

**RSPO PRINCIPLE AND CRITERIA –
1st ANNUAL SURVEILLANCE ASSESSMENT (ASA1)
Public Summary Report**

FGV Holding Bhd
Client company Address: Sustainability, Compliance and Certification Department (SCCD) Group Sustainability Division (GSD) FGV Holdings Berhad Level W, Wisma FGV Jalan Raja Laut 50350 Kuala Lumpur Malaysia
Certification Unit: FGV Palm Industries Sdn Bhd Belitong Palm Oil Mill Location of Certification Unit: Kilang Kelapa Sawit Belitong KM 28, Jalan Kluang/Kota Tinggi 86000 Kluang Johor Darul Takzim

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0225-16-000-00	Membership Approval Date	27/12/2016
Parent Company Name	FGV Holdings Berhad		
Address	Sustainability, Compliance and Certification Department (SCCD), Group Sustainability Division (GSD), Level 20 (W), Wisma FGV Jalan Raja Laut 50350 Kuala Lumpur, Malaysia		
Subsidiary (Certification Unit Name)	FGV Palm Industries Sdn Bhd Belitong Palm Oil Mill		
Address	Certification unit : Kilang Kelapa Sawit Belitong, KM 28, Jalan Kluang/Kota Tinggi 86000 Kluang, Johor, Malaysia		
Contact Name	En Ameer Izyanif Bin Hamzah		
Website	http://www.fgvholdings.com	E-mail	ameer.h@fgvholdings.com
Telephone	+603 2859 1995	Facsimile	+603 2859 1311

2. Certification Information			
Certificate Number	RSPO 693230	Date of First Certification	07/02/2019
		Certificate Start Date	07/02/2019
		Certificate Expiry Date	06/02/2024
Scope of Certification	Palm Oil and Palm Kernel Production		
Applicable Standards	RSPO P&C 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E: Mass Balance)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 693232	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	20/05/2024
MSPO 693234	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		20/05/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude

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FGVPISB Belitong Palm Oil Mill	Kilang Sawit Belitong, KM 28, Jalan Kluang/Kota Tinggi 86000 Kluang, Johor	1° 56' 18" N	103° 29' 55" E
FGVPM Ladang Bukit Tongkat B	Ladang FGVPM Bukit Tongkat B, 86000 Kluang, Johor	1° 56' 29" N	103° 30' 14" E
FGVAS Ladang Ulu Belitong	Stesen FASSB Ulu Belitong, 86000 Kluang, Johor	1° 56' 22" N	103° 28' 39" E

5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
FGVPM Ladang Bukit Tongkat B	1,070.66	0	171.86	1,242.52	86%
FGVAS Ladang Ulu Belitong	124.28	3	6.14	133.42	95%
Total	1,194.94	3	178.00	1,375.94	87%

6. Plantings & Cycle

Estate	Age (Years)					Mature** (ha)	Immature (ha)
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
FGVPM Ladang Bukit Tongkat B	0	212.98	733.54	124.14	0	1,070.66	0
FGVAS Ladang Ulu Belitong	0	79.17	45.11	0	0	124.28	0
Total	0	292.15	778.65	124.14	0	1,194.94	0

7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year		
	Estimated (mt) (Feb 2019-Jan 2020)	Actual (mt) (Feb 2019- Oct 2019)	Forecast (mt) (Feb 2020-Jan 2021)
FGVPM Ladang Bukit Tongkat B	18,201	9,454.35	20,780.00
FGVAS Ladang Ulu Belitong	3,526	2,056.55	1,400.00
Total	21,727	11,510.90	22,180.00

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8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (mt) (Feb 2019-Jan 2020)	Actual (mt) (Feb 2019- Oct 2019)	Forecast (mt) (Feb 2020-Jan 2021)
Nil			
Total			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (mt) (Feb 2019-Jan 2020)	Actual (mt) (Feb 2019- Oct 2019)	Forecast (mt) (Feb 2020-Jan 2021)
FELDA		23,514.14	
FTPSB		64,893.76	
DEALER		101,177.57	
Total		189,585.47	

10. Certified Tonnage			
Mill Capacity: 50 MT/hr	Estimated (mt) (Feb 2019-Jan 2020)	Actual (mt) (Feb 2019- Oct 2019)	Forecast (mt) (Feb 2020-Jan 2021)
		FFB	FFB
	21,727.00 mt	11,510.90 mt	22,180.00 mt
SCC Model: MB	CPO (OER: 19.60%)	CPO (OER: 20.00%)	CPO (OER: 20.5%)
	4,258.49 mt	2,302.18 mt	4,546.90 mt
	PK (KER: 5.60%)	PK (KER: 5.00%)	PK (KER: 5.0%)
	1,216.71 mt	575.55 mt	1,109.00 mt

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	1,037.88 mt			0	1,037.88 mt

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)	142.12 mt			312 mt	454.12 mt

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,
59200 Kuala Lumpur
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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 11-14/11/2019. 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 14/02/2020 . 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.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as 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 (Initial Assessment)	Year 2 (ASA1)	Year 3 (ASA2)	Year 4 (ASA3)	Year 5 (ASA4)
FGVPISB Belitong Palm Oil Mill	✓	✓	✓	✓	✓
FGVPM Ladang Bukit Tongkat B	✓	✓	✓	✓	✓
FGVAS Ladang Ulu Belitong	✓	✓	✓	✓	✓

Tentative Date of Next Visit: November 16, 2020 – 19 November, 2020

Total No. of Mandays: 10.0 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>

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<p>Muhamad Naqiuddin Mazeli</p>	<p>Trainee Auditor Lead</p>	<p>He graduated with Bachelor of Science Horticulture at University Putra Malaysia. He started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability Executive. Joining the sustainability team, he managed, implemented and monitored the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupation Safety and Health of Northern Region Sime Darby Plantation Berhad operations. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health and workers consultation.</p>
<p>Nicholas Cheong</p>	<p>Team Member</p>	<p>Holds a Master Degree in Environmental Management from the University Putra Malaysia and Bachelor of Science (Food Science) from Charles Sturt University Australia. He has more than 7 years of working experience in sustainability auditing for palm oil industry and hydropower plant. He is also an expert in Greenhouse Gas emissions accounting. He has also 2 years of working experience in wastewater treatment and operations. He has completed the ISO9001, ISO14001, RSPO P&C Lead Auditor course, RSPO Supply Chain Lead Auditor Course, RBA Labor & Ethic Lead Auditor Course and MSPO Awareness Training. In his previous certification body, he was a Lead Assessor for Clean Development Mechanism, World Commission of Dam and ISCC. He had been involved in Sustainable Palm Oil auditing for more than 5 years. In this assessment, the focus element includes legal requirements, social and workers welfare, workers health and safety and supply chain. He is fluent in both verbal/written in English and Bahasa.</p>
<p>Elzy Ovktafia Chairul</p>	<p>Team Member</p>	<p>She graduated from Universiti Putra Malaysia in Diploma of Agriculture while Licentiate Diploma and Advanced Diploma from the Incorporated Society of Planters. She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO and MSPO for more than 3 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for MSPO, RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015, ISO 14001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During assessment, she covers supply chain elements for mill.</p>

Accompanying Persons:

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No.	Name	Role
	Nil	

2.3 Assessment Plan

PRELIMINARY AGENDA (Revision 01)

Date	Time	Subjects	MN	EO	NC
Sunday, 10/11/2019		Travel from KL to Kluang and check in Hotel.	√	√	√
Monday, 11/11/2019 Belitong Palm Oil Mill	0830-0900	Belitong Mill: 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). 	√	√	√
	0900–1230	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.	√	-	√
	1230–1330	Lunch	√	√	√
	1330–1700	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).	√	√	√
	1700–1730	Interim Closing Briefing	√	√	√

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Date	Time	Subjects	MN	EO	NC
Tuesday 12/11/2019 Bukit Tongkat B estate	0830–1300	Bukit Tongkat B 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, Scheduled waste management, worker housing, clinic, Landfill, , etc.	√	√	√
		Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	1300 - 1400	Lunch Break	√	√	√
	1400-1630	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records	√	√	√
	1630-1700	Interim Closing Briefing	√	√	√
Wednesday 13/11/2019 Ulu Belitong estate	0830–1300	Ulu Belitong 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, Scheduled waste management, worker housing, clinic, Landfill, , etc.	√	√	√
		1300 - 1400	Lunch Break	√	√
	1400-1630	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records	√	√	√
	1630-1700	Closing Meeting for P&C	√	√	√

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Date	Time	Subjects	MN	EO	NC
Thursday 14/11/2019 Belitong Palm Oil Mill	0830–1230	Belitong POM RSPO Supply Chain Site visit: Incoming of FFB and outgoing of CSPO & CSPK – weighbridge, ramp, storage area, loading bays, etc. Documentation review: RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	-
	1230 - 1300	Closing meeting for SCC	√	√	-

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- FGV Holdings 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?	Yes, as per time bound plan 2018.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	9 Complexes have been certified in 2017/2018: POM Kemasul, Maokil, Krau, Keratong 9, Selancar 2b, Aring A, Bukit Sagu, Lepar Utara 6, Selendang	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.	Challenge from the time bound plan is age of plantations and location. No new acquisitions as per 2019.	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?	N/A	Yes
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There is no lapses in implementation of the plan	Yes
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	N/A	Yes
Have there been any stakeholder comments?	Stakeholder comments are recorded in Stakeholder report 2018.	Yes
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3:	No replacement for primary forest or HCV area. There were 7 LUCA submitted to RSPO and all of them have	Yes

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<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>been passed with no concept note or compensation plan required.</p>																	
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>Company Group/ Holding Statement: There is new planting after 1st January 2010.</p> <p>Auditor Verification: NPP audit has been carried out for all FGVP Estate and is currently under review. Data as per below:</p> <table border="1" data-bbox="699 763 1331 2000"> <thead> <tr> <th>Estate</th> <th>Hectar age Involves In NPP</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Tembangau 05</td> <td>45.84</td> <td>March 2016 – May 2016, Cannot undergo development https://hcvnetwork.org/reports/hcv-chegar-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/</td> </tr> <tr> <td>Chegar Perah</td> <td>259.84</td> <td rowspan="3">Proceed with land clearing Refer to FGVP Operation</td> </tr> <tr> <td>Selendang 03</td> <td>97.14</td> </tr> <tr> <td>Bukit Sagu 08</td> <td>61.54</td> </tr> <tr> <td>Pt CNP, Kalimantan</td> <td>14,385</td> <td>"Full assesment 22-29 Mac 2018 Public consultations 13-16 July 2018" "SEIA: Completed HCV: Completed" NPP Completed Nursery and Planting Development www.rspo.org/files/download/c085da6476b00a1</td> </tr> </tbody> </table>	Estate	Hectar age Involves In NPP	Status	Tembangau 05	45.84	March 2016 – May 2016, Cannot undergo development https://hcvnetwork.org/reports/hcv-chegar-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/	Chegar Perah	259.84	Proceed with land clearing Refer to FGVP Operation	Selendang 03	97.14	Bukit Sagu 08	61.54	Pt CNP, Kalimantan	14,385	"Full assesment 22-29 Mac 2018 Public consultations 13-16 July 2018" "SEIA: Completed HCV: Completed" NPP Completed Nursery and Planting Development www.rspo.org/files/download/c085da6476b00a1	<p>Yes</p>
Estate	Hectar age Involves In NPP	Status																
Tembangau 05	45.84	March 2016 – May 2016, Cannot undergo development https://hcvnetwork.org/reports/hcv-chegar-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/																
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	PT TAA, Kalimantan	8,193	SEIA: Completed NPP process Development on some area but stop after the CP issue.	
	Tawai 01	2740.1 1	"January, 24, 2018 - February, 02, 2018" Second resubmission by Aksenta First submission failed on 14 Nov 2018.	
	Tawai 02	2745.5 8	https://hcvnetwork.org/reports/hcv-ladang-tawai-1-and-ladang-tawai-2-fgvp-malaysia/	
	Asian Plantation Limited	25,32 5.00	5 - 19 February 2015 HCVRN CLOSED Can proceed with Planting subjected to HCSA report for Grand Performance. https://hcvnetwork.org/reports/felda-global-venture-miri-division-sarawak-state-malaysia/	
<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>There is No land Conflict reported. From the RSPO RaCP tracker the FGV Management unit already sent 7 Land Use Change Analysis to RSPO and already completed the review for all analysis.</p>			<p>Yes</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p>	<p>Synopsis On the 26th of July 2015, WSJ ran an article by Syed Zain Al – Mahmood alleging that Felda has breached labour conditions in its plantations. The allegations mainly say that forced labour is being used and the workers are not paid minimum wages. Further, it is alleged that their health and working conditions is are</p>			<p>Yes</p>

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	<p>neglected and also that their employers withheld their passports.</p> <p>Remarks</p> <p>29 July 2015 - 12 NGOs urged the RSPO to conduct a transparent investigation into Wall Street Journal's findings of forced labour, human trafficking, and other human and labour rights violations especially on RSPO member FELDA's plantations.</p> <p>The Complaints Panel in its meeting on August 2015, decided that the member, Felda, be investigated on the issues raised by the WSJ article. The RSPO Secretariat will conduct an independent assessment to investigate the report on labour condition on all RSPO members. Malaysia would be the first country, where the assessment would be done. RSPO release the following statement on its website: http://www.rspo.org/news-and-events/news/3rd-update rspo-response-to-the-report-titled-palmoil-migrant-workers tell-of-abuses-on-malaysian-plantations-published-by-the wall-street-journal-on-26th-july-2015</p> <p>7 March 2016 - RSPO Complaints Panel reviewed the independent assessment reports and decided to suspend Pasoh palm oil mill owned by Felda until full clearance is given based on the re-audits.</p> <p>10 March 2016 - FGV had a meeting with RSPO regarding the ASI report and suspension decision by RSPO.</p> <p>18 March 2016 - FGV sent complaint acknowledgment letter to RSPO. FGV will submit 12 month time bound action plan addressing all the issues relating to ASI report.</p> <p>6 May 2016 - FGV withdraws its RSPO Principles and</p> <p>Criteria certificates.</p> <p>4 July 2016 - FGV submits the action plan to RSPO.</p> <p>22 August 2016 - Secretariat has reviewed the action plan and sent the action plan back to the company for further clarification.</p> <p>20 October 2016 - Secretariat to wait for the updated action plan from the company.</p> <p>19 December 2016 - Secretariat to appoint an independent expert to verify action plan and set a time bound plan.</p> <p>22 March 2017 - Secretariat continues searching for an independent expert to review the action plan.</p> <p>31 May 2017 - Secretariat shares the action plan with the Complaints Panel and continues monitoring the case.</p> <p>5 October 2017 - FGV updated the Action Plan and upload to FGV website on the same day. A copy also</p>	
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	<p>sent to RSPO for their acknowledgement. Meeting with RSPO secretariat on 11 January 2017 at RSPO Bangsar, RSPO Compensation Panel would like to review the WSJ action plan and as suggested by RSPO CP a group of labour experts (lawyer and NUPW union org with 1 CP member as observer) will be engaged to verify the FGV and FELDA WSJ Action Plan. It were expected to have one operation unit for both FELDA and FGV in this verification exercise on the ground especially involving the policy and implementation. The verification is expected to be in this coming March 2018 and RSPO CP will share the scope and plan for the verification assessment once it is ready.</p> <p>25 July 2017 (CP Meeting) -Secretariat to proceed with the review of the Action Plan</p> <p>24 August 2017 (CP Meeting)</p> <p>1) CP to wait for the report of the Review of FGV Action Plan;</p> <p>2) Secretariat to work with the Technical department to develop a formula for identifying the number of units for verification;</p> <p>3) Secretariat to start identifying a team of experts for the verification exercise.</p> <p>26 September 2017 (CP Meeting) -Secretariat to follow up with FGV on the 2 reports.</p> <p>23 October 2017 (CP Meeting) - Secretariat to send CP's response to the Company.</p> <p>21 November 2017 (CP Meeting) -Verification exercise to be carried out once the schedule is confirmed with the verification team.</p> <p>21 December 2017 (CP Meeting) - Verification exercise to be carried out in March.</p> <p>24 January 2018 (CP Meeting) -TOR for the verification exercise to be drafted.</p> <p>Further details, please refer to https://www.rspo.org/members/complaints/status-of-complaints/view/85</p>	
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Auditor Verification: There is Non-compliance with the requirements of RSPO P&C criteria 2.1</p> <p>In Belitong POM, there is one female worker (Worker ID: 1210638) has worked overtime on 30/06/2019 from 2215 to 2445 (2.5 hours) which is after 10 pm. Belitong POM didn't have JTK permit for female work on nightshift.</p> <p>In Bukit Tongkat B Estate, it was found out that Employee ID: FW06010020 has the salary for month January 2019 (RM668.42/25 working days or RM26.74/day) and June 2019 (RM834.54/20 working</p>	<p>Yes</p>

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	<p>days or RM41.28/day) less than Worker Minimum Wage Order 2018 which is RM1100/month or RM42.31/day. The warning letters were given to the employee for low productivity on 3, 11 and 16 January 2019 however there is no evidence that employer has made the root cause analysis and further action taken on the low productivity for both months in order to comply with Minimum Wage Order 2018.</p> <p>In Mill, Audiometric test been done on 20 Oct 2018 by Industrial Safety Management Services, found the 2 STS (Standard Threshold Shift) was not send for retest within 3 month as per OSHA 1994 (Noise exposure 2019). As per CHRA recommendation dated May 2016, management need to conduct Chemical exposure monitoring for welding activity however no record of chemical exposure monitoring for welding fume, chromium fume, manganese fume and Ferum fume.</p> <p>The issue already been closed on 18 Feb 2020 and will be verify the consistent of implementation in the next audit.</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>Company Group/Holding Statement: Yes, there have positive assurance statement from internal certification unit.</p> <p>Auditor Verification: Yes, at the current status all 67 complexes already have internal audit in year 2017/2018/2019. Seen the internal audit done by Certification & Due Diligence (CDD) Department.</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
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	<p>Belitong POM received FFB from scheme smallholder and independent outgrower. The process of RSPO certification for scheme smallholder will be observed on next assessment.</p>	<p>Complied</p>

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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 1st Annual Surveillance Assessment there were seven (7) Major & three (3) Minor nonconformities raised. The FGVPISB Belitong Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	1850488-201906-M1	Clause & Category (Major / Minor)	Indicator 4.6.11 Major
Date Issued	14/11/2019	Due Date	14/02/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/02/2020
Statement of Nonconformity:	Found action to treat related health condition was not been demonstrated		
Requirement Reference:	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.		
Objective Evidence:	In Medical Surveillance (HQ/11/DOC/00/235) dated 16 Feb 2019, the total workers that involve with medical surveillance was 4 from pesticide sprayer and premix and 9 from manuring. From the result 2 workers was found unfit (FW) however no changes in work for both of them as per interview with management and verification on payslip for month of 07/2019 and 08/2019 The latest medical surveillance by Dr Halim Bin Ishak (JKKP HQ/08/DOC/00/387) was done last on 26 April 2018 however no medical surveillance been conducted for year 2019 thus Major NC been raised		
Corrections:	<ol style="list-style-type: none"> Maintenance workers who are unfit should be transferred to others activities that did not involve in the use of chemicals and fertilizers (Bukit Tongkat B) Employees involved in the use of chemicals should be sent for Medical Surveillance examination as CHRA Report (Ulu Belitong) 		
Root Cause Analysis:	There is no review of the implementation and analysis of the Medical Surveillance Report from the Occupational Safety and Health Committee at the project level as it is not identified in any medium such as the minutes of the OSH meeting		
Corrective Actions:	Review and analysis of the Medical Surveillance Report should be one of the main topics to be discussed in the Occupational Safety, Health Committee meeting.		
Assessment Conclusion:	<u>Major NC onsite verification:</u> The management already sent workers to medical surveillance to Klinik Sulaiman Temerloh (JKKP HQ/08/DOC/00/387), all worker that involve with chemical was fit		

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	to work with chemical. For the other 2 workers that unfit already change their work to general work. This Major NC was close accordingly.
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Non-conformity			
NCR Ref #	1850488-201906-M2	Clause & Category (Major / Minor)	Indicator 4.7.5 Major
Date Issued	14/11/2019	Due Date	14/02/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/02/2020
Statement of Nonconformity:	First aid equipment were not made available at worksites and the accident record was not kept and periodically review.		
Requirement Reference:	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.		
Objective Evidence:	Noted during interview and site visit at sterilizer station and workshop station, the operator aware on the nearest first aid box location. However no first aid box in Sterilizer area, the first aid in Workshop available however the item was not complete thus Major NC been raised because repetitive issue. In Mill, Audiometric test been done on 20 Oct 2018 by Industrial Safety Management Services, found 1 workers with hearing impairment with no record of JKPP 7 No accident happen for year 2019 however found 2 workers unfit based on previous year medical surveillance on 10 /11/2018 because of N-Hexane however no record of JKPP 7 and JKPP 8 for both workers.		
Corrections:	Mill has completed the items in each First Aid boxes and placed them at the designated area. Mill has sent JKPP 7 report to DOSH. There is no accident reported yet this year however JKPP 8 record will be send on January 2020.		
Root Cause Analysis:	Occupational Safety and Health Officers did not make detailed review regarding emergency first aid equipment and accident records during the project visit which resulted in the enforcement not being fully implemented. No monitoring of audiometric test result and medical surveillance result record for year 2019 by management because of having major management changes.		
Corrective Actions:	The Occupational Safety and Health Officer should review the whole as listed in the Safe Work Procedure every 3 months.		
Assessment Conclusion:	<p><u>Major NC onsite verification:</u> From the verification on site the management already appoint person in charged for First aid box as per letter Bil: (26)4056/BLT/840A/31 dated 25 December 2019. During site visit in mill the First aid box was in place with adequate tool as per FMA requirement.</p> <p>For JKPP 7 and JKPP 8 the management already updated the report according to letter Bil:(42)4056/BLT/840/11.1 pt3 and Bil: (40)4056/BLT/840A/16.10. The SHO checklist also already been updated as per latest report dated 12 December 2019.Thus Major NC was close accordingly.</p>		

Non-conformity			
NCR Ref #	1850488-201906-M3	Clause & Category	Indicator 2.1.1

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		(Major / Minor)	Major
Date Issued	14/11/2019	Due Date	14/02/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/02/2020
Statement of Nonconformity:	Some of the legal compliance is not effectively demonstrated.		
Requirement Reference:	Evidence of compliance with relevant legal requirements shall be available.		
Objective Evidence:	<p>In Belitong POM, there is one female worker (Worker ID: 1210638) has worked overtime on 30/06/2019 from 2215 to 2445 (2.5 hours) which is after 10 pm. Belitong POM didn't have JTK permit for female work on nightshift.</p> <p>In Bukit Tongkat B Estate, it was found out that Employee ID: FW06010020 has the salary for month January 2019 (RM668.42/25 working days or RM26.74/day) and June 2019 (RM834.54/20 working days or RM41.28/day) less than Worker Minimum Wage Order 2018 which is RM1100/month or RM42.31/day. The warning letters were given to the employee for low productivity on 3, 11 and 16 January 2019 however there is no evidence that employer has made the root cause analysis and further action taken on the low productivity for both months in order to comply with Minimum Wage Order 2018.</p> <p>In Mill, Audiometric test been done on 20 Oct 2018 by Industrial Safety Management Services, found the 2 STS (Standard Threshold Shift) was not send for retest within 3 month as per OSHA 1994 (Noise exposure 2019). As per CHRA recommendation dated May 2016, management need to conduct Chemical exposure monitoring for welding activity however no record of chemical exposure monitoring for welding fume, chromium fume, manganese fume and Ferum fume</p> <p>Thus Major NC been raised.</p> <p>The following was observed in mill which license are expired:</p> <ol style="list-style-type: none"> 1. Electricity generation license 2018/03797 required under Electricity Supply Act 1990 has expired in 14/10/2019. However there is no renewal observed. 2. Weighbridge calibration required under Measurement and Weigh Act 1972 has expired in 18/09/2019. However there is no recalibration observed. 		
Corrections:	<ol style="list-style-type: none"> 1. Mill to apply the permit mentioned. 2. Mill to conduct retest for 2019 audiometric test, if there is any STS. 3. Mill to conduct exposure monitoring for welding fumes. 4. Mill to renew ST license as soon as possible. 5. Mill to present the calibration evident as soon as possible. 		
Root Cause Analysis:	<ol style="list-style-type: none"> 1. There is no specific person for review and compliance of the legal register. 2. The management failed to provide adequate planning and work during the low production period. 3. The Occupational Safety, Health Committee at the project level does not make any review regarding the implementation and analysis of the Audiometric Test Report. 4. There is no mechanism for notification to the factory management regarding the validity of the validity period of the current license or permit. 		
Corrective Actions:	<ol style="list-style-type: none"> 1.The management should conduct training and provide information on the duties / responsibilities and required to perform periodically. 2. The management should provide additional work programs according to the estate budget during the low production period. 		

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	<p>3. Review and analysis of the Audiometric Test Report should be one of the key agenda items to be discussed in the Occupational Safety, Health Committee meeting at the project level.</p> <p>4. Establish a monitoring board list of valid licenses / permits in a convenient place.</p>
Assessment Conclusion:	<p>Major NC onsite verification: The License already been updated and available for Electricity Generation and the weighbridge calibration already been done on Nov 2019. Sighted training record regarding to working overtime on at night have been conduct on December 2019. The Workers already sign and understand regarding this matter was verified during interview. Management also already issue letter regarding this issue referred letter Bil:(37)4056/BLT/840/4pt.3.</p> <p>The management already send for STS issue refer letter (36)4056/BLT/840/13 dated 31 December 2019. Sighted letter to conduct chemical exposure monitoring ref no KKSBCEM-119 dated 28 Nov 2019, this chemical exposure monitoring will be done on Feb 2019 by MZ Enviro Testing & Consulting. The of weighbridge already been done and waiting for the result evidence verified as per payment voucher 352100496 same also for license for Electricity supply already been renew referred payment voucher 352100313. Thus Major NC was close accordingly.</p>

Non-conformity			
NCR Ref #	1850488-201906-M4	Clause & Category (Major / Minor)	Indicator 6.5.3 Major
Date Issued	14/11/2019	Due Date	14/02/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/02/2020
Statement of Nonconformity:	The housing inspection conducted was not effective.		
Requirement Reference:	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.		
Objective Evidence:	<p>During site visit at housing area, it was found out that domestic wastes were disposed behind the house Blk 11a, 11B, 11C and 11D Jalan Antoi, Blk 02 2A, 2B, 2C and 2D Jalan Antoi (Belitong POM) and Block Seri Alamanda & Dahlia (Bukit Tongkat B Estate) but not captured in the housing inspection record.</p> <p>In Ulu Belitong estate the housing inspection was not conducted in weekly basis. Example sighted for month October (7/10/19, 15/10/19 & 25/10/19), September (11/09/19 & 24/09/19), August (15/08/2019), July (18/08/2019), June 13/6/2019) and May (21/05/2019).</p>		
Corrections:	Carried out domestic solid waste cleaning at identified residential areas		
Root Cause Analysis:	No evaluation of the effectiveness of training was given to workers regarding to domestic waste disposal.		
Corrective Actions:	Evaluate the effectiveness of the training after training is given to workers and it is recorded.		
Assessment Conclusion:	<p>Major NC onsite verification: Sighted record training on awareness for domestic waste record dated 13 Feb 2020 with evaluation with same dated. management also issue the letter regarding this</p>		

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	matter dated (26)4056/BLT/840A/31. During site visit no sighted any domestic at back of house, thus Major NC was close accordingly.
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Non-conformity			
NCR Ref #	1850488-201906-M5	Clause & Category (Major / Minor)	Indicator 5.1.1 Major
Date Issued	14/11/2019	Due Date	14/02/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/02/2020
Statement of Nonconformity:	EAI documented is not sufficient to cover the activities and determining the impact.		
Requirement Reference:	An environmental impact assessment (EIA) shall be documented.		
Objective Evidence:	<p>The EAI was not sufficiently and appropriately assessed:</p> <ol style="list-style-type: none"> 1. The EAI at mill does not include the disposal of EFB. During the field assessment, it was observed EFB was on burning due to dry season at the mill. However, in the EAI there is no evaluation of this impact and management of this impact is not available. 2. The EAI at mill does not include chemical / lubricant storage at mill. During the field assessment, it was observed that there is no secondary containment. 3. In Bukit Tongkat B estate, there was no sufficient data to demonstrate the determination on the number of case reported to determine the scoring of the impact. 		
Corrections:	List all activities and products in the mill / estate that is known to affect the environment		
Root Cause Analysis:	Officers who provide the Environmental Assessment report have just been given the responsibility of assessing and are not proficient in identifying aspects of the environmental impact due to transferred to others location.		
Corrective Actions:	The management should conduct training on the identification of the environmental impact of the personnel responsible.		
Assessment Conclusion:	<p><u>Major NC onsite verification:</u> The record of aspect and impact was available dated 21 Jan 2020, as per FPI/L4/QOHSE-1.7Pind.0. The training already been arranged refer letter (37)4056/BLT/840/13 dated 2 Jan 2020. The major NC was close accordingly</p>		

Non-conformity			
NCR Ref #	1850488-201906-M6	Clause & Category (Major / Minor)	Indicator 5.1.2 Major
Date Issued	14/11/2019	Due Date	14/02/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/02/2020
Statement of Nonconformity:	No management plan was available. This is was previously raised as Minor and not successfully closed. Hence escalated to Major.		

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Requirement Reference:	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.
Objective Evidence:	In Bukit Tongkat B estate there is not management plan found for those significant impact: 1. Circle weeding – it was identified to have score of 32 and 24 for resources depletion and land/water contamination. However no management plan was found. 2. Killing Amplified palm – it as identified to have land/water contamination. However no management plan was found.
Corrections:	For the identification of impact aspects that score more than 24, management should prepare Management Plans for such activities to minimize environmental risks and they must be monitored to eliminate the impact of these impacts on estate activities. The management should prepare a management plan for the following activities: - a. Circle weeding b. Killing amplified palm
Root Cause Analysis:	Officers who provide the Environmental Assessment report have just been given the responsibility of assessing and are not proficient in identifying aspects of the environmental impact due to transferred to others location.
Corrective Actions:	The management to conduct training to identify aspects of the environmental impact of the personnel responsible and to evaluate the effectiveness of the training once the training has been given and recorded.
Assessment Conclusion:	<u>Major NC onsite verification:</u> Sighted the training already been done on 18 December 2019 with evaluation training record FGV/FGVPM/IV/IMS/15/5.4 Pind 0. The record of management plan for both activity was available dated Dec 2019. Thus Major NC close accordingly.

Non-conformity			
NCR Ref #	1850488-201906-M7	Clause & Category (Major / Minor)	Indicator 5.3.3 Major
Date Issued	14/11/2019	Due Date	14/02/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/02/2020
Statement of Nonconformity:	Waste disposal is not according to the management plan. This is was previously raised as Minor and not successfully closed. Hence escalated to Major		
Requirement Reference:	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.		
Objective Evidence:	Field observation at mill and estate evident the below: 1. Waste from contractor’s work are disposed at decanter cake disposal area. 2. At mill, the first generation dates for Scheduled waste SW410, SW 409 and SW 305 are not clear. Furthermore the usage of label is not consistent. 3. At the MBR plant, spotted traces of burning waste. 4. Observed 3 oil drums are disposed at scrap yard.		

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	<p>5. N-Hexane emptied containers are found in chemical stores rather than scheduled waste store.</p> <p>6. At Bukit Tongkat B, there is no label and first generation date for scheduled waste SW409 (contaminated gloves and PPE).</p> <p>7. SW410 at Ulu Belitong, first generation date is 28/03/2019. As on the day of the audit, it has not been disposed.</p>
Corrections:	<p>1) Conduct training on Scheduled waste management for Mill and estates by Regional SHO</p> <p>2) Identify used PPE as Scheduled waste in inventory form</p> <p>3) label and put first generation date for SW 409 and other class of SW</p>
Root Cause Analysis:	There are no competent person in the mills and estates. On behalf of the mill it is in the process of obtaining competent personnel. While the estate is in the process of appointing competent person for the Collection Center provided by the company.
Corrective Actions:	Competent person from nearby locations provide training to mill/estate on schedule waste management.
Assessment Conclusion:	<p><u>Major NC onsite verification:</u></p> <p>The Scheduled waste training already been done on 3 Jan 2020. the implementation was verified during site verification, sighted the store of scheduled waste was followed according to Scheduled waste Reg 2005 and the waste was dispose accordingly. Thus major NC was close accordingly.</p>

Non-conformity			
NCR Ref #	1850488-201906-N1	Clause & Category (Major / Minor)	Indicator 2.1.3 Minor
Date Issued	14/11/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	The mechanism to ensure compliance of the legal requirement cannot be demonstrated.		
Requirement Reference:	A mechanism for ensuring compliance shall be implemented.		
Objective Evidence:	As per the Register of Legal and Other Requirements dated 05/06/2019, the prove of compliance and status of compliance is not available. Interview with assistance manager also shows that he was not sure how compliance can be achieved.		
Corrections:	Provide an appointment letter to the responsible mills worker.		
Root Cause Analysis:	There is no specific person for review and compliance of the legal register.		
Corrective Actions:	The management should conduct training and provide information on the duties / responsibilities and required to perform periodically.		
Assessment Conclusion:	Corrective action plan accepted. Evidence of its effectiveness to be verified in next assessment.		

Non-conformity			
NCR Ref #	1850488-201906-N2	Clause & Category	Indicator 4.4.1

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		(Major / Minor)	Minor
Date Issued	14/11/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Water management plan are not implemented as per target set by management		
Requirement Reference:	An implemented water management plan shall be in place.		
Objective Evidence:	The target of water consumption at mill is 1.2liter per ton of FFB. However the average water consumed at the mill from January 2019 – October 2019 was 1.425. As interview with assistance manager, there is not water management plan available to meet the target set.		
Corrections:	Mill management has asked regional management to review the target for water consumption for year 2020 onwards.		
Root Cause Analysis:	Water consumption at mill is set by the Regional Controller at the beginning of the year. However, mill management was not given the option to set targets based on the actual water management capabilities of the plant and was not discussed at the monthly meetings.		
Corrective Actions:	The mill management should monitor monthly and held discussions with Regional Management on whether the targets set earlier in the year are achievable or need reviewing		
Assessment Conclusion:	Corrective action plan accepted. Evidence of its effectiveness to be verified in next assessment.		

Non-conformity			
NCR Ref #	1850488-201906-N3	Clause & Category (Major / Minor)	Indicator 5.2.4 Minor
Date Issued	14/11/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	The management plant was been create inadequately		
Requirement Reference:	Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. 		
Objective Evidence:	Management plan with timeline for implementation was not established at Bukit Tongkat B. Furthermore, in the most reason management review was conducted on 02/10/2019, the monitoring outcome of the conservation was not part of the		

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	management review discussion which in this case was not able to decide if monitoring plan needs to be revised or improved or maintained.
Corrections:	Provides detailed Action Plan and updates the status of the implementation of the action plan (wildlife, forest reserve and natural river)
Root Cause Analysis:	Management does not provide a detailed action plan that needs to be implemented within the stipulated time frame and did not review periodically for ensure implementation was done.
Corrective Actions:	Conduct yearly management review discussions on the current status of the action plan and implementation was done properly.
Assessment Conclusion:	Corrective action plan accepted. Evidence of its effectiveness to be verified in 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

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1638637-201804-M1	Clause & Category (Major/Minor)	Indicator 2.1.1 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	19/10/2018
Statement of Nonconformity	Evidence of compliance for some of the legal requirements was not adequately demonstrated.		
Requirement Reference	Evidence of compliance with relevant legal requirements shall be available.		
Objective Evidence	1) FGVPM Bukit Tongkat B Estate, there is no approval on installation of electric fence at PM00H as per requirement under regulation 15 of Electricity Regulation 1994. 2) Six manuring workers worked on 25 May 2018 (Friday – rest day) but was paid normal rate of pay instead of twice of the normal rate (ref.: Section 60(3)(d) Employment Act 1955). 3) During the site visit at the mill’s EFB stock, observed during the site visit smoke coming from escaped EFB on conveyor and chute above the EFB incinerator. [ref.: Clause 11.1 of Jadual Pematuhan] 4) Leachate from EFB stockyard was found to be flowing to the nearest monsoon drain (kernel store building) which eventually goes to the environment through “Takungan Alur Air Hujan No. 2”. [ref.: Clause 11.2 of Jadual Pematuhan]		

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<p>Corrective Action</p>	<p>1) (a) Refer to Energy Commission office to obtain guidelines and helps for re-application permit of electric fence installation (b) Show application prove permit from Energy Commission and feedback regarding the application. 2) (a) Give explanation regarding Employment Act and worker’s basic salary payment to all staff and plantation worker. (b) Copy of pay slip proof of payment to the employee involved. (c) Manager shall send warning letter to all intended staff to avoid any repeating situation 3) (a) Daily checklist of EFB surveillance to avoid any burning. (b) Appointment letter to respective staff to survey and to make any appropriate action needed to avoid burning of EFB 4) (a) Place EFB to the appropriate stockyard where leachate can be channelled into effluent pond (b) Discussion and sending notice with the plantation management of FGVPM and outsource supplier for reuse of EFB to reduce EFB quantity at mill (c) Get written approval from Department of Environment in term of using ash house for EFB burning</p>
<p>Assessment Conclusion</p>	<p><u>ASA1 verification:</u> The management already did not use the electric fencing in their estate. The training already been given to all workers regarding to Payslip dated March 2019. The EFB stockyard was in accordance to Jadwal Pematuhan and verified as per site visit verification. The NC was close accordingly .</p>

<p>Nonconformity</p>			
<p>NCR Ref #</p>	<p>1638637-201804-M2</p>	<p>Clause & Category (Major/Minor)</p>	<p>Indicator 4.7.1 Major</p>
<p>Closed (Yes/No)</p>	<p>Yes</p>	<p>Date of nonconformity closure</p>	<p>19/10/2018</p>
<p>Statement of Nonconformity</p>	<p>Health and safety plan was not effectively monitored and implemented.</p>		
<p>Requirement Reference</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>Objective Evidence</p>	<p>FGVPM Belitong POM: i) Monthly workplace inspection was carried out by ESH committee. Records of latest inspection did not include unsafe act/dangerous occurrence observed during site visit at: a) Marshalling/capstan line and loading ramp platform - Safety device/features malfunction - bobcat and shovel b) FFB Grader rest area - unsafe broken leg chair used. c) Boiler area - broken and self-modified chair used. ii) ESH Training programme a) Hearing Conservation Programme (frequency once every 2 years as per Noise Exposure Regulation 1989) b) Chemical Safety Handling (frequency once every 2 years as per CHRA recommendation)</p>		
<p>Corrections</p>	<p>1) Improve checklist by including several precise matter and immediate improvement action by the responsible officer</p>		

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	2) Appoint one staff who is responsible in ensuring HSE Training programme is implemented according to the schedule and including for all training criteria and need
Assessment Conclusion	<u>ASA1 verification:</u> The latest checklist of workplace inspection already been reviewed and included with all area such as boiler area, FFB grader test and with unsafe condition or act dated March 2019. Thus Major NC was close accordingly.

Nonconformity			
NCR Ref #	1638637-201804-M3	Clause & Category (Major/Minor)	Indicator 1.2.1 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	19/10/2018
Statement of Nonconformity	The Land Title documents for Belitong Mill and Bukit Tongkah B Estate are not publicly available at the respective offices.		
Requirement Reference	Publicly available documents shall include, but are not necessary limited to: • Land titles/user rights (Criterion 2.2);		
Objective Evidence	a. Land title for the Belitong Mill is not kept at the Mill office. b. Nine land titles covering an area of 419.56 ha out of 1070.66 ha of Bukit Tongkat B Estate are missing.		
Corrective Action	1) Make reference to get ownership grant copy or any document related ownership status from Department Land Office or from Land Management Unit FGVH 2) Obtain all copies of land grant references concerning legal ownership or later information of the grant status for Belitong Palm Oil mill from Land Management Department, FGVH and Department Land Office.		
Assessment Conclusion	<u>ASA1 verification:</u> The land title of Belitong already been kept in Mill office and for estate the land title covering 419.56 ha was an Agreement between Johor Government with Rancangan Kemajuan Tanah Ulu penggeli, Ulu belitong, Bukit Tongkat dated 15 Nov 1978 (99 years) until 27 Oct 2098. No Grant PTD 7521 available and was kept in office. Thus Major NC was close accordingly.		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1638637-201804-M4	Clause & Category (Major/Minor)	Indicator 6.5.2 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	19/10/2018
Statement of Nonconformity	There is no contract of employment detailing payments and conditions of employment for sub-contract workers working at Bukit Tongkat B Estate.		
Requirement Reference	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		

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	notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.
Objective Evidence	Four sub-contract workers employed by United Plantation Trading do not have any employment contracts. United Plantation Trading supplies FFB harvesters to carry out harvesting work on behalf of Bukit Tongkat B Estate’s sub-contractor, to ARL Anjung Jaya.
Corrective Action	1. Instruction letter to sub-contractor for registering and notice to estate management for each of the new worker made to ensure estate management monitoring 2. Copy of employment contract to all sub-contractor worker 3. Record of latest contractor and sub-contractor names’ registration
Assessment Conclusion	<u>ASA1 verification:</u> The Letter to ARL Anjung Jaya ref. (03)5300003540 dated 1/8/2018 was available and as verification on Agreements of workers ID BC0711445, ID B2907684, AT389574 & B3621884 and latest record of contractor was been kept, Major NC was close accordingly.

Nonconformity			
NCR Ref #	1638637-201804-M5	Clause & Category (Major/Minor)	Indicator 6.12.1 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	19/10/2018
Statement of Nonconformity	The right to terminate the employment contract by an employee was not clearly spelt out in the employment contract.		
Requirement Reference	There shall be evidence that no forms of forced or trafficked labour are used.		
Objective Evidence	Based on the contents of the Employment Contracts, the right of an employee to terminate the contract was not very clear. Should an employee choose to terminate the contract, he/she is required to pay the recruitment cost in pro-rate to the employer. (ref.: Employment contract 11 March 2013 between Felda Golden Ventures Plantations (Malaysia) Sdn Bhd with Hasim Sahari, and Indrawadi, and employment contract dated 21 December 2014 between Felda Golden Ventures Plantations (Malaysia) Sdn Bhd and Adri Adrian Atmaja).		
Corrective Action	1. Latest revision of employees’ Employment Act by Legal Department FGVH for matter regarding contract termination right is done in detail. 2. Re-description of latest employee employment contract to all employee and matter regarding contract termination right		
Assessment Conclusion	<u>ASA1 verification:</u> The management already revised conditions of contract works for FW and also the team from FGV Group HR records of briefing on revised conditions dated 29/8/2018. The record all available in office. Verification found that corrective actions evidence were effective to address the issues. Hence, Major NC closed accordingly.		

Nonconformity			
NCR Ref #	1638637-201804-M6	Clause & Category (Major/Minor)	SCCS E.5.1 c) Major

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Closed (Yes/No)	Yes	Date of nonconformity closure	19/10/2018
Statement of Nonconformity	The implementation mechanism and recording of short sale is not adequately demonstrable.		
Requirement Reference	The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short.(i.e. product can be sold before it is in stock.)		
Objective Evidence	Based on explanation by Belitong POM on utilisation of material and product recording system through Mill Production Report (MPR System), dispatch of both certified CPO & PK from negative stock is not allowed by default. However, based on their RSPO SC procedure [ref.: FGVPMRSPO SCC, rev. 2, 1/12/2017 page 8], dispatch from negative stock is allowed and to be reconciled within 3 months.		
Corrective Action	SCCS procedure awareness program and MPR system for licensed CPO and PK store monitoring to all related employees.		
Assessment Conclusion	<u>ASA1 verification:</u> The Training on Monthly Production Report (MPR) and Supply Chain Certification Standard (SCCS) dated 16/8/2018 by FGV Logistic Department personnel to relevant mill employees. Hence, Major NC closed accordingly.		

Nonconformity			
NCR Ref #	1638637-201804-N1	Clause & Category (Major/Minor)	Indicator 4.1.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	14/11/2019
Statement of Nonconformity	Records of monitoring was not effectively maintained.		
Requirement Reference	Records of monitoring and any actions taken shall be maintained and available, as appropriate.		
Objective Evidence	There is one (1) buffalo used for evacuation of FFB from harvesting block. No records of periodic health monitoring by competent person/Veterinary Department as per procedure, Section 21, "Peraturan Keselamatan Bagi Pengangkutan BTS Secara Mekanisasi Menggunakan Kerbau , sub section 5.0 Penjagaan Kerbau".		
Corrective Action	1. Record of "FFB transport by buffalo mechanism" procedure explanation to all related estate worker, mandore and estate supervisor 2. Letter to Veterinary Department to inform related matter and application for the need of animal health monitoring as required by Veterinary Department 3. Record of animal health monitoring implementation as required by Veterinary Department		
Assessment Conclusion	<u>ASA1 verification:</u> The record of procedure for FFB transport by Buffalo mechanism dated 23 April 2018 been given to the workers that handle the buffalo. The training been done on 3 August 2019 to all estate workers, mandore and estate supervisor. Management also already conduct buffalo health checking refer letter dated 11 June 2018 and record of veterinary treatment dated 24 Sept 2019 as per evidence. Thus Minor Nc was close accordingly.		

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Nonconformity			
NCR Ref #	1638637-201804-N2	Clause & Category (Major/Minor)	Indicator 4.7.5 Minor
Closed (Yes/No)	No	Date of nonconformity closure	Upgraded to Major NC
Statement of Nonconformity	First aid equipment were not made available at worksites.		
Requirement Reference	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.		
Objective Evidence	FASSB Ulu Belitong Estate First aid equipment was not made available at worksite, block 19 "peringkat 1" and at block 9 "peringkat 1" for harvesting and manuring activities. Further check with field mandore, first aid kit was not made available on site and was left at estate's office.		
Corrective Action	<ol style="list-style-type: none"> 1. Notification letter from HSO regarding the need of first aid box provided at the field 2. Prove of accepting /supplying first aid box confirmation at field 3. Picture of first aid box at field 		
Assessment Conclusion	ASA1 verification: Upgraded to Major NC due to recurrence of the same issue in the indicator. Please refer Major NC 1850488-201906-M2.		

Nonconformity			
NCR Ref #	1638637-201804-N3	Clause & Category (Major/Minor)	Indicator 6.5.3 Minor
Closed (Yes/No)	No	Date of nonconformity closure	Upgraded to Major NC
Statement of Nonconformity	Bukit Tongkat B Estate does not comply with the requirements of Rule 15 (a) of the Workers' Minimum Standard of Housing and Amenities Rules.		
Requirement Reference	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.		
Objective Evidence	Bangladeshi workers' hostel accommodates 15 workers. There are only two beds available. This is contrary to Rule 15 (a) of the Minimum Standard of Housing and Amenities Rules 1990.		
Corrective Action	<ol style="list-style-type: none"> 1. Wait for the integrated approval result of bed purchase to all worker 2. Copy of purchasing record and bed supply for all estate worker 3. A list of census record and bed accommodations to all estate worker 		
Assessment Conclusion	ASA1 verification: Upgraded to Major NC due to recurrence of the same issue in the indicator. Please refer Major NC 1850488-201906-M4 for detail.		

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Nonconformity			
NCR Ref #	1638637-201804-N4	Clause & Category (Major/Minor)	Indicator 6.12.2 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	14/11/2019
Statement of Nonconformity	Absence of contract substitution was not clearly demonstrated at Bukit Tongkat B Estate.		
Requirement Reference	Where applicable, it shall be demonstrated that no contract substitution has occurred.		
Objective Evidence	Based on interviews, 2 Bangladeshi workers (FW06010070 and FW06010074) were promised different jobs in Malaysia while in their home country. (e.g. work in the mill, nursery, market cleaner).		
Corrective Action	<ol style="list-style-type: none"> 1. Minute of meeting, name list and meeting's picture with worker for employee's agreement to accept employment act which has been signed together. 2. Feedback from FGV's Labour Department related to future action to be made by the top management to resolve the matter to the estate management 3. Feedback from FGV's Labour Department related to the necessary action to be made by estate management in reporting and immediate action if it is found to be a replacement contract 		
Assessment Conclusion	ASA1 verification: The meeting was done on 29 August 2019, the evidence was available and verified as per workers interview. 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 FGV. There was no contract substitution occurred. Hence minor NC close accordingly.		

Nonconformity			
NCR Ref #	1638637-201804-N5	Clause & Category (Major/Minor)	Indicator 5.3.3 Minor
Closed (Yes/No)	No	Date of nonconformity closure	Upgraded to Major NC
Statement of Nonconformity	Waste management and disposal were not effectively implemented.		
Requirement Reference	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.		
Objective Evidence	During the site visit at the mill, it was observed that contaminated empty chemical and lubricants containers (~40 units) were placed at a store next to the Scheduled Wastes store which were not appropriately handled in accordance to SW regulations – no labelling, not triple rinsed.		
Corrective Action	<ol style="list-style-type: none"> 1. Procedure training of scheduled waste management and rinse 3 times by the responsible worker 2. Update record for triple rinse for used chemicals and label at the place of collection of used chemicals in the store 		
Assessment Conclusion	ASA1 verification: Upgraded to Major NC due to recurrence of the same issue in the indicator. Please refer Major NC 1850488-201906-M7 for detail.		

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Nonconformity			
NCR Ref #	1638637-201804-N6	Clause & Category (Major/Minor)	Indicator 5.1.2 Minor
Closed (Yes/No)	No	Date of nonconformity closure	Upgraded to Major NC
Statement of Nonconformity	Mitigation of environmental impacts was not adequately addressed.		
Requirement Reference	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.		
Objective Evidence	i) Bukit Tongkat B Estate and Ulu Belitong have appointed third parties (Nafas Jentera & Sime Kubota) to carry out repair/servicing of its machinery. The used oil (SW305/306) and used filter (SW410) from the servicing activity were normally taken away by the third party to their premises. However, there is no evidence that the third parties have obtained any forms of authority to take away the scheduled wastes from the DOE. ii) It was observed that no oil interceptor at the washing bay drainage of Bukit Tongkat B Estate despite some trace of oil seen at the washing bay.		
Corrective Action	1. Get a copy of permit to transport and dispose of the black oil and oil filters waste from an appointed third party (e.g. Sime Kubota & Nafas Jentera) 2. Picture of estate machinery wash place by building an oil catchment for controlled pollution		
Assessment Conclusion	ASA1 verification: Upgraded to Major NC due to recurrence of the same issue in the indicator. Refer Major NC 1850488-201906-M6 for detail.		

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1638637-201804-M1	Major	2.1.1	08/06/2018	Closed out on 19/10/2018
1638637-201804-M2	Major	4.7.1	08/06/2018	Closed out on 19/10/2018
1638637-201804-M3	Major	1.2.1	08/06/2018	Closed out on 19/10/2018
1638637-201804-M4	Major	6.5.2	08/06/2018	Closed out on 19/10/2018
1638637-201804-M5	Major	6.12.1	08/06/2018	Closed out on 19/10/2018
1638637-201804-M6	Major	SCCS E.5.1 c	09/06/2018	Closed out on 19/10/2018
1638637-201804-N1	Minor	4.1.3	08/06/2018	Closed out on 14/11/2019
1638637-201804-N2	Minor	4.7.5	08/06/2018	Upgraded to Major NC

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1638637-201804-N3	Minor	6.5.3	08/06/2018	Upgraded to Major NC
1638637-201804-N4	Minor	6.12.2	08/06/2018	Closed out on 14/11/2019
1638637-201804-N5	Minor	5.3.3	08/06/2018	Upgraded to Major NC
1638637-201804-N6	Minor	5.1.2	08/06/2018	Upgraded to Major NC
1850488-201906-M1	Major	4.6.11	14/11/2019	Closed out on 14/02/2020
1850488-201906-M2	Major	4.7.5	14/11/2019	Closed out on 14/02/2020
1850488-201906-M3	Major	2.1.1	14/11/2019	Closed out on 14/02/2020
1850488-201906-M4	Major	6.5.3	14/11/2019	Closed out on 14/02/2020
1850488-201906-M5	Major	5.1.1	14/11/2019	Closed out on 14/02/2020
1850488-201906-M6	Major	5.1.2	14/11/2019	Closed out on 14/02/2020
1850488-201906-M7	Major	5.3.3	14/11/2019	Closed out on 14/02/2020
1850488-201906-N1	Minor	2.1.3	14/11/2019	"Open"
1850488-201906-N2	Minor	4.4.1	14/11/2019	"Open"
1850488-201906-N3	Minor	5.2.4	14/11/2019	"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 FGV PISB Belitong Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. 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	Union/Contractors/Local Communities Zaidan Joyoo Enterprise Penghulu Kampung Seri Timur

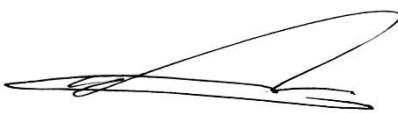
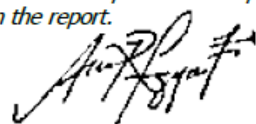
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General workers	
Government Departments Sekolah Kebangsaan LKTP	NGO Nil

IS #	Description
1	Feedbacks: <u>FELDA Bukit Tongkat Villagers/Surrounding Communities</u> There are elephants at the PM00H sighted by the settlers. The block has been left abandoned due to steep terrain and lead to the elephant encroachment at the settler’s oil palm block. The installation of Empangan Sembrong also become the reason why the elephants entered to the nearest villagers (Kampung Sri Timur). There is no land conflict/dispute occurred.
	Management Responses: Noted on the information.
	Audit Team Findings: No further issue.
2	Feedbacks: <u>Contractors & Suppliers</u> The payment and sales contracts are available and they were happy on the timeliness payment been made by FGV.
	Management Responses: Noted on the information.
	Audit Team Findings: No further issue.
3	Feedbacks: <u>Sekolah Kebangsaan LKTP</u> This is the first time school representative has come to Bukit Tongkat B office because they are nearer to FASSB Ulu Belitong Estate. So far they receive good cooperation and relationship with FGV management. The CSR programme mainly come from FELDA.
	Management Responses: Noted on the information.
	Audit Team Findings: No further issue.
4	Feedbacks: <u>Foreign Workers & Locals Representatives</u> There were wild boars roaming at the centralized waste bin in the housing area. No issue on salary and overtime paid.
	Management Responses: Noted on the information.
	Audit Team Findings: No further issue.
5	Feedbacks: <u>Gender Committee</u> No sexual harassment cases reported so far. Activities were conducted regularly and recorded in the meeting minutes.

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	<p>Management Responses: Noted on the information.</p>
	<p>Audit Team Findings: No further issue.</p>

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 FGV PISB Belitong 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 FGV PISB Belitong Palm Oil Mill is approved and continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
<p>Name: Muhamad Naquiddin Mazeli</p>	<p>Name: Amir Izyanif Hamzah</p>
<p>Company Name: BSI Services Malaysia Sdn Bhd</p>	<p>Company Name: FGV Holding Berhad</p>
<p>Title: Lead Auditor</p>	<p>Title: General Manager</p>
<p>Signature:</p> 	<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> 

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Date: 8 March 2020	Date: 10 March 2020
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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	The procedure to provide information to stakeholders is established in Procedure for Communication, Involvement and Negotiation (ML-1A/L2-Pr12(0) dated 01/06/2016. The list of stakeholders was also established.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	It was verified that each unit within the Belitong Complex maintain records of requests and responses at the respective offices.	Complied
Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

Criterion / Indicator	Assessment Findings	Compliance	
<p>1.2.1 Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<p>The procedure to provide information to stakeholders is established in Procedure for Communication, Involvement and Negotiation (ML-1A/L2-Pr12(0) dated 01/06/2016.</p> <p>The procedure stated that upon approval from the Estates Managers, document that will be shared includes:</p> <ul style="list-style-type: none"> • Land titles or ROH • Occupational health and safety plans • Environmental Aspect & Impact and Management Plans • HCV assessment • SIA and management Plan • Pollution prevention and reduction plans • Procedures and records of complaints and grievances • Land dispute procedures • Continual improvement plans • Public summary of certification assessment report; • Human Rights Policy • Sustainability Policy 	<p>Complied</p>	
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>			
<p>1.3.1</p>	<p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Employees of the Belitong Complex are bound by the documented Code of Business Conduct and Ethics for Employees (Policy number: FGV/GHR/POL/039 revision 3.0 dated 01/11/2017. The Code contains provisions for avoidance of conflict of interest situations, disclosure of information on potential conflict of interest, fair conduct of business, prohibition of all forms of corruption and crime, bribery, fair conduct of business, etc. Each employee is given a copy of the Code, briefed on its contents and signed an acknowledgement receipt.</p> <p>Samples of acknowledgement were sighted for plantation and mill workers within at the Belitong Complex in each individual files.</p> <p>In Bukit Tongkat B Estate and Ulu Belitong Estate, the policy was communicated on 07/10/2019 to workers.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
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>The following was observed in mill which license are expired:</p> <ol style="list-style-type: none"> 1. Electricity generation license 2018/03797 required under Electricity Supply Act 1990 has expired in 14/10/2019. However there is no renewal observed. 2. Weighbridge calibration required under Measurement and Weigh Act 1972 has expired in 18/09/2019. However there is no recalibration observed <p>In Mill, Audiometric test been done on 20 Oct 2018 by Industrial Safety Management Services, found the 2 STS (Standard Threshold Shift) was not send for retest within 3 month as per OSHA 1994 (Noise exposure 2019). As per CHRA recommendation dated May 2016, management need to conduct Chemical exposure monitoring for welding activity however no record of chemical exposure monitoring for welding fume, chromium fume, manganese fume and Ferum fume Thus Major NC been raised.</p> <p>Belitong Complex: There is evidence that generally, the units within the Belitong Complex complies with legal requirements relating to social and labour aspects such as:</p> <ul style="list-style-type: none"> - Payment of at least minimum wages stipulated under the Minimum Wages Order 2018. Samples of workers' pay slips were sighted and verified in clause 6.5.1. - Payment of statutory contributions such as EPF, SOCSO and EIS for Malaysian workers. <p>Based on summary of workers and confirmed via randomly selected interviews, there is no evidence of child employment.</p> <ul style="list-style-type: none"> - Work permits for foreign workers were sampled and confirmed to be valid and current and verified in clause 6.5.1. - JTK Permit (Ref no: BHG. PU/9/134 Jld 18 (17) dated 23/01/2019) for overtime limit (130 hours) dated 23/01/2019 (Belitong POM). 	<p>Major nonconformance</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>- JTK Permit (6) BHG PU/9/129 dated 10 April 2012 for salary deduction (Belitong POM).</p> <p>- JTK Permit (22) dlm BHG.PU/9/129 Jld 23 dated 26 April 2016 for electricity (RM 6) & water bill (RM 4) and excess of medical expenses.</p> <p>- JTK Permit (Siri: 223/34/0351) dated 20/09/2000 for Pembelian barang-barang harian, elektrik dan perabot FELDA Trading Sdn Bhd.</p> <p>However, there is one female worker (Worker ID: 1210638) in Belitong POM has worked overtime on 30/06/2019 from 2215 to 2445 (2.5 hours) which is after 10 pm. Belitong POM didn't have JTK permit for female work on nightshift.</p> <p>In Bukit Tongkat B Estate, it was found out that Employee ID: FW06010020 has the salary of month January 2019 (RM668.42/25 working days or RM26.74/day) and June 2019 (RM834.54/20 working days or RM41.28/day) less than Worker Minimum Wage Order 2018 which is RM1100/month or RM42.31/day. The warning letters were given to the employee for low productivity on 3, 11 and 16 January 2019 however there is no evidence that employer has made the root cause analysis and further action taken on the low productivity for both months in order to comply with Minimum Wage Order 2018.</p>	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	The Register of Leal and Other Requirements was reviewed on 05/06/2019. The registry includes responsible person and status of compliance.	Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	As per the Register of Legal and Other Requirements dated 05/06/2019, the prove of compliance and status of compliance is not available. Interview with assistance manager also shows that he was not sure how compliance can be achieved.	Minor nonconformance

Criterion / Indicator		Assessment Findings	Compliance
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	FGV has established a mechanism to monitor the changes of laws and regulations. The mechanism to review the laws and regulation is conducted annually. Any changes required will be disseminated to the local operating complexes.	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><u>Belitong Palm Oil Mill</u> The government leased the land to FELDA for development. As per agreement letter between FELDA and FELDA Mills Corporation dated 2 December 1995, FELDA agreed to grant part of the land for the purpose of palm oil mill and related purpose at 13.51 hectares. This agreement was valid from 1994 until 2024. <u>Bukit Tongkat B Estate</u> Land Title was available in Bukit Tongkat B as per below sampling:-</p> <table border="1" data-bbox="974 622 1859 1157"> <thead> <tr> <th>Lot No</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr> <td>PTD 7519</td> <td>0.7743</td> </tr> <tr> <td>PT PTD 7517</td> <td>284.10 ha</td> </tr> <tr> <td>PT PTD 7516</td> <td>186.80 ha</td> </tr> <tr> <td>PT PTD 3116</td> <td>188.30</td> </tr> <tr> <td>PT PTD 7520</td> <td>129.60</td> </tr> <tr> <td>PT PTD 7523</td> <td>12.91</td> </tr> <tr> <td>PT PTD 7524</td> <td>17.31</td> </tr> <tr> <td>Agreement between Johor Government with Rancangan Kemajuan Tanah Ulu penggeli, Ulu belitong, Bukit Tongkat dated 15 Nov 1978 (99 years) until 27 Oct 2098. No Grant PTD 7521</td> <td>419.5611(as per Grant 3449ha)</td> </tr> <tr> <td>Total</td> <td>1242.52 (1070.66ha)</td> </tr> </tbody> </table> <p><u>Ulu Belitong Estate</u> For Ulu Belitong estate, the total hectarage is 138.49 ha. The rental agreement was signed between Federal Land Development Authority and Felda Agricultural Services Sdn Bhd dated 7 Feb 2017 which expired on 31 December 2017. As per letter (18)820101013/khidmat korporat/External</p>	Lot No	Hectarage	PTD 7519	0.7743	PT PTD 7517	284.10 ha	PT PTD 7516	186.80 ha	PT PTD 3116	188.30	PT PTD 7520	129.60	PT PTD 7523	12.91	PT PTD 7524	17.31	Agreement between Johor Government with Rancangan Kemajuan Tanah Ulu penggeli, Ulu belitong, Bukit Tongkat dated 15 Nov 1978 (99 years) until 27 Oct 2098. No Grant PTD 7521	419.5611(as per Grant 3449ha)	Total	1242.52 (1070.66ha)	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		dated 14 June 2019, new rental agreement was establish for Ulu Belitong estate with new total hectarage 157.12 Ha.	
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	For BPOM, the Legal boundaries were clearly demarcated with fences between estate and mill. At Bukit Tongkat Estate, estate boundary with Kluang Forest Reserve and among the methods of demarcation seen were trenches, electrical fencing and pegs painted with red & white colour.	Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no evidence of a legitimately contested right to use the land within the Belitong Complex.	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no evidence of a legitimately contested right to use the land within the Belitong Complex.	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 evidence of a legitimately contested right to use the land within the Belitong Complex.	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 evidence of a legitimately contested right to use the land within the Belitong Complex.	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.			

Criterion / Indicator		Assessment Findings	Compliance
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 -	Based on interviews with the stakeholders and documents available, there is no evidence that the estate and mill operations diminish any legal, customary or user rights. Therefore, this indicator is not applicable.	Complied
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	Based on interviews with the stakeholders and documents available, there is no evidence that the estate and mill operations diminish any legal, customary or user rights. Therefore, this indicator is not applicable.	Complied

Criterion / Indicator		Assessment Findings	Compliance									
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	Based on interviews with the stakeholders and documents available, there is no evidence that the estate and mill operations diminish any legal, customary or user rights. Therefore, this indicator is not applicable.	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	Based on interviews with the stakeholders and documents available, there is no evidence that the estate and mill operations diminish any legal, customary or user rights. Therefore, this indicator is not applicable.	Complied									
Principle 3: Commitment to long-term economic and financial viability												
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.												
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Budget for Belitong Mill and estate is available, sampling refer to Belanjawan Bukit Tongkat B for 5 year. This budget is include the wages and allowance, medical, housing, commission, office maintenance and others. Example referred under Anggaran Perbelanjaan AM bagi Tahun 2019 for office maintenance is around RM 1,327,045.00 and for road side maintenance is around RM 2280,460.00.	Complied									
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	The replanting programme was established. Sighted Replanting Programme (FAS-RSPO/L1/K3.1/3.1.2 from year 2019 until 2023: <table border="1" data-bbox="972 1082 1861 1249"> <thead> <tr> <th>Estate</th> <th>Year will be replanting</th> <th>Hectare/field</th> </tr> </thead> <tbody> <tr> <td>Bukit Tongkat B</td> <td>2019</td> <td>PM00G (59.34 ha) PM00H(64.8 ha)</td> </tr> <tr> <td>Ulu Belitong</td> <td>No replanting within 5 years</td> <td>Nil.</td> </tr> </tbody> </table>	Estate	Year will be replanting	Hectare/field	Bukit Tongkat B	2019	PM00G (59.34 ha) PM00H(64.8 ha)	Ulu Belitong	No replanting within 5 years	Nil.	Complied
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Bukit Tongkat B	2019	PM00G (59.34 ha) PM00H(64.8 ha)										
Ulu Belitong	No replanting within 5 years	Nil.										
Principle 4: Use of appropriate best practices by growers and millers												

Criterion / Indicator	Assessment Findings	Compliance
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.		
4.1.1	<p>Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p> <p>The SOP for estates had been established entitled "Manual Ladang Sawit Lestari" (Sustainable Oil Palm Plantation Manual), 3rd edition as guidance to maintain the agriculture best practices. There are 5 main sections in the manual i.e. oil palm nursery management, development of replanting, immature oil palms, mature oil palms and fertiliser application.</p> <p>As for the mill, 3-tier Documentation System is in place:</p> <p>i. Tier 1: QOHSEMS Management Manual; Doc. no.: FPI/L1/QOHSE-1.0; Rev. 1.0; Date: 18/11/2016 ii. Tier 2: QOHSEMS Procedure; Doc. no.: FPI/L2/QOHSE- 1.0 – FPI/L2/QOHSE-25.0; Rev. 14; Date: 31/5/2017 iii. Tier 3: QOHSEMS Specific Work Instruction; FPI/L3/1-01 - FPI/L3/16-01; Rev. 24; Date: 31/5/2017; i.e. Palm Oil Mill Operation</p> <p>Manual and amendments covering every station from the security gate for reception of FFB until the delivery of processed oil and POME management.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance															
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	<p>FGV has established mechanism to check the consistency of procedure established such as Quality executive visit, RC visit, internal audit or internal request email. Sighted the Quality executive visit report recorded in the document dated 27 Sept 2019 in Belitong POM</p> <p>Mechanism to check consistent implementation of procedure is through Internal Audit, Mill Advisor and Regional compliance unit Visit. Internal Audit is planned twice a year by Sustainability Department, refer to internal audit carried out at specific operating units;</p> <table border="1"> <thead> <tr> <th>Operating unit</th> <th>Audit Date</th> <th>Finding/ NC status</th> </tr> </thead> <tbody> <tr> <td>Belitong POM</td> <td>19 Sept 2019 (Internal Audit)</td> <td>From the internal audit 27% was not comply with the requirement. All action already been taken.</td> </tr> <tr> <td>Bukit Tongkat B</td> <td>17-18 Sept 2019 (Internal Audit)</td> <td>The internal audit result 13% not comply. The corrective action already been taken.</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Operating Unit</th> <th>Agronomist visit</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Bukit Tongkat B</td> <td>26 March 2019</td> <td>The implementation was according to recommendation.</td> </tr> </tbody> </table> <p>In estate, agronomist also carried out the assessment and recommendation for manuring and others.</p>	Operating unit	Audit Date	Finding/ NC status	Belitong POM	19 Sept 2019 (Internal Audit)	From the internal audit 27% was not comply with the requirement. All action already been taken.	Bukit Tongkat B	17-18 Sept 2019 (Internal Audit)	The internal audit result 13% not comply. The corrective action already been taken.	Operating Unit	Agronomist visit	Remarks	Bukit Tongkat B	26 March 2019	The implementation was according to recommendation.	Complied
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Criterion / Indicator		Assessment Findings	Compliance
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	Records of monitoring and action taken by the mill were well maintained and available at the mill office for review. Sighted the sample records verified as follows such as Report from Quality Executive visit dated 27 Sept 2019.	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Purchasing of third-party sourced FFB implemented as per established Procedure: Purchasing of FFB; Doc. no.: FGV/FGVPM/II/QOHSE/15/012.1; Rev. 2; Date: 31/5/2017. There have 7 dealer and 12 smallholder as their FFB supplier was been recorded.	Complied
Criterion 4.2:			
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
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 -	Management of soil fertility is guided by FGV's "Manual Ladang Sawit Lestari" (Oil Palm Plantation Sustainability Manual), Third Edition (2017), Section V: Manuring. It covers the applications of fertiliser for various stages of palm age and techniques. Recommendation of type of fertilisers and dosage is given by the agronomy unit through analysis of foliar and soil. The evidence of implementation was seen through verification of various records as described in 4.2.2 and 4.2.3, apart from interview with manuring workers.	Complied
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. Bukit Tongkat B, Agronomist report by FGV Agri Services department dated 26 March 2019, fertilizer recommendation 2019 was done by agronomist : <ol style="list-style-type: none"> 1. PM00G : NK Mixture 12.6/24(AS) : 2.25 kg/ Palm 2. PM00H : ROCKERP: 1.50kg/ Palm 	Complied

Criterion / Indicator		Assessment Findings			Compliance									
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>Foliar and soil sampling was carried out by Internal Agronomist from Agronomy Advisory and Services Department prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conduct for every year while for soil analysis, the frequency for soil sampling is conducted at 5 years intervals (Leaf and Soil Sampling Notes Procedure. Analysis reports were summarized as per below:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Agronomist report</th> <th>Leaf Sampling and Soil Sampling</th> </tr> </thead> <tbody> <tr> <td>Bukit Tongkat B</td> <td>Dated; 26 March 2019 By Izwanizam Bin Arifin</td> <td>Report can refer leaf sampling and soil sampling result.</td> </tr> <tr> <td>Ulu Belitong</td> <td>Dated : 25 April 2019 By Mohd Hadi Akhbar Basri</td> <td>Leaf sampling in report mention the deficiency on Boron around 5-25% for others like NPK was normal. For Soil sampling comment was High content of Mg,Ex Ca, and P element.</td> </tr> </tbody> </table>			Estate	Agronomist report	Leaf Sampling and Soil Sampling	Bukit Tongkat B	Dated; 26 March 2019 By Izwanizam Bin Arifin	Report can refer leaf sampling and soil sampling result.	Ulu Belitong	Dated : 25 April 2019 By Mohd Hadi Akhbar Basri	Leaf sampling in report mention the deficiency on Boron around 5-25% for others like NPK was normal. For Soil sampling comment was High content of Mg,Ex Ca, and P element.	Complied
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Criterion / Indicator	Assessment Findings	Compliance
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 -	Complied
Criterion 4.3: Practices minimise and control erosion and degradation of soils.		
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Complied
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Complied
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	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 -	Not applicable

Criterion / Indicator		Assessment Findings	Compliance
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	Not applicable because no peat soil in Belitong POM supply base.	Not applicable
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 -	Not applicable because no peat soil in Belitong POM supply base.	Not applicable
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.			
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	The target of water consumption at mill is 1.2liter per ton of FFB. However the average water consumed at the mill from January 2019 – October 2019 was 1.425. As interview with assistance manager, there is not water management plan available to meet the target set.	Minor nonconformance
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	During field assessment it was observed that the identification of buffer zone is through areas planted with blue peg or palm painted with blue. There were no traces of spraying and chemical application. During interview with workers at Ulu Belitong, it was confirmed that the spraying gang understood about the blue zone.	Complied
4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	According to the DOE mill operating license, the BOD level for final discharge is 20mg/l. The monthly monitoring of the BOD was verified. Mill conducts weekly laboratory analysis of the discharge. The discharge limits are found to be meeting the license limit. The BOD concentration discharged from Jan-Sept 2019 ranged from 21mg/l(2 cases out of 35 samples) – 4mg/l.	Complied
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	The water consumed for the mill operations is monitored daily. The average water consumed from January 2019 – October 2019 was 1.425 litre per tonne of FFB.	Complied

Criterion / Indicator		Assessment Findings	Compliance									
Criterion 4.5:												
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.												
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	IPM plan dated Jan 2019. This plan include cencus on rat, Owl, bagworm and others. The implementation as per rat cencus record CDD-RSPO L1/K 4.5/4.5.2 in Field PM11Q dated 8/8/2019. Other sampling on Barn Owl Box document referred ML-1A/L4-F16(0) at Field PM06J dated 7 Feb 2019 have 20 box with occupancy 65%.	Complied									
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Last IPM training in Bukit Tongkat B was done on 8 March 2019 on rat cencus and baiting during Rollcall and attended by 12 people.	Complied									
Criterion 4.6:												
Pesticides are used in ways that do not endanger health or the environment												
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	Justification for all pesticide available under Manual Lestari 1A, under Document: ML- 1A/L3-GP1(0) dated March 2012. In this Justification all chemical such as pesticide, Herbicide and Fungicide is available for each chemical.	Complied									
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained <table border="1" data-bbox="969 1050 1859 1157"> <thead> <tr> <th>Estate</th> <th>Application Hectarage</th> <th>AI/Ha</th> </tr> </thead> <tbody> <tr> <td>Bukit Tongkat B</td> <td>1070.66</td> <td>1.601</td> </tr> <tr> <td>Ulu Belitong</td> <td>128.46</td> <td>2.45</td> </tr> </tbody> </table> <p>The higher on using chemical because high raining day for this year than previous year.</p>	Estate	Application Hectarage	AI/Ha	Bukit Tongkat B	1070.66	1.601	Ulu Belitong	128.46	2.45	Complied
Estate	Application Hectarage	AI/Ha										
Bukit Tongkat B	1070.66	1.601										
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Criterion / Indicator		Assessment Findings	Compliance
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Manual Lestari 1A . The implementation in the field is consistent with the manual. There is no prophylactic use of pesticides. It is the policy to minimize the use of pesticides in accordance with IPM plan. The pesticide reduction program is monitored on usage per hectare basis.	Complied
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 -	At FGV Lepar Hilir referred (27)010810/HQ/JAB.OP.17/ Plantations/AM dated 8 May 2017 under Title : Prohibition On Using Paraquat Dichloride. This letter or memo to all FGV plantation to ensure cannot use Paraquat start from this letter issue approved by Suhaidi Hamzah(Executive Director)	Complied

Criterion / Indicator	Assessment Findings	Compliance																						
4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	<p>The appropriate safety and application equipment (safety boots, safety helmets, rubber boots, cartridge masks, safety goggles, gloves and overalls) had been provided and used by the pesticides operators. PPE is been given to workers referred record in ` Buku Penyerahan PPE kepada pekerja' example record for Mask 2550, latest PPE given. The training also been given to ensure they competent with their work as per sampling below:-</p> <table border="1" data-bbox="969 587 1865 1254"> <thead> <tr> <th data-bbox="969 587 1128 624">Id Workers</th> <th data-bbox="1128 587 1464 624">Training attend</th> <th data-bbox="1464 587 1673 624">Date</th> <th data-bbox="1673 587 1865 624">Estate</th> </tr> </thead> <tbody> <tr> <td data-bbox="969 624 1128 692">FW 03300445</td> <td data-bbox="1128 624 1464 692" rowspan="4">Spraying and handling chemical</td> <td data-bbox="1464 624 1673 692" rowspan="4">7 August 2019</td> <td data-bbox="1673 624 1865 692" rowspan="4">Bukit Tongkat B</td> </tr> <tr> <td data-bbox="969 692 1128 794">FW 03301800 1</td> </tr> <tr> <td data-bbox="969 794 1128 863">FW 03300328</td> </tr> <tr> <td data-bbox="969 863 1128 932">FW 03301080</td> </tr> <tr> <td data-bbox="969 932 1128 1000">FW 01919018</td> <td data-bbox="1128 932 1464 1000" rowspan="2">Briefing on Spraying Technique</td> <td data-bbox="1464 932 1673 1000" rowspan="2">16 July 2019</td> <td data-bbox="1673 932 1865 1000" rowspan="2">Ulu Belitong estate</td> </tr> <tr> <td data-bbox="969 1000 1128 1069">FW 01919027</td> </tr> <tr> <td data-bbox="969 1069 1128 1137">FW 01919026</td> <td data-bbox="1128 1069 1464 1137" rowspan="3">Manuring and PPE training</td> <td data-bbox="1464 1069 1673 1137" rowspan="3">14 May 2019</td> <td data-bbox="1673 1069 1865 1137" rowspan="3">Ulu Belitong estate</td> </tr> <tr> <td data-bbox="969 1137 1128 1206">FW 01919019</td> </tr> <tr> <td data-bbox="969 1206 1128 1254">FW 01919020</td> </tr> </tbody> </table>	Id Workers	Training attend	Date	Estate	FW 03300445	Spraying and handling chemical	7 August 2019	Bukit Tongkat B	FW 03301800 1	FW 03300328	FW 03301080	FW 01919018	Briefing on Spraying Technique	16 July 2019	Ulu Belitong estate	FW 01919027	FW 01919026	Manuring and PPE training	14 May 2019	Ulu Belitong estate	FW 01919019	FW 01919020	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation and as per SOP (Working Safety Procedure) FGVPM/L3/PK-03 dated 1 April 2014.	Complied
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in "Manual Ladang Sawit Lestari" MLSL (Ed.2) – Sec. 2(5.0). The implementation in the field is consistent with the Agriculture Manual. The hazard already been assess in HIRARC ad action plan was available. During interview in field PM00G with Spraying all PPE been using such as Apron, 3M respirator and Safety Shoes, verified with PPE issuance dated 1 Oct 2019 (FW 06010044, FW06010002).	Complied
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spraying at all estate.	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 -	There is no associated smallholder at Belitong Certification Unit. Employees handling pesticide given knowledge and skill required to cover safe handling practices and standard operating procedures.	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 -	Waste are disposed either as scheduled waste, recycle waste or landfilled. Please refer to section 5.3 for assessment and finding raised. At Ulu Belitong, the scheduled waste are being transported Tun Razak Agriculture Research Center for disposal. The approval was received from DOE on 09/08/2016.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p>	<p>In Mill, CHRA Ref No. JKPP HIE 127/171-2(286) by Nor Mohd Razif Noraini dated 3 May 2016 from MZ Enviro Testing And Consulting.</p> <p>In Bukit Tongkat B estate the CHRA was done by Ihsan Bin Sharif (JKPP IH 127/171-2(85) valid from 5 Jan 2015 until 4 Jan 2016. The report was conducted on October 2015 and based on report medical surveillance must be done Annually, the latest was done on 16 Feb 2019 and previously was on 19 Feb 2018. In Medical Surveillance (HQ/11/DOC/00/235) the total workers that involve with medical surveillance was 4 from pesticide sprayer and premix and 9 from manuring. From the result 2 workers was unfit (FW) however no changes in work for both of them as per interview and verification on payslip for month of 07/2019 and 08/2019 thus Major NC been Raised.</p> <p>The latest medical surveillance by Dr Halim Bin Ishak (JKPP HQ/08/DOC/00/387) was done last on 26 April 2018 however no medical surveillance been conducted for year 2019 thus Major NC been raised.</p>	<p>Major nonconformance</p>

Criterion / Indicator		Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	Pesticide handlers and sprayers in the estates were noted to be men only. It was verified from records, field inspections and interviews that no pregnant or breast-feeding woman had been offered work as pesticide operator.	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:			

<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>FGVPM has established Safety and Health Policy and documented in Quality, Occupational Safety and Health and Environmental Policy signed by the CEO on 17 August 2018.</p> <p>The mill has established safety and health plan dated 7 Jan 2019. The plan covers on CHRA, Medical Surveillance, compliance monitoring, Fire Drill, training, OSH meeting and etc. Sighted the implementation of the management plan as follows:</p> <p>i. Audiometric test been done on 20 Oct 2018 by Industrial Safety Management Services, found the 2 STS (Standard Threshold Shift) and 1 workers with hearing impairment. For 2019 the Audiometric test was done on 12 Oct 2019 by Industrial Safety Management Services.</p> <p>ii. The mill has conducted the medical surveillance for the workers on annually basis. Latest medical surveillance was conducted on 10/11/2018 referred report from Dr Razif Bin Zainol Abidin (HQ/15/DOC/00/431). 16 workers were send for surveillance. Found 2 workers (1204826 & 1200825) was unfit as per result in the medical surveillance. Management already take action by transfer the worker into other work that not involve with chemical, refer letter (109)4056/BLT/840A/11 pt.2 and (108)4056/BLT/840A/11 pt.2.</p> <p>iii. Chemical register was available dated 1 Jan 2019, No changes in chemical registered. CHRA Ref No. JKPP HIE 127/171-2(286) by Nor Mohd Razif Noraini dated 3 May 2016 from MZ Enviro Testing And Consulting.</p> <p>iv. Chemical exposure monitoring (report no MZ/CEM/KSB/0918), done on August 2018 by Enviro Testing & Consulting (HQ/14/JHI/00/193). From the result was below the PEL limit. For year 2019 the chemical exposure the management already send dated 9 Oct 2019 and report still pending with Hygiene tech.</p> <p>v. LEV inspection (MZ/KSB/LEV/0818) by MZ Testing & Consulting (M) Sdn Bhd (JKPP HIE 127/171-3/2(160)). Dated 1 August 2018 previously done. For</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>this year the inspection was done on 9 Oct 2019 (refer letter MZ/KSB/SK/1119).</p> <p>In estate, OSH plan was available dated Jan 2019 approved by manager. As per OSH plan verification was done as per below:-</p> <p>OSH communities was available in FGV Bukit Tongkat B, Mr Hadi Helmi as Chairman (referred letter 38/9520/HSE/FGVPM/WM/2019) with 6 representative for employer and 8 representative from employee. OSH appointment letter was available dated 1 April 2019.</p> <p>OSH meeting was done periodically once in 3 month. Latest record available dated 7 Oct 2019 (04/2019) and previously was done on 20 August 2019 (03/2019).</p> <p>Verification on training should be done as per OSH plan, Policy on Safety briefing done dated 25 April 2019, and for HIRARC training was done 8 Jan 2019.</p>	

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.2</p>	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p> <p>FGVPI has established SOP to assess risk of all operation. Refer doc no FPI/L2/QOSHE-1.0 rev. 7 dated 8/6/2018. The mill has conducted risk assessment and documented Hazard Identification, Risk Assessment and Determination Control. Ref form no. FPI/L4/QOSHE-1.4 Pind. 2. The HIRADC reviewed at minimum of once a year and if any accident cases happen in the mill. Latest review was conducted in 27/5/2019. The risk assessment already been done periodically recorded under HIRARC in E1.2.1 for all operation activity. The latest HIRARC sampling on FGVPM/L4/PP-1.4 Pind 0 dated reviewed on 3 June 2019.</p> <p>In Bukit Tongkat B, The Risk during work have been assess and recorded in HIRARC (Hazard Identification, Risk Assessment and Risk Control) dated 7 Nov 2019. Its cover harvesting, Rat bait, herbicide, Office, Elephant control, Motorcycle, and pesticide control.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance												
4.7.3	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Minor compliance -</p>	<p>All operating units visited has established training program for all workers. FGV has established list of appropriated PPE as per work activity. The mill maintained the PPE issuance records by workers. Sighted PPE records for workers with employee id. no. LW1210610,LW 1210884,LW 1204544. Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. PPE standard and compliance based on CHRA recommendation and PPE matrix PPE/FGVPM dated 2015 rev:1</p> <table border="1" data-bbox="974 750 1859 954"> <thead> <tr> <th>Work Unit PPE type</th> <th>Work Unit PPE type</th> </tr> </thead> <tbody> <tr> <td>Laboratory Respirator: 3M 6003</td> <td>Laboratory Respirator: 3M 6003</td> </tr> <tr> <td>Rubber/nitrile glove</td> <td>Rubber/nitrile glove</td> </tr> <tr> <td>Goggle: Anti-fog</td> <td>Goggle: Anti-fog</td> </tr> <tr> <td>Workshop Welding shield</td> <td>Workshop Welding shield</td> </tr> <tr> <td>Respirator N95</td> <td>Respirator N95</td> </tr> </tbody> </table>	Work Unit PPE type	Work Unit PPE type	Laboratory Respirator: 3M 6003	Laboratory Respirator: 3M 6003	Rubber/nitrile glove	Rubber/nitrile glove	Goggle: Anti-fog	Goggle: Anti-fog	Workshop Welding shield	Workshop Welding shield	Respirator N95	Respirator N95
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Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.4</p>	<p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p> <p>The mill manager were appointed as OSH Committee Chairman and responsible for all issue regarding safety and health at the mill. The mill manger has appointed members of OSH Committee consist of secretary, employer and employee representatives. Latest appointment letter dated 25/9/2019 signed by the mill manager.</p> <p>The committee conduct meeting to discussed safety and health issue on quarterly basis. Sighted the minutes of OSH committee meeting dated 29/8/2019, 21/5/2019 and 14/2/2019.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p> <p>FGVP has established emergency procedures and documented in Emergency Preparedness and Response in QOSHE Manual Procedure document no. FPI/L2/QOSHE-14.0. In the procedure stated emergency procedure on fire, minor and major accident and chemical spillage. The procedure is written in Bahasa Malaysia an available at the office for review.</p> <p><u>Belitong Palm Oil Mill</u> First aid were provided at strategic work station in the mill. Noted during interview and site visit at steriliser station and boiler station, the operator aware on the nearest first aid box location. However no first aid box in Steriliser area, the first aid in Workshop available however the item was not complete. The accident record for mill was available as per detail below:- JKKP 6 available only for accident happen on 4 August 2108 referred letter (41)4056/BLT/840/11.1 pt.3. No record accident for year 2019. However found 2 workers unfit based on previous year medical surveillance on 10 /11/2018 because of N-Hexane however no record of JKKP 7 for both workers and no record in JKKP 8. For JKKP 8, been report on 24 Jan 2019 for year 2018.</p> <p>In Bukit Tongkat B, latest fire drill, ERP and First Aid was conducted on 20 Dec 2017 and valid until 9 Oct 2020 as per certificate saries (1)16529 and (1)16516</p> <p>In Bukit Tongkat B, JKKP 8 (JKKP 8/25625/2018) dated 15 Jan 2019 have recorded no accident happen in estate.</p> <p>In Ulu Belitong estate, JKKP 8 (JKKP 8/31879/2018) dated 24 Jan 2019 have 1 accident record with MC 132 for Taib Andak, no accident happen in Ulu Belitong estate.</p>	<p>Upgraded to Major NC due to recurrence of issue in the same indicator</p>

Criterion / Indicator	Assessment Findings	Compliance												
<p>4.7.6 All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p>	<p>Medical care is provided to all the employees. All workers is covered with SOCSO as per Regulations 2019 and Employer’s Circular No. 3 Year 2018, Employees’ Social Security Act, 1969.</p> <p><u>Belitong Palm Oil Mill</u> All workers in the mill are covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial) and Group Personel Accident. Refer to form 8A, “Jadual Caruman” for July, August and September 2019.</p> <p>Sighted the SOCSO application form for accident case dated 26/5/2019 and SOCSO application and compensation payment from Group Personnel Accident for case dated 17/5/2018.</p> <table border="1" data-bbox="972 815 1861 1209"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Mill/estate</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>SOCSO</td> <td>Sept 2019</td> <td>Belitong Mill</td> <td>No Id: FW 03680955, FW 03680968, FW 0380970, FW 03680867</td> </tr> <tr> <td>SOCSO</td> <td>Sept 2019</td> <td>Ulu Belitong</td> <td>No Id: FW01919029, FW01919026, FW01919019, FW01919025, FW04750362.</td> </tr> </tbody> </table> <p>From the verification FGV already establish the procedure referred FGV/FGVPM-JTK/SOP/017 dated 1 Sep 2019 distributed on 1 Oct 2019 to all operation unit .The claim to JTK already been done by management dated 3 december 2018 refer toletter 475/Fail_Peribadi/FW04750873 to JTK. The claim already been get dated 7 March 2019 (refer letter: CLC047519030002).</p>	Insurance	Period	Mill/estate	Remarks	SOCSO	Sept 2019	Belitong Mill	No Id: FW 03680955, FW 03680968, FW 0380970, FW 03680867	SOCSO	Sept 2019	Ulu Belitong	No Id: FW01919029, FW01919026, FW01919019, FW01919025, FW04750362.	<p>Complied</p>
Insurance	Period	Mill/estate	Remarks											
SOCSO	Sept 2019	Belitong Mill	No Id: FW 03680955, FW 03680968, FW 0380970, FW 03680867											
SOCSO	Sept 2019	Ulu Belitong	No Id: FW01919029, FW01919026, FW01919019, FW01919025, FW04750362.											

Criterion / Indicator		Assessment Findings	Compliance															
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained and based on JKPP 6, 7 & 8. Sample of accident statistic as shown below :</p> <table border="1"> <thead> <tr> <th>Year</th> <th></th> <th>BPOM</th> <th>BTE</th> <th>UBE</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>Case</td> <td>2</td> <td>0</td> <td>1</td> </tr> <tr> <td></td> <td>LTA</td> <td>23.81</td> <td>0</td> <td>9.62</td> </tr> </tbody> </table> <p>The mill and estates visited submitted the JKPP 8 form to DOSH through myKPP. Sighted the submission dated as follows: BPOM: 24/1/2019 UBE: 24/1/2019</p>	Year		BPOM	BTE	UBE	2018	Case	2	0	1		LTA	23.81	0	9.62	Complied
Year		BPOM	BTE	UBE														
2018	Case	2	0	1														
	LTA	23.81	0	9.62														
<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>																		
4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -	The mill has established training program and documented in Annual Training Program for all employee and contractors FY 2019.	Complied															

Criterion / Indicator	Assessment Findings	Compliance
<p>4.8.2</p> <p>Records of training for each employee shall be maintained. - Minor compliance -</p>	<p><u>Belitong Palm Oil Mill</u> The mill maintained the training records for all employee. Sighted the sampled training records as follows: i. Group Sustainability Policy training dated 18 Oct 2019 ii. RSPO awareness 23 Jan 2019 iii. Safety briefing and awareness to contractor dated 7 March 2019 iv. First Aid Training dated 18 Oct 2019 v. Fire Drill training dated 18 Oct 2019</p> <p><u>Bukit Tongkat B</u> i. IPM training and P&D control dated 15 August 2019 ii. Harvesting training 29 Jan 2018 iii. Chemical Handling training 2 September 2019 iv. MSPO & RSPO and Human right 5 July 2019 v. Buffer zone dated 30 Oct 2019 vi. Manuring training dated 30 April 2019 vii. First Aid training dated 7 Oct 2019 viii. Safety Training in Field dated 31 Jan 2018 ix. Scheduled waste Training dated 20 Sept 2019</p> <p><u>Ulu Belitong estate</u> i. Anti-Bribery Management System training dated 22 Oct 2019 ii. Group Sustainability Policy training dated 17 Oct 2019 iii. Harvesting training dated 26 Sept 2019 iv. Harvesting training dated 13 Oct 2019 v. Manuring Training dated 10 Oct 2019 vi. Triple Rinsing training dated 7 Oct 2019 vii. Chemical handling training dated 16 July 2019</p>	<p>Complied</p>
<p>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</p>		

Criterion / Indicator		Assessment Findings	Compliance
Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	The EIA has been conducted in the form of Environmental Aspect and Impact evaluation. The last review of the EAI at mill was on 22/01/2019 and Bkt Tongkat B on 07/04/2019. The EAI was not sufficiently and appropriately assessed: 1. The EAI at mill does not include the disposal of EFB. During the field assessment, it was observed EFB was on burning due to dry season at the mill. However, in the EAI there is no evaluation of this impact and management of this impact is not available. 2. The EAI at mill does not include chemical / lubricant storage at mill. During the field assessment, it was observed that there is no secondary containment. 3. In Bukit Tongkat B estate, there was no sufficient data to demonstrate the determination on the number of case reported to determine the scoring of the impact.	Major nonconformance
5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -	The Significant Environmental Aspect and Impact Registrar for mill dated 22/01/2019 documented the mitigation plans to mitigate the significant EAI. In Bukit Tongkat B estate there is not management plan found for those significant impact: 1. Circle weeding – it was identified to have score of 32 and 24 for resources depletion and land/water contamination. However no management plan was found. 2. Killing Amplified palm – it as identified to have land/water contamination. However no management plan was found.	Upgraded to Major NC due to recurrence of issue in the same indicator

Criterion / Indicator		Assessment Findings	Compliance
5.1.3	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p>The management plan on the environmental impacted by the operations are reviewed annually. The last review conducted at Ulu Belitong was on 26/02/2019 and approved on 28/02/2019.</p> <p>Management review was conducted on 10/10/2019 to review the issues arises. There management review resulted that there is no required changes in the mitigation and monitoring measures.</p>	Complied
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>			
5.2.1	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p>	<p>Bukit Tongkat B Estate HCV assessment was conducted internally lead by Amir Hazmah Bin Dollah Abdullah. The assessment was conducted from 22 to 23 January 2018.</p> <p>The internal HCV assessment was conducted including interview with workers and FELDA Settlers.</p> <p>There is no HCV ID has been identified within the concession. However there are 3 conservation areas identified. There area are mainly border of Kluang forest reserve; steep area at PM00H and gazetted Penggeli river.</p>	Complied
5.2.2	<p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>The recommendations to manage the conservation areas where HCVs are potentially presence are provided in the Bukit Tongkat B HCV assessment conducted in 22 to 23 January 2018 and Ulu Belitong assessment reported on 25/01/2018. Please refer to 5.2.4.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	Continuous training and briefing is provided to workforce usually during master call. Other sample of training regarding conservation was provided to workforce on 14/08/2019 and 12/10/2019. During interview with workers, it was confirmed they understood that no hunting is permitted.	Complied
5.2.4	Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	Sample of monitoring conducted by the estate: 1. Monitoring of wildlife presence. This monitoring is conducted by Felda Security team. For any observed wildlife, it will be recorded in log book "Presence of Wild Animals in Felda Bukit Tongkat B Estate". 2. Water analysis was conducted on 17/10/2019. As per the recommendation, water analysis shall be conducted yearly. 3. Felda Security has conducted routine patrolling to monitor encroachment at conservation area PM00H. The daily patrolling record was reviewed. Management plan with timeline for implementation was not established at Bukit Tongkat B. Furthermore, in the most recent management review was conducted on 02/10/2019, the monitoring outcome of the conservation was not part of the management review discussion which in this case was not able to decide if monitoring plan needs to be revised or improved or maintained.	Minor nonconformance
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	There is no HCV set-asides for local communities. The HCV assessment has identified that there is no potential HCV 5 and 6. The identification was conducted with stakeholder consultation especially with the Felda Settlers.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			

Criterion / Indicator		Assessment Findings	Compliance
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Waste generated from the mill operation has been documented. It includes scheduled waste (e.g. used PPE; chemical containers; battery; electronic items) and non-scheduled waste (e.g. used metal; tires; domestic waste). The waste generated from Bukit Tongkat estate operations include scheduled waste, domestic waste	Complied
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	Chemical containers are disposed as scheduled waste. Sample of the waste recorded in e-Swis: 1. For mill's September 2019 was reported on 26/09/2019 with SW305 of 0.0850MT; SW410 of 0.0560MT. For mill's April 2019 was reported on 28/04/2019 with SW306 of 0.0250MT and SW409 of 0.09MT.	Complied
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	Field observation at mill and estate evident the below: 1. Waste from contractor's work are disposed at decanter cake disposal area. 2. At mill, the first generation dates for Scheduled waste SW410, SW 409 and SW 305 are not clear. Furthermore the usage of label is not consistent. 3. At the MBR plant, spotted traces of burning waste. 4. Observed 3 oil drums are disposed at scrap yard. 5. N-Hexane emptied containers are found in chemical stores rather than scheduled waste store. 6. At Bukit Tongkat B, there is no label and first generation date for scheduled waste SW409 (contaminated gloves and PPE). SW410 at Ulu Belitong, first generation date is 28/03/2019. As on the day of the audit, it has not been disposed.	Upgraded to Major NC due to recurrence of issue in the same indicator
Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.			

Criterion / Indicator		Assessment Findings	Compliance
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	The consumption of diesel at mill is monitored using bin card and inventory records. The mill has installed wench system to reduce vehicle usage for adjusting FFB bins/cages. The mill and plantations are connected with national grid. The usage of grid power could reduce fossil fuel consumptions. Preventive maintenance for vehicle are in place to ensure efficiency to reduce fuel consumptions.	Complied
Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
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 -	FGV in committed to "No Open Burning / Use of Fire". The commitment is stated in the Group Sustainability Policy dated 29/05/2019. There was burn marks found in the estate.	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	There was no replanting activities in Bukit Tongkat B estate. Furthermore the Group Sustainability Policy dated 29/05/2019 prohibits open burning.	Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			

Criterion / Indicator		Assessment Findings	Compliance
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	The polluting activities includes air pollutant and GHG emissions. The source of the pollutants are stated in the Resource usage, pollution control and GHG mission Management Plan.	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	The significant GHG emission from plantation operations is fertilizer usage while in the mill will be open lagoon to treat POME. The plan to reduce fertilizer consumption at estates operation is to increase the usage EFB while at the mill MBR has been used to enhance water treatment method to reduce COD concentration before discharge.	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 -	The GHG emission has been calculated using the PalmGHG version 3. The GHG emitted is 1.23 tCO ₂ e/ha. As this certification is only estate certification the inputs to determine the GHG emission includes – diesel consumption, electricity consumption and fertilizer applications. The data input listing (Jan 2018 – Dec 2018) was verified to confirm the inputs are accurate.	Complied
Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.			
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	The SIA with was carried out on 23 Jan 2018 and 24 Jan 2018 for the Mill and Bkt Tongkat B Estate and Ulu Belitong Estate, respectively. Records of consultation such as attendance lists and inputs received from stakeholders are being documented. Those who attended included workers (foreign and local), contractors, etc. Records of meetings are documented in the SIA report itself.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Based on the attendance lists sighted, there is evidence that the SIA which was carried out for the Belitong Complex was done with the participation of affected parties. A total of 17 participants attended at the Mill, 19 at Bkt Tongkah B Estate and 22 at Ulu Belitong Estate. The participants included foreign and local workers, contractors, etc), and 22 at Ulu Belitong Estate (workers, contractor).	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 -	Stakeholder meeting was conducted in every 5 years as per SIA SOP FGV/ML-1A/I2-Pr21 issue 1 re 2 dated Mach 2019. For the Belitong Complex, a stakeholder consultation was carried out on 24 May 2018 where 107 participants attended. Issues were raised by stakeholders and discussed. For example, the Department of Wildlife and National Parks raised the issue of elephants within the estates. It was mutually agreed that a committee would be set up to reduce elephant encroachments into the estates.	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The plans were revised following SIA held on 23 & 24 January 2018 and noted under Table 5.2.1 of the SIA Report (Document No: 1/2018 dated 23 January 2018). As per SOP for Penilaian Impak Sosial (SIA), Doc No: FGV/ML-1A/L2-Pr21 Issue 1 version 2 effective date on March 2019, the review on SIA will be raised for 2 years period.	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 is no smallholder scheme at the Belitong Complex and therefore this indicator is not applicable.	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.			

Criterion / Indicator		Assessment Findings	Compliance
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	Documented procedure in place for consultation and communication as per "Menangani Aduan dan Rungutan" procedure, Doc. No. ML-1A/L2-Pr13(0), Issue 1 dated 01.06.2016 and "Komunikasi, Penglibatan dan Rundingan", Doc. No.: FGV/ML-1A/L2-Pr12(0), Issue 1, 01.06.2016. Scope of the procedure covered all the complaints related to Project issues, damage or broken of housing, settlers issue under FELDA, social welfare of workers and etc.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	The management officials responsible were appointed as follows: For Belitong Mill: Mohd Shahariezal bin Zainudin, Assistant Manager. Appointment was done via letter dated 1 Jan 2018 Ref: (55) 4056/BLT/840A/30/1. Pt.2. For Bkt Tongkat B Estate: Mr. Khairuddin Bin Abd Halim, Kerani HEP dated 19 Mac 2019 (Bil: 3601/12-1-3 Pt.2) For Ulu Belitong Estate: Mohd fauzi Isahak, Estate Supervisor who was appointed via letter dated 12 March 2019 (Ref: (11)820630001-2019/01/01.	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	For Belitong Mill, the stakeholder list was last updated on 1 Feb 2019. It comprises Felda estates, nearby schools, settler heads (ketua peneroka), contractors, traders, government agencies, panel clinics, etc. For Bukit Tongkat B and Ulu Belitong Estates, their separate stakeholder lists were last updated in 10.10.2018 and contains contractors, other nearby plantation companies, clinics, government agencies, etc.	Complied
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			

Criterion / Indicator		Assessment Findings	Compliance
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	<p>For the Belitong Mill, documented system for dispute resolution is contained in the Procedure Manual Document No. FPI/L2/QOHSE-22.0 entitled Complaints, Non-Conformity, Incidents Investigation and Corrective Action Communication, Participation and Consultation Issue No. 2 issued on 2 January 2008 (amended on 23 September 2016). This procedure is to be read together with the Communication, Participation and Consultation Procedure Document No. FPI/L2/QOHSE-6.0 updated on 29 November 2016, and extract of the Whistleblowing Policy which was circulated to all employees on 24 February 2015 Ref: (1) FGVHB/GIA/WB (2015) by the Group President/CEO.</p> <p>For Bkt Tongkat B & Ulu Belitong Estates, the system exists in Prosedur Menangani Aduan dan Rungutan Document No. FGV/ML-1A/L2-Pr13. This procedure is applicable to all employees and stakeholders who wish to lodge a complaint or grievance. The procedure also provides a mechanism for addressing complaints received, and accords protection and confidentiality to complainants.</p>	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	<p>At the Belitong Mill: all complaints lodged by workers are documented in the Complaints Record Book (Buku Rekod Aduan). This book also shows that all complaints lodged are duly resolved.</p> <p>At Bkt Tongkat B Estate, a complaint form is being used by workers to lodge complaints against house repairs and other things while in Ulu Belitong Estate, complaint book is used. As of the date of this audit, there is no evidence of other complaints lodged by other parties. The actions taken are recorded and dates recorded.</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>			

Criterion / Indicator		Assessment Findings	Compliance
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 -	The procedure applied by Belitong Complex is Procedure known as Pengenalpastian Dan Penyelesaian Pertikaian Tanah Document No. FGV/ML-1A/1.2-Pr10 effective on 1 June 2016. The procedure has clearly states the process of negotiation, involvement of affected and responsible parties (e.g. estate management, FGV Sustainability, Compliance and Certification Department, affected parties) and compensation if any land disputes with Legal Department according to legal requirement and market value.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	The procedure for calculation and distributing fair compensation is contained in procedure known as Pengenalpastian Dan Penyelesaian Pertikaian Tanah Document No. FGV/ML-1A/1.2-Pr10 effective on 1 June 2016. Paragraph 6.3.5 takes into account gender differences, ownership and access to land, different ethnic groups, long-established communities, transmigrant workers, etc.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities, settlers and other stakeholders reported during the time of audit through interviewed with the settlers. Boundary stone and trenches were available to demarcate the boundary of land between the neighbouring stakeholders.	Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			

<p>6.5.1</p>	<p>Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>All workers employed under FGV check-roll are hired based on permanent / recognized employment basis that is based on legal regulation and entitlement as per the employment regulation. They were paid with minimum wage based on piece rated, daily rates and monthly rated according to the task they assigned to. Workers are paid once a month, before 7th day of the month and provided with pay-slip, that details their monthly earned wage, deduction, allowance, overtime pay and rate of pay. Payslip, attendance record for month of Jan, Jun & October 2019 were sampled based on the crop summary as listed below.</p> <p>Belitong POM:</p> <ol style="list-style-type: none"> 1. Employee ID: 1207048 2. Employee ID: 1211630 3. Employee ID: 1211536 4. Employee ID: 1210838 5. Employee ID: 1210700 <p>Bukit Tongkat B Estate:</p> <ol style="list-style-type: none"> 1. Employee ID: FW06010045 2. Employee ID: LW01950087 3. Employee ID: LW06010020 4. Employee ID: LW06010118 5. Employee ID: FW06010020 <p>FASSB Ulu Belitong Estate:</p> <ol style="list-style-type: none"> 1. Employee ID: PI001919027 2. Employee ID: PI001919030 3. Employee ID: P1001919032 4. Employee ID: PB001919022 5. Employee ID: PB001919017 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>For the Belitong Mill, conditions of pay are contained in the Collective Agreement signed between Felda Palm Industries Sdn Bhd and Workers' Union Felda Palm Industries Sdn Bhd Semenanjung valid from 1 January 2019 to 31 December 2021.</p>	

<p>6.5.2</p>	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -</p>	<p>For the Belitong Mill, conditions of pay are contained in the Collective Agreement signed between Felda Palm Industries Sdn Bhd and Workers' Union Felda Palm Industries Sdn Bhd Semenanjung valid from 1 January 2019 to 31 December 2021.</p> <p>For non-unionised workers, their conditions of employment are detailed out in their employment contracts. The contracts were prepared in Bahasa Malaysia for the local and Indonesian workers, and in Bengali for the Bangladeshi workers, and they confirmed that the terms were explained to them by a management official. The employment contracts contain contract duration, type of work, annual leave, public holidays, medical leave, termination, location, working hours, wages, (payment of wages based on Kadar Upah Kerja Pekerja Pentadbiran dan Operasi Ladang Bagi Pekerja Ladang FGVMSB (KUK Bil 06 Mulai 01HB Januari 2019) and based on the Minimum Wages Order 2019.</p> <p>Sampled below employment contract for Jan, Jun and Sept 2019:</p> <p>Belitong POM:</p> <ul style="list-style-type: none"> 6. Employee ID: 1207048 7. Employee ID: 1211630 8. Employee ID: 1211536 9. Employee ID: 1210838 10. Employee ID: 1210700 <p>Bukit Tongkat B Estate:</p> <ul style="list-style-type: none"> 6. Employee ID: FW06010045 7. Employee ID: LW01950087 8. Employee ID: LW06010020 9. Employee ID: LW06010118 10. Employee ID: FW06010020 	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>FASSB Ulu Belitong Estate:</p> <ul style="list-style-type: none"> 6. Employee ID: PI001919027 7. Employee ID: PI001919030 8. Employee ID: P1001919032 9. Employee ID: PB001919022 <p>Employee ID: PB001919017</p>	
6.5.3	<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>- Minor compliance –</p>	<p>The Belitong Complex provide adequate housing for all its workers. Housing provided to the workers are found to be clean and habitable. Amenities provided include secondary and primary schools, government-run health clinic, sundry shops, children playing ground, mosque, etc. Sighted the housing inspection done by Penyelia BTS (Hamidun bin Ahmad) at Belitong POM and Kerani HEP (Khairuddin) at Bukit Tongkat B Estate.</p> <p>However, during housing inspection, it was found out that domestic wastes were disposed behind the house Blk 11a, 11B, 11C and 11D Jalan Antoi, Blk 02 2A, 2B, 2C and 2D Jalan Antoi (Belitong POM) and Block Seri Alamanda & Dahlia (Bukit Tongkat B Estate) but not captured in the housing inspection record.</p>	<p>Upgraded to Major NC due to recurrence of issue in the same indicator</p>
6.5.4	<p>Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p>The workers’ houses are located within a complex and nearby FELDA villagers that contains amenities including grocery shops which sell daily requirements such as rice, cooking oil, flour, eggs, etc. and sold at reasonable prices.</p>	<p>Complied</p>
<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>			
6.6.1	<p>A published statement in local languages recognising freedom of association shall be available.</p> <p>- Major compliance -</p>	<p>At Belitong Complex, the policy recognising freedom of association is available in Bahasa Malaysia entitled Polisi Hak Kebebasan Bersuara & Menganggotai Kesatuan, displayed at the main notice boards at the Mill and Estate offices, near muster ground and near the workers’ hostel.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	The minutes of meetings between the mill management and the committee members of Felde Palm Industries Workers' Union are available. The meetings were held on 18-20 Sept 2019 (Persidangan Perwakilan Tiga Tahunan Kali Ke 15 Sesi 2019-2022) for Belitong POM and 23 May 2019 (Minit Mesyuarat Jawatankuasa Kerja Bil 73) and Minit Mesyuarat Kebajikan TKL Stesen Penyelidikan Ulu Belitong Bil (01)/2019 on 02 nd April 2019. Among the issues discussed were request from different complexes such as: <ol style="list-style-type: none"> 1. Peggeli POM: Includes the compassionate leave for grandchildren's death. 2. Clini 3 POM: Increment and salary for old workers and service and menu in fasting season to be further improved. 3. Bukit Tongkat B POM: to request that Yang Dipertua will escalate any information with regards of union's journey to the members. 4. Ulu Belitong POM: Only information shared during the meeting, no complaint from workers. 	Complied
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	As documented in FGV Holdings Berhad Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, effective date: 29.05.2019, Chapter 5.1.3.1 – Respect for Human Rights. FGV has defined hiring of workers is 18 and above due to the nature of work. Age of workers and candidates are verified against government issue photo ID, passport (for foreign workers) and documented in the personal files. Copy of ID and application form sighted in the personal files evidence of verification is carried out. As FGV policy statement is under drafting, the existing policy is remaining valid as per Child Labour Policy with Doc. No. ML1A/L1-Po5(0) dated 1/6/2014 where the company will not recruit any individual who less than 18 years old to work in plantations.	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	As documented in FGV Holdings Berhad Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, effective date: 29.05.2019, Chapter 5.1.2 – Responsible Employment. Policy displayed publicly in strategic locations within all operating units and communicated directly to employees as well as through general assembly and relevant meetings.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	No discrimination practices sighted; workers are hired based on skill and experience and not based on race, caste, origin, religion, disability, gender, sexual orientation, union membership, age, etc. and treated fairly without any signs of discrimination in terms of work assignment, pay, promotion, etc. 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 benefits/treatment such as free medical treatment, fair overtime offered to all the workers whoever want to work and free housing to everyone. Manual Lestari 1A, Doc. No.: ML-1A/L2-PR10(1), dated March 2012 – Handling Complaint through Gender Committee Procedure is in place to guide the process of complaints received.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	As documented in FGV Holdings Berhad Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, effective date: 29.05.2019, Chapter 5.1.2 – Responsible Employment, where hiring and selection of workers during recruitment is based on skill, minimum age, medical fitness and work experience. Performance review is conducted annually and documented in Performance Appraisal Form: PMS2018. There is no any discrimination based on religion, gender, nationality, etc. during their recruitment.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	FGV Holdings has developed Sexual Harassment, Violence and Reproductive Rights Policy with Doc. No. ML-1A/L1-Po10(0) dated 1/6/2014; and Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, Eff date: 29.05.2019. The company is committed to protect the rights of women and prohibits sexual and all forms of harassment and violence. Workers may raise their concern should there be any cases through gender committee, verbal thru immediate superior / estate manager / worker’s affair office, suggestion / complaint box anonymously. Policies were communicated to all Belitong POM employees on 18/10/2019, and both Bukit Tongkat B Estate and Ulu Belitong Estate on 17/10/2019.	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	FGV Holdings has developed Sexual Harassment, Violence and Reproductive Rights Policy with Doc. No. ML-1A/L1-Po10(0) dated 1/6/2014; and Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, Eff date: 29.05.2019. The company is committed to protect the rights of women on the reproductive and family planning. The policy is publicly displayed at the exterior side of the office area. Policies were communicated to all Belitong POM employees on 18/10/2019, and both Bukit Tongkat B Estate and Ulu Belitong Estate on 17/10/2019.	Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	As per "Carta Alir Proses Aduan; Talian Nur (Kementerian Pembangunan Wanita, Keluarga & Masyarakat)" and the procedure as following: Manual Lestari 1A; 3.11 "Prosedur Menangani Aduan Melalui Jawatankuasa Wanita"; Doc. No.:ML- 1A/L2 PR10(1); Date revised: 22/5/2015; and documented procedure for workers to raise their concern, complain and suggestion of improvement, either with their identity or anonymously as per "Menangani Aduan dan Rungutan/ Handling Complaint" procedure, Doc. No. ML-1A/L2-Pr13(0), issue 1 dated 1/6/2016 and "Komunikasi, Penglibatan dan Rundingan", doc. No.: FGV/ML-1A/L2-Pr12(0), issue 1. Gender committee for Belitong POM established and led by Puan Junidah. Appointment letter dated 01/01/2019 Doc. No: (63)4056/BLT/840a/30 sighted. Sighted the Gender Committee Meeting Minutes for Belitong Mill, FGV Bukit Tongkat B & FASSB Ulu Belitong dated 07/11/2019, 21/06/2019 and 04/102019. There is no sexual harassment case reported so far in Belitong Complex.	Complied
Criterion 6.10:			
Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	The current and past prices for FFB was sighted in the notice board in front of Mill office. It was based on the MPOB prices guideline.	Complied

Criterion / Indicator	Assessment Findings	Compliance
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 -	Based on the interviews conducted, and records sighted at the weighbridge, there is evidence that the Belitong Mill document all monthly transactions (dates of delivery, FFB weight, amount payable) on the slips given to FFB suppliers. The smallholders confirm that the calculation is transparent. Weighing and fruit loading at the Mill ramp are done in a fair and transparent manner.
		Complied

Criterion / Indicator	Assessment Findings	Compliance	
<p>6.10.3</p>	<p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -</p>	<p>Selection of contractors and suppliers for services are carried out via a tender system, and decided by a Tender Committee. Based on interviews held with Suzziq Enterprise and Zaidan Joyoo Enterprise, there is evidence that the contractors understand the provisions of the agreements. The contractors also confirm during stakeholder interview that the tender system is transparent and fair.</p> <p>Also, sighted the contract below: Belitong POM:</p> <ol style="list-style-type: none"> 1. AZ Iman Resources Sdn Bhd (Ref no: (10)FGVPISB/FFBPD/92179) dated 28/02/2019. Harga 1% x KPG = Harga Satu Tan BTS. 2. Fauzi Agro Enterprise (Ref no: (01)FGVTSB/FFBPD/ dated 28/08/2019. Harga 1% x KPG = Harga Satu Tan BTS. <p>Bukit Tongkat B Estate:</p> <ol style="list-style-type: none"> 3. Zaidan Joyoo Enterprise (Contract No: 5300003788) dated 24 Dec 2018 valid from 01.01.2019 – 31.12.2019 for transporting FFB to Belitong Mill and Ulu Penggeli Mill for 3000 MT x RM36.50 and RM47.00. <p>FASSB Ulu Belitong Estate:</p> <ol style="list-style-type: none"> 4. Bukit Tongkat Enterprise SPK no: 820105001-18/820231101-12-208 dated 31 Dec 2018 valid until 31 Dec 2019 for transporting FFB from LadangSawit Pkt 1 2 & 3 Stesen FASSB Ulu Belitong Kluang to Kilang Sawit Ulu Belitong. Perniagaan Ama Bersatu SPK no: 820105001-19/820231502-3-44 dated 21 March 2019 valid until 31 Dec 2019 for transporting EFB from Kilang Sawit Ulung Belitong ke Ladang Sawit Pkt. 1,2 & 3 FGVAS Ulu Belitong. 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	<p>The contractors also confirmed during the interview that payments are made within approximately within 1 month from the issuance date of invoice. Sighted below invoice:</p> <ol style="list-style-type: none"> 1. Voucher no: 350021543, dated 06/11/2019 for FFB prices: MYR 24,824.68. 2. Voucher no: 350021547, dated 06/11/2019 for FFB prices: MYR 29,232.17 3. Progress payment invoice/Reference no: KLV060119100005 (Vendor invoice no: 601/5300004992/10), agreement number: 5300004992 for RM 16,757.51. 4. Contract Payment Certificate no: 10/2019 for RM 18.70/unit, total of RM 51,263.99 on 08/11/2019 5. Contract Payment Certificate no: 04/2019for RM 10.00/unit, total od RM 6,591.97 on 11/10/2019. 	Complied
<p>Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.</p>			

<p>6.11.1</p>	<p>Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –</p>	<p>As a group level, FGV Holdings has Funding Social Development in website: http://www.fgvholdings.com/sustainability/people-development/community-development/ and as below:</p> <ol style="list-style-type: none"> 1. The Settlers: The profitability of FGV’s business contributes to the success of Felda settlers. The annual lease payments on the 355,864 hectares of land that FGV manages provides a secure and consistent income stream to FELDA, enabling it to focus on its social development programmes. Additionally, proceeds from FGV’s profit are channelled to FELDA, through its 37 percent stake in our business. These earnings enable FELDA to be internally funded, and ensures its success in sustaining the vibrancy of Malaysia’s smallholder plantations. FGV further distributes its benefits, in the form of dividends, to settlers via Koperasi Permodalan Felda. Some two million people, comprising 112,635 settler families, children and grandchildren, benefit from plantation income, and it is estimated that a further 300,000 people associated with the settlements derive their income from FELDA. In addition to this, various community-based and assistance programmes are being carried out to look into the welfare of Felda communities, including housing improvement loans, training and development programmes for the settlers’ offsprings and their children, as well as development of infrastructure and facilities within the settlements. 2. Yayasan FELDA: FELDA and FGV contribute two percent net profit every year to Yayasan Felda. Through the foundation, FGV helps to spur a variety of charitable causes and initiatives centering on educational, healthcare and philanthropic causes, which benefit settler communities, rural populace and Malaysians at large. 	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>The development needs of the local community are being carried out on a unit basis. This is verified via requests made by local communities as follows:</p> <p>Belitong POM:</p> <ol style="list-style-type: none"> 1. Supplying 10 hampers for Hari Keluarga Kelab Sukan Audit Johor Tahun 2019 on 12/06/2019. 2. Request for EFB and POME for settler’s estate on 14/03/2019. 3. EFB: 1000 MT for PKT 01,02,03 & 04 dated 07/04/2019 for FTPSB Ulu Peggelli. <p>Bukit Tongkat B Estate:</p> <ol style="list-style-type: none"> 1. Request to borrow the drill machine on 01/01/2019 from Ladang Inas Selatan. 2. Request to improve the police office from FELDA Ulu Belitong on 17/01/2019. <p>Ulu Belitong POM:</p> <ol style="list-style-type: none"> 1. Contribution of Maulidur Rasul Programme (RM200) to Badan Kebajikan Masjid Al Rahman on 08/11/2019. 2. Contribution of 50 hampers for Majlis Semarak Kasih by Pertubuhan Kebajikan Pertubuhan Dalam Komuniti PKPDK Firdausi FELDA Bukit Besar on 25/04/2019. 	
6.11.2	<p>Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.</p> <p>- Minor compliance –</p>	<p>There is no scheme smallholder involved in the Belitong Complex and so this indicator is not applicable.</p>	Not applicable
<p>Criterion 6.12: No forms of forced or trafficked labour are used.</p>			

<p>6.12.1</p>	<p>There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -</p>	<p>There is no objective evidence sighted in relates to any forms of forced or trafficked labour used. Foreign workers are mainly used at estates; from Indonesia, India, Bangladesh and Myanmar. As all workers are hired based on permanent / recognized employment under FGV, work permit for each of randomly selected workers were in place and carries the facility's company name under the sector of plantation worker. Based on interview, workers confirmed that they are not being restricted on their movement during work hours and from their housing, being given the freedom and rights to move freely and choose to perform additional work / overtime at their own choice and have custody of their traveling document / passport. Foreign workers are given the option to safe keep their own passport or to place them in the lockable pigeon-hole steel cabinet outside the estate office area.</p> <p>Work permits of selected foreign workers verified as listed below. Although some of foreign workers work permit found to be expired, facility has presented the progress of permit renewal with the local authority.</p> <p>Belitong POM:</p> <ul style="list-style-type: none"> A. Employee ID: 1207048 B. Employee ID: 1211630 C. Employee ID: 1211536 D. Employee ID: 1210838 E. Employee ID: 1210700 <p>Bukit Tongkat B Estate:</p> <ul style="list-style-type: none"> A. Employee ID: FW06010045 B. Employee ID: LW01950087 C. Employee ID: LW06010020 D. Employee ID: LW06010118 E. Employee ID: FW06010020 <p>FASSB Ulu Belitong Estate:</p> <ul style="list-style-type: none"> A. Employee ID: PI001919027 	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>B. Employee ID: PI001919030 C. Employee ID: P1001919032 D. Employee ID: PB001919022 Employee ID: PB001919017</p>	
6.12.2	<p>Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance -</p>	<p>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 FGV. There was no contract substitution occurred.</p>	Complied
6.12.3	<p>Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -</p>	<p>FGV Holdings has developed Recruitment of Foreign Workers Policy with Doc. No. ML-1A/L1-Po8(0) dated 1/6/2014, which states company's commitment not to discriminate on the selection of workers and no substitution of contract. Besides, orientation program on the language, safety, labour law and cultural practices were included into the policy as sighted in the daily muster briefing records. The company also provide decent living condition and insurance to all the workers.</p> <p>There is no foreign workers hired in Belitong POM, the foreign workers only hired in Estates.</p>	Complied
<p>Criterion 6.13: Growers and millers respect human rights.</p>			
6.13.1	<p>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 -</p>	<p>FGV Holdings has developed Human Rights Policy with Doc. No. ML1A/L1-Po12(0) dated 01.06.2014 and Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, Eff date: 29.05.2019.</p> <p>Policies communicated to all Belitong POM employees during daily muster assembly and meetings as recorded in the muster briefing records. Policies were communicated to all Belitong POM employees on 18/10/2019, and both Bukit Tongkat B Estate and Ulu Belitong Estate on 17/10/2019.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable for the certification unit.	Not applicable
Principle 7: Responsible development of new plantings			
FGVPISB Belitong 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
8.1.1	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>Complied</p>

Appendix B: Approved Time Bound Plan

Time Bound Plan Forecast For RSPO Certification of All FGV Palm Oil Mills & Supply Bases					
	Palm Oil Mill	Supply bases (estates, plantations, associations)			
		Internal			
		FFB Supplier	Certification Year	Certification standard	Status
1	KS Selancar 2B	FGVPM Selancar 06	2017	MYNI 2014	Certified
		FGVPM Selancar 08	2017	MYNI 2014	
		FGVPM Selancar 09	2017	MYNI 2014	
2	KS Aring A	FGVPM Aring 02	2017	MYNI 2014	Certified
		FGVPM Aring 03	2017	MYNI 2014	
		FGVPM Aring 04	2017	MYNI 2014	
		FGVPM Aring 05	2017	MYNI 2014	
		FGVPM Aring 06	2017	MYNI 2014	
		FGVPM Aring 08	2017	MYNI 2014	
		FGVPM Aring 10	2017	MYNI 2014	
		FGVPM Aring 11	2017	MYNI 2014	
3	KS Selendang	FGVPM Selendang 3	2017	MYNI 2014	Certified
		FGVPM Selendang 4	2017	MYNI 2014	
		FGVPM Selendang 5	2017	MYNI 2014	
		FGVPM Berabong 1	2017	MYNI 2014	
4	KS Bukit Sagu	FGVPM Bukit Sagu 04	2017	MYNI 2014	Certified
		FGVPM Bukit Sagu 06	2017	MYNI 2014	
		FGVPM Bukit Sagu 07	2017	MYNI 2014	
		FGVPM Bukit Sagu 08	2017	MYNI 2014	
5	KS Keratong 9	FGVPM Bera Selatan 05	2017	MYNI 2014	Certified
		FGVPM Bera Selatan 07	2017	MYNI 2014	
		FGVPM Merchong	2017	MYNI 2014	
		FGVPM Keratong Timur	2017	MYNI 2014	
		FASSB Merchong	2017	MYNI 2014	
6	KS Lepar Utara 6	FGVPM Lepar Utara 07	2017	MYNI 2014	Certified
		FGVPM Lepar Utara 08	2017	MYNI 2014	
		FGVPM Lepar Utara 09	2017	MYNI 2014	
		FGVPM Lepar Utara 11	2017	MYNI 2014	

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7	KS Maokil	FGVPM Maokil 6	2018	MYNI 2014	Certified
		FGVPM Maokil 7	2018	MYNI 2014	
8	KS Kemasul	FGVPM Mengkarak 1	2018	MYNI 2014	Certified
		FGVPM Mengkarak 2	2018	MYNI 2014	
9	KS Krau	FGVPM Krau 2	2018	MYNI 2014	Certified
		FGVPM Krau 4	2018	MYNI 2014	
10	KS Lepar Hilir	FGVPM Lepar Hilir 5	2017	MYNI 2014	Certified
		FGVPM Lepar Hilir 6	2017	MYNI 2014	
		FGVPM Lepar Hilir 8	2017	MYNI 2014	
11	KS Triang	FGVPM Triang 2	2017	MYNI 2014	Certified
		FGVPM Triang Selatan 1	2017	MYNI 2014	
		FGVPM Triang 4	2017	MYNI 2014	
12	KS Kechau B	FGVPM Kechau 02	2017	MYNI 2014	Certified
		FGVPM Kechau 03	2017	MYNI 2014	
		FGVPM Kechau 06	2017	MYNI 2014	
		FGVPM Kechau 07	2017	MYNI 2014	
		FGVPM Kechau 08	2017	MYNI 2014	
		FGVPM Kechau 09	2017	MYNI 2014	
		FGVPM Kechau 10	2017	MYNI 2014	
		FGVPM Kechau 11	2017	MYNI 2014	
		FGVPM Telang 01	2017	MYNI 2014	
		FGVPM Chegar Perah 02	2017	MYNI 2014	
		FASSB Telang	2017	MYNI 2014	
13	KS Palong Timur	FGVPM Palong Timur 4/5	2018	MYNI 2014	Certified
		FGVPM Palong Timur 6	2018	MYNI 2014	
14	Besout	FGVPM Besout 06	2018	MYNI 2014	Certified
		FGVPM Besout 07	2018	MYNI 2014	
15	KS Neram	FGVPM Cherul 03	2018	MYNI 2014	Certified
16	KS Chini 3	FGVPM Terapai 1	2018	MYNI 2014	Certified
		FGVPM Chini Timur 4	2018	MYNI 2014	
17	KS Chiku	FGVPM Ciku 4	2018	MYNI 2014	Certified
		FGVPM Ciku 8	2018	MYNI 2014	
18	KS Keratong 2	FGVPM Bera Selatan 3	2018	MYNI 2014	Certified
19	KS Serting	FGVPM Palong 17	2018	MYNI 2014	Certified
		FGVPM Palong 18	2018	MYNI 2014	
		FGVPM Palong 21	2018	MYNI 2014	

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		FGVPM Serting Hilir 08	2018	MYNI 2014	
20	KS Keratong 3	FGVPM Keratong 11	2018	MYNI 2014	Certified
21	KS Kerteh	FASSB Kerteh	2019	MYNI 2014	Certified
		FGVPM Semaring 01	2019	MYNI 2014	
22	KS Kota Gelanggi	FASSB PPTR	2018	MYNI 2014	Certified
		FASSB Kota Gelanggi 5/6	2018	MYNI 2014	
23	KS Jengka 21	FASSB Jengka 24/25	2021	MYNI 2014	Main Audit
24	KS Penggeli	FGVPM Inas Selatan	2021	MYNI 2014	Main Audit
25	KS Belitong	FASSB Ulu Belitong	2019	MYNI 2014	Certified
		FGVPM Bukit Tongkat B	2019	MYNI 2014	
26	KS Kulai	FASSB Bkt Besar/Taib Andak	2018	MYNI 2014	Certified
27	KS Adela	FGVPM Kledang 2	2018	MYNI 2014	Certified
28	KS Serting Hilir	FGVPM Tembangau 03	2021	MYNI 2014	Main Audit
		FGVPM Tembangau 05	2021	MYNI 2014	
		FGVPM Tembangau 06	2021	MYNI 2014	
		FGVPM Tembangau 07	2021	MYNI 2014	
		FGVPM Tembangau 08	2021	MYNI 2014	
		FGVPM Tembangau 09	2021	MYNI 2014	
		FGVPM Serting Hilir 8	2021	MYNI 2014	
		FGVPM Serting Hilir 9	2021	MYNI 2014	
		FASSB Serting Hilir	2021	MYNI 2014	
29	KS Bukit Kepayang	FGVPM Terapai 3	2018	MYNI 2014	Certified
30	KS Jerangau Baru	FGVPM Rantau Abang 1	2018	MYNI 2014	Certified
		FGVPM Rantau Abang 2	2018	MYNI 2014	
		FGVPM Chador 1	2018	MYNI 2014	
31	KS Tenggaroh	FGVPM Tenggaroh 9	2018	MYNI 2014	Certified
		FGVPM Tenggaroh 11	2018	MYNI 2014	
		FGVPM Tenggaroh 13	2018	MYNI 2014	
32	KS Nitar	FGVPM Nitar Timur	2018	MYNI 2014	Certified
33	KS Chalok	FGVPM Setiu 1	2018	MYNI 2014	Certified
34	KS Waha	FGVPM Bukit Aping Selatan	2018	MYNI 2014	Certified
35	KS Sampadi	FGVPM Sampadi 1	2021	MYNI 2014	Internal Audit
		FGVPM Sampadi 3	2021	MYNI 2014	
		FGVPM Sampadi 4	2021	MYNI 2014	
		FGVPM Sampadi 5	2021	MYNI 2014	
		FGVPM Sampadi 6	2021	MYNI 2014	

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36	KS Mempaga	n/a	n/a	n/a	Internal Audit
		n/a	n/a	n/a	
37	KS Kalabakan	FGVPM Sahabat 01	2019	MYNI 2014	Internal Audit
		FGVPM Sahabat 02	2019	MYNI 2014	
38	KS Kembara Sakti	FGVPM Sahabat 30	2019	MYNI 2014	Internal Audit
		FGVPM Sahabat 35	2019	MYNI 2014	
		FGVPM Sahabat 40	2019	MYNI 2014	
		FGVPM Sahabat 41	2019	MYNI 2014	
		FGVPM Sahabat 42	2019	MYNI 2014	
		FGVPM Sahabat 30	2019	MYNI 2014	
39	KS Nilam Permata	FGVPM Sahabat 50	2019	MYNI 2014	Internal Audit
		FGVPM Sahabat 51	2019	MYNI 2014	
		FGVPM Sahabat 52	2019	MYNI 2014	
		FGVPM Sahabat 53	2019	MYNI 2014	
		FGVPM Sahabat 54	2019	MYNI 2014	
40	KS Hamparan Badai	FGVPM Sahabat 23	2019	MYNI 2014	Internal Audit
		FGVPM Sahabat 24	2019	MYNI 2014	
		FGVPM Sahabat 26	2019	MYNI 2014	
		FGVPM Sahabat 28	2019	MYNI 2014	
		FGVPM Sahabat 31	2019	MYNI 2014	
		FGVPM Sahabat 33	2019	MYNI 2014	
		FGVPM Sahabat 34	2019	MYNI 2014	
		FASSB Tambisan Sahabat 59	2019	MYNI 2014	
		FGVPM Sahabat 21	2019	MYNI 2014	
		FGVPM Sahabat 22	2019	MYNI 2014	
41	KS Mercu Puspita	FGVPM Sahabat 07	2019	MYNI 2014	Internal Audit
		FGVPM Sahabat 46	2019	MYNI 2014	
		FGVPM Sahabat 48	2019	MYNI 2014	
		FASSB Sahabat 06	2019	MYNI 2014	
42	KS Lancang Kemudi	FGVPM Sahabat 10	2019	MYNI 2014	Internal Audit
		FGVPM Sahabat 36	2019	MYNI 2014	
		FGVPM Sahabat 38	2019	MYNI 2014	
		FGVPM Sahabat 39	2019	MYNI 2014	
		FGVPM Sahabat 44	2019	MYNI 2014	
		FGVPM Sahabat 45	2019	MYNI 2014	
43	KS Embara Budi	FGVPM Sahabat 11	2019	MYNI 2014	Internal Audit

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		FGVPM Sahabat 12	2019	MYNI 2014	
		FGVPM Sahabat 17	2019	MYNI 2014	
		FGVPM Sahabat 56	2019	MYNI 2014	
		FGVPM Sahabat 20	2019	MYNI 2014	
		FGVPM Sahabat 25	2019	MYNI 2014	
		FASSB Sahabat 17	2019	MYNI 2014	
44	KS Baiduri Ayu	FGVPM Sahabat	2019	MYNI 2014	Internal Audit
		FGVPM Sahabat	2019	MYNI 2014	
		FGVPM Sahabat	2019	MYNI 2014	
45	KS Umas	FGVPM Sahabat	2019	MYNI 2014	Internal Audit
		FGVPM Sahabat	2019	MYNI 2014	
46	KS Tenggaraoh Timur	FGVPM Tenggaraoh 12	2019	MYNI 2014	Internal Audit
		FGVPM Tenggaraoh Timur 2	2019	MYNI 2014	
47	KS Selancar 2A	n/a	n/a	n/a	Internal Audit
48	KS Bukit Mendi	n/a	n/a	n/a	Internal Audit
49	KS Jengka 8	n/a	n/a	n/a	Internal Audit
50	KS Jengka 18	n/a	n/a	n/a	Internal Audit
51	KS Jengka 3	n/a	n/a	n/a	Internal Audit
52	KS Padang Piol	n/a	n/a	n/a	Internal Audit
53	KS Tersang	n/a	n/a	n/a	Internal Audit
54	KS Pontian Fico	Pontian Fico	2022	MYNI 2014	Internal Audit
		Pontian Subok	2022	MYNI 2014	
		Pontian Orico	2022	MYNI 2014	
		Pontian Pendirosa	2022	MYNI 2014	
		Pontian Kuril	2022	MYNI 2014	
		Pontian Hilco	2022	MYNI 2014	
		Rawajaya Sdn Bhd	2022	MYNI 2014	
		Blossom	2022	MYNI 2014	
55	KS Tementi	FGVPM Bera Selatan 1	2022	MYNI 2014	Internal Audit
		FGVPM Bera Selatan 4	2022	MYNI 2014	
56	KS Kemahang	n/a	n/a	n/a	Internal Audit
57	KS Chini 2	n/a	n/a	n/a	Internal Audit
58	KS Jerangau Barat	n/a	n/a	n/a	Internal Audit
59	KS Trolak	n/a	n/a	n/a	Internal Audit
60	KS Semenchu	n/a	n/a	n/a	Internal Audit
61	KS Panching	n/a	n/a	n/a	Internal Audit

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62	KS Air Tawar	n/a	n/a	n/a	Internal Audit
63	KS Lok Heng	n/a	n/a	n/a	Internal Audit
64	KS Sg Tenggi	n/a	n/a	n/a	Internal Audit
65	KS Pasoh	n/a	n/a	n/a	Internal Audit
66	KS Kahang	n/a	n/a	n/a	Internal Audit
67	Asian Plantation Milling Sdn Bhd	Incosetia Sdn Bhd	2021	Group Cert	Internal Audit
		Kronos Plantations Sdn Bhd	2021	Group Cert	
		Fortune Plantation Sdn Bhd	2021	Group Cert	
		BJ Corporation Sdn Bhd	2021	Group Cert	
68	Tanah Emas Oil Palm Processing	Tanah Emas Corporation Berhad (TECB)	2021	Group Cert	Internal Audit
		Ladang Kluang	2021	Group Cert	
		Yapidmas D	2021	Group Cert	
		Sri Mosta 1	2021	Group Cert	
		Sri Mosta 2	2021	Group Cert	
		Sri Mosta 3	2021	Group Cert	
		Cepat Ringgit A	2021	Group Cert	
		Cepat Ringgit B	2021	Group Cert	
		Cepat Ringgit D	2021	Group Cert	
		Karamuak	2021	Group Cert	
		Sg Milian	2021	Group Cert	
		Sg Imbak	2021	Group Cert	
		Kuamut	2021	Group Cert	
69	PT Citra Niaga Perkasa	TBA	2021	INA-NIWG	Internal Audit
70	PT Temilia Agro Abadi	TBA	2021	INA-NIWG	Internal Audit
71	FGV estate without mill (Paloh)	Paloh	2021	INA-NIWG	Internal Audit

Appendix C: GHG Reporting Executive Summary

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

Emission per product	tCO ₂ e/tProduct
CPO	1.23
PKO	1.23

Extraction	%
OER	19.14
KER	4.95

Production	t/yr
FFB Process	22,408.42
CPO Produced	4,288.97
PKO Produced	1,109.21

Land Use	Ha
OP Planted Area	1,192.12
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	1,402.11

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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	11,843.26	0.53					11,843.26	0.53
CO ₂ Emission from fertilizer	347.89	0.02					347.89	0.02
NO ₂ Emmission	363.25	0.02					363.25	0.02
Fuel Consumption	62.8	0					62.8	0
Peat Oxidation	0	0					0	0
Sink								
Crop Sequestration	-11,225.84	-0.5					-11,225.84	-0.5
Conservation Sequestration	0	0					0	0
Total	1,391.36	0.06					1,391.36	0.06

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	4,392.43	0.2
Fuel Consumption	645.59	0.03
Grid Electricity Utilisation	188.22	0.01
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	5,226.24	0.23

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	1,359.77

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PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

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

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

Appendix 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.	FGVPM Belitong Palm Oil Mill takes legal ownership and physically handles its RSPO certified oil palm products i.e. CPO and PK.	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.	FGVPM Belitong Palm Oil Mill is not a trading company. Therefore, this requirement is not applicable.	N/A
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.	The membership of FGVPM is under FGVPM (RSPO membership no.: 1- 0225-16-000-00) – at the time of the assessment the membership number is still applicable. RSPO palm trace ID: RSPO_PO1000001311.	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	There is no processing aid involve in the productions.	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 RSPO certified estate and FELDA scheme and FTPSB (non-certified). Mix of FFB source which contributes to module E classification. Declassification of the CPO or PK only to non-certified as the highest possible module is mass balance.	Yes

5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	FGVPM Belitong Palm Oil Mill will be using one module MB or conventional only.	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. 	Procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established which covered general chain of custody, RSPO SCC Committee, Sustainability Compliance & Certification (SCCD), FGVHB, organization chart responsibility, RSPO SCC Supply Chain Verification, claim, RSPO Supply Chain Model, Notis Amaran/Handling Non-conformance material & document, supply chain verification-FFB delivery plantation to mill, etc.	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). 	Procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established which covered general chain of custody, RSPO SCC Committee, Sustainability Compliance & Certification (SCCD), FGVHB, organization chart responsibility, RSPO SCC Supply Chain Verification, claim, RSPO Supply Chain Model, Notis Amaran/Handling Non-conformance material & document, supply chain verification-FFB delivery plantation to mill, etc	Yes
	<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. 	Stated in the SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0, the Mill Manager was the chairman of RSPO SCC Committee whom need to ensure the RSPO SCC system is being implemented. The job descriptions were identified in the procedure accordingly.	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>	Procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established which covered the internal audit under Certification & Due Diligence (CDD), Sustainability & Environmental Department (SED), FGVH responsibility. The internal audit will be plan annually before CB	Yes

		audit. Internal audit procedure was crossed-reference with SOP: FGV/ML-1A-L2-PR11 issue 1 dated 01.06.2016. Internal audit was done on 18/09/2019 by CDD department.	
	ii) effectively implements and maintains the standard requirements within its organization	The procedure was implemented and maintained by the management. The records (for example Internal audit report done on 18/09/2019 by CDD department) was available for verification. One NCR was raised during the internal audit and closed accordingly.	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 estate, the transporters presented delivery order to the mill weighbridge clerk in order the FFB to be received by the mill. E.g. of information available in the delivery order @ "nota hantaran BTB" is as follows:</p> <p>A) Within Belitong Certification Units:</p> <p>1. Bukit Tongkat B Estate MPOB License: 501064-302000 Despatch Note: A00030608 Date: 13 Nov 2019 Field: 001 Tonnage: 4.32 mt Lorry no.: CAV3739</p> <p>2.Ulu Belitong Estate MPOB License: 506507311000 Despatch Note: A00030593 Date: 13 Nov 2019 Field: 001 Tonnage: 4.81 mt Lorry no.: JFU4574</p>	Yes

		<p>B) Non-certified Suppliers:</p> <p>1. FTPSB Ulu penggeli MPOB License: 500883502000 Despatch Note: A00030595 Date: 26/10/2019 Tonnage: 4.43 mt Lorry no.: JBW7246</p> <p>2. Felda Ayer Hitam MPOB License: 501152602000 Despatch Note: A00030521 Date: 19/10/2019 Tonnage: 6.78 mt</p> <p>3) RSPO CPO Sold Out MPOB License: 508514725000 Buyer name: Vxxxx Bioxxxxx Sdn Bhd Contract No: RSPO54523 Despatch Note: H00000974 Date: 29/08/2019 Tonnage: 42.02 mt Lorry no.: WA4304E</p> <p>MPOB License: 508514725000 Buyer name: Vxxxx Bioxxxxx Sdn Bhd Contract No: RSPO53963A Despatch Note: H00000740 Date: 28/6/2019 Tonnage: 36.55 mt Lorry no.: WYJ4099</p>	
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	<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 was complete and was presented on the sampled delivery notes, shipping documents and specification documentation).shipping documents and weighbridge tickets as above.</p>	<p>Yes</p>
	<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 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. 	<p>Based on Procedure for Mill RSPO SCC; Doc. # FGPM-RSPO SCC (Mass Balance); Issue # 3.0; Distribution date: 1/9/2019, the site receiving RSPO certified oil palm products were ensured the RSPO certification states are verified.</p> <p>There are several transaction in Belitong been done, sampling on August selling as per below detail;- Transaction date: 29 August 2019 CPO contract: RSPO54523C Despatch note :H00000974 Total: 42.02 MT. The announcement dated: 12-09-2019 Transaction id: TR-7feddf3c77d8</p> <p>Transaction date: 28 August 2019 Kernal contract: RSPG1218F Despatch note :L00000217 Total: 49.58 MT. The announcement dated: 11/9/2019 Transaction id: TR-121ac60fbc1f</p>	<p>Yes</p>
	<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. 	<p>SOP for mill RSPO SCC, FGPM-RSPO SCC, issue:3, rev: 3 dated 1/9/2019 has defined mechanism to check validity of RSPO certified supply.</p>	<p>Yes</p>

	<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. 	Not applicable. The facility is a palm oil mill.	Not applicable
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Addressed under SOP for Mill RSPO SCC", FGVP-MSPO SCC, dated 1/9/19, section non-conformance material which reads non-certified or contaminated FFB shall be segregated from certified oil palm products via segregation at mill ramp. In case of contamination with non-conforming material (mixed FFB from mill diversion), if unable to be segregated at source supported with traceability record, the consignment shall be downgraded as conventional.	Yes
5.5. Outsourcing activities			
5.5.1	<p>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 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>	Not applicable. No outsourcing activity FTSSB managed the movement and delivery of palm product from palm oil mill (transportation, storage @ bulking and refinery) Transport arrangement is handled by FTSPB Bulking installation under Felda bulkers.	Not applicable

5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a. The site has legal ownership of all input material to be included in outsourced processes;	Not applicable. No outsourcing activity	Not applicable
	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.	Not applicable. No outsourcing activity	Not applicable
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	Not applicable. No outsourcing activity	Not applicable
	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.	Not applicable. No outsourcing activity with regards to processing of FFB or PK.	Not applicable
5.5.3	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.	Not applicable. No outsourcing activity with regards to processing of FFB or PK.	Not applicable
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 with regards to processing of FFB or PK.	Not applicable
5.6. Sales and goods out			
5.6.1	The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form. <ul style="list-style-type: none"> The name and address of the buyer; 	Crude Palm Oil Quantity: 300 mt dated 25/5/19 Buyer: name and address were	Yes

	<ul style="list-style-type: none"> 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>stated in sales contract (but not disclosed in this report) Seller: FPI-belitong - stated in sales contract Delivery order: H00000974 Tanker weight: 41.59 mt Specification: PORAM Commodity: certified Certificate number: triggered in the system using check box (as for now only for non-certified)</p>	
	<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 as mentioned above.</p>	Yes
	<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>Shipping announcements will be made once certified. Announcement is made per contract or group of shipments after completion delivery per contract and maximum for 1 year.</p>	Yes
5.7. Registration of transactions			
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>Felda Global Ventures Holdings Berhad held RSPO membership number: 1-0225-16-000-00 since 27 December 2016. Company has registered in PalmTrace system as follows: Members ID – FGVPISB Belitong Palm Oil Mill: RSPO_PO1000001311. Member category : Oil Mill</p>	Yes

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. 	<p>Procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established. FGVPI was responsible to do announcement in the RSPO IT Platform after each contract completed with maximum of 1 year.</p> <p>Sampled the shipping announcement as below:</p> <p>Transaction ID: TR-7feddf3c77d8 Seller: FGVPI SB Kilang Sawit Belitong Seller ref: RSPO54523C Buyer: Vxxx xxxxx sdn bhd Buyer ref: VMPO1025105 Product: CSPO Supply Chain Model: Mass Balance Volume: 245.14 MT Date: 12/9/2019</p>	Yes
	<ul style="list-style-type: none"> 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. 	<p>Procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established. FGVPI was responsible to do announcement in the RSPO IT Platform after each contract completed with maximum of 1 year.</p>	Yes
	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	<p>This is stated in the Supply Chain Declaration volume for actual sold under conventional volume.</p>	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	<p>Sampled the shipping announcement as below:</p> <p>Transaction ID: TR-7feddf3c77d8 Seller: FGVPI SB Kilang Sawit Belitong Seller ref: RSPO54523C Buyer: Vxxx xxxxx sdn bhd Buyer ref: VMPO1025105</p>	Yes

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		Product: CSPO Supply Chain Model: Mass Balance Volume: 245.14 MT Date: 12/9/2019	
5.8. Training			
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.	Procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established. The RSPO SCC training has been conducted on 18/09/2019 involved weighbridge operator, auxiliary police, laboratory analyst etc. Sighted the minutes of the training and attendance list.	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.	Last training was conducted on 18/09/2019 attended by 12 people involved weighbridge operator, auxiliary police, laboratory analyst etc. Sighted the minutes of the training and attendance list.	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.	FGV Belitong Palm Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	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.	Procedure namely Mill RSPO SCC (Mass Balance), SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 has defined at least 2 years of retention time for all records and report.	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.	The forecast volume for Feb 20– Jan 21 was stated in the public summary report.	Yes

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 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 Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER. Last year's average were 20.00% (OER) & 5.00% (KER).	Yes
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.	Verified RSPO Annual Communication Of Progress (ACOP) 2017 submitted by FGV Holding Berhad on 4/5/18. RSPO trademark was not use as POM producing raw product (CPO and PK) Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	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.	The following was communicate in the group website - http://www.fgvholdings.com/ Palm Upstream is FGV's largest revenue earner and forms the core of the company. Armed with a total land bank of about 440,000 hectares in both Malaysia and Indonesia, the Palm Upstream affirms FGV's status as one of the world's largest CPO producers, producing approximately 3 million tonnes of CPO annually.	Yes

<p>4.2</p>	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> 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. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>	<p>The communication in http://www.fgvholdings.com/ states that:</p> <p>As one of the world’s largest Crude Palm Oil (CPO) producer and the third largest oil palm plantations operator, FGV acts responsibly towards its shareholders, business partners, employees, society and the environment. This covers in every one of its business areas, regions and locations across the globe. Additionally, we are committed to technologies and products that unite the goals of customer value and sustainable development.</p> <p>Our commitment level to sustainability is 110% and we are embedding sustainability throughout our organisation and value chain business partners. Aligning with the global action towards sustainability, namely Sustainable Development Goals (SDGs), FGV has placed sustainability at the top priority in our value chain and business practices. This includes sustainable agriculture, combating climate change, social compliance and human rights, innovation as well as sustainable production and consumption.</p> <p>As such, one of our key strategies in accelerating our commitment towards sustainability is the introduction of the Group Sustainability Policy (GSP) which applies to our operations, subsidiaries and suppliers. Meanwhile, a holistic approach to our business management through Economic, Environmental & Social (EES) will ensure the sustainability is embedded within our business as recommended by the Bursa Malaysia.</p> <p>In our journey to success, we believe the contribution and support from our stakeholders are pivotal for us to achieve our</p>	<p>Yes</p>
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		<p>sustainability goals and targets. Stakeholder engagement is an integral aspect of our sustainability strategy for continued progress towards realising our sustainability vision and we intend to achieve this by continuously engaging our stakeholders at various platforms to understand and address their concerns.</p> <p>No use of RSPO trademark in the website noted.</p>	
<p>4.3</p>	<p>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.</p>	<p>As per website:</p> <p>FGV Obtained Its Own RSPO Membership:</p> <p>As a key proponent of the RSPO, FGV has played an active role in promoting sustainable practices in its application of the guidelines since its inception in 2004.</p> <p>FGV was amongst the first agricultural companies to obtain the mill certification in 2010; and the first in the world to organise a smallholder group to obtain the RSPO Fresh Fruit Bunch (FFB) Certification. In the process of certifying our mills, we had also certified about 40,000 FELDA schemed smallholders. Although we had initially targeted to complete auditing all of our mills by 2017, we made such rapid progress to have all certification to be completed by 2015.</p> <p>However, FGV's decision to withdraw from RSPO Principles and Criteria (P & C) Certification on 3 May 2016 was made to ensure any issue along the supply chain would be addressed and that the improvements had been implemented. In tandem with this, FGV has started anew in its RSPO certification plans. FGV had undergone a partial certification exercise in October 2016, when it was highlighted that FGV shall not be RSPO certified under the FELDA's membership. This was due to the fact that FELDA does not have controlling interest in FGV. As such, FGV needed to be certified under its own membership and the request was tabled</p>	<p>Yes</p>

		<p>to the RSPO Board of Governors on 7 November 2016 and approved on the same date. On the 28 December 2016, FGV received its Confirmation of Membership (RSPO) with effect from 27 December 2016.</p> <p>FGV will continue to move forward with its 72 mills complexes RSPO Certification programme in January 2017.</p> <p>Apart from the mill and FFB certifications, we also certified four of our kernel crushing plants, one refinery and a biodiesel plant to RSPO' s Supply Chain Certification System (SCCS).</p> <p>No misuse of communication noted.</p>	
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.	Same as 4.3.	Yes
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 logo used has been observed in the website, official documents or t-shirts.	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.	The only business to business communication is through the delivery documents with Vance Bioenergy Sdn Bhd (CPO) and Kilang Isi Sawit Pasir Gudang (PK).	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.	The only business to business communication is through the delivery documents with refinery and kernel crusher plant (buyer). However, the communication is mainly of the RSPO certificate number and product description. There is no trademark used.	Yes

5.3	<p>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:</p> <ul style="list-style-type: none"> 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. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. 	Belitong POM is not a distributor or wholesaler.	Yes
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>Belitong POM is producing CPO and PK. The communication provided in the delivery documents has provided clear description of the products.</p> <p>There is no product labelling.</p>	Yes
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>	There is no business to consumer communication as this is an upstream activity certification.	Yes

6.2	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.	There is no business to consumer communication as this is an upstream activity certification.	Yes
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.	There is no business to consumer communication as this is an upstream activity certification.	Yes
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Yes
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Yes
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.	There is no business to consumer communication as this is an upstream activity certification.	Yes
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.	There is no business to consumer communication as this is an upstream activity certification.	Yes
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	There is no business to consumer communication as this is an upstream activity certification.	Yes

	RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules 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.	The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content.	Yes
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content.	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.	The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content.	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).	There is no product partial claims	Yes

	In on-pack communications, the RSPO trademark can be printed anywhere on the pack.		
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. 	There is no product partial claims	Yes
5.12. Complaints			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Procedure namely Mill RSPO SCC (Mass Balance), SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established to handle the complaint and grievance which is cross-referenced with the SOP for Complaint & Grievance (Doc no: FGV/ML-1A/L2-Pr13 issue 01 dated 01.06.2016. No complaint been received with regards of Supply Chain.	Yes
5.13. Management Review			

5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	Management review was conducted on 08/10/2019 attended by 8 people.	Yes
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>Input for management review was discussed as below:</p> <ol style="list-style-type: none"> 1. Introduction 2. Internal & External audit result: Internal (status of NCR was closed accordingly). One NC for internal and external audit. 3. Customer feedback: No complaint 4. Production: All the certified FFB suppliers has been recorded. RSPO Mass Balance sheet was used for total calculation of certified products. 5. Changes on the newest SOP. 6. Recommendation: All the data need to be checked from time to time. 	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>Output for management review was discussed as below:</p> <ol style="list-style-type: none"> 1. Data for Weighbridge system, MPR and bank was checked. 2. The feedback form was verified. 3. The action for audit result will be taken accordingly. 4. Improvement: re-training of supply chain for employees on 10/12/2019. 	Yes

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

Requirements	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
E.1 Definition		
E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Belitong POM received from own certification unit and non-certified FFB supplier. Belitong POM was certified with SC Module E: Mass Balance. 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.	Yes
E.2 Explanation		
E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.	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
E.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).	Felda Global Ventures Holdings Berhad held RSPO membership number: 1-0225-16-000-00 since 27 December 2016. Company has registered in PalmTrace system as follows: Members ID – FGVPISB Belitong Palm Oil Mill: RSPO_PO1000001311. Member category : Oil Mill	Yes
E.3 Documented procedures		
E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:	Procedure namely Mill RSPO SCC (Mass Balance), SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established which covered responsibility, reporting of	Yes

<p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint, Communication, Claim and etc.</p> <p>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 requirements. During interview, he can demonstrate an awareness of the site procedures for the implementation of this standard.</p>	
<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBS.</p>	<p>Procedure namely Mill RSPO SCC (Mass Balance), SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established which covered responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint, Communication, Claim and etc.</p>	<p>Yes</p>
<p>E.4 Purchasing and goods in</p>		
<p>E.4.1 The site shall verify and document the volumes of certified and non-certified FFBS received.</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, 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/FFB dispatch note is recorded in the mill's ticket number.</p>	<p>Yes</p>
<p>E.4.2 The site shall inform the CB immediately if there is a projected overproduction.</p>	<p>Based on interview with the staff, the facility is aware of this procedure. Moreover, this is also spelt out in the procedure (Page 9) which reads, "Pihak kilang perlu memaklumkan Badan Pensijilan pada kadar segera sekiranya terdapat pengeluaran product melebihi anggaran asal" [The mill is to inform the</p>	<p>Yes</p>

	Certification Body immediately if there is any projected overproduction].	
E.5 Record keeping		
<p>E.5.1 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p> <p>(b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)</p>	<p>All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place. No PKO and Palm kernel expeller at Belitong Palm Oil mill. Daily records are prepared at the entry point at the weighbridge.</p> <p>Daily summary and monthly summary documented for all the FFB received. Computerized system in place with the delivery deducted accordingly.</p> <p>The Mill aware that only positive stock can be delivered as only positive stock is allowed in system. No short selling.</p>	Yes
<p>E.5.2 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement</p>	<p>Not applicable as Belitong POM did not outsource any activity to Palm Kernel Crusher.</p>	Not applicable

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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit (Feb 2019-Oct 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	02/2019	0	20425.15	20425.15
2	03/2019	488.14	24,101.53	24,589.67
3	04/2019	1,513.58	21,110.35	22,623.93
4	05/2019	1,475.70	22,837.49	24,313.19
5	06/2019	1,450.44	16,364.89	17,815.33
6	07/2019	1,614.59	19,624.56	21,239.15
7	08/2019	1,603.03	20,516.12	22,119.15
8	09/2019	1,618.50	21,341.00	22,959.50
9	10/2019	1,746.92	23,264.38	25,011.30
Total		11,510.90	189585.47	201096.37

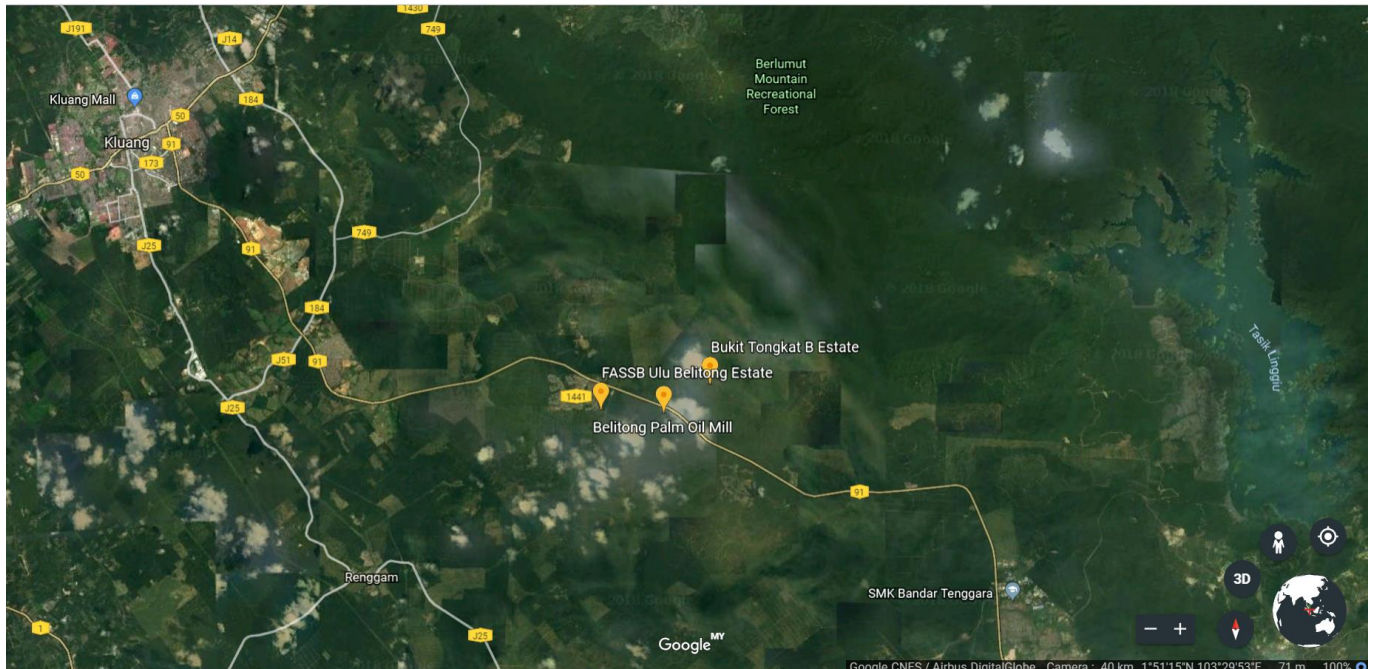
B. Monthly Records of Certified CPO & PK since the last audit (Feb 2019-Oct 2019)			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	02/2019	0	0
2	03/2019	97.628	24.407
3	04/2019	302.716	75.679
4	05/2019	295.14	73.785
5	06/2019	290.088	72.522
6	07/2019	322.918	80.7295
7	08/2019	320.606	80.1515
8	09/2019	323.7	80.925
9	10/2019	349.384	87.346
Total		2302.18	575.55

C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) (Oct 2018-Sept 2019)				
No.	Buyers Name	Palmtree Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	A	TR-b3ff3cc7-c01b		92.57

2	A	TR-0241cc3f-7699		49.55
3	B	TR-ce731a36-a0b9	248.8	
4	B	TR-7feddf3c-77d8	245.14	
5	B	TR-121ac60f-bc1f	234.99	
6	B	TR-1a54a159-6248	235.81	
7	B	TR-587389c6-b926	73.14	
Total			1037.88	142.12

D. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) (Feb 2019-Oct 2019)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	A-D	0	312.00
	Total	0	312.00

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



Appendix G: FGVPM Bukit Tongkat B Estate Field Map



Appendix H: FGVAS Ulu Belitong Estate Field Map



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

Not applicable

Appendix J: 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