bound plan has been revised to take into consideration the social challenges encountered in Indonesia for the remaining SOU (PT MAS) yet to be certified. Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter.</p> <p>For Indonesia operation, the reported Case No: DSF 007 between the parties PT Mistra Austral Sejahtera (a subsidiary of Sime Darby Plantation Sdn Bhd) and Kerunang/Entapang community. New status has been updated for dispute tracker for following case, http://askrspo.force.com/Complaints/s/case/50090000028ErzsAAC/. Case reference PreCAP/2012/06/PR.</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>No lapses.</p>	<p>Yes</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No.</p>	<p>Yes</p>
<p>Have there been any stakeholder comments?</p>	<p>Up to date, there is no comment. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat.</p>	<p>Yes</p>
<p>Un-Certified Units or Holdings</p>		
<p>No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. </p>	<p>HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p>	<p>Yes</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due</p>	<p>Yes</p>

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	<p>strike and unstable site condition. Audt was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1st quarter of 2019. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p> <p>*Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</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&C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</p>	<p>Latest update based on RSPO Case Tracker (19 potential liabilities; 5 LUCA submitted, 1 LUCA is passed, 1 CN submitted, 1 CN approved) on LUCA submission stauts as per below table:</p> <p style="text-align: center;">SIME DARBY PLANTATION: LUCA SUBMISSION TIMELINE</p> <table border="1" data-bbox="726 907 1321 1406"> <thead> <tr> <th>No.</th> <th>PT/ Company</th> <th>Report Submission to RSPO</th> <th>Current Status (14 Aug 2018)</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>PT Lahan Tani Sakti</td> <td>Submitted on 31 May 2017</td> <td>LUCA approved by reviewer</td> </tr> <tr> <td>2.</td> <td>PT Bina Sains Cemerlang</td> <td>Submitted on 29 Sept 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>3.</td> <td>PT Swadaya Andika</td> <td>Submitted on 6 Oct 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>4.</td> <td>PT Langgeng Muara Makmur</td> <td>Submitted on 8 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>5.</td> <td>PT Laguna Mandiri</td> <td>Submitted on 20 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>6.</td> <td>PT Kridatama Lancar</td> <td>Submitted on 22 Sept 2017</td> <td rowspan="19">Shapefiles to be submitted to RSPO by 17 Aug 2018</td> </tr> <tr> <td>7.</td> <td>PT Paripurna Swakarsa</td> <td>Submitted on 29 Sept 2017</td> </tr> <tr> <td>8.</td> <td>PT Sime Indo Agro</td> <td>Submitted on 10 Nov 2017</td> </tr> <tr> <td>9.</td> <td>PT Bhumireksa Nusa Sejati</td> <td>Submitted on 12 Dec 2017</td> </tr> <tr> <td>10.</td> <td>PT Budidaya Agro Lestari</td> <td>Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017</td> </tr> <tr> <td>11.</td> <td>PT Teguh Sempurna</td> <td>Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017</td> </tr> <tr> <td>12.</td> <td>PT Bahari Gembira Ria</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>13.</td> <td>PT Guthrie Pecconina Indonesia</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>14.</td> <td>PT Sajang Heulang</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>15.</td> <td>PT Bersama Sejahtera Sakti</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>16.</td> <td>PT Tunggal Mitra Plantation</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>17.</td> <td>PT Ladangrumpun Suburabadi</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>18.</td> <td>PT Aneka Inti Persada</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>19.</td> <td>PT Mitra Austral Sejahtera</td> <td>Submitted on 29 Dec 2017</td> </tr> </tbody> </table> <p>Note: SDP's LUCA is still in queue for review process pending finalization of the contract between RSPO and the reviewer. Sime Darby Plantation has also submitted its RSPO Compensation Plan (CP) for evaluation by RSPO.</p>	No.	PT/ Company	Report Submission to RSPO	Current Status (14 Aug 2018)	1.	PT Lahan Tani Sakti	Submitted on 31 May 2017	LUCA approved by reviewer	2.	PT Bina Sains Cemerlang	Submitted on 29 Sept 2017	Shapefiles submitted to RSPO	3.	PT Swadaya Andika	Submitted on 6 Oct 2017	Shapefiles submitted to RSPO	4.	PT Langgeng Muara Makmur	Submitted on 8 Dec 2017	Shapefiles submitted to RSPO	5.	PT Laguna Mandiri	Submitted on 20 Dec 2017	Shapefiles submitted to RSPO	6.	PT Kridatama Lancar	Submitted on 22 Sept 2017	Shapefiles to be submitted to RSPO by 17 Aug 2018	7.	PT Paripurna Swakarsa	Submitted on 29 Sept 2017	8.	PT Sime Indo Agro	Submitted on 10 Nov 2017	9.	PT Bhumireksa Nusa Sejati	Submitted on 12 Dec 2017	10.	PT Budidaya Agro Lestari	Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017	11.	PT Teguh Sempurna	Submitted on 15 Dec 2017 *Re-submitted on 29 Dec 2017	12.	PT Bahari Gembira Ria	Submitted on 29 Dec 2017	13.	PT Guthrie Pecconina Indonesia	Submitted on 29 Dec 2017	14.	PT Sajang Heulang	Submitted on 29 Dec 2017	15.	PT Bersama Sejahtera Sakti	Submitted on 29 Dec 2017	16.	PT Tunggal Mitra Plantation	Submitted on 29 Dec 2017	17.	PT Ladangrumpun Suburabadi	Submitted on 29 Dec 2017	18.	PT Aneka Inti Persada	Submitted on 29 Dec 2017	19.	PT Mitra Austral Sejahtera	Submitted on 29 Dec 2017	<p>Yes</p>
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<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p>	<p>No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>None noted. No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>Yes. The uncertified management unit is referred to PT Mitra Austral Sejahtera which subject to RSPO Compliants Panel decision prior to certification. Refer to case reference PreCAP/2012/06/PR</p>	<p>Yes</p>																																																																			

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable.	

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 4th annual surveillance assessment there were one (1) Major nonconformity & two (2) Minor nonconformities raised. The Chaah Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1816031-201906-M1	Clause & Category (Major / Minor)	Indicator 2.1.1 Major
Date Issued	23/08/2019	Due Date	20/11/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	03/10/2019
Statement of Nonconformity:	1. Foreign workers at Sg Simpang Kiri Estate and North Labis Estate found not contributing the SOCSO SBKA (Skim Bencana Pekerja Asing) in accordance to Akta Keselamatan Social Pekerja 1969 (Akta 4). 2. No written approval obtained from the local authority (JTK) for deduction of RM39 for School Bus Deduction; not complying with Employment Act 1955, Part IV Deduction from Wages; Section 24 – Lawful Deduction		
Requirement Reference:	Evidence of compliance with relevant legal requirements shall be available.		
Objective Evidence:	1. 4 selected foreign workers found expired on 27.05.2019, 27.03.2019 & 25.03.2019 concurrently with their SPPA insurance. However, there is no SOCSO contribution was found made by the employer for the rest of the month up to the day of audit. SOCSO Contribution Form 8A review confirmed that the selected workers not paid for SOCSO contribution.		

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	<p>Affected workers sampled; e.g. Expired on 27.05.2019 – Emp. No.: 102147, 102226, 102154 (Simpang Kiri Estate) Expired on 25.03.2019 – Emp. No.: 141369, 141372 (North Labis Estate) Expired on 27.03.2019 – Emp. No.: 141474, 141475 (North Labis Estate).</p> <p>2. 1 out of 3 selected local workers Emp.No.: 137901 for the month of October 2018, January 2019 and July 2019 found deducted with RM39 (D065 – School Bus Deduction).</p>
Corrections:	<p>i) Estate Management already rectify the issue immediately by register Form 8A on August 2019 to SOCSO. All the workers already registered under SOCSO scheme.</p> <p>ii) The person in charged removed the Fixed rate T-code from check roll system immediately to avoid auto deduction for school bus until obtain JTK approval.</p>
Root Cause Analysis:	Miscommunication between estate management and HQ level and ineffectiveness monitoring of new law.
Corrective Actions:	HR Southern Region will communicate with operation unit (OU’s) related to the SOCSO and deduction on pay slip. All workers must contribute to SOCSO and any deduction on pay slip must get approval from JTK.
Assessment Conclusion:	<p>Major NC close out verification:</p> <p>i) Registration under SOCSO scheme was verified for the said workers under SOCSO contribution form 8A for August and September 2019 (Simpang Kiri and North Labis Estate)</p> <p>ii) Removal of fixed rate T-code from Chaah Estate's check roll was verified. No more auto-deduction starting from August 2019. This was further verified during interview with Chaah Estate's NUPW leader and workers pertaining to monthly deduction in the pay slip. The last deduction was in July 2019 salary.</p> <p>iii) Memo from Regional General Manager dated 16/9/19 and Southern Region HR dated 27/9/19 related to SOCSO and lawful deduction dated was verified. Briefing to related personnel was carried out on 23/9/17 (Simpang Kiri Estate), 30/9/19 (North Labis Estate) and 28/9/19 (Chaah Estate) was verified.</p> <p>The corrective action taken was found to be effective, thus the major NC is closed on 3/9/19. Continuous implementation will be further verified in the next audit.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1816031-201906-N1	Clause & Category (Major / Minor)	Indicator 6.5.3 Minor
Date Issued	23/08/2019	Due Date	Next annual surveillance audit
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	<p>- Line-site weekly inspection found not effective. - Non compliance with Pekeling Bil: 02FY/16 – Peraturan Keselamatan dan Kesihatan Pekerjaan Di Kawasan Linesite Pekerja Mengikut Piawai Rountable Sustainable Palm Oil dated 18th Sept 2015; Adalah menjadi kesalahan sekiranya pekerja: Clause 1 – Menyimpan tong tong racun dan tong tong minyak di dalam atau di sekitar rumah.</p>		

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<p>Requirement Reference:</p>	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p>
<p>Objective Evidence:</p>	<p>Despite weekly line-site inspection is carried out and documented in Housing Complex/ Nest/ Community Hall Inspections form; there are several issues found as:- Chaah POM Internal hygiene and maintenance for some of the houses has yet to be improved. E.g. house 14B – toilet and cooking area found not clean, roof (ceiling) broken - Several houses were found with cooking / kitchen local exhaust vent/chimney cover broken, which causes rain water drips directly into the kitchen area.</p> <p>Sungai Simpang Kiri Estate - Majority of selected hostel found with drums filled with petrol that is meant for their transport / motorcycle. These drums found kept inside the bedroom next to extension wires. Cigarettes butt and box found in the same room as well. - 1 of the fire extinguisher at the Bangladesh house found with low pressure. Toilet door in the house was found damaged (hinges dismantled) - 1 of the Nepalese house found with roof leaking at the kitchen area, while bedrooms roof found with dirt dropping from the edges directly onto beds. Workers interview states that no action have being taken despite complaints made. - All selected foreign workers hostel found with broken glass windows.</p> <p>North Labis Estate - All selected hostel found with drums filled with petrol, kept in the bedroom of the workers.</p>
<p>Corrections:</p>	<p><u>Sungai Simpang Kiri</u> The Estate Management removed the petrol container immediately from the said workers quarters and briefed the workers on 24th August 2019 to not keep petrol inside the workers quarters. The Estate Management removed the faulty fire extinguisher and replaced with the new one on 24th August 2019. The Estate Management arranged the carpenter immediately to repair the damaged roof and clear the dirt from the roof on 24th August 2019. The Estate Management replaced the broken windows on 24th August 2019.</p> <p><u>KKS Chaah</u> The Mill Management arranged the carpenter to carry out broken ceiling.</p> <p><u>North Labis Estate</u> The Estate Management removed the petrol container immediately from the said workers quarters and briefed the workers on 22nd August 2019 to not keep petrol inside the workers quarters.</p>
<p>Root Cause Analysis:</p>	<p>Sungai Simpang Kiri & KKS Chaah i)The Estate Management not aware the workers kept petrol inside the house for own daily use for their motorcycle since the petrol bunk is 30 km away from Estate. Current Estate Management not review the Surat Pekeliling Bil: 02FY/16 displayed at workers quarters prepared by previous Estate Manager in year 2016. ii)No specific person in charge to monitor the condition of fire extinguisher. iii)The Estate Management still in progress replacing the broken glass windows on schedule basis.</p>

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	<p>iv)The person in charged not aware on the repair inside the house since there was no complaint received from the workers.</p> <p>North Labis Estate The Estate Management not aware the workers kept petrol inside the house for own daily use for their motorcycle.</p>
Corrective Actions:	<p>Sungai Simpang Kiri, North Labis Estate & KKS Chaah The Medical Assistant and person in charged (mill) will patrol and monitor during his workers housing complex weekly inspection and report immediately to the Estate Management on non-compliances.</p> <p>Sungai Simpang Kiri Estate Estate Management continue to brief regularly the workers on safety at workers housing complex and communicate in complain book for any repair work inside the house. The Estate management will review the Surat Pekeliling Bil: 02FY/16. The Estate Management appoint person in charge to monitor the condition of fire extinguisher on monthly basis.</p>
Assessment Conclusion:	<p>Corrective action taken is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1816031-201906-N2	Clause & Category (Major / Minor)	Indicator 6.10.4 Minor
Date Issued	23/08/2019	Due Date	Next annual surveillance audit
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Payment not in accordance with Contract Agreement, Clause 2.2; between Sime Darby Plantation Bhd and Dewi Dairy Farm Trading.		
Requirement Reference:	Agreed payments shall be made in a timely manner.		
Objective Evidence:	<p>Invoice#0361 & 0360 dated 30.05.2019 amounting MYR35,164.80 and MYR10,951.60 raised by Contractor Dewi Dairy Farm Trading for Pruning/raking/transport FFB / transport Soil / transport fertilizer / hiring machine sent to SDPB on 03.06.2019 and subsequently on 17.07.2019 with invoice attached; however no payment was made up to date of audit. Payment ledger generated from the system shows that invoice received on 17.07.2019 is captured into the system on 15.08.2019 and subjected for next payment cycle on 27.08.2019.</p> <p>Payment terms agreed in the agreement read as : - Clause 2.2 – The company shall pay the within fourteen (14) days of the date of submission of the statement showing the value of the workers carried out, supported with documents evidencing the same save in the event the company disputes the said payment and or the performance of the work by the contractor.</p>		
Corrections:	Estate administration shall in constant communication with HQ (MEX) to ensure all payment are up to date. Any incomplete invoice, notification shall be sent to Contactor and copy to Estate for reference and quick action.		

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Root Cause Analysis:	There are lack of communication between HQ (MEX) and Estate to ensure the contractor were paid in time. Estate were only notified by the contractor if no payment were made.
Corrective Actions:	Invoice sent by contractor to HQ (MEX) through email should be cc copied to Estate as well. This will alerted Estate Management that invoice has been sent timely manner. Any delay of payment occurrence, Estate and Contractor will able to check and revert accordingly
Assessment Conclusion:	Corrective action taken is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	

Positive Findings	
PF #	Description
PF 1	

3.4.1 Status of Nonconformities Previously Identified and Observations

No nonconformity raised during previous assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1228987M1	Major	4.7.1	29/08/2015	Closed 28/09/2015
1228987N1	Minor	6.6.2	29/08/2015	Closed on 22/9/2016
1228987N2	Minor	4.4.1	29/08/2015	Closed on 22/9/2016
1228987N3	Minor	4.7.5	29/08/2015	Closed on 22/9/2016
1381349M1	Major	6.5.2	22/09/2016	Closed on 11/11/2016
1381349M2	Major	4.7.1	22/09/2016	Closed on 11/11/2016
1381349M3	Major	2.1.1	22/09/2016	Closed on 11/11/2016
1381349M4	Major	4.6.11	22/09/2016	Closed on 11/11/2016
1381349N1	Minor	6.2.3	22/09/2016	Closed on 11/08/2017
1509988-201707-M1	Major	5.3.2	11/08/2017	Closed on 10/10/2017

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1509988-201707-N1	Minor	5.3.3	11/08/2017	Closed on 25/09/2018
1816031-201906-M1	Major	2.1.1	23/08/2019	Closed on 03/10/2019
1816031-201906-N1	Minor	6.5.3	23/08/2019	"Open"
1816031-201906-N2	Minor	6.10.4	23/08/2019	"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 SOU Chaah Palm Oil Mill Certification Unit's (SOU 22) 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.


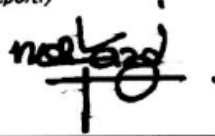
List of Stakeholders Contacted	
Internal Stakeholders Field workers Mill workers NUPW representative Gender committee General workers	Union/Contractors/Local Communities Cattle owners Contractors Suppliers
Government Departments Nil	NGO Nil

IS #	Description
1	<p>Feedbacks: Contractors: They signed service contract agreement and understood the terms and condition outlined in the agreement including payment terms. Payment made promptly and accurately according to the invoices issued; from 2nd to 8th of the month. They have good relationship with the estate / mill management and received invitation for stakeholder meeting.</p> <p>Management Responses: The management will continue to ensure payment made promptly.</p> <p>Audit Team Findings:</p>

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	<p>Verified the payment record and confirmed it is made promptly. Service contracts are in place, signed by both parties and remain valid.</p>
2	<p>Feedbacks: Suppliers – He has informed that payment was made promptly once they delivered the goods and services. He has good relationship with the management and has been invited to attend stakeholder meeting.</p>
	<p>Management Responses: Have being dealing with the company for years and will continue to ensure payment is made promptly.</p>
	<p>Audit Team Findings: Payment records reviewed and confirmed they are made promptly.</p>
3	<p>Feedbacks: Union representative – Good respond from estate management. Issues raised during management and union committee meeting are rectified by the management promptly. E.g. sick leave entitlement, subsidy of NUPW, etc. Recently, he has receives issue in regards to overtime hours that is not distributed to local workers, and planned to discuss in the next meeting.</p>
	<p>Management Responses: The management will continue to support union activities and work along with the representative to ensure workers issues are settled amicably.</p>
	<p>Audit Team Findings: Meeting minutes review confirmed that both, union representative and the estate/mill management communicate to each other regularly. All issues discussed are followed up and closed.</p>
4	<p>Feedbacks: Cattle Owners – attended several meeting with the management and were made informed that from 1st September 2019, they are not allowed to bring their cattle into Sime Darby Estates. If they disobey the order, the management will give order to remove them by all means and charge them on the damages caused. Meeting carried out in peaceful manner without any argument. Management give thorough explanation why they are being prohibited and loses caused by them for the past months.</p>
	<p>Management Responses: This is implemented as the cattle entering the estate area damages the plant and fruits. Numerous meeting held with cattle owners to discuss and explain the issues.</p>
	<p>Audit Team Findings: Meeting minutes sighted that meeting held with cattle owners. The owners found well aware of the issue and why they are being prohibited from entering the estate area and will comply with the rule set by the management.</p>
5	<p>Feedbacks: Gender committee – well verse with the procedure to lodge complain if there is any case of sexual harassment. No sexual issue raised or received from any of their members and workers. They were treated equally disregards of gender. Meeting held with the committee regularly (quarterly) to discuss on any potential issues and activities such as open house, break fast, cooking event, etc. Management is supportive and provided necessary support to make the activities a success. Chairperson is elected by the members/workers/worker’s spouse.</p>
	<p>Management Responses: Will continue to support the gender committee. Received no complain. Grievance and sexual abuse / harassment complain from the gender committee.</p>
	<p>Audit Team Findings: No further issue.</p>

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Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Chaah Palm Oil Mill has complied with the RSPO P&C MY-NI 2014 & RSPO Supply Chain Certification Standard (June 2017) 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 Chaah Palm Oil Mill is approved and continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: Nor Yasid Bin Kanapi
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Sime Darby Plantation
Title: Lead Auditor	Title: Manager (SOU chairman)
Signature: 	<p>Signature:</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> 
Date: 15 th November 2019	Date: 15/11/2019

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Requests for information from the Regulatory Department such as DOE quarterly reports were attended and no noncompliance or complaints were noted. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. Publicly available documents such as land title, OSH plan, HCV documents, negotiation procedure, complaint records, RSPO public summary reports, EIA, Management Plans & Continuous Improvement Plans and company policies are available	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>1.1.2 Records of requests for information and responses shall be maintained. -Major compliance</p>	<p>Sime Darby Plantation Berhad has implemented Procedure for External Communication (Sub-section 5.5, Appendix 5.5.3.2, ver. 2 dated 25.05.2015) where the purpose of the procedure is to put in place a system to effectively communicate with external interested parties on matters pertaining to QSHE performance of the estate. Time frame for dealing and provide feedback to the external communication was within two weeks of the date of receipt for communication that require direct feedback and within one week of the completion of investigation for communication that required investigation.</p> <p>Requests for information and responses were maintained accordingly through the inspections book and letters in the mill and supply bases. Sg Simpang Kiri Estate has implemented 'Communication Book (LSSK Buki Aduan)' to record all the communication from the stakeholders. For e.g.: the workers have requested for road repair. The management has responded and requested contractor to carry out the job on 8/5/2019.</p> <p>North Labis Estate has implemented 'Communication Book External North Labis / SG Labis Division' to record all communication and complain made from stakeholders. E.g., Road damage reported on 05.03.2019. Management has responded the request and acknowledged by the Assistant Manager.</p> <p>Chaah Estate has implemented 'External Communication Book' to record all communication, request of information and complain made from stakeholders. Book is placed at the clinic area. No request made so far except records and updates pertaining to site visit by hospital assistant.</p>	<p>Complied</p>
<p>Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>		

Criterion / Indicator	Assessment Findings	Compliance
1.2.1 Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). - Major compliance –	SOU20 estates and mill has maintained an approved Health and Safety Policy dated January 2015 by Sime Darby Plantations Sdn Bhd, Managing Director that is displayed prominently on notice boards in English and local language Bahasa Malaysia, and available in Sime’s website and posted at the notice board outside the office area. Other financial confidential documents will be provided upon request.	Complied
Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.		
1.3.1 There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	Sime Darby Plantation Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The COBC has been briefed to all new and refresher training to existing workers on 18.07.2019, 10.06.2019 in North Labis Estate, 6, 8, 16, 28.06.2019 in Sungai Simpang Kiri Estate and 26/5/2018 in Chaah Estate.	Complied
Principle 2: Compliance with applicable laws and regulations		
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.		

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>SOU 20 had continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team. SOU 20 had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were:</p> <p><u>Chaah Palm Oil Mill:</u> The mill operates under MPOB license no 518-94000-4000 issued for period of 01/3/19-30/2/20. The license provides therein;</p> <ul style="list-style-type: none"> a) entitlement of <i>menjual and mengalih FFB</i> b) the total processed allowed is 1680000 mt/annum <p>The total FFB processed in the entire year 2018, (1/3/18 – 20/2/19) is 144499.92 mt thus complying within the approved quantity by MPOB.</p> <ul style="list-style-type: none"> i. DOE licence no. 004747, reference number, AS(B) J31/152/000/051 Jld.7 (02); licensing period: 1/7/19 – 30/6/20. Method of discharge: land application (BOD₃ limit @ 30°C is 100 mg/l with processing capacity of 36 mt/hr. ii. MPOB license: 518940004000 (validity period 1/3/2019 – 29/02/2020) for processing capacity of 168,000MT. iii. Energy commission license, serial no: 004559/2019 (validity period 30/05/2019 – 29/05/2020) for 1,000 kW installation capacity. iv. There are 12 CFs belonged to the mill covering various equipment such as sterilizers, hoist and crane and boilers. Sample of CF checked: <ul style="list-style-type: none"> - Boiler no. 3 (JH PMD 762, valid until 30/6/20) - Boiler no. 4 (JH PMD 80145, valid until 9/3/20) - Sterilizer no. 1 (JH PMT 21639, valid until 30/6/20) - Sterilizer no.2 (JH PMT 20597 valid until 30/6/20) - Back Pressure Steam Receiver (PMT 9187 valid until 30/6/20) - Air compressor (JH PMT12174 valid until 30/6/20) - Hoist crane (JH PMA 13364 valid until 30/6/20) v. Competent Person 	<p>Major nonconformance</p>
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		<table border="1"> <tr> <td>Competence license</td> <td>Registration no.</td> <td>Issuance date</td> </tr> <tr> <td>Engine Driver Grade 1</td> <td>J32/2000</td> <td>29/6/20</td> </tr> <tr> <td>Steam Engineer Grade 1</td> <td>090/2018</td> <td>20/4/18</td> </tr> <tr> <td>Engine Driver Grade 1</td> <td>JH/14/EIS/01/12</td> <td>230/4/14</td> </tr> <tr> <td>CePPOME</td> <td>Serial no. : CePPOME/194521</td> <td>Validity period (15/8/18 – 15/8/19) Field training report (FTR) submitted. Status will be further verified in the next audit.</td> </tr> <tr> <td>Electrical charge man, A4</td> <td>PJ-T-4-B-0505-2013</td> <td>29/6/13</td> </tr> </table>	Competence license	Registration no.	Issuance date	Engine Driver Grade 1	J32/2000	29/6/20	Steam Engineer Grade 1	090/2018	20/4/18	Engine Driver Grade 1	JH/14/EIS/01/12	230/4/14	CePPOME	Serial no. : CePPOME/194521	Validity period (15/8/18 – 15/8/19) Field training report (FTR) submitted. Status will be further verified in the next audit.	Electrical charge man, A4	PJ-T-4-B-0505-2013	29/6/13	
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		<ul style="list-style-type: none"> vi. Water Abstraction License (BAKAJ), license no. 08/A/BP/035, file no.: BAKAJ:334/300/05/05/08/1 valid until 31/12/19. Maximum water abstraction: 500 m³/day vii. Diesel permit, reference no. JH(SGT) 0130/06 PSK, serial no. P(J/SGT 000030), quantity: 10,800 litre valid until 19/2/20 viii. Approval obtained from Jabatan Tenaga Kerja Semenanjung Malaysia to deduct salary from the workers on temple and mosque fund, electricity and bus fare. Seen the permits with Serial No.: PP3/29/027/2010 dated 1/9/2010 and Serial No.: PP3/29/026/2010 dated 1/9/2010. ix. Approval for the overtime limit to be increased to 130 hours per month. Refer to with Ref. No. BHG. PU/9/134 JLD 9 (11) date 27/3/2017 was sighted. 																			

		<ul style="list-style-type: none"> - Foreign workers at Sg Simpang Kiri Estate and North Labis Estate found not contributing the SOCSO SBKA (Skim Bencana Pekerja Asing) in accordance to Akta Keselamatan Social Pekerja 1969 (Akta 4). 4 selected foreign workers found expired on 27.05.2019, 27.03.2019 & 25.03.2019 concurrently with their SPPA insurance. However, there is no SOCSO contribution was found made by the employer for the rest of the month up to the day of audit. SOCSO Contribution Form 8A review confirmed that the selected workers not paid for SOCSO contribution. Affected workers sampled; e.g. Expired on 27.05.2019 – Emp. No.: 102147, 102226, 102154 (Simpang Kiri Estate) Expired on 25.03.2019 – Emp. No.: 141369, 141372 (North Labis Estate) Expired on 27.03.2019 – Emp. No.: 141474, 141475 (North Labis Estate). - No written approval obtained from the local authority (JTK) for deduction of RM39 for School Bus Deduction; not complying with Employment Act 1955, Part IV Deduction from Wages; Section 24 – Lawful Deduction - 1 out of 3 selected local workers Emp.No.: 137901 for the month of October 2018, January 2019 and July 2019 found deducted with RM39 (D065 – School Bus Deduction). <p><u>Simpang Kiri Estate</u></p> <ul style="list-style-type: none"> i) MPOB license no. 532593002000, registered area: 2,371.66 ha valid until 30/9/19 ii) MPOB license for nursery, valid until 31/10/19 iii) Diesel and petrol permit, reference no. JH (SGT) 0155/10 PSK serial no. P(J/SGT 000021), diesel quantity: 10,800 litre, petrol quantity: 800 litre valid until 4/3/20 	
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		<p>iv) Certificate of fitness, for air compressor JH PMT 27205 valid until 19/12/19</p> <p>v) Salary deduction permit, serial no. PP3/29/025/2010 dated 15/8/10 for electricity and "surau" deduction</p> <p><u>North Labis Estate</u></p> <p>i) MPOB license no. 520479102000, registered area: 1,573 ha valid until 30/4/20 (Sungai Labis Division)</p> <p>ii) MPOB license no. 520479102000, registered area: 1,573 ha valid until 31/7/20 (Main Division)</p> <p>iii) Diesel permit, reference no. JH (SGT) 0028/83 PSK serial no. P(J/SGT 000041), diesel quantity: 11,000 litre valid until 25/3/20 (Sungai Labis)</p> <p>iv) Diesel permit, reference no. JH (SGT) 0149/09 PSK serial no. P(J/SGT 000041), diesel quantity: 15,000 litre valid until 25/3/20 (Sungai Labis)</p> <p>v) Certificate of fitness for air compressor JH PMT 2909 valid until 24/9/20</p> <p>vi) Salary deduction permit</p> <ul style="list-style-type: none"> - Ref: TK(NJ)U-34 dated 25 October 2018, NUPW deduction - Ref: TK(NJ)U-24 dated 25 October 2018, AMESU, water, temple, school bus, mosque etc. - Ref: BHG.PU/9/129 JLD 38 (53) dated 6/7/17, electricity deduction. <p><u>Chaah Estate</u></p> <p>i) Certificate of fitness for air compressor MK PMT 1885 valid until 11/3/20</p> <p>ii) Diesel permit, reference no. JH (SGT) 0123/05 PSK</p>	
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Criterion / Indicator		Assessment Findings	Compliance
		serial no. J031398, diesel quantity: 16,500 litre valid until 25/3/20 iii) MPOB license no. 518848002000, registered area: 2,800 ha valid until 29/2/20	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	SOU 20 continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that are applicable to the CU operation [ref.: Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008]. Each office of the operating unit (mill and estates) has its own LORR and were being evaluated individually annually for compliance and it can be accessed by all levels of staff. Latest legal and other requirements register (LORR) dated 10/8/19 was sighted at Chaah POM. The latest update has included Factory and Machinery (Steam Boiler and Unfired Pressure Vessel) Regulation 2017, Minimum Wages Order 2018 and Noise Exposure Regulation 2019 in the register.	Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	All applicable legal and other requirements registered in the LORR. Periodically, SOU20 assigned its personnel to cross check the status of compliance against the LORR through various ways such as internal audit, routine inspections, etc. Whenever there is non-compliance detected, appropriate actions will be taken to address the issue.	Complied

Criterion / Indicator		Assessment Findings	Compliance
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group’s Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Information and implementation date of the new Minimum Wages Order 2018 has been communicated by Group HR on 4 th January 2019 to all Sime Darby Plantation Berhad SOUs via email/secular. Effective date of implementation is on 1 st January 2019. Update from regional office via IOM @ inter-office memo pertaining to Nosie Exposure Regulation 2019 and one (1) year grace period from effective date is given for implementation. Latest communication from SQM HQ dated 1/8/19 is referred to.	Complied
Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			

<p>2.2.1</p>	<p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -</p>	<p>SOU20 estates were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates has a list of all its land titles which have the information about names of leasee, hectare, terms & conditions, lease period and grant numbers. Copies of the land titles were available at the estate’s offices while the original were kept at headquarter.</p> <p>Example of land titles checked:</p> <table border="1" data-bbox="981 619 1870 1316"> <thead> <tr> <th data-bbox="981 619 1205 667">Estate</th> <th data-bbox="1205 619 1429 667">Land title</th> <th data-bbox="1429 619 1704 667">Land use type</th> <th data-bbox="1704 619 1870 667">Tenure</th> </tr> </thead> <tbody> <tr> <td data-bbox="981 667 1205 1316">Simpang Kiri Estate</td> <td data-bbox="1205 667 1429 1316"> <p>Sample of land title checked:</p> <p>HSD no. 14359, PT no. PTD 2650, Mukim Chaah Bahru, District: Batu Pahat title area: 105.6228 ha ha</p> <p>HSD no. 7747, PT no. 2379A Mukim Chaah Bahru, District: Batu Pahat, title area: 1538.0053 ha</p> <p>Total titles (5): 2,371.66 ha</p> </td> <td data-bbox="1429 667 1704 1316">Agriculture</td> <td data-bbox="1704 667 1870 1316">Leasehold for 99 years until 20/3/2081</td> </tr> </tbody> </table>	Estate	Land title	Land use type	Tenure	Simpang Kiri Estate	<p>Sample of land title checked:</p> <p>HSD no. 14359, PT no. PTD 2650, Mukim Chaah Bahru, District: Batu Pahat title area: 105.6228 ha ha</p> <p>HSD no. 7747, PT no. 2379A Mukim Chaah Bahru, District: Batu Pahat, title area: 1538.0053 ha</p> <p>Total titles (5): 2,371.66 ha</p>	Agriculture	Leasehold for 99 years until 20/3/2081	<p>Complied</p>
Estate	Land title	Land use type	Tenure								
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		<p>North Labis</p>	<p>Sample of land title checked: Grant no. 137861, Lot no. 2642, Mukim Labis, District: Segamat title area: 1,955.405 ha Grant no. 88289, Lot no. 693 Mukim Labis, District: Segamat, title area: 196.1783 ha Total titles (14): 3,520.73 ha</p>	<p>No specific land use type @ not categorized</p>	<p>Freehold</p>	
		<p>Chaah Estate</p>	<p>Sample of land title checked: HSD no. 7745, PT no. PT 2378, Mukim Chaah Baru, District: Batu Pahat, title area: 1,991.0502 ha HSD no. 7746, PT no. PT 2379,</p>	<p>Agriculture</p>	<p>Leasehold period until 22/12/77.</p>	

Criterion / Indicator		Assessment Findings			Compliance																				
			Mukim Chaah Baru, District: Batu Pahat, title area: 804.3114 ha Total titles (2): 2,795.36 ha																						
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	<p>The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the three estates, during the field inspection confirmed that they were clearly marked and maintained.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Boundary</th> <th>Neighbouring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Sg Spg Kiri Estate</td> <td>P2003</td> <td>Kg Karto</td> </tr> <tr> <td>2</td> <td>Sg Spg Kiri Estate</td> <td>P2004</td> <td>Ldg Sindora</td> </tr> <tr> <td>3</td> <td>North Labis Estate</td> <td>P2015B</td> <td>Hutan Simpan Kekal Labis</td> </tr> <tr> <td>4</td> <td>Chaah Estate</td> <td>P1999C</td> <td>Small Holder Arokiam</td> </tr> </tbody> </table>				Estate	Boundary	Neighbouring	1	Sg Spg Kiri Estate	P2003	Kg Karto	2	Sg Spg Kiri Estate	P2004	Ldg Sindora	3	North Labis Estate	P2015B	Hutan Simpan Kekal Labis	4	Chaah Estate	P1999C	Small Holder Arokiam	Complied
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4	Chaah Estate	P1999C	Small Holder Arokiam																						
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	<p>There is no land dispute in SOU 20 Chaah certification unit at the time of audit. The land belongs Sime Darby Plantation Bhd and land ownership documents verified. Document verified the land titles and site verification confirmed that encroachment of land reported.</p>			Complied																				

Criterion / Indicator		Assessment Findings	Compliance
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in SOU 20 Chaah certification unit at the time of audit. The land belongs Sime Darby Plantation Bhd and land ownership documents verified. Document verified the land titles and site verification	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in SOU 20 Chaah certification unit at the time of audit. The land belongs Sime Darby Plantation Bhd and land ownership documents verified. Document verified the land titles and site verification confirmed that encroachment of land reported.	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute in SOU 20 Chaah certification unit at the time of audit. The land belongs Sime Darby Plantation Bhd and land ownership documents verified. Document verified the land titles and site verification confirmed that encroachment of land reported.	Complied
Criterion 2.3:			
Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	There is no land dispute in SOU 20 Chaah certification unit at the time of audit. The land belongs Sime Darby Plantation Bhd and land ownership documents verified. Site verification confirmed that encroachment of land reported. Boundary stones and trenches were constructed to demarcate the boundary of the company.	Complied

Criterion / Indicator	Assessment Findings	Compliance
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	Complied
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	Complied

Criterion / Indicator	Assessment Findings	Compliance
Principle 3: Commitment to long-term economic and financial viability		
Criterion 3.1:		
There is an implemented management plan that aims to achieve long-term economic and financial viability.		
3.1.1	<p>A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders.</p> <p>- Major compliance -</p> <p>The mill has established forecast business plan for five financial years from FY 2019 till 2024 as guideline for the mill to run the operation. Plan was review on annually basis. The plan covers the FFB process, cost for labour, mill maintenance, EVIT and administration cost.</p> <p>Among approved CAPEX for 2019/2020 (mill and estates) ;</p> <ul style="list-style-type: none"> i) 20,000 m3 holding 40,000 m3, surface aerator, continuous desludging system (belt-press) ii) Machinery and equipment replacement (pump, lab apparatus etc) iii) Kernel recovery system (2nd stage winnower system) iv) Fire-fighting System v) Transport vehicle/agriculture equipment – Badang L100 sprayer, KUBOTA L3200T vi) Upgrading works/pipeline for SAJ water supply (head loss problem) <p>The estates visited has established forecast business plan for five financial years from FY 2019 till 2024 as guideline for the estates to run the daily operation and documented in the MPLAN. The plan was reviewed on annually basis. The business plan covers the Area statement, Crop production, Field maintenance cost, Harvesting, FFB transportation, Labour benefits/cost and administration cost.</p>	Complied

Criterion / Indicator		Assessment Findings			Compliance									
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	SOU 20 have long range replanting programme until FY 2023. Replanting planned for the palm older than 25 years, low palm stand, tall palm and non-performance field (yield) and ganoderma infected palm. Sighted SOU20 replanting programme for the next financial year as follows: <table border="1" data-bbox="981 555 1870 885"> <thead> <tr> <th>Estate</th> <th>Replanting programme/Ha</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Simpang Kiri</td> <td>5 years progressive replanting = 676.96 ha 2019 (104.56 ha field 2000B1)</td> <td>Low palm stand</td> </tr> <tr> <td>Chaah</td> <td>2019 = 102.91 ha (1997A) 2021 = 167.50 ha (1997B & 2003C) 2020 = 178.12 ha (1999D & 2003B)</td> <td>Ganoderma/Low palm stand</td> </tr> </tbody> </table>			Estate	Replanting programme/Ha	Remarks	Simpang Kiri	5 years progressive replanting = 676.96 ha 2019 (104.56 ha field 2000B1)	Low palm stand	Chaah	2019 = 102.91 ha (1997A) 2021 = 167.50 ha (1997B & 2003C) 2020 = 178.12 ha (1999D & 2003B)	Ganoderma/Low palm stand	Complied
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Principle 4: Use of appropriate best practices by growers and millers														
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.														

Criterion / Indicator		Assessment Findings	Compliance
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	SOP available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs: sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. Estates have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc. Noted updated procedure under SOP for water analysis and RSPO SCCS procedure: i) SPMS, Appendix 7: SOP for water quality monitoring, issue: 2 dated 1/6/16. SOP for sampling guideline ii) Water and Wastewater Sampling Guideline, issue: 1 dated 1/6/16. iii) RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version: 2, issue: 5 dated April 2019.	Complied
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	Plantation Advisory Department, Performance Monitoring Unit, Quality Management Unit (PSQM) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements.	Complied

**RSPO Public Summary Report
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<p>4.1.3</p>	<p>Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -</p>	<p><u>Chaah Palm Oil Mill</u> Mill advisor visit was conducted twice a year. Latest visit was conducted on 20-21st February 2019. Refer report no. SOU 22/CAM/01/2019 with score rating at 76.39 respectively. All areas of concern raised has been addressed by mill according to the given timeline.</p> <p>SORA (Structured Oil Recovery Assessment) visit on 6 monthly basis focusing on product quality and mill operation inspection. Latest visit was conducted in 20-23/5/2019. A few areas of concern highlighted for improvement.</p> <p>RSPO internal audit was carried out on 25/6/19 by SQM team HQ and site safety officer. Total of 3 major, 3 minor non-conformities and 9 OFI were raised.</p> <p>Environmental compliance audit by registered DOE auditor (6 monthly basis)</p> <table border="1" data-bbox="981 911 1861 1206"> <thead> <tr> <th>Period</th> <th>Report reference</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1st half (6th December 2018)</td> <td>ECA_ChaahPOM_0612 18 No NC raised.</td> <td>DOE registered auditor, EA 0027 & EA0087</td> </tr> <tr> <td>2nd half (27th June 2019)</td> <td>ECA_ChaahPOM_2706 19 No NC raised.</td> <td>DOE registered auditor, EA 0027 & EA0087</td> </tr> </tbody> </table> <p><u>Simpang Kiri Estate</u> Latest Agronomist report dated 17/6/19 for Simpang Kiri Estate (Agronomic & Fertilizer Recommendation Report – Oil Palm) FY 2019/2020 is available for review. The report has summarized yield gap, palm nutritional status and fertilizer recommendation for the 2019/2020 programme. Plantation</p>	Period	Report reference	Remarks	1 st half (6 th December 2018)	ECA_ChaahPOM_0612 18 No NC raised.	DOE registered auditor, EA 0027 & EA0087	2 nd half (27 th June 2019)	ECA_ChaahPOM_2706 19 No NC raised.	DOE registered auditor, EA 0027 & EA0087	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>Advisory (PA) visit was last done on 4-6 December 2018 by Plantation Advisory Department. Refer to report no. STR/SOU20/SKE/01/18. Overall estate performance rated at 78% with comments for improvement.</p> <p><u>North Labis Estate</u> Latest Agronomist report dated 31/7/19 for North Labis Estate (Agronomic & Fertilizer Recommendation Report – Oil Palm) FY 2019/2020 is available for review. The report has summarized yield gap, palm nutritional status and fertilizer recommendation for the 2019/2020 programme. Plantation Advisory (PA) visit was last done on 21-23 November 2018 by Plantation Advisory Department. Refer to report no. STR/SOU20/NLE/01/18. Overall estate performance rated at 77% with comments for improvement.</p> <p><u>Chaah Estate</u> Latest Agronomist report dated 2/5/19 for Chaah Estate (Agronomic & Fertilizer Recommendation Report – Oil Palm) FY 2019/2020 is available for review. The report has summarized yield gap, palm nutritional status and fertilizer recommendation for the 2019/2020 programme. The latest Plantation Advisory (PA) visit was carried out on 8-10 January 2019 by Plantation Advisory Department. Refer to report no. STR/SOU20/CE/01/18. Overall estate performance rated at 81% with comments for improvement.</p>	
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	No third party FFB received. All the FFB are from own certificate scope and adjacent Sime Darby certified estates.	Complied
<p>Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			

Criterion / Indicator		Assessment Findings	Compliance
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield.	Complied

Criterion / Indicator	Assessment Findings	Compliance
4.2.2 Records of fertiliser inputs shall be maintained. - Minor compliance -	<p><u>Simpang Kiri Estate</u> Fertilizer application programme is based on the recommendation by agronomist under Appendix I, Agronomist and Fertilizer Recommendations Report. Date of visit: 14-15/5/19. Programme for mature and immature fields available for review. Programme for mature field (2011A/B, 2012A/B, 2012C and 2016A) verified. Sample of actual application records for MOP: 2011A (21.90 ha) : rate per palm 1.5 kg [total applied : 188 bags x 50kg/bag – 9.4 mt] 2016A (60.28 ha) : rate per palm 1.5 kg [total applied : 309 bags x 50kg/bag – 15.45 mt]</p> <p><u>North Labis Estate</u> Fertilizer application programme is based on the recommendation by agronomist under Appendix I, Agronomist and Fertilizer Recommendations Report. Date of visit: 23-24/5/19. Programme for mature and immature fields available for review. Programme for mature field was verified. Sample of actual application records for AC & MOP: 2010B (43.74 ha) : AC rate per palm 2.5 kg [total applied : 254 bags x 50kg/bag – 12.7 mt], MOP rate per palm 1.5 kg [total applied : 163 bags x 50kg/bag – 8.15 mt]</p> <p><u>Chaah Estate</u> Fertilizer application programme is based on the recommendation by agronomist under Appendix I, Agronomist and Fertilizer Recommendations Report. Date of visit: 26/2/19. Programme for mature and immature fields available for review. Programme for mature field was verified. Sample of actual application records for AC: 2000A (50.01 ha) : AC rate per palm 2.8 kg [total applied : 169 bags x 50kg/bag – 8.45 mt]</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.3</p>	<p>There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -</p> <p>Sime Darby Seeds and Agriculture Services Sdn Bhd prepare the annual fertilizer recommendation. Leaf analysis result which shows the nutrient level was used as guidance for the fertilizer recommendation. At Simpang Kiri Estate, leaf sampling was carried out in May 2019 during agronomist visit. Foliar nutrient status reported under the latest agronomist report for FY2019/2020 dated 17th June 2019. Soil analysis carried out at 5 years interval. The latest soil analysis was carried out on 21/6/18, Report# S45/2018 dated 21/6/18.</p> <p><u>North Labis Estate</u> Latest foliar analysis is based on agronomist report dated 31/7/19. Sample was taken in April 2019. Based on the report, leaf N and K reported to be decline and the status indicating poor uptake. This has to be improved by latest manuring programme recommended by agronomy team.</p> <p><u>Chaah Estate</u> Latest foliar analysis is based on agronomist report dated 26/2/19. Sample was taken in December 2018. Based on the report, leaf P and K and Mg reported to be decline and the status indicating poor uptake. This has to be improved by latest manuring programme recommended by agronomy team.</p> <p>Last soil sampling was done in 2014 by Sime Darby Research Sdn Bhd. Refer to report dated 13/2/15, ref: S9/2015.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.4 A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -</p>	<p>Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. EFB applied at selected fields at the estates. Recommended rate is 40mt/ha for mature field and 35 mt/ha for immature field.</p> <p><u>Simpang Kiri Estate</u> Field 2005C: total applied - 1,384.8 mt (104.21 ha): 13.28 mt/ha Field 2003: total applied - 120.16 mt (76.25 ha): 1.58 mt/ha *Only supplementary application, not based on agronomist recommendation.</p> <p><u>North Labis Estate</u> No EFB application at North Labis Estate. Pending</p> <p><u>Chaah Estate</u> Total applied area: 313.63 ha, tonnage applied: 9,408.99 mt [30 mt/ha]</p>	<p>Complied</p>
<p>Criterion 4.3: Practices minimise and control erosion and degradation of soils.</p>		

<p>4.3.1</p>	<p>Maps of any fragile soils shall be available. - Major compliance -</p>	<p>Soil series map available for both visited estates. There are no peat soil or soil categorised as problematic or fragile at all the visited estates. For e.g. at Simpang Kiri Estate, the major soil series were Setol (62.43%), Gajah Mati (17.16%) and Bungor (14.63%).</p> <p><u>North Labis Estate</u></p> <table border="1" data-bbox="981 555 1816 855"> <thead> <tr> <th>Soil Series</th> <th>Percentage (%)</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Rengam</td> <td>39.09</td> <td rowspan="5">No fragile and problematic soil.</td> </tr> <tr> <td>Rasau</td> <td>31.16</td> </tr> <tr> <td>Local alluvium</td> <td>15.14</td> </tr> <tr> <td>Jerangau</td> <td>13.88</td> </tr> <tr> <td>Alluvium</td> <td>0.73</td> </tr> </tbody> </table> <p><u>Chaah Estate</u></p> <table border="1" data-bbox="981 954 1816 1393"> <thead> <tr> <th>Soil Series</th> <th>Percentage (%)</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Local alluvium</td> <td>45.74</td> <td rowspan="2">No fragile and problematic soil.</td> </tr> <tr> <td>Serdang/Bungor</td> <td>17.10</td> </tr> <tr> <td>Malacca</td> <td>9.41</td> <td rowspan="7"></td> </tr> <tr> <td>Muck</td> <td>7.26</td> </tr> <tr> <td>Munchong</td> <td>7.19</td> </tr> <tr> <td>Bungor</td> <td>5.63</td> </tr> <tr> <td>Tavy</td> <td>3.75</td> </tr> <tr> <td>Yong Peng</td> <td>1.76</td> </tr> </tbody> </table>	Soil Series	Percentage (%)	Remarks	Rengam	39.09	No fragile and problematic soil.	Rasau	31.16	Local alluvium	15.14	Jerangau	13.88	Alluvium	0.73	Soil Series	Percentage (%)	Remarks	Local alluvium	45.74	No fragile and problematic soil.	Serdang/Bungor	17.10	Malacca	9.41		Muck	7.26	Munchong	7.19	Bungor	5.63	Tavy	3.75	Yong Peng	1.76	<p>Complied</p>
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Criterion / Indicator		Assessment Findings		Compliance
		Unclassified	1.3	
		Jempol	0.88	
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 -	Ref.: ARM Section 4, Land Preparation, Clause 8.4 which reads "Areas with greater than 25 degree slope should not be planted and best left for biodiversity purposes...". The area which has more than 25 degree will be excluded from being replanted in future. This was evident through site visit at North Labis Estate where an area of 57 Ha (cross refer to 5.2.3) with more than 25 degree had been abandoned and kept as a conserved area. For hilly area between 9 - 25 degree, ARM is referred to as a management strategy to minimise soil erosion which mainly by construction of terrace.		Complied
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Road maintenance program for FY 2019 was available for all the visited estates. Among the activities for the road maintenance are roadside pruning, grading and resurfacing, roadside pit (to divert flow of water). Based on expenditure report, the progress to-date is in-line with the programme.		Complied
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	No peat soil at the visited estates.		Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	No peat soil at the visited estates.		Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	No fragile or problem soil at the visited estates.		Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.				

<p>4.4.1</p>	<p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p>Chaah CU had established its Water Management Plan for year 2019 which was developed to maintain the quality and availability of natural water resources. This is made practicing efficient water consumption through various methods such as;</p> <ul style="list-style-type: none"> a) implementation of rain water harvest, b) construction of water gate for effective management of field drains, c) establishment of <i>Mucuna bracteata</i> to prevent erosion, d) side drain at field road to control water, frond stacking, e) Enhancement of ground vegetation at bare ground area. f) PR2019 Sg Spg Kiri Estate – construction of individual platforms for the palms for effective growth and protection during flooding. <p>The contingency plan during water shortage</p> <table border="1" data-bbox="981 815 1854 1337"> <thead> <tr> <th></th> <th>Area/incident</th> <th>Action steps</th> <th>PIC</th> <th>status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water shortage/ prolonged dry season</td> <td>to obtain water from SAJ /estate catchment to train/educate staff/workers to conserve water to seek assistance from SAJ to obtain treated water supply from mill's WTP</td> <td>Manager AM//Mill Engineer</td> <td>As and when required</td> </tr> <tr> <td>2</td> <td>Severe water pollution/ contamination</td> <td>to obtain water from SAJ to train/educate staff/workers to conserve water to seek assistance from SAJ to obtain treated water supply from mill's WTP</td> <td>Manager AM//Mill Engineer</td> <td>As and when required</td> </tr> </tbody> </table> <p>The water reduction plan is shown below;</p>		Area/incident	Action steps	PIC	status	1	Water shortage/ prolonged dry season	to obtain water from SAJ /estate catchment to train/educate staff/workers to conserve water to seek assistance from SAJ to obtain treated water supply from mill's WTP	Manager AM//Mill Engineer	As and when required	2	Severe water pollution/ contamination	to obtain water from SAJ to train/educate staff/workers to conserve water to seek assistance from SAJ to obtain treated water supply from mill's WTP	Manager AM//Mill Engineer	As and when required	<p>Complied</p>
	Area/incident	Action steps	PIC	status														
1	Water shortage/ prolonged dry season	to obtain water from SAJ /estate catchment to train/educate staff/workers to conserve water to seek assistance from SAJ to obtain treated water supply from mill's WTP	Manager AM//Mill Engineer	As and when required														
2	Severe water pollution/ contamination	to obtain water from SAJ to train/educate staff/workers to conserve water to seek assistance from SAJ to obtain treated water supply from mill's WTP	Manager AM//Mill Engineer	As and when required														

Issues/Areas	Action Steps	PIC	Status
1 Rain water collection	Large containers are to be placed at strategic locations to collect rain water The rainwater shall be recycled for washing heavy machinery	AM/Field staff	On-going
2 Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going

The Mill Identification & Management of Waste Water

	location	Wastewater produced	Treatment/containment	Reuse/recycle/disposal method
1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system
2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain
	Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain
3	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain

Criterion / Indicator		Assessment Findings				Compliance	
		4	Laboratory	Cleaning water	Process drain	Monsoon drain	
		5	washroom	Toilet water, cleaning water	Septic tank	collected by licensed contractor.	

Criterion / Indicator	Assessment Findings	Compliance																		
4.4.2	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -</p> <p>The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table border="1" data-bbox="1032 719 1615 954"> <thead> <tr> <th></th> <th>River width (Meters)</th> <th>Buffer Zone (Meters)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>>40</td> <td>50</td> </tr> <tr> <td>2</td> <td>20-40</td> <td>40</td> </tr> <tr> <td>3</td> <td>10-20</td> <td>20</td> </tr> <tr> <td>4</td> <td>5-10</td> <td>10</td> </tr> <tr> <td>5</td> <td><5</td> <td>5</td> </tr> </tbody> </table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the SQM Unit with latest revision dated on 13/6/2011. During the field visit there was no spraying activities or signs left in such an area</p>		River width (Meters)	Buffer Zone (Meters)	1	>40	50	2	20-40	40	3	10-20	20	4	5-10	10	5	<5	5	Complied
	River width (Meters)	Buffer Zone (Meters)																		
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4.4.3	<p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6).</p> <p>- Minor compliance -</p>	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE through 'Borang Penyata Suku Tahunan'. The Mill DOE license was for land application and the requirement is for the BOD to be less than 100 mg/l. The results from final discharge were compliance within parameter limit. <i>Jadual Pematuhan license no 004043</i> validity period of 01/7/19-30/6/20</p> <table border="1"> <thead> <tr> <th></th> <th>Parameters</th> <th>Std</th> <th>18/4/19</th> <th>17/5/19</th> <th>14/6/19</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>-</td> <td>8.5</td> <td>8.4</td> <td>8.2</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>100</td> <td>698</td> <td>689</td> <td>289</td> </tr> <tr> <td>3</td> <td>COD</td> <td>-</td> <td>-</td> <td>1753</td> <td>1165</td> </tr> <tr> <td>4</td> <td>Total solids</td> <td>-</td> <td>-</td> <td>7577</td> <td>8879</td> </tr> <tr> <td>5</td> <td>S Solids</td> <td>-</td> <td>-</td> <td>480</td> <td>420</td> </tr> <tr> <td>6</td> <td>Oil & grease</td> <td>-</td> <td>-</td> <td>8</td> <td>12</td> </tr> <tr> <td>7</td> <td>A Nitrogen</td> <td>-</td> <td>-</td> <td>171</td> <td>107</td> </tr> <tr> <td>8</td> <td>Total N</td> <td>-</td> <td>-</td> <td>255</td> <td>172</td> </tr> </tbody> </table> <p>The Mill carried out desludging activities for the effluent pond hence no analysis compiled in April 2019. The mill submitted to DOE Johor for the deferment of BOD 100 compliance via letter dated 27/5/19. Documents was sighted and verified</p>						Parameters	Std	18/4/19	17/5/19	14/6/19	1	PH	-	8.5	8.4	8.2	2	BOD	100	698	689	289	3	COD	-	-	1753	1165	4	Total solids	-	-	7577	8879	5	S Solids	-	-	480	420	6	Oil & grease	-	-	8	12	7	A Nitrogen	-	-	171	107	8	Total N	-	-	255	172	Complied
	Parameters	Std	18/4/19	17/5/19	14/6/19																																																								
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Criterion / Indicator		Assessment Findings				Compliance
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	The water usage for mill is monitored on monthly basis. The average water ratio to FFB from Jul 18 till June 19 is shown below.				Complied
		Month	FFB processed	Water/L	Water/FFB	
		July 18	9196	13935	1.52	
		Aug 18	11176	16684	1.49	
		Sept 18	13573	15397	1.13	
		Oct 18	14657	18977	1.29	
		Nov 18	12989	15320	1.18	
		Dec 18	12752	16491	1.29	
		Jan 19	12273	15118	1.23	
		Feb 19	11333	12949	1.14	
		Mac 19	10821	16268	1.50	
		April 19	10767	15179	1.41	
		May 19	10160	12220	1.20	
		Jun19	11763	10514	0.96	
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.						

Criterion / Indicator		Assessment Findings	Compliance
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators. The estates are continue to plant beneficial plants such as <i>Turnera subulata</i>. Additional beneficial plant has been introduced in the estate such as <i>Euphorbia Heterophyllia</i>. For example, latest update of Simpang Kiri Estate IPM's as per below: Beneficial plant: 6:2:2 (planted 1 dm/ha), <i>Euphorbia Heterophyllia</i> strip length (total) – 10 m length to date (as at July 2019) Barn owl box: Occupancy rate average at 65% (1st round in February 2019) together with BOB maintenance and replacement/new box. <u>Chaah Estate</u> Barn owl box: Occupancy rate average at 66% (1st round in March 2019) together with BOB maintenance and replacement/new box. Rat Baiting application: 6 - 7 rounds of application (acceptance below 20%). Campaign start in January up to March 2019.</p>	Complied
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>IPM training is given by the Agronomist and plantation executives with qualification in agriculture. Interview with the barn owl occupancy census team confirm their understanding of the Sime Darby SOP in Agricultural Reference Manual v.1 Section 15 on census. The latest IPM training on Bagworm Census and treatment was carried on 10/7/19 at Simpang Kiri Estate by Plant Protection Department.</p>	Complied
<p>Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment</p>			

Criterion / Indicator		Assessment Findings	Compliance
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class III & class IV pesticides. a) No illegal agrochemicals (stated by local and international laws) paraquat was used in their estates. b) The usage of the agrochemicals was based on the Agricultural Reference Manual (ARM) Section 15 and 16, SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations. The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs	Complied
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Chaah CU had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (a.i.) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified. All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class III & class IV pesticides. No illegal agrochemicals (stated by local and international laws) in particular <i>paraquat</i> were used in the estates.	Complied

Criterion / Indicator	Assessment Findings	Compliance
4.6.3	<p>Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.</p> <p>- Major compliance -</p>	<p>Chaah CU is committed to minimize the usage of agrochemicals through the implementation of IPM practices among others;</p> <ul style="list-style-type: none"> a) The planting of beneficial plants i.e. <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> rate of 10 dm: 1 ha. The recent being cultivation of <i>euphobia</i> in the row of beneficial plant. b) Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection c) No prophylactic use of such pesticides is permitted. <p>The practices of Barn Owl in estates at ratio 10 ha: 1box was sighted with census records maintained.</p>

Criterion / Indicator	Assessment Findings	Compliance																																										
<p>4.6.4 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -</p>	<p>All the 3 estates confined usage of pesticides which are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <ul style="list-style-type: none"> a) The review of the chemical register concluded that all pesticides used were of class II, III & class IV. The use of paraquat had been prohibited in all SDP estates. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. c) Sighted from records and interviews with workers, staff and estate assistants, concluded that trainings were held with all precautions being taken and all legal requirements <p>The chemical used in the estate captured from the chemical register updated on 2/1/19 among others as listed below;</p> <table border="1" data-bbox="981 879 1854 1278"> <thead> <tr> <th></th> <th>Chemical name</th> <th>Class</th> <th></th> <th>Chemical name</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Glyphosate isopropylamine</td> <td>III</td> <td>7</td> <td>Cypermethrin</td> <td>III</td> </tr> <tr> <td>2</td> <td>Sodium chlorate</td> <td>III</td> <td>8</td> <td>Triclopyr butoxy e/ester</td> <td>III</td> </tr> <tr> <td>3</td> <td>Glufosinate ammonium</td> <td>III</td> <td>9</td> <td>Canyon 20G</td> <td>IV</td> </tr> <tr> <td>4</td> <td>Alion</td> <td>III</td> <td>10</td> <td>Amine 2.4 D</td> <td>III</td> </tr> <tr> <td>5</td> <td>Metsulfuron methy 20% w/w</td> <td>III</td> <td>11</td> <td>Bayfolan</td> <td>III</td> </tr> <tr> <td>6</td> <td>Acephate</td> <td>III</td> <td>12</td> <td>Antracol</td> <td>III</td> </tr> </tbody> </table>		Chemical name	Class		Chemical name	Class	1	Glyphosate isopropylamine	III	7	Cypermethrin	III	2	Sodium chlorate	III	8	Triclopyr butoxy e/ester	III	3	Glufosinate ammonium	III	9	Canyon 20G	IV	4	Alion	III	10	Amine 2.4 D	III	5	Metsulfuron methy 20% w/w	III	11	Bayfolan	III	6	Acephate	III	12	Antracol	III	<p>Complied</p>
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<p>4.6.5</p>	<p>Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -</p>	<p>The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. Trainings on pesticide handling were available in all the visited estates. Among others extracted for records are;</p> <table border="1" data-bbox="1003 619 1832 821"> <thead> <tr> <th colspan="4">Chaah Palm Oil Mill</th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>16/4/19</td> <td>Safety Town Hall</td> <td>entire</td> </tr> <tr> <td>2</td> <td>13/8/19</td> <td>Chemical Handlings</td> <td>11</td> </tr> <tr> <td>3</td> <td>1/4/19</td> <td>PPE adherence</td> <td>23</td> </tr> <tr> <td>4</td> <td>4/4/19</td> <td>Chemical spillage ERP</td> <td>6</td> </tr> </tbody> </table> <p style="text-align: center;">..</p> <table border="1" data-bbox="1003 853 1832 1161"> <thead> <tr> <th colspan="4">Sungai Simpang Kiri Estate</th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>25/7/19</td> <td>Spraying calibration</td> <td>16</td> </tr> <tr> <td>2</td> <td>13/8/19</td> <td>PPE Adherence</td> <td>2</td> </tr> <tr> <td>3</td> <td>13/8/19</td> <td>USECCH 2000</td> <td>2</td> </tr> <tr> <td>4</td> <td>14/8/19</td> <td>Chemical handling</td> <td>16</td> </tr> <tr> <td>5</td> <td>28/1/19</td> <td>Town Hall 7.0</td> <td>Entire</td> </tr> <tr> <td>6</td> <td>13/8/19</td> <td>MSDS / SDS</td> <td>16</td> </tr> <tr> <td>7</td> <td>14/8/19</td> <td>ERP – chemical spillage</td> <td>18</td> </tr> </tbody> </table> <p style="text-align: center;">.</p> <table border="1" data-bbox="1003 1193 1832 1391"> <thead> <tr> <th colspan="4">Chaah Estate</th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>24/1/19</td> <td>Inter pump handling</td> <td>23</td> </tr> <tr> <td>2</td> <td>3/8/19</td> <td>Spraying techniques</td> <td>7</td> </tr> <tr> <td>3</td> <td>13/8/19</td> <td>Chemical spillage</td> <td>20</td> </tr> <tr> <td>4</td> <td>21/6/19</td> <td>PPE adherence</td> <td>8</td> </tr> </tbody> </table>	Chaah Palm Oil Mill					Date	Subject	Attendees	1	16/4/19	Safety Town Hall	entire	2	13/8/19	Chemical Handlings	11	3	1/4/19	PPE adherence	23	4	4/4/19	Chemical spillage ERP	6	Sungai Simpang Kiri Estate					Date	Subject	Attendees	1	25/7/19	Spraying calibration	16	2	13/8/19	PPE Adherence	2	3	13/8/19	USECCH 2000	2	4	14/8/19	Chemical handling	16	5	28/1/19	Town Hall 7.0	Entire	6	13/8/19	MSDS / SDS	16	7	14/8/19	ERP – chemical spillage	18	Chaah Estate					Date	Subject	Attendees	1	24/1/19	Inter pump handling	23	2	3/8/19	Spraying techniques	7	3	13/8/19	Chemical spillage	20	4	21/6/19	PPE adherence	8	<p>Complied</p>
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4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	<p>The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149).</p> <ul style="list-style-type: none"> a) Records of purchase, storage and use were maintained. b) All store buildings were equipped with exhaust fans with the door was secured. c) Only authorized personnel are assigned to handle the chemicals. d) All the chemicals were segregated in storage accordingly. <p>Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures to M/s SS Setia Enterprise.</p>				Complied																												

Criterion / Indicator	Assessment Findings	Compliance
4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	During the audit, it was noted that Chaah CU had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. a) <i>Paraquat</i> usage has been prohibited in all units and the entirety of the organization. b) The Safety Procedures for pesticides application were well described in Pictorial Safety Standard. c) Training on pesticide handling was made with details in 4.6.5. The training included the safety aspects and usage of PPE when handling with pesticides.	Complied
4.6.8 Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	Aerial application of agrochemicals is not practiced in the CU. This is confirmed through observation during the site visit, estate complex and interview with the employees.	Complied
4.6.9 Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	Training on pesticide/chemical handling was continuously carried out at the CU. The trainings included the safety aspects and usage of PPE when handling with pesticides and herbicides. From interviews with the staff and workers such as the storekeepers and workers who applied fertilizers, it was evident that they have been trained and understood the hazards involve and how the chemicals should be used in a safe manner. Records of training were sighted and given in 4.7.3 & 4.6.5	Complied
4.6.10 Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	The procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established. Collection of SW is made by SDI on completion of every vehicle servicing. The clinical waste is disposed to <i>Kualiti Alam Sdn Bhd</i> a DOE licensed vendor. Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s SS Setia Enterprise Approved by DOE & DOA) Domestic wastes are delivered to the respective landfill –Collection at interval of 2-3x/week.	Complied

<p>4.6.11</p>	<p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p>	<p>The CHRA for Chaah POM was conducted on 12/7/18 by M/s Azlina Shafawi HQ/06/ASS/223). The recommendation from the CHRA is mainly on the training for operators working in laboratory, ETP, WTP, Boiler, workshop, scheduled waste and chemical store. In addition the assessor recommended medical surveillance be conducted for the categories of employees in the workshop and laboratory and chemicals handlers. Similar CHRA was compiled for the estates with details provided below. The CHRA report among others described requirement of medical surveillance to be made for the listed category of employees. The CHRA assessors are as follows;</p> <table border="1" data-bbox="981 715 1854 1018"> <thead> <tr> <th>OU</th> <th>Date</th> <th>CHRA Assessor</th> <th>DOSH no</th> </tr> </thead> <tbody> <tr> <td>Chaah Mill</td> <td>12/7/18</td> <td>M/s Azlina Shafawi</td> <td>HQ/06/ASS/00/223-2018/005</td> </tr> <tr> <td>Sg Spg Kiri</td> <td>13/10/15</td> <td>NM Laboratory</td> <td>JKKP HIE 127/171-2(2015)</td> </tr> <tr> <td>Chaah</td> <td>13/10/15</td> <td>NM Laboratory</td> <td>JKKP HIE 127/171-2(2015)</td> </tr> <tr> <td>N Labis</td> <td>13/10/15</td> <td>NM Laboratory</td> <td>JKKP HIE 127/171-2(2015)</td> </tr> </tbody> </table> <p>Medical surveillance was carried out on in the CU as follows;</p> <table border="1" data-bbox="981 1114 1854 1343"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">OU</th> <th colspan="6">Employees categories</th> </tr> <tr> <th>Date</th> <th>workshop</th> <th>Lab</th> <th>sprayers</th> <th>WTP</th> <th>Others</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Chaah Mill</td> <td>7/9/18</td> <td>11</td> <td>6</td> <td>-</td> <td>2</td> <td>21</td> </tr> <tr> <td>2</td> <td>Sg Spg Kiri</td> <td>26/9/18</td> <td>2</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	OU	Date	CHRA Assessor	DOSH no	Chaah Mill	12/7/18	M/s Azlina Shafawi	HQ/06/ASS/00/223-2018/005	Sg Spg Kiri	13/10/15	NM Laboratory	JKKP HIE 127/171-2(2015)	Chaah	13/10/15	NM Laboratory	JKKP HIE 127/171-2(2015)	N Labis	13/10/15	NM Laboratory	JKKP HIE 127/171-2(2015)		OU	Employees categories						Date	workshop	Lab	sprayers	WTP	Others	1	Chaah Mill	7/9/18	11	6	-	2	21	2	Sg Spg Kiri	26/9/18	2	-	-	-	-	<p>Complied</p>
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Criterion / Indicator		Assessment Findings						Compliance
			29/8/18	-	-	27	-	-
	3 Chaah		17/5/19	-	-	29	-	3
			3/9/18	3	-	4	-	-
	4 N Labis		8/8/18	4	-	11	-	2
		<p>All medical surveillance was conducted an OHD Doctor of <i>Klinik Segamat OHD DOSH Rgn No. HQ/08/DOC/00/545</i>. The results for the entire workers were positive and declared FIT to handle chemical.</p>						

Criterion / Indicator		Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	All the estates and mill in the CU complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby no work with pesticides is given to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan</i> The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.	Complied
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.1</p> <p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.</p> <p>- Major compliance -</p>	<p>The Group Occupational Safety & Health Management Policy had been established and implemented. The policy was signed by the Managing Director of Sime Darby Plantation dated January 2015 and displayed prominently on notice boards in English and local language <i>Bahasa Malaysia</i>. The Policy is implemented through the OSH activities by the Regional SQM Executives and monitored by SQM Department at Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. In interviews with the workers and staff during the site visit workshop, office compound, workshop, laboratory, engine room, boiler house) revealed that the employees had been briefed and had understood the policy. The plan also covered OHS objectives which included the following:</p> <ul style="list-style-type: none"> a) zero accident case in major accident (class I and class II). b) to achieve > 1000,000-man hours without LTI c) to enhance OSH awareness through comprehensive ESH Training (target 70%). d) to extent the awareness of safety from operation area to Housing Complex. <p>The implementation of OSH plan was monitored by internal audits conducted by OSH officers from SQM department</p>	<p>Complied</p>

<p>4.7.2</p>	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	<p>The Mill and Estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following;</p> <ul style="list-style-type: none"> a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents <p>HIRARC for the mill/estates was formalized on in 2008 with review made annually. The significant and routine activities for mill were covered with details as follows;</p> <table border="1" data-bbox="981 746 1816 986"> <thead> <tr> <th></th> <th>Areas/Activities (Mill)</th> <th></th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reception –Wbridge/Ramp</td> <td>7</td> <td>Engine Room</td> </tr> <tr> <td>2</td> <td>Fruit Handling</td> <td>8</td> <td>Product storage /Dispatch</td> </tr> <tr> <td>3</td> <td>Sterilizer</td> <td>9</td> <td>Laboratory</td> </tr> <tr> <td>4</td> <td>Threshing</td> <td>10</td> <td>Water treatment</td> </tr> <tr> <td>5</td> <td>Clarification / Oil Room</td> <td>11</td> <td>Effluent Treatment Pond</td> </tr> <tr> <td>6</td> <td>Boiler House</td> <td>12</td> <td>Compound upkeep</td> </tr> </tbody> </table> <p>The mill HIRARC was reviewed on 01/01/19. Similarly the estates analysed the risk in all the major operations with control measures documented. The work activities among others include the following;</p> <table border="1" data-bbox="981 1150 1816 1375"> <thead> <tr> <th></th> <th>Areas/Activities (Estates)</th> <th></th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Palm /bunch census</td> <td>10</td> <td>Harvesting & collection</td> </tr> <tr> <td>2</td> <td>Circle /selective spraying</td> <td>11</td> <td>Transportation of workers</td> </tr> <tr> <td>3</td> <td>Confined space</td> <td>12</td> <td>Walking form palm to palm</td> </tr> <tr> <td>4</td> <td>Drainage – machinery and manual</td> <td>13</td> <td>Loose fruit collection</td> </tr> </tbody> </table>		Areas/Activities (Mill)		Areas /Activities	1	Reception –Wbridge/Ramp	7	Engine Room	2	Fruit Handling	8	Product storage /Dispatch	3	Sterilizer	9	Laboratory	4	Threshing	10	Water treatment	5	Clarification / Oil Room	11	Effluent Treatment Pond	6	Boiler House	12	Compound upkeep		Areas/Activities (Estates)		Areas /Activities	1	Palm /bunch census	10	Harvesting & collection	2	Circle /selective spraying	11	Transportation of workers	3	Confined space	12	Walking form palm to palm	4	Drainage – machinery and manual	13	Loose fruit collection	<p>Complied</p>
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		5	Grass cutting	14	In field machine to 3mt bin	
		6	Compound sanitation	15	Water catchment – all activities	
		7	Fertilizer application	16	Chemical mixing	
		8	Replanting	17	Nursery (where applicable)	
		9	Water T Plant (where relevant)	18	Working at chemical store	
		<p>Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all work stations in the mill office and workshop. In general, the control measures were appropriate to the identified risks. A person-in-charge at each site were appointed to monitor the implementation of the control measures through the 5S initiative</p>				

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<p>4.7.3 All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -</p>	<p>Trainings and briefings on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. Based on the HIRARC carried out at the estates and mill the PPE types for the various activities has been identified and implemented.</p> <table border="1" data-bbox="981 751 1861 1082"> <thead> <tr> <th></th> <th>Type of work</th> <th>PPE issuance</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Harvester</td> <td>Safety helmet, sickle cover, hand glove. Wellington boots</td> </tr> <tr> <td>2</td> <td>Sprayers</td> <td>Respirator, nitrile glove (Chemical Resistant) goggles, wellington boots, apron.</td> </tr> <tr> <td>3</td> <td>Manurer</td> <td>Apron, wellington boots, dust mask, nitrile glove.</td> </tr> <tr> <td>4</td> <td>Mill operators</td> <td>Safety shoes, ear muff, safety vest, helmet, cotton glove</td> </tr> <tr> <td>5</td> <td>WTP operator</td> <td>Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask.</td> </tr> </tbody> </table> <p>Workers were observed in PPE adherence during the field and mill visits</p>		Type of work	PPE issuance	1	Harvester	Safety helmet, sickle cover, hand glove. Wellington boots	2	Sprayers	Respirator, nitrile glove (Chemical Resistant) goggles, wellington boots, apron.	3	Manurer	Apron, wellington boots, dust mask, nitrile glove.	4	Mill operators	Safety shoes, ear muff, safety vest, helmet, cotton glove	5	WTP operator	Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask.	<p>Complied</p>
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<p>4.7.4</p>	<p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>Both the Estates / Mill Managers were appointed as the Chairman of the ESH committee. The letter of appointment for the Managers signed by the Regional CEO was sighted. The Manager subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates. Similar appointment was made for all the estates and the mill. All identified Executives were officially given a letter for such an appointment. Both estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held by both estates are recorded below. Date appointed Chaah Mill Manager as Chairman was dated 01/7/18. Similarly for Sg Spg Kiri Estate dated 20/4/19 and North Labis Estate dated 01/4/19.</p> <table border="1" data-bbox="994 767 1816 1034"> <thead> <tr> <th>Estate</th> <th>1st</th> <th>2nd</th> <th>3rd</th> <th>4th</th> </tr> </thead> <tbody> <tr> <td>Chaah Mill</td> <td>05/7/19</td> <td>05/4/19</td> <td>13/1/19</td> <td>08/10/18</td> </tr> <tr> <td>Chaah Estate</td> <td>12/6/19</td> <td>13/3/19</td> <td>12/12/18</td> <td>27/11/18</td> </tr> <tr> <td>Sg Sp Kiri Estate</td> <td>02/8/19</td> <td>12/4/19</td> <td>18/1/19</td> <td>20/10/18</td> </tr> <tr> <td>N Labis Estate</td> <td>30/6/19</td> <td>18/3/19</td> <td>24/12/18</td> <td>29/9/18</td> </tr> </tbody> </table> <p>Workers during the meeting participated in the discussion mainly on housing and safety. All units adopted the agenda as released SQM. The agenda as discussed during the meeting among others includes the following;</p> <ul style="list-style-type: none"> a) <i>Laporan Pemakaian PPE</i> b) <i>Laporan Prestasi ESH/Kesihatan</i> c) <i>Laporan LatIhan & SOP/HIRARC</i> d) <i>Laporan Pematuhan Undang-Undang</i> e) <i>Laporan Pematuhan Oleh Kontraktor</i> f) <i>Laporan Kemalangan</i> 	Estate	1st	2nd	3rd	4th	Chaah Mill	05/7/19	05/4/19	13/1/19	08/10/18	Chaah Estate	12/6/19	13/3/19	12/12/18	27/11/18	Sg Sp Kiri Estate	02/8/19	12/4/19	18/1/19	20/10/18	N Labis Estate	30/6/19	18/3/19	24/12/18	29/9/18	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> g) <i>Laporan Pemeriksaan Tempat Kerja</i> h) <i>Laporan Bahan Buangan Berjadual.</i> i) <i>Laporan Kesihatan & Kawasan Perumahan</i> 	

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<p>4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p>	<p>Procedures guidelines were issued by SQM and amended to tailor to the situation differences in the estates and mills.</p> <table border="1" data-bbox="981 475 1742 948"> <thead> <tr> <th></th> <th>Emergencies Situation</th> <th>Mill</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire Hazard</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Injury At Site</td> <td>/</td> <td>/</td> </tr> <tr> <td>3</td> <td>CPO spillage</td> <td>/</td> <td></td> </tr> <tr> <td>4</td> <td>Dieseline spillage</td> <td>/</td> <td>/</td> </tr> <tr> <td>5</td> <td>Explosion</td> <td>/</td> <td></td> </tr> <tr> <td>6</td> <td>Poisonous animals attack</td> <td></td> <td>/</td> </tr> <tr> <td>7</td> <td>Flood</td> <td></td> <td>/</td> </tr> <tr> <td>8</td> <td>Workers' Strike</td> <td>/</td> <td>/</td> </tr> <tr> <td>9</td> <td>Electrocution /Electric shock</td> <td>/</td> <td>/</td> </tr> <tr> <td>10</td> <td>Gas Release/Leaks</td> <td>/</td> <td></td> </tr> <tr> <td>11</td> <td>Exposion Incident</td> <td>/</td> <td></td> </tr> <tr> <td>12</td> <td>Rescueretrieval Worker Confined Space</td> <td>/</td> <td></td> </tr> </tbody> </table> <p>ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training. The trained personnel for the First Aid were among the employees working in the mill on shift and the estates staff/mandores. The first aid boxes were available at various points in the mill complex including laboratory, office, workshop, process control room etc. Similarly, the estates distributed the first aid box to the mandores and brought along to the field during operations.</p>		Emergencies Situation	Mill	Estate	1	Fire Hazard	/	/	2	Injury At Site	/	/	3	CPO spillage	/		4	Dieseline spillage	/	/	5	Explosion	/		6	Poisonous animals attack		/	7	Flood		/	8	Workers' Strike	/	/	9	Electrocution /Electric shock	/	/	10	Gas Release/Leaks	/		11	Exposion Incident	/		12	Rescueretrieval Worker Confined Space	/		<p>Complied</p>
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<p>4.7.6 All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p>	<p>SOU 20 Chaah provides medical care to the employees with Klinik Ladang established within the premises. Cases requiring higher attention of medical care are referred to <i>Klinik Kesihatan Chaah</i> 8 km away or <i>Hospital Segamat</i> located 60 km from the Estates/Mill vicinity. The estates and mill use the RHB Insurance Bhd for the FW insurance coverage. In addition there are services made by the VMO Klinik Rajoo Dr Bhagat at Chaah town.</p> <table border="1" data-bbox="981 624 1834 919"> <thead> <tr> <th></th> <th>OU</th> <th>Policy No</th> <th>Validity</th> <th>No - workers</th> <th>SOCSSO file no</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Chaah Mill</td> <td>-</td> <td>-</td> <td>-</td> <td>DCT06201900050380</td> </tr> <tr> <td>2</td> <td>S Spg Kiri</td> <td>MW287523</td> <td>12/1/20</td> <td>5</td> <td>E1400006483P</td> </tr> <tr> <td>3</td> <td>N Labis</td> <td>MW295570</td> <td>27/3/20</td> <td>10</td> <td>E1400000454B</td> </tr> <tr> <td>4</td> <td>Chaah</td> <td>BG174776</td> <td>8/9/19</td> <td>2</td> <td>E1500001015Z</td> </tr> </tbody> </table> <p>SOCSSO coverage was made for the local workers. The inclusion of FW workers in the same scheme will commence on expiry of their insurance coverage.</p>		OU	Policy No	Validity	No - workers	SOCSSO file no	1	Chaah Mill	-	-	-	DCT06201900050380	2	S Spg Kiri	MW287523	12/1/20	5	E1400006483P	3	N Labis	MW295570	27/3/20	10	E1400000454B	4	Chaah	BG174776	8/9/19	2	E1500001015Z	<p>Complied</p>
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<p>4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -</p>	<p>Accident statistics are being maintained and periodically reviewed (quarterly basis) during 'Health and Safety' committee meeting – minutes reviewed. The following accident incidents were reviewed:</p> <ul style="list-style-type: none"> a) JKPP 8 for FY 2018 submitted on 08/1/19 by the Mill. b) JKPP 8 Sg Spg Kiri Estate was forwarded on 28/1/19 c) North Labis Estate forwarded JKPP 8 on 31/1/19. <table border="1" data-bbox="981 624 1834 826"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Estate /Mill</th> <th colspan="2">Cases with LTI</th> <th colspan="2">Cases non LTI</th> <th rowspan="2">Total cases</th> </tr> <tr> <th>No</th> <th>LTI</th> <th>No</th> <th>No</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Chaah Mill</td> <td>3</td> <td>49</td> <td>0</td> <td></td> <td>3</td> </tr> <tr> <td>2</td> <td>Chaah</td> <td>6</td> <td>13</td> <td>0</td> <td></td> <td>6</td> </tr> <tr> <td>3</td> <td>Sg Spg Kiri</td> <td>25</td> <td>89</td> <td>6</td> <td></td> <td>31</td> </tr> <tr> <td>4</td> <td>N Labis</td> <td>14</td> <td>81</td> <td>0</td> <td></td> <td>14</td> </tr> </tbody> </table> <p>There is 1 case of 1 mill workshop apprentice 06/2//18 suffering a cut upon stepping on a zinc placed the floor. Investigation was made with remedial measures given. HIRARC was reviewed 2/8/2018. SSKE involving tractor driver hurting a finger while handling a PTO. North Labis Estate had 2 cases of 20 and 23 LTI respectively general worker and harvester respectively.</p> <p>Accident Statistics are being maintained in a satisfactory manner</p>		Estate /Mill	Cases with LTI		Cases non LTI		Total cases	No	LTI	No	No	1	Chaah Mill	3	49	0		3	2	Chaah	6	13	0		6	3	Sg Spg Kiri	25	89	6		31	4	N Labis	14	81	0		14	<p>Complied</p>
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<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>																																									

4.8.1	<p>A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.</p> <p>- Major compliance -</p>	<p>The training program for 2019 covering all aspects of the RSPO Principles and Criteria and other essential operations activities has been established. Regular assessments of training needs were available and verified. Training needs identification matrix has been established with target dates for of implementation. The training program/subjects among others includes</p> <table border="1" data-bbox="978 555 1818 1391"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Subjects</th> <th colspan="3">Month</th> </tr> <tr> <th>1-4</th> <th>5-8</th> <th>9-12</th> </tr> </thead> <tbody> <tr><td>1</td><td>ESH Legal & Other requirements</td><td>/</td><td></td><td></td></tr> <tr><td>2</td><td>Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000</td><td>/</td><td></td><td></td></tr> <tr><td>3</td><td>Accident Investigation Techniques</td><td>/</td><td></td><td></td></tr> <tr><td>4</td><td>Emergency Respond Plan Training (Chemical spill, poisoning, Fire. Lightning)</td><td>/</td><td></td><td>/</td></tr> <tr><td>5</td><td>First Aid Training</td><td>/</td><td></td><td>/</td></tr> <tr><td>6</td><td>Scheduled waste management</td><td>/</td><td>/</td><td></td></tr> <tr><td>7</td><td>Safe Work Procedure for All Stations.</td><td>/</td><td></td><td>/</td></tr> <tr><td>8</td><td>Confined Space Training</td><td></td><td>/</td><td></td></tr> <tr><td>9</td><td>Policy Training</td><td>/</td><td></td><td>/</td></tr> <tr><td>10</td><td>Effective workplace inspection</td><td></td><td>/</td><td>/</td></tr> <tr><td>11</td><td>GAP training / SW</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>12</td><td>RSPO & Management Training,</td><td>/</td><td></td><td>/</td></tr> <tr><td>13</td><td>RSPO Human Right Training,</td><td>/</td><td></td><td>/</td></tr> <tr><td>14</td><td>Briefing on S Darby Policies (Gender & Conservation).</td><td>/</td><td></td><td>/</td></tr> <tr><td>15</td><td>Maintenance of spraying equipment</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>16</td><td>HCV Training for Region</td><td></td><td>/</td><td>/</td></tr> <tr><td>17</td><td>Safe handling of Electrical Equipment</td><td>/</td><td></td><td>/</td></tr> <tr><td>18</td><td>MSDS/CSDS</td><td>/</td><td></td><td>/</td></tr> <tr><td>19</td><td>5 S Housekeeping</td><td>/</td><td>/</td><td></td></tr> </tbody> </table>		Subjects	Month			1-4	5-8	9-12	1	ESH Legal & Other requirements	/			2	Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000	/			3	Accident Investigation Techniques	/			4	Emergency Respond Plan Training (Chemical spill, poisoning, Fire. Lightning)	/		/	5	First Aid Training	/		/	6	Scheduled waste management	/	/		7	Safe Work Procedure for All Stations.	/		/	8	Confined Space Training		/		9	Policy Training	/		/	10	Effective workplace inspection		/	/	11	GAP training / SW	/	/	/	12	RSPO & Management Training,	/		/	13	RSPO Human Right Training,	/		/	14	Briefing on S Darby Policies (Gender & Conservation).	/		/	15	Maintenance of spraying equipment	/	/	/	16	HCV Training for Region		/	/	17	Safe handling of Electrical Equipment	/		/	18	MSDS/CSDS	/		/	19	5 S Housekeeping	/	/		Complied
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		21	Estate Activities / Mill Work stations	/	/	/
		22	Triple rinsing	/	/	
		23	Effective work place inspection		/	/
		24	HIRARC	/		/
		25	Safe driving techniques	/		/

<p>4.8.2</p>	<p>Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>SOU 20 – Chaah CU had trained their staff, workers and records of training were kept in the RSPO training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue. Among others the training held by the units in Chaah CU are listed below.</p> <table border="1" data-bbox="1003 523 1760 1361"> <thead> <tr> <th colspan="4">Chaah Palm Oil Mill</th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>07/9/18</td> <td>Confined space management</td> <td>17</td> </tr> <tr> <td>2</td> <td>18/9/18</td> <td>Incident / NADOPOD</td> <td>1</td> </tr> <tr> <td>3</td> <td>22/9/18</td> <td>LOTO</td> <td>20</td> </tr> <tr> <td>4</td> <td>22/9/18</td> <td>Working at height</td> <td>20</td> </tr> <tr> <td>5</td> <td>16/4/19</td> <td>Safety Town Hall</td> <td>entire</td> </tr> <tr> <td>6</td> <td>10/3/19</td> <td>5 S application</td> <td>17</td> </tr> <tr> <td>7</td> <td>29/5/19</td> <td>Passport keeping</td> <td>14</td> </tr> <tr> <td>8</td> <td>13/6/19</td> <td>MSPO SCCS</td> <td>Entire</td> </tr> <tr> <td>9</td> <td>09/8/19</td> <td>MSPO/RSPO for Contractors</td> <td>26</td> </tr> <tr> <td>10</td> <td>22/9/18</td> <td>Hearing Conservation/PPE</td> <td>Entire</td> </tr> <tr> <td>11</td> <td>8/8/19</td> <td>Gender committee/rights</td> <td>12</td> </tr> <tr> <td>12</td> <td>13/8/19</td> <td>Chemical Handlings</td> <td>11</td> </tr> <tr> <td>13</td> <td>08/10/18</td> <td>Fire Drill</td> <td>Entire</td> </tr> <tr> <td>14</td> <td>31/5/19</td> <td>COBC, Whistle blowing</td> <td>Entire</td> </tr> <tr> <td>15</td> <td>13/6/19</td> <td>Policies briefing</td> <td>Entire</td> </tr> <tr> <td>16</td> <td>30/4/19</td> <td>First Aid /BOFA</td> <td></td> </tr> <tr> <td>17</td> <td>26/7/19</td> <td>HCV management</td> <td>Entire</td> </tr> <tr> <td>18</td> <td>12/4/19</td> <td>Mill maintenance</td> <td>23</td> </tr> <tr> <td>19</td> <td>4/4/19</td> <td>Laboratory operations</td> <td>6</td> </tr> <tr> <td>20</td> <td>15/8/19</td> <td>Gender /reproductive rights</td> <td>2</td> </tr> </tbody> </table>	Chaah Palm Oil Mill					Date	Subject	Attendees	1	07/9/18	Confined space management	17	2	18/9/18	Incident / NADOPOD	1	3	22/9/18	LOTO	20	4	22/9/18	Working at height	20	5	16/4/19	Safety Town Hall	entire	6	10/3/19	5 S application	17	7	29/5/19	Passport keeping	14	8	13/6/19	MSPO SCCS	Entire	9	09/8/19	MSPO/RSPO for Contractors	26	10	22/9/18	Hearing Conservation/PPE	Entire	11	8/8/19	Gender committee/rights	12	12	13/8/19	Chemical Handlings	11	13	08/10/18	Fire Drill	Entire	14	31/5/19	COBC, Whistle blowing	Entire	15	13/6/19	Policies briefing	Entire	16	30/4/19	First Aid /BOFA		17	26/7/19	HCV management	Entire	18	12/4/19	Mill maintenance	23	19	4/4/19	Laboratory operations	6	20	15/8/19	Gender /reproductive rights	2	<p>Complied</p>
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		21	13/8/19	Scheduled management waste	11
		22	07/8/19	Fire drill	Entire
		23	1/4/19	PPE adherence	23
		24	7/2/19	Mill operations /parameter	23
		25	10/2/19	Processing Parameters	23
		26	4/4/19	Chemical spillage ERP	6
		27	12/11/18	Environmental issues	9
		<i>Sungai Simpang Kiri Estate</i>			
			Date	Subject	Attendees
		1	25/7/19	Spraying calibration	16
		2	16/3/19	Accident investigation	2
		3	9/8/19	Safe driving techniques	4
		4	13/8/19	PPE Adherence	2
		5	28/6/19	COBC understanding	Entire
		6	16/3/19	HIRARC	2
		7	26/7/19	EAI/EIE/EMP briefing	Entire
		8	16/8/19	FW induction program	12
		9	13/8/19	USECCH 2000	2
		10	9/8/19	Driver competency	4
		11	12/7/19	Harvesting competency	20
		12	05/3/19	R & D briefings	8
		13	06/8/19	Induction Program FW	13
		14	28/1/19	Fertilizer application	9
		15	10/7/19	Trunk injection	4
		16	13/8/18	SW management	2
		17	14/8/19	Chemical handling	16
		18	28/1/19	Town Hall 7.0	Entire
		19	13/8/19	MSDS / SDS	16

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		20	12/7/19	Pruning	7		
		21	5/3/19	IPM program, - BOB	20		
		22	28/6/19	Company policies briefing	Entire		
		23	10/7/19	IPM management	20		
		24	16/8/19	5 S housekeeping	entire		
		25	26/7/18	HCV – management	3		
		26	08/8/19	ERP – Fire Drill	Entire		
		27	15/8/19	Gender com/reproductive	4		
		28	26/2/19	Zenoah blower operations	8		
		29	24/8/19	ERP – Flood Drill	Entire		
		30	14/8/19	ERP – chemical spillage	18		
		31	29/7/19	First Aid – BOFA	17		
Chaah Estate							
			Date	Subject	Attendees		
		1	27/6/19	HCV briefing	73		
		2	27/6/19	Harvesting & Collection SD1	36		
		3	19/7/19	Rat baiting	25		
		4	24/1/19	Inter pump handling	23		
		5	13/3/19	Accessibility briefing	13		
		6	26/4/19	Fire Drill	Entire		
		7	8/2/19	FronD stacking	10		
		8	3/8/19	Spraying techniques	7		
		9	18/9/18	SW management	2		
		10	5/8/19	Fertiliser application	7		
		11	21/9/18	OSH committee	9		
		12	8/10/18	LF blower operations	14		

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		13	13/8/19	Chemical spillage	20			
		14	19/2/19	LF collection	17			
		15	22/9/18	Sexual harassment	17			
		16	21/6/19	PPE adherence	8			
		17	13/7/19	Spraying techniques	11			
		18	27/6/19	Kick off – replanting	9			
		19	10/7/19	IPM – BOB	22			
		20	14/3/19	MTG driving	16			
		21	24/7/19	Fertiliser application	12			
		22	25/4/19	Flood pump operations	25			
		23	20/12/18	Pest & Disease Operations	10			
		24	19/7/19	OSH validation	7			
		25	9/8/19	Stakeholder briefing	24			
		26	24/4/19	Water management	41			
		27	9/4/19	Town Hall 7.0	Entire			
		28	15/8/19	Gender /reproductive rights	22			
		29	10/7/19	Trunk injection	22			
		30	13/8/19	SW management	entire			
		31	18/10/18	Workshop operations	2			
		32	29/5/19	Passport keeping	14			
		North Labis Estate						
			Date	Subject	Attendees			
		1	25/7/19	Passport safe keeping	Entire			
		2	16/4/19	IPM management	10			
		3	18/5/19	CDA spraying	15			
		4	20/6/19	First Aid	89			
		5	14/08/19	EAI & EIE activities	Entire			

Criterion / Indicator		Assessment Findings				Compliance
		6	3/4/19	Harvesting operations	10	
		7	26/9/18	Oil trap operation	3	
		8	26/9/18	MSPO/RSPO audit	5	
		9	9/8/19	RSPO/MSPO/HCV/COBC	5	
		10	6/3/19	Pruning safety	11	
		11	5/6/19	PPE & Chemical handling	Entire	
		12	15/2/19	Fertiliser application/PPE	10	
		13	14/3/19	Ganoderma – deboling	14	
		14	12/4/19	Spraying techniques – safety	22	
		15	5/3/19	FronD stacking	14	
		16	18/2/19	FronD stacking procedure	14	
		17	20/6/19	Emergency Fire drill	Entire	
		18	12/5/19	FFB crop quality	20	
		19	15/5/19	Safety and working hours	entire	
		20	9/5/19	Tractor driving	7	
		21	15/8/19	Safe driving	12	
		22	1/3/19	Spraying technique and safety	46	
		23	19/4/19	Town Hall 7.0	Entire	
		24	10/6/19	COBC	Entire	
		25	19/6/19	Stakeholder awareness	8	

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

Criterion 5.1:

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

<p>5.1.1</p>	<p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p>The plans and impact assessments relating to environmental impacts based on documents for both estates and the mill are elaborated in the following records:</p> <ul style="list-style-type: none"> a) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, <i>(version 1; year 2008 Issue no. 1; dated 1 April 2009 Register)</i> b) Appendix 5.4.1c - Environmental Aspect and Impact Identification form <i>(version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EAI)</i> c) Appendix 5.4.1d – Environmental Impacts Evaluation form <i>(version 1; year 2008 issue no. 1; dated 1 April 2009; MR-02/EIE)</i> <p>The EAI as detailed in the estates register covers all estates activities/operations. The latest register being reviewed dated 25/7/19. There were no changes since the last review for all the three estates. The significant environmental aspects related to the estate operation among others include the following;</p> <ul style="list-style-type: none"> a) FFB transportation to the mill. b) Movement of vehicles/transportation of estates machines and tractors. c) Herbicide/pesticides spraying d) Anti-malaria fogging e) Road resurfacing & grading f) Grass cutting g) construction activities h) harvesting, pest and disease, i) upkeep programme j) nursery / replanting <p>Similarly, the environmental aspects for the mill are tabulated in the EAI master list <i>(EAI/MOM/2013/001—1ME to EAI/2015/MOM/020)</i> updated on 1/12/18. Among others the EIAs are divided into the all stations in the mill processing as listed below.</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> a) the boiler stack emission, black smoke b) palm oil mill effluent (POME) discharge and water contamination, c) Activities related to managing of scheduled wastes and general waste. d) Activities of all operations beginning from the mill entrance ending to the effluent, EFB operations. <p>The documents are maintained, sighted and verified</p>	

<p>5.1.2</p>	<p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -</p>	<p><u>Chaah Palm Oil Mill</u> The Environmental Aspect and Impact Identification Form & Environmental Impact Evaluation Form was used to identify Aspect & Impact and take necessary action. The record was reviewed on 01/12/18 by the Assistant Engineer and approved by the Mill Manager. No changes were made to the record. The Waste Management Plan FY 2019 comprising of Pollution Prevention Plan 2019 has been established on Jan 2019. Among others the pollution prevention identified are; a) The control of black smoke emissions, monitoring water course, b) Scheduled Waste and effluent discharge monitoring. Records of monitoring by the mill were sighted.</p> <p><u>Chaah/North Labis/Sg Spg Kiri Estates</u> The Pollution Prevention Plan has been established to address environmental issues;</p> <table border="1" data-bbox="981 863 1845 1348"> <thead> <tr> <th data-bbox="981 863 1025 895"></th> <th data-bbox="1025 863 1330 895">Issues</th> <th data-bbox="1330 863 1845 895">Mitigation measures</th> </tr> </thead> <tbody> <tr> <td data-bbox="981 895 1025 1031">1</td> <td data-bbox="1025 895 1330 1031">Leakage of pesticide during chemical mixing</td> <td data-bbox="1330 895 1845 1031">to recollect water used at chemical mixing area to be recycled during mixing to construct containment sum at chemical mixing area to contain leakages</td> </tr> <tr> <td data-bbox="981 1031 1025 1222">2</td> <td data-bbox="1025 1031 1330 1222">Contaminated ground / soil at workshop area</td> <td data-bbox="1330 1031 1845 1222">to replace tray whenever tractors / machines under repairing progress to avoid oil spillage on the ground periodic checking on oil sump to ensure it is well maintained and to avoid any leakages</td> </tr> <tr> <td data-bbox="981 1222 1025 1348">3</td> <td data-bbox="1025 1222 1330 1348">Prohibited spraying at line site</td> <td data-bbox="1330 1222 1845 1348">Education to workers not to spray at the line site and explain reason for such a directive. periodic checking at the line site</td> </tr> </tbody> </table>		Issues	Mitigation measures	1	Leakage of pesticide during chemical mixing	to recollect water used at chemical mixing area to be recycled during mixing to construct containment sum at chemical mixing area to contain leakages	2	Contaminated ground / soil at workshop area	to replace tray whenever tractors / machines under repairing progress to avoid oil spillage on the ground periodic checking on oil sump to ensure it is well maintained and to avoid any leakages	3	Prohibited spraying at line site	Education to workers not to spray at the line site and explain reason for such a directive. periodic checking at the line site	<p>Complied</p>
	Issues	Mitigation measures													
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		<p>4 Prohibited spraying and fertilizer of chemical near the river (buffer zone)</p>	<p>provide training and create awareness to workers marking the buffer zones</p>	
<p>Training in relation to environmental as listed below;</p>				
<p style="text-align: center;"><i>Chaah Palm Oil Mill</i></p>				
		Date	Subject	Attendees
1		16/4/19	Safety Town Hall	entire
2		09/8/19	MSPO/RSPO for Contractors	26
3		13/6/19	Policies briefing	Entire
4		26/7/19	HCV management	Entire
5		13/8/19	Scheduled waste management	11
6		4/4/19	Chemical spillage ERP	6
7		12/11/18	Environmental issues	9
<p style="text-align: center;">..</p>				
<p style="text-align: center;"><i>Sungai Simpang Kiri Estate</i></p>				
		Date	Subject	Attendees
1		26/7/19	EAI/EIE/EMP briefing	Entire
2		13/8/18	SW management	2
3		28/1/19	Town Hall 7.0	Entire
4		13/8/19	MSDS / SDS	16
5		28/6/19	Company policies briefing	Entire
6		26/7/18	HCV – management	3

Criterion / Indicator		Assessment Findings				Compliance
		7	14/8/19	ERP – chemical spillage	18	
Chaah Estate						
			Date	Subject	Attendees	
		1	27/6/19	HCV briefing	73	
		2	18/9/18	SW management	2	
		3	13/8/19	Chemical spillage	20	
		4	24/4/19	Water management	41	
		5	9/4/19	Town Hall 7.0	Entire	
		6	13/8/19	SW management	entire	
North Labis Estate						
			Date	Subject	Attendees	
		1	14/08/19	EAI & EIE activities	Entire	
		2	26/9/18	Oil trap operation	3	
		3	12/4/19	Spraying techniques – safety	22	
		4	1/3/19	Spraying technique and safety	46	
		5	19/4/19	Town Hall 7.0	Entire	

<p>5.1.3</p>	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -</p>	<p><u>Chaah Palm Oil Mill</u> There were no changes made to the environmental aspects and impacts or current practices which require changes in the environmental action plans at the mill. Nevertheless, the existing environmental action plans had identified timeframes and responsible person at each operating unit assessed: a) BOD final discharge targeted at 100 mg/l b) Reduce water consumption. c) Reduce electricity consumption.</p> <p><u>Chaah/North Labis/Sg Spg Kiri Estates</u> An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. The pollution prevention plan and waste management plan were reviewed on yearly basis and was verified at all visited operating units. Sighted and extracted the following environmental management plan for all Estates 2019</p> <table border="1" data-bbox="981 1007 1836 1302"> <thead> <tr> <th></th> <th>Issues</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Vehicle maintenance</td> <td>To maintain daily checklist for all vehicles To maintain all vehicles in good running condition</td> </tr> <tr> <td>2</td> <td>Rat baiting</td> <td>Proper records of rat baiting be maintained To properly maintain on barn owl boxes</td> </tr> <tr> <td>3</td> <td>Reduce spillage to land / water</td> <td>To ensure use of recycled water To maintain segregation of mixing area</td> </tr> </tbody> </table>		Issues	Action Plan	1	Vehicle maintenance	To maintain daily checklist for all vehicles To maintain all vehicles in good running condition	2	Rat baiting	Proper records of rat baiting be maintained To properly maintain on barn owl boxes	3	Reduce spillage to land / water	To ensure use of recycled water To maintain segregation of mixing area	<p>Complied</p>
	Issues	Action Plan													
1	Vehicle maintenance	To maintain daily checklist for all vehicles To maintain all vehicles in good running condition													
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3	Reduce spillage to land / water	To ensure use of recycled water To maintain segregation of mixing area													

Criterion / Indicator		Assessment Findings		Compliance
		4	Bagworm infestation To establish growth of beneficial plant such as <i>tunera</i> , <i>antigonan</i> , <i>cassia cabonensis</i> , <i>euphobia</i> etc.	
Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.				
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -	A combined HCV Re-Assessment for Strategic Operating Unit (SOU 19 and 20) Pagoh and Chaah was carried out on August 2016 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. Final report (Version II). Total HCV area identified for Chaah SOU20 is 70.69 ha which consist of water catchment, river reserve and bunds. The above area is categorized under HCV4.		Complied
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	Regular patrols within the operating unit estates were carried out and findings recorded by the respective Estate executives to monitor the Conservation / buffer zone areas. Mechanism for reporting the sightings of various types of wildlife, were found to have been in place. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented. Signage that prohibit hunting, fishing and water polluting activities were verified on-site at the estates visited (i.e. North Labis and Chaah Estate) found to have been satisfactorily maintained		Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>5.2.3</p>	<p>There shall b a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -</p>	<p>The program to regularly educate the workforce and community about the status of these RTE species are also established with on-going consultation with the relevant authorities such as Wildlife Department etc. The last HCV/bio-diversity training for southern region was carried on 26/7/2019. It was attended by 3 participants from each estates. The training was given by GSQM (Environmental Management Unit) and focusing on management of HCV area and reclassification of 25° area. There is evidence of commitment to discourage any illegal or inappropriate hunting, fishing or collecting activities via the signage erected around the affected areas which prohibit such activities. This was observed during site visit at conservation area (>25° slope) (2°23'9.3"N 103°4'12.4"E) and water catchment (HCV4) at North Labis Estate.</p>

Criterion / Indicator		Assessment Findings	Compliance												
5.2.4	<p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. <p>- Minor compliance -</p>	<p>Management plans were established and monitoring outcomes were reviewed by the Estate managers. Refer to HCV management plan for 2018. There are reported RTE at the SOU20 as reported in the PSQM HQ Report. Verification were also made during on-site assessment and found to be satisfactory. The overall management plan on the status of HCV/RTE of the Chaah operating unit is collated reviewed and monitored by the HQ sustainability team. Onsite monitoring records such AP patrolling and field observation records were checked and carried on monthly basis. Animal sighting, buffer zone and pond are were monitored and outcomes will be fed back into the management plan for improvement. Summary of monitoring report per operating units:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Monitoring records</th> <th>Frequency of monitoring</th> </tr> </thead> <tbody> <tr> <td>Simpang Kiri</td> <td>Sighting/patrolling record dated 17/7/18</td> <td>Monthly</td> </tr> <tr> <td>North Labis</td> <td>Sighting/patrolling record dated 10/8/19</td> <td>Monthly</td> </tr> <tr> <td>Chaah</td> <td>Sighting/patrolling record dated 5/8/19</td> <td>Monthly</td> </tr> </tbody> </table>	Estate	Monitoring records	Frequency of monitoring	Simpang Kiri	Sighting/patrolling record dated 17/7/18	Monthly	North Labis	Sighting/patrolling record dated 10/8/19	Monthly	Chaah	Sighting/patrolling record dated 5/8/19	Monthly	Complied
Estate	Monitoring records	Frequency of monitoring													
Simpang Kiri	Sighting/patrolling record dated 17/7/18	Monthly													
North Labis	Sighting/patrolling record dated 10/8/19	Monthly													
Chaah	Sighting/patrolling record dated 5/8/19	Monthly													
5.2.5	<p>Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights.</p> <p>- Minor compliance -</p>	No HCV set asides with existing rights of local communities have been identified	Complied												
<p>Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>															

<p>5.3.1</p>	<p>All waste products and sources of pollution shall be identified and documented. - Major compliance -</p>	<p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2019.</p> <p>a) The waste generated from the mill operations as shown below;</p> <table border="1" data-bbox="981 491 1836 730"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fibre, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>b) The pollution identified from the mill activities</p> <table border="1" data-bbox="981 829 1836 1005"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>Emission from Boilers</td> </tr> <tr> <td>2</td> <td>Odour & gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage & vehicle maintenance</td> </tr> </tbody> </table> <p>All waste and pollution are identified and documented in the Waste Management Action Plan. The compilation for Financial Year 2019 was made at SOU level. Details of waste generated from the estates and mill operations among others are shown below;</p> <table border="1" data-bbox="981 1197 1854 1391"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste rubbish</td> <td>Line sites, office, workshop, store,</td> </tr> <tr> <td>2</td> <td>Industrial waste-fertilizer bags</td> <td>Empty bags store</td> </tr> <tr> <td>3</td> <td>Scrap metal</td> <td>workshop</td> </tr> <tr> <td>4</td> <td>SW 404 Clinical waste</td> <td>clinic</td> </tr> </tbody> </table>		Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill complex and employees' quarters	3	Industrial waste	Fibre, palm kernel shell, boiler ash, scrap iron	4	Sewage	Sewage from housing/office complex		Type of waste	Details	1	Black smoke	Emission from Boilers	2	Odour & gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance		Type of waste	Location	1	Domestic waste rubbish	Line sites, office, workshop, store,	2	Industrial waste-fertilizer bags	Empty bags store	3	Scrap metal	workshop	4	SW 404 Clinical waste	clinic	<p>Complied</p>
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		5	SW rags, plastics, filters	Workshop	
		6	Spent lubricant & hydraulic oil	Workshop	
		7	Disposed containers, bags, equipment contaminated with chemicals, pesticides,	Scheduled waste store	
		<p>The disposal/recycling of waste generated by the estates are made as follows;</p>			
			Type of waste	Location	Action to be taken
		1	Domestic waste rubbish	Line sites, office, workshop, store,	Collection/disposal 2 to 3x /week in designated landfill area/MPJ
		2	Industrial waste-fertilizer bags	Empty bags store	Inventory of bags, reuse for LF collection, sell to appointed contractor for surplus quantity.
		3	Scrap metal	workshop	Inventory maintained, tender at zone level for sale to licensed contractors
		4	SW 404 Clinical waste	clinic	Inventory maintained. Storage in sharp bin in clinic. Disposal to <i>Klinik Segamat</i>
		5	SW rags, plastics, filters	Workshop	Inventory maintained. Storage in scheduled waste store. Disposal to Saudara Baru Sdn Bhd.
		6	Spent lubricant & hydraulic oil	Workshop	Collection by SDI upon completion of maintenance.
		7	Disposed containers, bags,	Scheduled waste store	Inventory maintained. Storage in SW store. All containers are

Criterion / Indicator		Assessment Findings			Compliance
		equipment contaminated with chemicals, SW pesticides,		labeled. Empty containers collected by authorized vendor.	

<p>5.3.2</p>	<p>All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p>	<p>The procedures for handling used chemicals classified under Environment Quality Regulation (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by SQM and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows;</p> <ul style="list-style-type: none"> a) Management of class 1 chemical containers b) Management of class 2 (and higher) chemical containers c) Management of fertilizer bags <p>This document was established on 26/2/2015 and remains effective for practice in all estates and mills. The scheduled waste management, a procedure "<i>Scheduled Waste (Hazardous Waste Management)</i>" 52 pages was established.</p> <p>Among others the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were rinsed at the washing station prior to disposal to M/s SS Setia Enterprise. Records as follows;</p> <table border="1" data-bbox="1025 943 1868 1209"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>20 L</th> <th>Steel 20 L</th> <th>Boxes</th> <th>Empty drums</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SG Spg Kiri</td> <td>15/8/19</td> <td>55</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>2</td> <td>North Labis</td> <td>21/6/19</td> <td>133</td> <td>47</td> <td>469kg</td> <td>5</td> </tr> <tr> <td>3</td> <td>Chaah</td> <td>15/8/19</td> <td>104</td> <td>-</td> <td>20kg</td> <td>-</td> </tr> </tbody> </table> <p>Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory & consignment notes verified for confirmation of proper management & disposal. Scheduled waste has been disposed through licensed contractor M/s Pentas Flora (Johor Bahru Sdn Bhd</p>		Estate	Date	20 L	Steel 20 L	Boxes	Empty drums	1	SG Spg Kiri	15/8/19	55	-	-	-	2	North Labis	21/6/19	133	47	469kg	5	3	Chaah	15/8/19	104	-	20kg	-	<p>Complied</p>
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5.3.3	<p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>There are procedures and guidelines in the disposal of wastes and pollutants issued by the SDPB Head Office level to minimise pollution on the routine operation.</p> <table border="1" data-bbox="981 491 1848 1335"> <thead> <tr> <th colspan="5">Chaah/North Labis/Sg Spg Kiri Estates</th> </tr> <tr> <th></th> <th>Type</th> <th>Description</th> <th>Location</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste</td> <td>Rubbish</td> <td>Line sites, office, workshop, store,</td> <td>Collection/disposal min 2x /week internally. Establish landfill/collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site landfill at frequency of 2x/week.</td> </tr> <tr> <td rowspan="3">2</td> <td rowspan="3">Industrial waste</td> <td>Fertilizer bags</td> <td>Empty bags store</td> <td>Inventory of bags, reuse for LF collection, sell to appointed contractor</td> </tr> <tr> <td>Scrap metal</td> <td>workshop</td> <td>Inventory maintained, tender at zone level for sale to licensed contractor.</td> </tr> <tr> <td>POME</td> <td>ETP</td> <td>Daily monitoring of application at designated fields a rate of 40mt/ha for mature areas.</td> </tr> <tr> <td>3</td> <td>Sewage waste</td> <td>sewage</td> <td>Workers & housing toilets & office</td> <td>To monitor during housing inspection and residents' complaints Engagement with licensed contractor for sewage management.</td> </tr> </tbody> </table>	Chaah/North Labis/Sg Spg Kiri Estates						Type	Description	Location	Action to be taken	1	Domestic waste	Rubbish	Line sites, office, workshop, store,	Collection/disposal min 2x /week internally. Establish landfill/collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site landfill at frequency of 2x/week.	2	Industrial waste	Fertilizer bags	Empty bags store	Inventory of bags, reuse for LF collection, sell to appointed contractor	Scrap metal	workshop	Inventory maintained, tender at zone level for sale to licensed contractor.	POME	ETP	Daily monitoring of application at designated fields a rate of 40mt/ha for mature areas.	3	Sewage waste	sewage	Workers & housing toilets & office	To monitor during housing inspection and residents' complaints Engagement with licensed contractor for sewage management.	Minor
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					SW rags, plastics, filters	workshop	Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor <i>SS Setia Enterprise</i>				
					Spent lubricant & hydraulic oil	workshop	Collection by licensed vendor. Inventory maintained.				
					Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,	Schedule d waste store	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by authorized vendor <i>M/s Saudara Baru Sdn Bhd</i>				
				5	Recycle able waste	Empty pesticide container Reuse empty container	Waste store	Disposal to licensed buyer Labeled with container X Store under locked			
						EFB	Mill waste	Monitoring and disposal of EFB			
				Chaah Palm Oil Mill (latest review dated 01/12/18)							
						Type	Description	Action to be taken			

		1	Industrial waste	EFB	<p>Sent for mulching in the estates.</p> <p>To ensure and submit EFB disposal schedule and location every month</p> <p>To dispose EFB within 14 days upon storage</p> <p>To ensure no open burning activity on EFB and mill waste</p> <p>To design EFB storage area in ensuring no spillage of leachate into monsoon drain.</p>	
				Scrap iron	Dispose as sale to assigned vendor by Regional office. Recycle where appropriate for workshop maintenance	
				POME	<p>Treated in effluent plant. The final discharge from the treatment plant is used for water discharge.</p> <p>Effluent quality monitoring on monthly basis.</p> <p>The monitoring of the effluent discharge is reported to DOE on monthly and quarterly basis. This practice is accordance with the requirements in the written approval issued by DOE.</p> <p>Review of the results revealed that the quality of the effluent discharge is in within the regulatory limit.</p>	
				Boiler ash	<p>Disposed to designated dumping site near holding pond</p> <p>Daily leveling monthly using backhoe.</p>	

		2	Scheduled Waste	SW305/306/102/ 410/109 SW 409 /410 /322 /429	Clean and tidy storage area Separation of type SW using labels 10cm x 10cm To ensure spillage trap functions effectively Monthly stock verification by executives Ensure inventory not exceeding 180 days / 20 mt Follow approved consignment note and update in ESWIS. Provide training to the SW handlers.	
		3	Domestic Waste	Rubbish/garden waste	Disposal made 2x /week for both mill/estate on a different day. Encourage 3R program – disposal via estate landfill. Provide adequate dustbins line sites /office complex. Weekly inspection by MA/executives Awareness on hygiene.	
				Landfill site	Chaah Mill/Estate – P2000C SSK Estate – P2003 N Labis Estate – P1999	
				Sewage	Provide adequate washrooms/toilets at mill and line sites To ensure employees’ quarters equipped with appropriate septic tank. Cleaning/desludging septic tank done by appointed contractor.	

Criterion / Indicator	Assessment Findings	Compliance
Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.		

<p>5.4.1</p>	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2019. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1" data-bbox="978 491 1832 1013"> <thead> <tr> <th>No</th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe, tractor</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van / Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>to record vehicle activity in order to eliminate waste activity which consume fuel. to turn off vehicle engine during idle time.</td> </tr> </tbody> </table> <p>The diesel utilisation for the mill and estates is provided in the below table. There is a baseline established with commentary provided for any high variation.</p> <table border="1" data-bbox="978 1177 1832 1377"> <thead> <tr> <th colspan="5">Chaah Mill – Baseline = 0.18</th> </tr> <tr> <th>No</th> <th>Month</th> <th>FFB processed</th> <th>Diesel/L</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>July 18</td> <td>9196</td> <td>1708</td> <td>0.19</td> </tr> <tr> <td>2</td> <td>Aug 18</td> <td>11176</td> <td>2769</td> <td>0.25</td> </tr> <tr> <td>3</td> <td>Sept 18</td> <td>13573</td> <td>1890</td> <td>0.14</td> </tr> </tbody> </table>	No	Target	Objective	Action plan	1	Backhoe, tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to record vehicle activity in order to eliminate waste activity which consume fuel. to turn off vehicle engine during idle time.	Chaah Mill – Baseline = 0.18					No	Month	FFB processed	Diesel/L	Diesel/FFB	1	July 18	9196	1708	0.19	2	Aug 18	11176	2769	0.25	3	Sept 18	13573	1890	0.14	<p>Complied</p>
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		4	Oct 18	14657	2139	0.15
		5	Nov 18	12989	3052	0.23
		6	Dec 18	12752	1284	0.10
		7	Jan 19	12273	753	0.06
		8	Feb 19	11333	855	0.08
		9	Mac 19	10821	1437	0.13
		10	April 19	10767	1084	0.10
		11	May 19	10160	1778	0.17
		12	Jun19	10956	918	
		Chaah Estate				
		No	Month	FFB processed	Diesel/L	Diesel/FFB
		1	July 18	3874	5871	1.52
		2	Aug 18	3739	6439	1.72
		3	Sept 18	4603	7373	1.59
		4	Oct 18	5403	6593	1.22
		5	Nov 18	5066	8654	1.71
		6	Dec 18	4996	9561	1.91
		7	Jan 19	4559	7928	1.74
		8	Feb 19	4093	6521	1.59
		9	Mac 19	3996	6993	1.75
		10	April 19	4496	8068	1.79
		11	May 19	4925	7583	1.54
		12	Jun19	4602	4380	1.07
		North Labis Estate				
		No	Month	FFB processed	Diesel/L	Diesel/FFB
		1	July 18	2806	5878	2.09

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		2	Aug 18	4429	6737	1.52
		3	Sept 18	6244	7278	1.17
		4	Oct 18	6165	8441	1.37
		5	Nov 18	5755	8747	1.52
		6	Dec 18	5764	7408	1.29
		7	Jan 19	5254	10384	1.98
		8	Feb 19	5026	7920	1.58
		9	Mac 19	4508	5804	1.29
		10	April 19	5206	8253	1.59
		11	May 19	4382	6146	1.40
		12	Jun19	3489	7270	2.08
		Sg Spg Kiri Estate				
		No	Month	FFB processed	Diesel/L	Diesel/FFB
		1	July 18	2618	9248	2.53
		2	Aug 18	2963	8235	2.78
		3	Sept 18	3968	6942	1.75
		4	Oct 18	4108	17029	4.14
		5	Nov 18	3433	13527	3.94
		6	Dec 18	3053	13612	4.46
		7	Jan 19	2730	11483	4.21
		8	Feb 19	2712	10272	3.79
		9	Mac 19	2752	5358	1.95
		10	April 19	2777	10449	3.76
		11	May 19	2909	6071	2.09
		12	Jun19	3066	7545	2.46
		The record of fibre and shell consumption for the mill is tabulated below;				

Criterion / Indicator		Assessment Findings					Compliance
		Chaah Mill					
		Month	FFB processed	Fibre	shell	total	F&S/FFB
		1 July 18	9196	1765	478	2243	0.24
		2 Aug 18	11176	2145	581	2727	0.24
		3 Sept 18	13573	2606	705	3311	0.24
		4 Oct 18	14657	2814	762	3576	0.24
		5 Nov 18	12989	2493	675	3169	0.24
		6 Dec 18	12752	2448	663	3111	0.24
		7 Jan 19	12273	2356	638	2994	0.24
		8 Feb 19	11333	2175	589	2765	0.24
		9 Mac 19	10821	2077	562	2640	0.24
		10 April 19	10767	2067	559	2627	0.24
		11 May 19	10160	1950	528	2479	0.24
		12 Jun19	10956	2103	569	2673	0.24
Criterion 5.5:							
Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.							
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	The Group policy of "Zero open burning" is enforced since July 2008. The operating units adhere to the policy of "Zero open burning" for any replanting, if any, in the estates. Field inspections made in Simpang Kiri Estate, North Labis and Chaah Estates field showed no evidence of open burning.					Complied

Criterion / Indicator	Assessment Findings	Compliance
5.5.2	<p>Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>- Minor compliance -</p>	<p>Fire was not used for preparing land for replanting at all visited estates.</p> <p>For example at Simpang Kiri Estate, stipulated in the contract under Appendix 2, dated 12/12/18 between Sime Darby Plantation Berhad and Hayati Enterprise. Only mechanized operation is allowed for the land preparation (felling, shredding, pulverizing and deboling). No phyto-sanitary disposal using fire allowed for pest outbreak.</p>
<p>Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>		

<p>5.6.1</p>	<p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="981 683 1852 1114"> <thead> <tr> <th></th> <th>Environment al receptors</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases), GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>land</td> <td>Land – Scheduled waste, domestic waste and industrial / process waste.</td> </tr> <tr> <td>4</td> <td>Clinical waste</td> <td>Clinical wastes – generated from clinics.</td> </tr> </tbody> </table> <p>The estates monitor the nearby water courses quarterly extracted at random as follows;</p> <table border="1" data-bbox="981 1225 1852 1361"> <thead> <tr> <th colspan="8"><i>Sg Simpang Kiri Estate</i></th> </tr> <tr> <th>Date</th> <th>Samples</th> <th>pH</th> <th>BOD</th> <th>COD</th> <th>SS</th> <th>DO</th> <th>P+</th> </tr> </thead> <tbody> <tr> <td>17/6/19</td> <td>Upstream</td> <td>6.3</td> <td>6</td> <td>240</td> <td>6</td> <td>8.4</td> <td>0.028</td> </tr> </tbody> </table>		Environment al receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases), GHG emission from anaerobic processes (ETP, EFB dumping).	2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	land	Land – Scheduled waste, domestic waste and industrial / process waste.	4	Clinical waste	Clinical wastes – generated from clinics.	<i>Sg Simpang Kiri Estate</i>								Date	Samples	pH	BOD	COD	SS	DO	P+	17/6/19	Upstream	6.3	6	240	6	8.4	0.028	<p>Complied</p>
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Criterion / Indicator		Assessment Findings								Compliance
		17/6/19	Midstream	3.0	6	380	4	7.4	ND	
		17/6/19	d/stream	2.9	6	444	4	7.5	0.004	
			Standard	6-9	3	25	50	5-7	0.2	
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Chaah CU SOU 20 had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and vehicles operations. <ul style="list-style-type: none"> a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment. b) Fuel Consumption, Peat Oxidation, and POME and reported in the Palm GHG Summary Report. Details of calculations as provided in appendix C 								Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Details as provided in appendix C attached herein.								Complied
Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.										
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.										

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Criterion / Indicator		Assessment Findings	Compliance
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Social & Environment Projects Unit, PSQM Department has carried out Social Impact Assessment for whole SOU 20 Chaah region on 6-9/4/2015, which included Chaah POM, Chaah Estate, North Labis Estate and Sungai Simpang Kiri Estate. The techniques for the assessment were field observation, interview and documentation review. The assessment has involved the affected stakeholders such as government authorities and internal workers. The findings raised during the assessment were recorded in the report.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	The assessment has carried out with the participation of affected stakeholders such as government authorities and internal workers. Seen the attendance list that attached in the assessment report. Latest stakeholder meeting was found held combination of all the estate and POM dated 09.08.2019. Minutes of Stakeholder Meeting 'Ladang Chaah' dated 09.08.2019 @ 330pm @ Clubhouse, Chaah Estate sighted. Case specific - Stakeholder meeting for North Labis is conducted with cattle owner dated 28.12.2017, 18.05.2019, 20.08.2019 to discuss issues related to damages caused by cows and 19.06.2019 for issue related to construction of electrical fencing.	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	Done on yearly basis and updated as necessary. The stakeholder meeting held on 09.08.2019 contributes to the review and documented in Management Plan (Chaah Estate and Mill).	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The management plan was reviewed once a year and the last review was conducted on : <ul style="list-style-type: none"> - 26.07.2019 covering Chaah POM (based on the Local Union meeting and issues raised by the Union team and issues identified in the SIA), - 03.08.2019 in Sungai Simpang Kiri Estate, - 23.07.2018, 18.09.2018, 03.07.2017 in North Labis Estate, - 30.05.2019 in Chaah Estate. Review of the plan covers the issues identified in the SIA as well as feedback and issues raised during the stakeholder meeting. E.g. Chaah Estate stakeholder meeting dated: 05.09.2018, 09.08.2019.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	There was no scheme smallholders involved in the certification unit.	Not applicable
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	Sime Darby Plantation Berhad has implemented Procedure for External Communication (Sub-section 5.5, Appendix 5.5.3.2, ver. 2 dated 25.05.2015) where the purpose of the procedure is to put in place a system to effectively communicate with external interested parties on matters pertaining to QSHE performance of the estate. Time frame for dealing and provide feedback to the external communication was within two weeks of the date of receipt for communication that require direct feedback and within one week of the completion of investigation for communication that required investigation.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.2.2 A management official responsible for these issues shall be nominated. - Minor compliance -</p>	<p>Management official responsible for social related issues is nominated to :- Mr. Mohd Anis Fauzan Bin Pisal (Assistant Engineer). Appointed letter dated 26.06.2019 in place " Perlantikan Sebagai Pegawai Rasmi Yang Bertanggungjawab Ke Ata Isu-isu Social Kilang Kelapa Sawit Chaah"</p> <p>Mr. Ahmad Shafiq Bin Che Rameli (Assistant Manager). Appointed letter dated 01.01.2018 in place " Perlantikan Sebagai Pegawai Rasmi Yang Bertanggungjawab Ke Atas Isu-isu Social Ladang Sungai Simpang Kiri"</p> <p>Mr. Mohd Syauqi Bin Mahmud (Assistant Manager). Appointed letter dated 01.07.2019 in place " Perlantikan Sebagai Pegawai Rasmi Yang Bertanggungjawab Ke Atas Isu-isu Social untuk Ladang North Labis"</p> <p>Mr. Mohammad Faiz Bin Nazri (Senior Assistant Manager). Appointed letter dated 01.07.2018 in place " Perlantikan Sebagai Pegawai Rasmi Yang Bertanggungjawab Ke Atas Isu-isu Social untuk Ladang Chaah"</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>6.2.3</p> <p>A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.</p> <p>- Minor compliance -</p>	<p>Stakeholder list was developed covering contractors, suppliers, vendor, local communities, vendor, government authorities and NGO.</p> <p>Chaah POM has implemented External Communication Logbook to record request from external stakeholders. 2 issues were raised for the past 12 months; i.e. road to the factory is not in good condition and sterilizer station lighting is not working. Action taken and status of the actions have been recorded in the logbook. For estates, 'Communication Book External' is introduced to record all communication and complain raised by stakeholder.</p> <p>Stakeholder meeting was organized once a year and the last meeting was conducted on 09.08.2019 after 5/9/2018 with the participation of stakeholders such as local communities, government authorities, smallholder and contractor in Chaah POM and Chaah Estate. Meeting minutes was sighted and issues reported were recorded. Action plan was developed in the meeting minutes.</p> <p>North Labis Estate has organized 1 stakeholder meeting involved the affected parties such as cattle's owners only and carried out on 28.12.2017, 18.05.2019, 20.08.2019; and 19.06.2019 for specific issue related to construction on completion of electrical fencing and cattle issues.</p>	<p>Complied</p>
<p>Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.</p>		
<p>6.3.1</p> <p>The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has developed and implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 1/11/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	<p>Mill - 3 complains for year 2019 as at year to date and 19 cases for year 2018 which are closed and communicated to relevant team.</p> <p>Simpang Kiri Estate – last complains received is year 2014. All cases found closed and communicated to relevant team. 'Buku Laporan Kerosakan Workers Housing Complex' sighted as at time of audit. All issues raised by the workers are rectified and documented.</p> <p>North Labis Estate – 8 cases were raised up to date of audit, where all cases are resolved. All internal complaints are documented in "BUKU Laporan Kerosakan Workers Housing Complex" and completed action are itemized (type of action taken, date of action taken, etc.) and documented in "Complaint Book".</p> <p>Chaah Estate – common internal complains are house repairs which is documented in "Borang Aduan Kerosakan Perumahan Pekerja / Kakitangan Pegawai Ladang". There are 9 complaints received is year 2019. All issues raised are closed and documented in the form.</p>	Complied
<p>Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	Sime Darby Plantation Berhad (SDPB) has developed Flowchart and Procedures on Handling Land Disputes, version 1 and issue date: 1/10/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.4.2	<p>A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land.</p> <p>- Minor compliance -</p>	Complied
6.4.3	<p>The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available.</p> <p>- Major compliance -</p>	Complied
<p>Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.</p>		

<p>6.5.1</p>	<p>Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>Mill and estate have employed local and foreign workers. All the mill and estates workers are under direct employment and under contract. The payslip has included basic pay, allowances, working days, deduction of salary such as Union, electricity, temple and mosque fund. Pay-slip for January 2019, July 2019 and October 2018 are sampled based on the crop summary as below:</p> <table border="1" data-bbox="981 603 1854 975"> <thead> <tr> <th colspan="2">Chaah POM</th> <th colspan="2">Sg. Simpang Kiri Estate</th> </tr> </thead> <tbody> <tr> <td>Emp. No.:</td> <td>93797</td> <td>Emp. No.:</td> <td>140364</td> <td>Emp. No.:</td> <td>142881</td> </tr> <tr> <td>Emp. No.:</td> <td>139339</td> <td>Emp. No.:</td> <td>140600</td> <td>Emp. No.:</td> <td>146043</td> </tr> <tr> <td>Emp. No.:</td> <td>137039</td> <td>Emp. No.:</td> <td>142559</td> <td>Emp. No.:</td> <td>147940</td> </tr> <tr> <td>Emp. No.:</td> <td>146048</td> <td>Emp. No.:</td> <td>149304</td> <td>Emp. No.:</td> <td>143244</td> </tr> <tr> <td>Emp. No.:</td> <td>146050</td> <td>Emp. No.:</td> <td>149739</td> <td>Emp. No.:</td> <td>143245</td> </tr> <tr> <td>Emp. No.:</td> <td>14640</td> <td>Emp. No.:</td> <td>118294</td> <td></td> <td></td> </tr> <tr> <td>Emp. No.:</td> <td>82280</td> <td>Emp. No.:</td> <td>118295</td> <td></td> <td></td> </tr> <tr> <td>Emp. No.:</td> <td>143247</td> <td>Emp. No.:</td> <td>118296</td> <td></td> <td></td> </tr> <tr> <td>Emp. No.:</td> <td>129419</td> <td>Emp. No.:</td> <td>142879</td> <td></td> <td></td> </tr> <tr> <td>Emp. No.:</td> <td>151720</td> <td>Emp. No.:</td> <td>142880</td> <td></td> <td></td> </tr> </tbody> </table> <table border="1" data-bbox="981 1007 1854 1369"> <thead> <tr> <th colspan="4">North Labis Estate</th> <th colspan="2">Chaah Estate</th> </tr> </thead> <tbody> <tr> <td>Emp. No.:</td> <td>134292</td> <td>Emp. No.:</td> <td>145610</td> <td>Emp. No.:</td> <td>137901</td> <td>Emp. No.:</td> <td>137610</td> </tr> <tr> <td>Emp. No.:</td> <td>104317</td> <td>Emp. No.:</td> <td>108294</td> <td>Emp. No.:</td> <td>138959</td> <td>Emp. No.:</td> <td>137611</td> </tr> <tr> <td>Emp. No.:</td> <td>152459</td> <td>Emp. No.:</td> <td>108297</td> <td>Emp. No.:</td> <td>143803</td> <td>Emp. No.:</td> <td>144464</td> </tr> <tr> <td>Emp. No.:</td> <td>118946</td> <td>Emp. No.:</td> <td>141369</td> <td>Emp. No.:</td> <td>108922</td> <td>Emp. No.:</td> <td>144465</td> </tr> <tr> <td>Emp. No.:</td> <td>129921</td> <td>Emp. No.:</td> <td>141371</td> <td>Emp. No.:</td> <td>108994</td> <td>Emp. No.:</td> <td>144466</td> </tr> </tbody> </table>	Chaah POM		Sg. Simpang Kiri Estate		Emp. No.:	93797	Emp. No.:	140364	Emp. No.:	142881	Emp. No.:	139339	Emp. No.:	140600	Emp. No.:	146043	Emp. No.:	137039	Emp. No.:	142559	Emp. No.:	147940	Emp. No.:	146048	Emp. No.:	149304	Emp. No.:	143244	Emp. No.:	146050	Emp. No.:	149739	Emp. No.:	143245	Emp. No.:	14640	Emp. No.:	118294			Emp. No.:	82280	Emp. No.:	118295			Emp. No.:	143247	Emp. No.:	118296			Emp. No.:	129419	Emp. No.:	142879			Emp. No.:	151720	Emp. No.:	142880			North Labis Estate				Chaah Estate		Emp. No.:	134292	Emp. No.:	145610	Emp. No.:	137901	Emp. No.:	137610	Emp. No.:	104317	Emp. No.:	108294	Emp. No.:	138959	Emp. No.:	137611	Emp. No.:	152459	Emp. No.:	108297	Emp. No.:	143803	Emp. No.:	144464	Emp. No.:	118946	Emp. No.:	141369	Emp. No.:	108922	Emp. No.:	144465	Emp. No.:	129921	Emp. No.:	141371	Emp. No.:	108994	Emp. No.:	144466	<p>Complied</p>
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		Emp. No.: 141474	Emp. No.: 125516	Emp. No.: 141446	
		Emp. No.: 141475	Emp. No.: 125520	Emp. No.: 141448	
		Emp. No.: 145603		Emp. No.: 141450	
		All the sampled workers have achieved the Minimum Wage Order 2018 of RM 1100/month or RM 42.31/day.			
6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -	<p>Employment contract are available and explained in language that understood by workers. The contract was signed by the workers and a copy of the contract is made available to them. Employment contracts for all the sampled as listed in 6.5.1 reviewed.</p> <p>For foreign workers, their contracts are issued in dual language –English and their national language except Myanmar worker. However the condition of the contracts are explained to them by the management during the orientation training.</p> <p>Interviewed with the workers confirmed that they were understood on the terms and conditions outlined in the employment contract.</p>			Complied

<p>6.5.3</p>	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –</p>	<p>Workers are provided with houses that is equipped with necessity when they join the company; i.e. kitchen utensils, bed, cooking facility, etc. Each of the house is supplied with free water supply from SAJ (Syarikat Air Johor), while electricity sourced from TNB (National electric power supply – Tenaga National Berhad) is at workers expenses.</p> <p>Line site inspection found carried out on weekly basis by nominated responsible person for mill and all selected estates; and documented in “Housing Complex/ Nest/ Community Hall Inspections” form. Seen the inspection report which is consistently being carried out on weekly basis. Each individual report generated by the inspector represent all the houses available. All selected form/report has clean result without any issue reported. Below list of responsible person and sampled report.</p> <ul style="list-style-type: none"> - Chaah Mill : Supervisor (Anif Rizal B Marzuki) Verified by : Assistant Engineer Report date : 14.08.2019, 01.08.2019, 24.07.2019, 17.072019, 10.07.2019. - North Labis : Field Supervisor – Affendi Esnin. Verified by : Assistant Manager Report date : 10.08.2019, 03.08.2019, 27.07.2019, 20.072019, 13.07.2019 - Sg. Simpang Kiri : Medical Assistant (Mr. Azhar Ahmad) Verified by : Estate Assistant Manager. Report date : 13.08.2019, 06.08.2019, 30.07.2019, 23.07.2019. - Chaah Estate : Hospital Assistant Verified by : Senior Assistant Manager Report date : 14.08.2019, 08.08.2019, 01.08.2019 <p>Clinic, crèches and other facilities such as football field were provided to the workers. School bus service is arranged by the company to transport</p>	<p>Minor nonconformance</p>
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		<p>worker’s children to nearby Government schools; fees of the school bus is deducted from workers salary on monthly basis.</p> <p>“Buku Laporan Kerosakan Worker’s Housing Complex” is available recording all damages raised by the workers and found rectified accordingly. E.g. Sungai Labis – Damages toilet floor and sink dated 25.07.2019 and repairs completion is documented.</p> <p>However,</p> <ul style="list-style-type: none"> - Non compliance with Pekeling Bil: 02FY/16 – Perturan Keselamatan dan Kesihatan Pekerjaan Di Kawasan Linesite Pekerja Mengikut Piawaian Rountable Sustainable Palm Oil dated 18th Sept 2015; Adalah menjadi kesalahan sekiranya pekerja: Clause 1 – Menyimpan tong tong racun dan tong tong minyak di dalam atau di sekitar rumah. <p>Line-site weekly inspection found not effective. Despite weekly line-site inspection is carried out and documented in Housing Complex/ Nest/ Community Hall Inspections form; there are several issues found as:-</p> <p><u>Chaah POM</u></p> <ul style="list-style-type: none"> - Selected foreign workers houses found inadequately maintained. E.g. Hostel 14B – toilet and cooking area found not clean, roof (ceiling) broken. - Line site tour sighted several houses were found with kitchen local exhaust vent/chimney cover broken, which causes rain water drips directly into the kitchen area. <p><u>Sungai Simpang Kiri Estate</u></p> <ul style="list-style-type: none"> - All selected houses found with 1 to 2 containers filled with petrol. These drums either found kept inside the bedroom or at the living room. - 1 of the fire extinguisher at the Bangladesh house found with low pressure. Toilet door in the house was found damaged (hinges dismantled) 	
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - 1 of the Nepalese house found with roof leaking at the kitchen area, while bedrooms roof found with dirt dropping from the edges onto their beds. - Several selected foreign workers houses found with broken glass windows. <p><u>North Labis Estate</u> All selected hostel found with drums filled with petrol, kept in the bedroom.</p>	
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance –	There were sundry shops located in the estates compound and the estates are nearby to the nearest town. The workers can easily access to adequate, sufficient and affordable foods and goods. Price of goods were displayed at the sundry shops. Workers interview confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their transport until the main guard post and public transport to the nearest town.	Complied
<p>Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			

Criterion / Indicator	Assessment Findings	Compliance
6.6.1	<p>A published statement in local languages recognising freedom of association shall be available.</p> <p>- Major compliance -</p> <p>Sime Darby Plantation Berhad has implemented Social Policy dated January 2015 where the management is committed and respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively. The policy is developed in English and signed by the Managing Director – Datuk Franki Anthony Dass.</p> <p>The policy was also developed in Bahasa Malaysia that states company commitment towards the policy and quotes of local law related to the Union requirement. The policy has been briefed to 94 workers and contractors during town hall Safety and Health meeting dated 16.04.2019 and displayed at the notice board outside the office. Interviewed with the workers confirmed that they understood on the policy and aware that they are freely to join any association.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -</p>	<p>Chaah POM has organized meeting with NUPW representatives to discuss the workers' issue on 25.07.2019 with meeting minutes documented. Issues such as cleanliness in the canteen, road and water issues were discussed in the meeting. The management has developed an action plan for the issues raised.</p> <p>For North Labis Estate, the meeting between management and NUPW representatives was conducted on 23.07.2019. Meeting minutes was sighted, attended by 2 union representative and 2 management representative that discuss topic about workers house repairs, replacement of holidays and work performance. No other issue were raised. Interview with union representative confirmed that he has attended the meeting accordingly.</p> <p>Sungai Simpang Kiri Estate's management has carried out meeting with the NUPW representatives at least once a year to discuss welfare of the workers. The last meeting conducted on 27.02.2019 with total 9 participants including management and workers' representatives. Meeting minutes sighted and no major issue has been raised during the meeting with the management, except some clarification such as sick leave entitlement, subsidy of NUPW, etc.</p> <p>Union meeting organized and completed on 27.07.2018 with total 10 participants from Chaah Estate and Union representative. No issue reported during the meeting, except disruption of water supply by the SAJ (Syarikat Air Johor), recycling program for waste generate from houses and house roof repair works. Reviewed 'Aduan Kerosakan Perumahan Pekerja / Kakitangan Pegawai Ladang' confirmed that necessary action plan are taken.</p>	<p>Complied</p>
<p>Criterion 6.7: Children are not employed or exploited.</p>		

Criterion / Indicator		Assessment Findings	Compliance
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	<p>Sime Darby Plantation Berhad has developed Child Protection Policy and Social Policy dated January 2015 where they are committed to comply with the minimum age of employees.</p> <p>The policy has been briefed to all the workers during Town Hall Meeting dated 16.04.2019 for Chaah Mill and POM, 6, 8, 16, 28.06.2019 in Sungai Simpang Kiri Estate and 09.04.2019 in Chaah Estate.</p> <p>The policy was displayed at the notice board outside the office. Document reviewed on the master listing of the employees found that all workers employed were above 18 years old. Interviewed with the workers confirmed that no child labour was found in the plantations.</p> <p>All workers age are verified against government issue photo ID during interview process while foreign workers are screened by the immigration before permits are issued.</p>	Complied
<p>Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p>			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	<p>SDPB has implemented Social Policy, Social & Humanity Management Policy dated January 2015 & Social Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.</p> <p>The policy has been briefed to all the workers on 04.09.2018 & 16.04.2019 during town hall meeting for Chaah POM workers, 6, 8, 16, 28.06.2019 in Sungai Simpang Kiri Estate and 09.04.2018 in Chaah Estate. The policy was found displayed at the notice board outside the estate and mill office.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Interviewed with the workers consisted of different nationalities and different gender confirmed that they are treated equally without any discrimination. The workers were provided with standard treatment such as free medical treatment, fair overtime offered to all the workers whoever want to work and free housing to everyone.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	<p>Workforce Management Unit Liaison and Recruitment, Doc. No.: WMU/LR-SOPP/March2016, Version 0, Dated 30.03.2016. Section 3.1.13 – LR13 – Recruitment Drive & Interview Selection of Foreign Workers. Sime Darby is currently in progress of drafting a recruitment procedure that is currently under review; i.e. ‘Responsible Recruitment Procedure’ Draft 4.</p> <p>The recruitment process was clearly stated in the procedure where hiring is based on work experience, skill, minimum age, medical fitness and etc. There is no any discrimination based on religion, gender, nationality and etc. during their recruitment.</p> <p>Noted medical check during pre-employment required applicant to declare their last menstrual date. However, policy of checking purpose is clearly defined in the policy, that it is meant to ensure pregnant and breast feeding workers shall not be assigned to hazardous task, handling pesticide and other chemicals.</p>	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			

Criterion / Indicator		Assessment Findings	Compliance
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Sime Darby Plantation Berhad (SDPB) has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. Briefing of the policies was conducted during town hall safety and health meeting dated 16.04.2019. Besides, policy is displayed at the notice board. Selected workers interview states that no sexual harassment and violence practices ever encountered by them throughout their service in the estate and mill.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	SDPB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. Policy is communicated to all levels of workers and during the gender meeting dated 4/5/2019 in Sungai Simpang Kiri Estate and 09.04.2018 in Chaah Estate town hall training. The policy was displayed at the notice board outside the mill and estates office.	Complied

<p>6.9.3</p>	<p>A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -</p>	<p>Grievance mechanism is in place which respects anonymity and protects complaints based on Flowchart and Procedure on Handling Social Issues, version 1 and dated 1/11/2008 and Gender Committee Handbook First Edition year 2014. Procedures and Committee Handbooks are communicated to all members and workforce during induction and thru gender committee refresher training. E.g. Chaah Estate - Refresher training on Gender policy and method or reporting last done on 05.08.2019 with total of 32 participation.</p> <p>Gender Committee established in Estate Sg. Simpang Kiri, chaired by Ms. Maruti Saleha (Store Clerk). Appointment letters of the chairperson dated 19.04.2019, meeting minutes & organization chart of the committee were sighted.</p> <p>Meeting found conducted quarterly on 02.8.2019, 04.05.2019, 04.02.2018 & 02.11.2018. Seen all the meeting minutes with no issue reported. Activities such as festival celebration, sport events, cooking workshop and other issues were proposed and discussed in the meeting as well. Interviewed with the female workers and Gender Committee Chairperson confirmed that no case of sexual harassment and violence reported.</p> <p>For Ladang North Labis Estate, the gender committee is chaired by Second Clerk. Appointment letter dated 18.07.2019 and meeting minutes sighted . Meeting held every quarterly; last meeting was conducted on 18.07.2019; no issue reported and mainly covers events and activities organized by the committee. Interview with chairperson noted aware of her task and able to explain the procedure on how to report issued and sexual harassment issues if there are any. "Gender Committee Handbook First Edition year 2014" is in place and presented by the chairperson.</p> <p>Gender Committee established in Chaah Estate and chaired by Puan Aminah Abas (Second Clerk). Appointment letters dated 01.01.2019, meeting minutes & organization chart of the committee were sighted. Meeting held</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		every quarterly, e.g. 16.08.2019, 16.05.2019 & 14.02.2018. Seen all the meeting minutes with no issue reported. Activities such as cooking workshop, break fasting, Pap-Smear test, sport activities, etc. were proposed and carried out progressively based on objective evidences shown. Interviewed with the female workers confirmed that no case of sexual harassment and violence reported. Should there be any, they are aware of the reporting channel and method of reporting.	
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Chaah Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders.	Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	Chaah Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
6.10.3	<p>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>Chaah SOU20 receive and processes FFB from its own company estate only. The only contracts that exist are basically for suppliers and contractors, which based on SDPB Procurement and Finance template agreement / contract that specify terms of condition of payment, termination of contract, validity of the contract, etc.</p> <p>Sampled of contract agreements as below:</p> <ol style="list-style-type: none"> 1. Company No.: JM0584525-U dated 01.01.2019 for grass cutting activities in workers' quarters, water reservoir and mill compound which valid until December 2019. 2. Company No.: 46800-A dated 01.01.2019 for electrical inspection and facilities which valid until December 2019. 3. Company No.: 721668-U dated 01.01.2019 for workshop station which valid until December 2019 4. Company No.: JR0009890-P) dated 26.09.2018 for FFB transportation which valid until 31.08.2019. 5. Company : Hayati Enterprise Sdn Bhd, dated 11.12.2018 for Land Preparation for Replanting which work shall commence by 15.12.2018 to 15.03.2019. 6. Company No.: JR0009890-P) dated 01.11.2018 for hiring of machinery for contract work at North Labis Estate which valid until 31.12.2019. 7. Company No.: 628700-K dated 26.09.2018 for FFB Transportation at North Labis which valid until 31.08.2019. 8. Company No.: JM0542597-V dated 18.01.2019 for pruning/raking/transport FFB, Soil, fertilizer and hiring machineries at Chaah Estate which valid until 18.01.2021. 9. Company No.: JM0409369-D dated 26.09.2018 for transportation FFB at Chaah Estate which valid until 31.08.2019. 	Complied

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<p>6.10.4</p>	<p>Agreed payments shall be made in a timely manner. - Minor compliance -</p>	<p>Payments are made on a monthly basis within 30 days from the date of receipt of invoice from the transporter/ contractor, according to the payment terms and condition that is attached along with the Purchase Order issued. Supplier / Contractor invoices must reach SDPB Finance office or through estate or mill management according to the payment cycle; i.e. payment will be made on 8th ~10th if invoices submitted before and on 2nd of the month, or 27th to 29th if invoices submitted before and on 15th of the month. Sampled of invoices and payment voucher as below: <u>Chaah POM</u> - INV#19007 dated 31.07.2019 paid on 08.08.2019 with Doc.#1600039817 - INV#20201 dated 2707.2019 paid on 08.08.2019 with Doc.#1600039421 <u>Simpang Kiri Estate</u> - INV#RSKP01/05/2019 dated 14.05.2019 paid on 04.06.2019 with Doc.#1600028266 - INV#01.06.2019 dated 30.06.2019 paid on 08.07.2019 with Doc.#1600033491 <u>North Labis Estate</u> - INV#0392 dated 31.05.2019 paid on 01.06.2019 with Doc.#4300466790 - INV#0394 dated 31.07.2019 paid on 01.08.2019 with Doc.#4300473259 - INV#0393 dated 30.06.2019 paid on 01.07.2019 with Doc.#4300470079 <u>Chaah Estate</u> - INV# 0365&0370 dated 30.06.2019 paid on 08.07.2019 with Doc.#1600033250 - INV#0375 dated 30.07.2019 paid on 08.08.2019 with Doc.#1600039752 - PO#4300467436 dated 30.05.2019 paid on 04.06.2019 with Doc.#1600028127</p>	<p>Minor nonconformance</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - PO#4300470692 dated 30.06.2019 paid on 16.07.2019 with Doc.#1600035184 - PO#4300476086 dated 30.07.2019 paid on 08.08.2019 with Doc.#1600038860 <p>Generally all invoices received are processed promptly and paid on timely manner except 1 of the randomly selected payment found to be above the agreed term.</p> <p>Invoice#0361 & 0360 dated 30.05.2019 amounting MYR35,164.80 and MYR10,951.60 raised by Contractor Dewi Dairy Farm Trading for Pruning/raking/transport FFB / transport Soil / transport fertilizer / hiring machine sent to SDPB on 03.06.2019 and subsequently on 17.07.2019 with invoice attached; however no payment was made up to date of audit.</p> <p>Payment ledger generated from the system shows that invoice received on 17.07.2019 is captured into the system on 15.08.2019 and subjected for next payment cycle on 27.08.2019.</p> <p>Payment terms agreed in the agreement read as :- Clause 2.2 – The company shall pay the within fourteen (14) days of the date of submission of the statement showing the value of the workers carried out, supported with documents evidencing the same save in the event the company disputes the said payment and or the performance of the work by the contractor.</p>	
<p>Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.</p>		

Criterion / Indicator		Assessment Findings	Compliance
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	The mill and estates have made contribution to the local communities such as organized festival celebration, donation to temples, supporting the temple festival, etc. upon request received. Based on CSR File of the facility, e.g. North Labis Estate – the estate management have supported the local temples by supplying water during the festive, giving permission and supporting the school event - 'cross country run' in the estate route. Sungai Simpang Kiri Estate has organized activities such as dinner together with workers during fasting month, distribution of meat during festival season to workers.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	There were no scheme smallholders involved in the certification unit.	Not applicable
Criterion 6.12: No forms of forced or trafficked labour are used.			

<p>6.12.1</p>	<p>There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -</p>	<p>Passport is kept by the each management (POM and Estates); surrendered freely by the migrant workers (Myanmar, Bangladesh, Sri Lanka, India & Indonesia) for safety and security purposes. Workers may request for passport at anytime by completing the "Borang Passport 1 – Borang Pengambilan Passport" or get an assistance from the office personnel. Passport handling process is documented in 'Prosedur Pengendalian Passport Pekerja Asing',</p> <p>Version 1, dated 01.07.2017 and recorded in 'Logbook Pengambilan dan Penyerahan Semula Passport'. As at time of audit, there are 2 Indian workers passport issued to workers and 9 Indonesian workers passport collected to workers for personal use (Mill). This is evidence that workers may collect and have their own passport at any time they wish to without any restriction. "Consent for Passport Safekeeping" is in place for all migrant workers, in English and their native language. All migrant workers recruited in the mill and estates are recognized employment with Contract of Employment and valid work permit. Randomly selected work permit attached in the passport found registered as Plantation Worker category and remains valid.</p> <p>Sampled work permit as below:-</p> <p><u>Chaah POM</u></p> <ul style="list-style-type: none"> • Permit No: PE1291887, valid thru 28.08.2019 (Sazli) • Permit No: PE6541661, valid thru 05.02.2020 (Hilwan) • Permit No: PE6912183, valid thru 28.03.2020 (Abdulrahim) • Permit No: PE6912192, valid thru 29.03.2020 (Andika) • Permit No: PE6910294, valid thru 21.03.2020 (Barik) • Permit No: PE6910300, valid thru 20.03.2020 (SK) • Permit No: PE8382338, valid thru 05.08.2020 (Samir) • Permit No: PE6988300, valid thru 12.04.2020 (Supian) 	<p>Complied</p>
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		<p><u>North Labis Estate</u></p> <ul style="list-style-type: none"> • Permit No: PE7798361, valid thru 27.05.2020 (Amin Fayez) • Permit No: PE7798359, valid thru 27.05.2020 (Ali Mohammad) • Permit No: PE7239769, valid thru 27.05.2020 (Alom) • Permit No: PE8208054, valid thru 27.05.2020 (Kamal) • Permit No: PE7304930, valid thru 08.05.2020 (Sapa) • Permit No: PE7304986, valid thru 22.05.2020 (Ruslan) • Permit No: PE7574830, valid thru 15.05.2020 (Shivam) • Permit No: PE8186529, valid thru 06.09.2020 (Nuwan) <p><u>Sg Simpang Kiri Estate</u></p> <ul style="list-style-type: none"> • Permit No: PE6175857, valid thru 08.12.2019 (Mahara) • Permit No: PE6176569, valid thru 15.12.2019 (manik Halder) • Permit No: PE6178876, valid thru 19.12.2019 (Nasir) • Permit No: PE1294602, valid thru 29.07.2020 (Urvantha Beersab) • Permit No: PE7586283, valid thru 27.05.2020 (MD Tarikul Isalm) • Permit No: PE7586317, valid thru 27.05.2020 (Ali MD Tuahid) • Permit No: PE7586321, valid thru 27.05.2020 (Kalam Miah) • Permit No: PE9451236, valid thru 19.12.2019 (Sukri) <p><u>Chaah Estate</u></p> <ul style="list-style-type: none"> • Permit No: PE6178758, valid thru 12.01.2020 (Hilmi) • Permit No: PE6059939, valid thru 01.12.2019 (Sarder) • Permit No: PE6782504, valid thru 27.03.2020 (Adya Sabujj) • Permit No: PE6782508, valid thru 27.03.2020 (Modal Kuddus) • Permit No: PE8258808, valid thru 27.09.2020 (MD Harun) • Permit No: PE8367935, valid thru 04.09.2020 (Ram Milan) • Permit No: PE8186515, valid thru 03.07.2020 (Karyawan) • Permit No: PE1932259, valid thru 09.11.2019 (Rahim) 	
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Criterion / Indicator		Assessment Findings	Compliance
		No evidence of forced labour sighted in the facility. All work carried out in the facility is based on voluntary basis and workers may leave the facility if they refused to work overtime.	
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	Interviewed with the foreign workers confirmed that the terms and conditions in the contracts they signed in the origin / home country were the same as they signed in Sime Darby. There was no contract substitution occurred.	Complied

<p>6.12.3</p>	<p>Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -</p>	<p>There is no temporary workers in the facility. Migrant workers at current based on Workforce Management Unit Liaison and Recruitment, Doc. No.: WMU/LR-SOPP/March2016, Version 0, Dated 30.03.2016. Section 3.1.13 – LR13 – Recruitment Drive & Interview Selection of Foreign Workers. Sime Darby is currently in progress of drafting a recruitment procedure and under review; i.e. 'Responsible Recruitment Procedure" Draft 4.</p> <p>SDPB has implemented a Sime Darby's Human Rights Charter on 13/1/2017, version 3.0 where they committed as below:</p> <ul style="list-style-type: none"> • Providing equal opportunity • Respecting freedom of association • Eradicating any form of exploitation • Ensuring favourable working conditions • Enhancing Safety and Health • Respecting Community Rights and the Rights of Indigenous People • Protecting the Rights of Vulnerable People • Protecting the Rights of Children • Eliminating Violence and Sexual Harassment. <p>Induction training given to all the new workers during their arrival to the plantations. Terms and conditions stated in the employment contract, company's policies, safety and health at workplace, job scope and the culture in the company were briefed to the new workers. Provision of living quarters / hostel and benefits entitlement as per legal requirement clearly stated in the employment contract issued to all workers in understandable language.</p> <p>Seen the attendance list of the new workers who have attended the induction training dated 29.05.2019 in Chaah POM for 3 workers, 11.02.2019 for 7 workers, 10/8/2018 in North Labis Estate for total 36</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		workers, 17/8/2018 in Diamond Jubilee Estate for total 5 workers and 6, 8, 16, 28.06.2019 in Sungai Simpang Kiri Estate for total 231 workers.	
Criterion 6.13: Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	The Social and Humanity Management Policy, dated January 2015 & Sime Darby Human Rights Charter, Version 3.0 effective date 13.01.2017, covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations. The policy has been briefed to all the workers progressively; last training was found conducted on Town Hall Meeting dated 16.04.2019. The policy was displayed at the notice board outside the office.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable in Peninsular Malaysia.	Not applicable
Principle 7: Responsible development of new plantings			
Chaah Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this surveillance assessment. The immature areas are replanted area.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>North Labis Estate had the following projects;</p> <ol style="list-style-type: none"> a) Scout harvesting Husqvarna device introduced to increase productivity b) 2015b – construction of walking route on a river at Hutan Simpan Labis. <p>Chaah Estate</p> <ol style="list-style-type: none"> a) Introduction of Badang Grabber to enhance productivity in field collection b) Conversion of abestos roofing to zinc type for 10 units of workers quarters c) Rotor rain project – to increase water moisture in the field P02B/01A/01A1 of 186 ha via furrow and sprinkler system. <p>Chaah Mill</p> <p>The mill had the following plan in the process improvement installation for the current and forthcoming period;</p> <ol style="list-style-type: none"> a) Construction of effluent pond no 8, for further improvement of BOD and solids content. Current status is awaiting approval of commissioning from the DOE. b) Installation of belt press system also with the aim to reduce solids contents and further reducing the BOD level recently reduced to 100 mg/L <p>Continuous improvement plan –</p> <p>High kernel loss (reduce kernel loss from 0.15% to 0.13% per FFB)</p> <p>High kernel loss at winnower (reduce kernel loss from 0.19% to 0.12% per FFB)</p>	<p>Complied</p>

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Appendix B: Approved Time Bound Plan

SDP- RSPO Certification Status for Malaysia Operations

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	11-Aug-20	RSPO 550179	N.A
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	N.A
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	N.A
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	N.A
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	N.A
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	N.A
5a	Sg Samak		3 Mar '11	NA	NA	Mill was closed down.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	N.A
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	N.A
8	East	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543543	N.A
9	West	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543594	N.A
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Mill was closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020, MUTU – RSPO/091	N.A
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019, MUTU-RSPO/094	N.A
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049, MUTU-RSPO/092	N.A
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-855480	N.A
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	RSPO 541905	

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-19	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO- 819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO- 819157, RSPO 928188, 824 502 16051, MUTU-RSPO/093	N.A
17	Kempas	Jasin, Melaka	19 May '10	18-May-20	RSPO 005	N.A
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO- 819146, RSPO 591224	N.A
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-19	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	RSPO 550182	Mill was closed down.
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	N.A
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	N.A
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO- 819147, RSPO 591229	N.A
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042, BV-RSPO-20170705-01	N.A
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BV-RSPO-20170623-01	N.A
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	RSPO 547123	Mill was closed down.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-18	RSPO 537872	N.A
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	N.A
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	N.A
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	Mill was closed down.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Mill was closed down.
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO- 819166, MUTU-RSPO/053	N.A

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
32	Rajawali	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819167, RSPO 0020	N.A
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	N.A
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	N.A

Legends

Certification Withdrawal

NA - NOT APPLICABLE

Note: There are 2 certificate numbers for some SOUs due to transfer of CB.

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	SGS-RSPO/PC17-00005	N.A
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	3-Jul-18	MUTU-RSPO/027	N.A
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	N.A
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	N.A
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	N.A
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	N.A
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	MUTU-RSPO/002	N.A
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	N.A
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	N.A

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NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	N.A
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	30-Dec-16	MUTU-RSPO/009	N.A
13		BETUNG		1-April-14	1-April-19	MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU-RSPO/001	N.A
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	15-Mar-17	MUTU-RSPO/015	Cert. discontinued – supply bases extended to Rantau POM
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU-RSPO/020	N.A
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	N.A
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16	30-Nov-21	MUTU-RSPO/008	N.A
19		MANDAH		1 April 2014	1 April 2019	MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	N.A
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU-RSPO/018	N.A
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	N.A
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	3-May-18	MUTU-RSPO/026	N.A
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-19	MUTU-RSPO/044	N.A
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab. Sanggau, Kalimantan Barat	NA	NA	NA	N.A

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Legends

Pending Certification by RSPO EB	Mill down	closed
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NA - NOT APPLICABLE

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2018** for **Chaah POM** 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 **2018** for **Chaah Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.26
PKO	0

Extraction	%
OER	20.55
KER	5.12

Production	t/yr
FFB Process	144520.01
CPO Produced	29703.26
PKO Produced	0

Land Use	Ha
OP Planted Area	10304.93
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	10304.93

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	74738.51	0.52	13.52	0.48	0	0	74,738.51	1
CO ₂ Emission from fertilizer	9011.93	0.06	1.74	0.06	0	0	9,013.67	0.12
NO ₂ Emmision	6628.63	0.05	1.12	0.04	0	0	6,629.75	0.09
Fuel Consumption	952.81	0.01	0.20	0.01	0	0	953.01	0.02
Peat Oxidation	0	0	0	0	0	0	0.00	0
Sink								
Crop Sequestration	-68805.91	-0.48	-12.81	-0.45	0	0	-68,818.72	-0.93
Conservation Sequestration	0	0	0	0	0	0	0.00	0

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Total	22525.97	0.16	3.77	0.13	0	0	22,529.74	0.29
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*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO _{2e}	tCO _{2e} /tFFB
Emission		
POME	22891.21	0.16
Fuel Consumption	77.44	0
Grid Electricity Utilisation	1412.1	0.01
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	24380.75	0.17

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO _{2e}
PK from own mill	9354.88
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

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

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

Appendix D: General Chain of Custody Requirements for the Supply Chain

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Sime Darby Plantation headquarter has the physically handle the RSPO Certified Sustainable oil palm products. All trading, contract and sales are managed by Global Trade Marketing department at Sime Darby Plantation, HQ and held the palmTrace registration number for respective mill (Chaah Palm Oil Mill: RSPO_PO1000000190)	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Chaah POM is not a trading company. Therefore, this requirement is not applicable.	Yes
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	Sime darby Plantation Bhd held RSPO membership number: 2 10008-04-000-00 since 06 September 2004. Company has registered in palmTrace system as follows: Members ID – East Palm Oil Mill: RSPO_PO1000000190. License valid until 17/11/2019 Member category : Oil Mill	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Processing aids are not used in the milling process.	Yes
5.2 Supply chain model			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	The FFB suppliers are of RSPO certified estates which consists of Chaah POM certification unit and other Sime	Yes

		Darby group estates Declassification of the CPO or PK was done in accordance to the correct order.	
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Chaah POM only produced IP certified palm product and the sales of product were IP or conventional.	Yes
5.3. Documented Procedures			
5.3.1	<p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	<p>Procedure for supply chain has been established entitled "Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability" [appendix 15 of the Sustainable Plantation Management System (SPMS)], version 2, issue 5 dated April 2019. Among the subjects covered in the procedure are:</p> <ul style="list-style-type: none"> • Responsibilities • Control of documents & records • Delivery of FFB from the estate • Receiving FFB at the mill • Process monitoring • CPO and PK dispatch • Non-conforming products and/or documents • Product claims • Outsourced contractor • Training • Reclassification of mill's supply chain model • Production volume • Conversion factors • Internal audit • Complaints • Management review 	Yes
	<ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	<p>Among the records included in the procedures are:</p> <ul style="list-style-type: none"> • Weighbridge tickets 	Yes

		<ul style="list-style-type: none"> Dispatch of CPO/PK – weighbridge ticket, delivery order, shipping document Daily production report Record and balance All the records were found to be up-to-date. 	
	<ul style="list-style-type: none"> Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard. 	Addressed in the SOP for Sustainable Supply Chain and Traceability, clause 4.0. The assigned persons are the Head of Operating Unit where in this case the Mill Manager. Based on interview, the person in-charge was able to demonstrate the implementation of their procedures in accordance to the standard requirements.	Yes
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>Addressed in the SOP for Sustainable Supply Chain and Traceability, clause 17.0. Based on the procedure, the internal audit is to be conducted annually in accordance to Internal Audit Procedure (SD/SDP/PSQM/IAP).</p> <p>CAP process is documented under internal audit procedure, SD/SDP/PSQM/IAP rev:2 dated 1/11/17. The timeline for CAP submission and closure has yet to be followed, within 14 days from closing meeting and closure within 60 days for evidence verification by lead auditor. This CAP process has yet to be consistently followed for improvement.</p>	Yes
	<p>ii) effectively implements and maintains the standard requirements within its organization</p>	<p>Combined internal audit for supply chain was last conducted on 25/6/2019 by 3 internal auditor sourced from other department (PSQM). There were 3 major raised (RSPO SCC) as the results of the audit.</p>	Yes
5.4. Purchasing and goods in			

5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the DO is as follows:</p> <ul style="list-style-type: none"> • Consignment note no. (24441) • Estate’s names (North Labis – E134) • Date & time of delivery (27/7/19) • Field No. (99B) • No. of bunches (521 bunches) • Vehicle no. (JSU4684) • Seal no. (99865, 99866) • RSPO certificate no. – RSPO 548299 <p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> • Weighbridge ticket no.:137535 • Name of estates (North Labis – M112) • Field No. (99B) • Name of driver (anonymous) • Vehicle no. (JSU4684) • Date & time in/out (4:38 PM, 4:52 PM) • Total bunches (521 bunches) • Seal no. (107646) • Net weight (12.78 mt) 	Yes
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>The information was available in various documents such as delivery order and weighbridge tickets.</p>	Yes
	<ul style="list-style-type: none"> • The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required 	<p>The mill has a list of certified FFB suppliers which has the information about certificate number and validity period.</p>	Yes

	to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.	This is applied to both second and third party FFB suppliers [ref.: clause 7.2 of SOP for Sustainable Supply Chain and Traceability]	
	<ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	A check of the validity of supply chain certification of supplier is done via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org). Physical RSPO certificate for all diverted crops sent to Chaah Mill, e.g. from Ulu Remis and Hadapan POM certification unit need to be check prior to delivery.	Yes
	<ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	NA – this part is applicable for supply chain actor after refinery.	Yes
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	<p>Addressed in the SOP clause 10.0 Non-conforming Products and/or Documents. Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage and dispatch, the mill shall downgrade the materials in such order: IP to MB to conventional.</p> <p>Material received with insufficient information shall be treated as non-conforming documents. The documents shall be investigated, verified and corrected in order to allow processing of material. Authorization for release shall be by the mill manager.</p>	Yes
5.5. Outsourcing activities			
5.5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with	<p>No bulking facilities outsourced by the mill. Transporter for CPO and PK (JASA and JBL) was assigned by buyer.</p> <p>Syarikat Wijaya (Masai) Sdn Bhd, Ref: T/PEN/CPO/0215/001 dated 1/5/19 valid until 30/4/20.</p>	N/A

	<p>the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	Specific clause on RSPO requirements detail out under Annexure 5, RSPO standard.	
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	Not applicable. No outsourcing activity.	N/A
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	Not applicable. No outsourcing activity.	N/A
	<p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	Not applicable. No outsourcing activity.	N/A
	<p>d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p>	Not applicable. No outsourcing activity.	N/A
5.5.3	<p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.</p>	Not applicable. No outsourcing activity.	N/A

5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	N/A
5.6. Sales and goods out			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	<p>Chaah POM ensured the required information is available in document form. Sampled of PK contract: S/PSD/1904/CPO0222A dated 16/4/19, quantity 250 mt (delivery month – April 2019)</p> <ul style="list-style-type: none"> • The name and address of the buyer; XXX • The name and address of the seller: KKS Chaah, Chaah, Johor • The loading or shipment/ delivery date; e.g. 23/4/19 • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Crude Palm Oil (CPO) RSPO IP • The quantity of the products delivered; e.g. 41.07 mt • Any related transport documentation; e.g. Despatch note e.g. #009017 • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 548299 • A unique identification number: palm trace no. TR-ec482bd4-ad25 • Available in a few forms e.g. DN no., seal no., etc. <p>Bkt Benut POM ensured the required information is available in document form. Sampled of PK contract: S/C-PSD/1812/PK0708 dated 26/12/18, quantity 600 mt (delivery month – December 2018)</p>	Yes

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		<ul style="list-style-type: none"> • The name and address of the buyer; XXX • The name and address of the seller: KKS Chaah, Chaah Johor. • The loading or shipment/ delivery date; e.g. 26/12/18 • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Palm Kernel (PK) RSPO IP • The quantity of the products delivered; e.g. 36.17 mt • Any related transport documentation; e.g. Despatch note e.g. #008716 • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 548299 • A unique identification number: palm trace no. TR-1de37dfa- 2470 • Available in a few forms e.g. DN no., seal no., etc. 	
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>Information is complete and available in various documents such as sales contract, mill weighbridge ticket, delivery note, transporter collection order.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> • For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	<p>Review period from July 2018 to July 2019. Shipping announcement details refer to table C.</p>	<p>Yes</p>
<p>5.7. Registration of transactions</p>			

5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	<p>The registration of Palm Trace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the Palm Trace.</p>	<p>Yes</p>
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	<p>Summary of shipping announcement/confirmation is reported under table C and cross reference with table 7 and 8.</p> <p>Not applicable. Products are not sold beyond refinery.</p> <p>Conventional volume sold reported reconcile in 3 (three) monthly basis and reported under mass balance sheet.</p> <p>Final volume sold is based on shipping confirmation acknowledge by refinery or buyer.</p>	<p>Yes</p> <p>Not Applicable</p> <p>Yes</p> <p>Yes</p>
<p>5.8. Training</p>			

5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Training plan for 2019 were available which training for RSPO Supply Chain has been included. Training need analysis is done prior to development of training plan.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	Relevant personnel to supply chain implementation as defined by the CU are the personnel that involve in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor & assistant, weighbridge operators and security personnel. At Chaah POM case, 11 personnel were identified. The latest RSPO training was carried out on 29/5/2019 attended by other operating units representative. The refresher training was given by SQM personnel from HQ.	Yes
5.9. Record Keeping			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date and accessible.	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	As spelt out in its supply chain procedure, Clause 5.4, records are to be maintained minimum of two years.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Not applicable. The product of the facility is containing 100% palm oil.	N/A
5.10. Conversion factors			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates	Conversion factor of CPO and PK production is depending on the actual OER and KER. Last year's average from	Yes

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	which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	February to December 2018 were 20.55% (OER) & 4.53% (KER).	
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Yes
5.11. Claims			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims which explained in the Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019	Yes
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Chaah POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	N/A
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO.	Not applicable as no off-product claim made by Chaah POM as to date.	N/A

	Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rsपो.org' where the link must lead to the member's profile page.		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Chaah POM as to date.	N/A
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Chaah POM as to date.	N/A
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Chaah POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Yes
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Yes
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (Crude Palm Oil RSPO IP) and RSPO certificate number; RSPO 548299. Refer to weighbridge ticket number 008716 dated 23/4/19. This also applies to PK.	Yes
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:	Chaah POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Yes

	<p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>Chaah POM is producing crude palm product and does not involved in any labelling of end product and the presence of certified palm oil contained within a product. This requirement is for the next supply chain actor and not applicable for POM.</p>	N/A
Business to consumer communication			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.</p>	<p>No business to consumer communication on product specific claim made Chaah POM and only producing crude and unfinished product. This is not applicable for POM.</p>	N/A
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>No business to consumer communication on product specific claim made Chaah POM and only producing crude and unfinished product. This is not applicable for POM.</p>	N/A

6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made Chaah POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made Chaah POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made Chaah POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made Chaah POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made Chaah POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules	No business to consumer communication on product specific claim made Chaah POM and only producing crude and unfinished product. This is not applicable for POM.	N/A

	applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Yes
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	No SG claim made.	Yes
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Yes
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.	As to date, no RSPO trademark used by Chaah POM.	Yes
Messaging (IP)			

	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>As to date, no RSPO trademark used by Chaah POM.</p>	<p>Yes</p>
<p>MODULE B – MASS BALANCE SPECIFIC RULES</p>			
<p>Minimum Mass Balance content (MB)</p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Chaah POM is producing RSPO IP product and no MB claim made as to date</p>	<p>Yes</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>Chaah POM is producing RSPO IP product and no MB claim made as to date</p>	<p>Yes</p>
<p>Labelling and trademark (MB)</p>			

	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	<p>Chaah POM is producing RSPO IP product and no MB claim made as to date .</p>	<p>Yes</p>
<p>Messaging (MB)</p>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	<p>Chaah POM is producing RSPO IP product and no MB claim made as to date.</p>	<p>Yes</p>

	<ul style="list-style-type: none"> In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed. 		
	<p>Messaging NOT ALLOWED in storytelling in product-related communications: Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p>	<p>Chaah POM is producing RSPO IP product and no MB claim made as to date</p>	<p>Yes</p>
<p>MODULE C – PARTIAL PRODUCT CLAIMS</p>			
	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim. 	<p>Chaah POM is producing RSPO IP product and no MB claim made as to date.</p>	<p>Yes</p>

MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES		
	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made</p>	<p>Chaah POM is producing only RSPO IP product and no possibility of mixture inputs supplied. All infeed material (FFB) coming from RSPO certified estates.</p> <p>Yes</p>
	<p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p> <p>95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made</p>	<p>Chaah POM is producing only RSPO IP product and no possibility of mixture inputs supplied. All infeed material (FFB) coming from RSPO certified estates.</p> <p>Yes</p>
5.12. Complaints		
5.12.1	<p>The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.</p>	<p>Addressed in Section 18 of the supply chain SOP. Should there be any complaints from stakeholders pertaining supply chain issues, it will be handled through Procedure for External Communication in PQMS SOM Sub-Section 5.5 Appendix 5.5.3.2. There has been no complaint from any third party with regards to supply chain so far.</p> <p>Yes</p>
5.13. Management Review		
5.13.1	<p>The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.</p>	<p>RSPO SCC management review was last conducted on 28/6/2019. It was chaired by Mill Manager and attended by other estates manager, mill staff which include AMs, Head of AP, office clerk, lab supervisor, quality supervisor and mill supervisor.</p> <p>Yes</p>

5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	<p>Based on the minutes of meeting, the following agendas were adequately recorded:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. (item 1.8) • Customer feedback. (item 1.0.1) • Status of preventive and corrective actions. (item 1.8) • Follow-up actions from management reviews. (item 1.0.2) • Changes that could affect the management system. (item 3.0) • Recommendations for improvement. (item 4.0) 	Yes
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	<p>Discussion about the improvement of the effectiveness of the management system and its processes, and any resource needs were found to be included in the meeting minute.</p>	Yes

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

D.1 Definition			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
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&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.	Chaah palm oil mill received only certified FFB from supply base. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. No diversion crop received from other certified estate from February to December 2018.	Yes
D.2 Explanation			
D.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must 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	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.	Yes

	to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.		
D.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	Sime Darby Plantation Bhd held RSPO membership number: 1-0008-04-000-00 since 06 September 2004. Company has registered in PalmTrace system as follows: Members ID – Chaah Oil Mill: RSPO_PO1000000190. Licensee valid until 17/11/2019 with extension until 17/1/20. Member category : Oil Mill	Yes
D.3 Documented procedures			
D.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a. Complete and up to date procedures covering the implementation of all the elements in these requirements;	SOP for Sustainable Supply Chain and Traceability, Issue No:4, Dated September 2018 which covered control of documents and records, delivery of FFB from the estate, receiving FFB at the mill, process monitoring, CPO and PK despatch, non-conforming material/product, product claims, production volume, conversion factor, internal audit, outsourced contractor, training, reclassification of mill’s supply chain model, complaints and management review.	Yes
	b.The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site’s procedures for the implementation of this standard.	SOP for Sustainable Supply Chain and Traceability, Issue No:4, Dated September 2018 has identified every responsible personal who involved in the implementation RSPO Supply Chain Certification. The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirement	Yes
D.3.2	The site shall have documented procedures for receiving and processing certified FFBs.	SOP for Sustainable Supply Chain and Traceability, Issue No:4, Dated September 2018 which covered control of documents and records, delivery of FFB from the estate, receiving FFB at the mill, process monitoring, CPO and PK despatch, non-conforming material/product, outsourced contractor, training,	Yes

		reclassification of mill's supply chain model and production volume.	
D.4 Purchasing and goods in			
D.4.1	The site shall verify and document the tonnage and sources of certified FFBs received.	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified. Records verified by internal and external audit.</p> <p>The accompanying documents of incoming FFB from own estate are estate's weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate's ticket number were recorded in the mill's ticket number. For the review period of September 2018 to July 2019, no diversion crop received from other Sime Darby's certified estates.</p> <p>Sample of weighbridge tickets checked: i) Simpang Kiri Estate (E534) DO no. :14421, date: 27/7/19, A crop/field 2003A1, 2005B RSPO certificate number: RSPO 548299 Weight: 5.67 mt, lorry: BLM5626</p> <p>i)North Labis Estate (E-134) DO no. :24441, date: 27/7/19, A crop/field 99B RSPO certificate number: RSPO 543543 Weight: 12.78 mt, lorry: JSU4684</p>	Yes

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D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facility is aware of this procedure. There was no projected overproduction for the period under review from September 2018 to July 2019. 86.62 % of volume allocated has been used for the period of September 2018 to July 2019. Request for volume extension was made on 22/8/19; CPO : 1600 mt, PK: 90 mt.	Yes
D.5 Record keeping			
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. <i>IP Mill must report on real time basis.</i>	All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place. Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the FFB received. Records of certified FFB received verified during this audit. Sighted the Mass Balance Sheet monthly basis was updated with FFB receiving, FFB processed, CPO production and PK production	Yes
D.6 Processing			
D.6.1	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm product including during transport and storage to strive for 100% separation.	During this assessment it was confirmed that only certified source of FFB from own plantation is processed. This ensures that there is no possibility of mixing during processing.	Yes

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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit (July 2018- July 2019)				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Sept 18	13,526.63	N/A	13,526.63
2	Oct 18	14,800.19	N/A	14,800.19
3	Nov 18	12,962.30	N/A	12,962.30
4	Dec 18	12,833.60	N/A	12,833.60
5	Jan 19	12,116.61	N/A	12,116.61
6	Feb 19	11,371.05	N/A	11,371.05
7	Mar 19	10,775.48	N/A	10,775.48
8	Apr 19	10,656.49	N/A	10,656.49
9	May 19	10,288.43	N/A	10,288.43
10	June 19	10,920.40	N/A	10,920.40
11	July 19	11,809.22	N/A	11,809.22
12	Total	132,060.40	N/A	132,060.40

B. Monthly Records of Certified CPO & PK since the last audit (July 2018-July 2019)			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Sept 18	2,696.603	698.346
2	Oct 18	2,980.635	719.837
3	Nov 18	2,684.640	681.152
4	Dec 18	2,691.255	633.740
5	Jan 19	2,614.610	653.087
6	Feb 19	2,408.359	647.036
7	Mar 19	2,241.714	570.001
8	Apr 19	2,195.890	505.282
9	May 19	2,161.544	455.373
10	June 19	2,300.383	566.864
11	July 19	2,497.394	625.462
	Total	27,473.027	6,756.18

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C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) (July 2018-July 2019)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	September 2018	TR-3df3c202-3fd8, TR-ad57dc2c-e29f, TR-013ff1b7-12f0, TR-a15532a3-a5c5, TR-978029ca-7bfc, TR-6d248315-5003, TR-7707eb6a-5b35, TR-062c7914-7315, TR-02a24671-7cc1	2360.00	0
2	September 2018	TR-87797500-b0e3, TR-8bb50064-31a2	0	950.00
3	October 2018	TR-f54c0244-63bd, TR-c9513c55-e511, TR-19675db0-70af, TR-9b0d34a0-efb1, TR-1e780c49-1ddc, TR-189eab19-21d9	1474.77	0
4	October 2018	TR-81d45770-22f3, TR-af5ab1ba-b440, TR-bd8dce48-7c01, TR-ae9fc7d0-be6d, TR-f851801b-4006, TR-37942b2f-5955	811.51	0
5	October 2018	TR-1de37dfa-2470	0	550.00
6	November 2018	TR-395e94b4-0114, TR-8831f651-6afe, TR-b4f593ff-f76c, TR-597955cf-a1a2, TR-852981a1-341a, TR-7a593162-7c56, TR-67869073-8f29	1257.77	0
7	December 2018	TR-ba5af871-47f2, TR-8928987a-e743, TR-beb08250-9a51, TR-2e1b3b7f-3155, TR-f54c0244-63bd	1153.43	0
	December 2018	TR-6368375e-34d4	244.00	0
8	January 2019	TR-0e59991b-268f	200.00	0
9	February 2019	TR-11f6c676-0afc, TR-7aba1f96-7e9c, TR-4e1d2f63-3ff4, TR-75e900d9-cc50, TR-d44b5139-a69b, TR-520c80ba-7312, TR-a264a38f-8ca6, TR-	897.42	0

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		01ae32f7-3271, TR-f63944ea-7db4, TR-7570ac87-f1cc, TR-9363266a-c340, TR-3a43cb76-94a6, TR-79758b78-c04e, TR-bad813b2-0051, TR-1b72a188-f854, TR-6f01bc84-6f7b, TR-0dc96b29-50ef, TR-87156de0-48c5, TR-dde12921-be72, TR-e4fb92db-5823,		
10	April 2019	TR-6cb1dc0e-9a95, TR-d1873818-c7c1, TR-82693430-35a1, TR-ec482bd4-ad25, TR-f6bfe175-6e73, TR-87efff65-4f74, TR-dc2d04b7-4e3c, TR-5a4e28a3-9d1a, TR-b9f537f6-ba13, TR-6da3ca9f-9508	1829.94	0
11	April 2019	TR-ebf85dbe-55d4, TR-41facacd-1104, TR-ca668f63-f9e9, TR-5a06aac2-badb, TR-9ca2b9ec-54c2, TR-cec3851f-fae, TR-267b1cc7-fbe1, TR-f7e07e96-7b54	1421.32	0
12	May 2019	TR-0eef59d1-dff8, TR-1b606096-16b7, TR-66641e9d-2487, TR-71088b2d-a905, TR-1359abafe4-a6dc, TR-2d23589d-8872, TR-f9ce2499-16ac, TR-4f5635df-ab8e, TR-631b51d0-fa38, TR-5767e249-7698, TR-037f4c93-08f3, TR-1eda1775-d055, TR-4d8b3a01-88b2	2272.84	0
13	May 2019	TR-ea6e3506-1f9f, TR-9d82e6b7-caae, TR-7d5a665f-f933	450	0
14	June 2019	TR-12c9e93b-a2cd, TR-42586882-b37a, TR-eec35888-2781	791.06	0
15	July 2019	TR-e64ab8df-2554, TR-1e812821-1b92, TR-	1482.95	0

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		e66d9a12-78bd, TR-543cb844-5871		
		Total	16,647.01	1,500

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any) (July 2018-July 2019)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
Nil				

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) (July 2018-July 2019)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	A	10,500	0	
2	B	0	4,560	
10	Total	14,500	4,560	

F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any) (July 2018-July 2019)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
Nil			

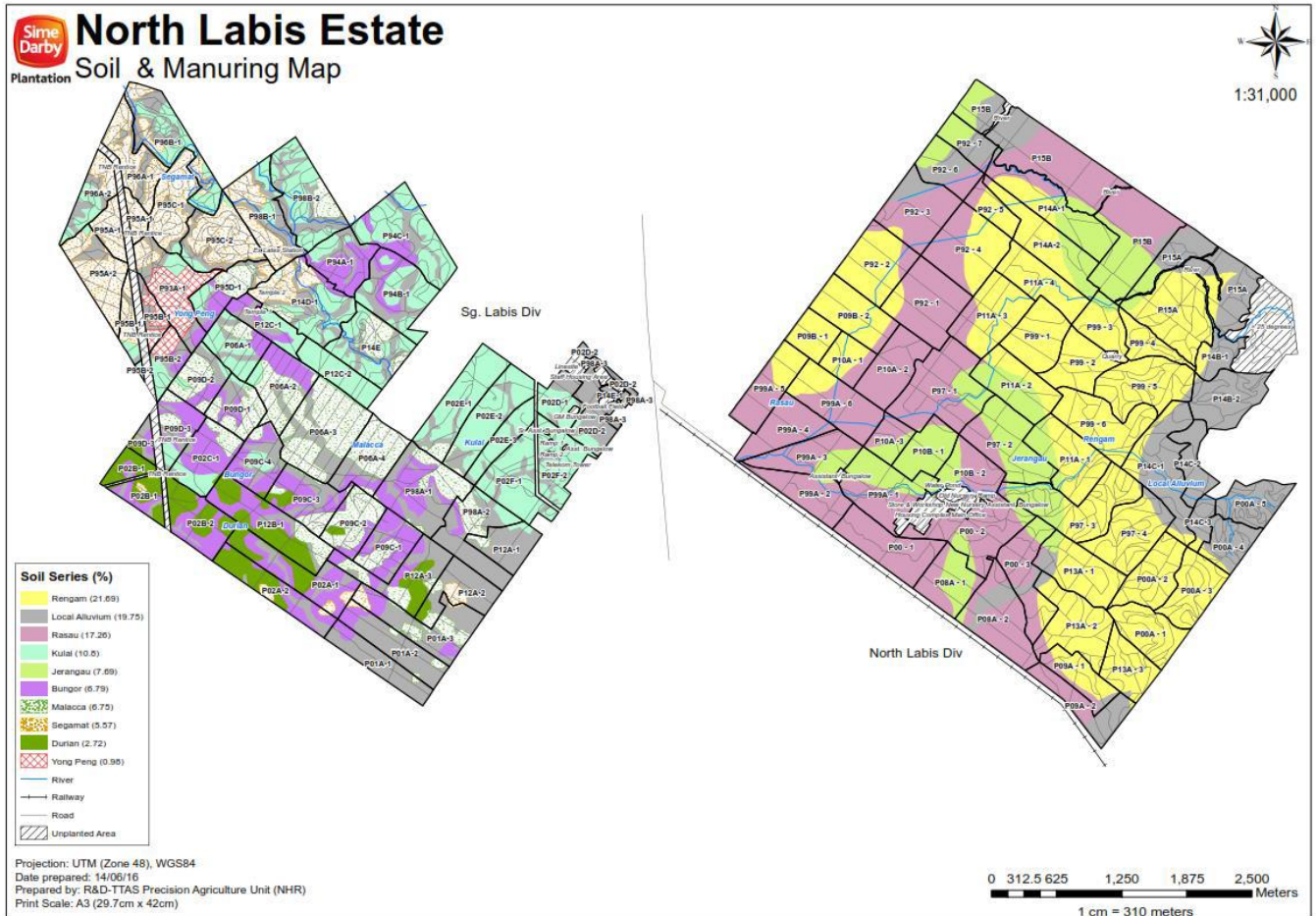
Appendix F: Location Map of Chaah Palm Oil Mill and Supply bases



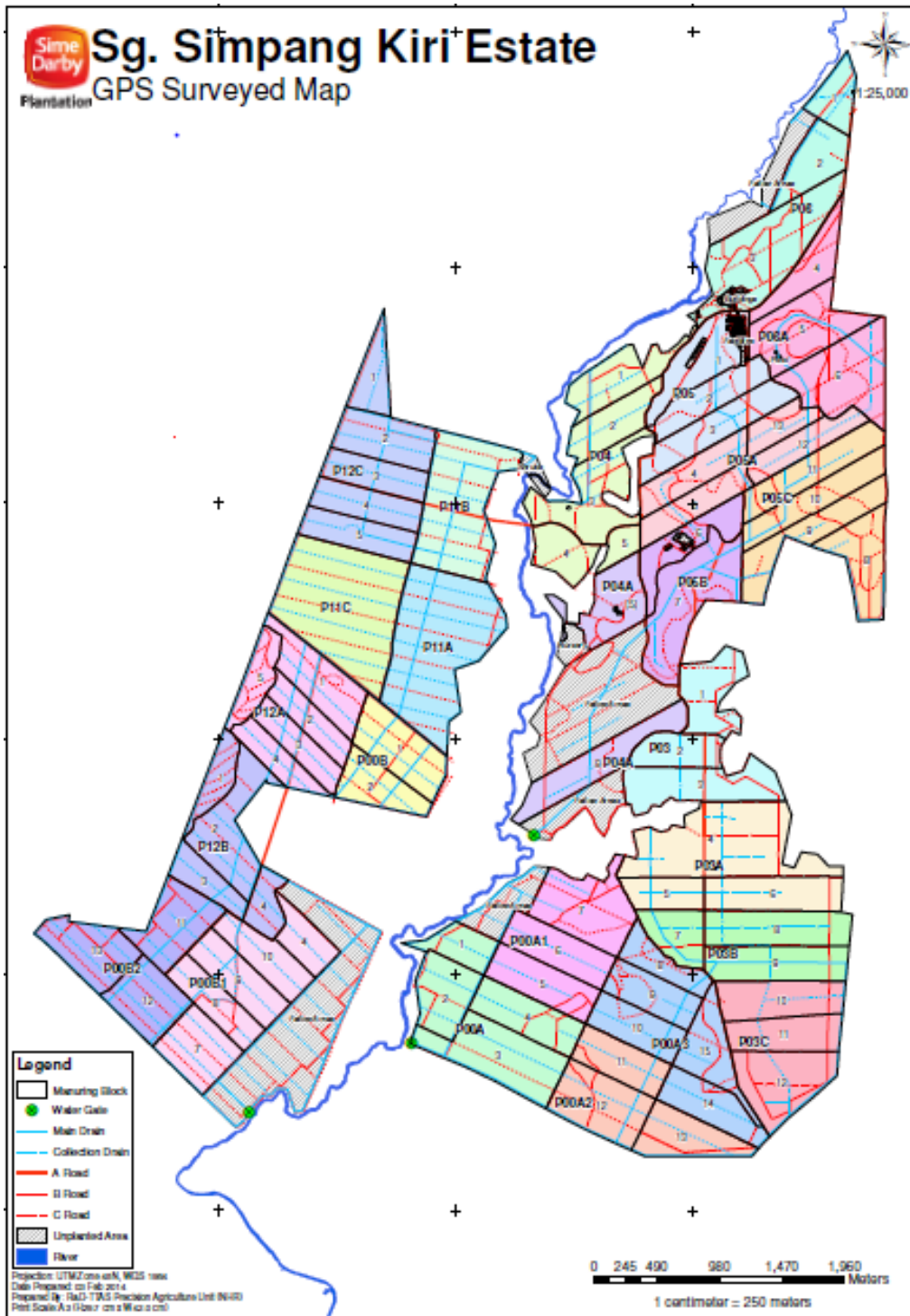
Appendix G: Chaah Estate Field Map



Appendix H: North Labis Estate Field Map



Appendix I: Simpang Kiri Estate Field Map



Appendix K: List of Smallholder Sampled *(If applicable – scheme/associated/group certification)*

Appendix L: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
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
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
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
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
SIA	Social Impact Assessment
SOP	Standard Operating Procedure