

**RSPO PRINCIPLE AND CRITERIA –  
RECERTIFICATION ASSESSMENT 2  
Public Summary Report**

<b>Client Company name (Parent Company): SIPEF GROUP</b>
Client company Address: Forum Nine Building, 10 <sup>th</sup> Floor, Suite 1-11 Jl.Imam Bonjol No.9 Medan – 20112 Sumatera Utara Province Indonesia
Certification Unit: <b>PT Eastern Sumatra Indonesia – Bukit Maradja Palm Oil Mill</b>  Location of Certification Unit: Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, Sumatera Utara Province, Indonesia

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0021-05-000-00	<b>Membership Approval Date</b>	7 <sup>th</sup> December 2005
<b>Parent Company Name</b>	SIPEF Group		
<b>Address</b>	Head Office: Forum Nine Building, 10th Floor, Suite 1-11 Jl.Imam Bonjol No.9 Medan – 20112 Sumatera Utara Province Indonesia		
<b>Subsidiary (Certification Unit Name)</b>	PT. Eastern Sumatra Indonesia – Bukit Maradja Palm Oil Mill		
<b>Address</b>	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, Sumatera Utara Province, Indonesia		
<b>Contact Name</b>	Mr. Sander Van Den Ende		
<b>Website</b>	www.tolantiga.co.id	<b>E-mail</b>	<a href="mailto:svdende@sipef.com">svdende@sipef.com</a>
<b>Telephone</b>	061 - 41060020	<b>Facsimile</b>	+62 61 452 0908

2. Certification Information			
<b>Certificate Number</b>	RSPO 632266	<b>Date of First Certification</b>	17/05/2010
		<b>Certificate Start Date</b>	17/05/2020
		<b>Certificate Expiry Date</b>	16/05/2025
<b>Scope of Certification</b>	Production of CPO and PK at Bukit Maradja POM with 3 estates as supply base, namely Bukit Maradja Estate (PT. Eastern Sumatra Indonesia), Kerasaan Estate (PT. Kerasaan Indonesia) and Timbang Deli Estate (PT. Timbang Deli Indonesia); with Marketing Activities through SIPEF N.V.  Mill capacity of Bukit Maradja POM is 30 MT FFB/hour. Supply Chain Model: identity Preserved		
<b>Applicable Standards</b>	RSPO P&C Generic November 2018		

3. Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
BSI-ISPO 614348	ISPO	BSI	18/07/2021
EU-ISCC-Cert-US201-70600643	ISCC EU	SCS Global Service	03/12/2020
ISO 9001 – 00053944-002	ISO 9001:2015	Lloyd's Register Indonesia	03/07/2021

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<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base)</b>	<b>Location [Map Reference #]</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Bukit Maradja POM	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, North Sumatera Province – Indonesia	3° 0' 44.26" N	99° 14' 8.06" E
Bukit Maradja Estate	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, North Sumatera Province – Indonesia	3° 0' 05.27" N	99° 14' 8.06" E
Kerasaan Estate	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, North Sumatera Province – Indonesia	3° 3' 51.00" N	99° 15' 53.53" E
Timbang Deli Estate	Timbang Deli Village, Galang District, Deli Serdang Regency, Sumatera Utara Province – Indonesia	3° 27' 20.91" N	98° 53' 58.37" E

<b>5. Description of Supply Base</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Bukit Maradja Estate	3,016.49	97.71	63.74	3,177.94	94.92
Kerasaan Estate	2,316.65	26.42	18.96	2,362.03	98.08
Timbang Deli Estate	236.23	13.53	722.43**	972.19	24.30*
<b>Total</b>	<b>5,569.37</b>	<b>137.66</b>	<b>805.13</b>	<b>6,512.16</b>	<b>85.80</b>

**Note:** \*) The percentage based on total planted with oil palm.  
\*\*) Including area planted with rubber.

<b>6. Plantings &amp; Cycle</b>							
<b>Estate</b>	<b>Age (Years)</b>					<b>Mature**</b>	<b>Immature</b>
	<b>0 - 3</b>	<b>4 - 10</b>	<b>11 - 20</b>	<b>21 - 25</b>	<b>26 - 30</b>		
Bukit Maradja Estate	*369.47	902.29	942.87	741.86	60.00	2,647.02	369.47
Kerasaan Estate	-	1,090.92	588.87	636.86	-	2,316.65	-
Timbang Deli Estate	166.32	69.91	-	-	-	69.91	166.32
<b>Total (ha)</b>	<b>535.79</b>	<b>2,063.12</b>	<b>1,531.74</b>	<b>1,378.72</b>	<b>60.00</b>	<b>5,033.58</b>	<b>535.79</b>

**Note:** Replanting in 2019, at 23.22 Ha.

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<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>				
Estate	Tonnage / year			
	Estimated (May 2019 – April 2020)	Actual (March 2019 – February 2020)		Forecast (May 2020 – Apr 2021)
		Previous license period (Mar – Apr 2019)	Current license period (May 2019 – Feb 2020)	
Bukit Maradja Estate	68,100	8,046.15	48,917.24	63,628
Kerasaan Estate	59,944	8,379.75	45,750.29	55,048
Timbang Deli Estate	858	-	754.07	3,149
<b>Total</b>	<b>128,902</b>	<b>111,847.50</b>		<b>121,825</b>
<b>Note:</b> Last Audit: March 2019				

<b>8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *</b>				
Estate	Tonnage / year			
	Estimated (May 2019 – April 2020)	Actual (May 2019 – February 2020)		Forecast (May 2020 – Apr 2021)
	N/A	Previous license period (Mar – Apr 2019)	Current license period (May 2019 – Feb 2020)	N/A
Nil				
<b>Total</b>				
<b>Note:</b> Last Audit: March 2019				

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>				
Independent FFB Supplier	Tonnage / year			
	Estimated (May 2019 – April 2020)	Actual (May 2019 – February 2020)		Forecast (May 2020 – Apr 2021)
		Previous license period (Mar – Apr 2019)	Current license period (May 2019 – Feb 2020)	
<b>Nil</b>				
<b>Total</b>				
<b>Note:</b> Last Audit: March 2019				

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<b>10. Certified Tonnage</b>				
<b>Mill Capacity: 30 MT/hr</b>  <b>SCC Model: IP</b>	<b>Estimated</b> <i>(May 2019 – April 2020)</i>	<b>Actual</b> <i>(May 2019 – February 2020)</i>		<b>Forecast</b> <i>(May 2020 – Apr 2021)</i>
	<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
	<b>128,902</b>	<i>Previous license period</i> (Mar –Apr 2019)	<i>Current license period</i> (May 2019 – Feb 2020)	<b>121,825</b>
		<b>16,425.90</b>	<b>95,421.60</b>	
	<b>CPO (OER: 24.00%)</b>	<b>CPO (OER: 23.90%)</b>		<b>CPO (OER: 23.70%)</b>
	<b>30,907</b>	<b>26,729.88</b>		<b>28,872</b>
	<b>PK (KER: 5.50%)</b>	<b>PK (KER: 5.04%)</b>		<b>PK (KER: 5.00%)</b>
	<b>7,090</b>	<b>5,635.57</b>		<b>6,091</b>
<b>Note:</b> Last Audit: March 2019				

<b>11. Actual Sold Volume (CPO)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSB</b>		
<b>CPO (MT)</b>	2,484.54	21,598.53	-	1,700.00	25,783.07

<b>12. Actual Sold Volume (PK)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSB</b>		
<b>PK (MT)</b>	4,106.63	-	-	740.51	4,847.14

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

## 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,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

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 recertification assessment was conducted from 9 – 14 March 2020. The audit programme is included as Section 2.3. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria Generic November 2018 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (0.8\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

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



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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Re-Certification)</b>	<b>Year 2 (ASA 2.1)</b>	<b>Year 3 (ASA 2.2)</b>	<b>Year 4 (ASA 2.3)</b>	<b>Year 5 (ASA 2.4)</b>
Bukit Maradja POM	X	X	X	X	X
Bukit Maradja Estate	X	X	X	X	X
Kerasaan Estate	X	X	X	X	X
Timbang Deli Estate	X	X	X	X	X

**Tentative Date of Next Visit: March 1, 2021 - March 6, 2021**

**Total No. of Mandays: 16**

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Eko Purwanto	Team Leader	Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB) in 2001. He has working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implementing good agricultural practice including integrated pest management and limited pesticides uses. He has completed lead auditor training courses for RSPO P&C (2013), RSPO SCC (2012), ISPO (2012), LAC ISO 9001 (2012), ISO

		14001 (2013) and ISO 45001 (2019). Refreshment training have been completed for RSPO P&C in May 2018, RSPO SCC in March 2018. He has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in RSPO and ISPO audit for several plantations and mills since October 2012. During this assessment, he assessed on the aspects of best management practice in palm oil mill and estate, supply chain for palm oil mill.
Imam Fakhrurozi	Team Member	Imam holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta on 2011. He had 2 (two) years working experience related to oil palm industry, as a sustainability and HSE officer in oil palm Plantation Company in Indonesia. Imam has completed a number of relevant trainings, the training includes ISO 9001:2008 and EMS 14001:2004 Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed course. Currently he works for BSI Group based in Jakarta office. He is one of the BSI qualified RSPO auditor. He had been involved in RSPO auditing since 2015. During this assessment, he assessed on the aspects of Environmental aspect-impacts, Occupational Health and Safety.
Yudwi Wisnu Rahmanto	Team Member	Bachelor of Forestry with Silviculture background. He worked at professional independent Certification Body as an Auditor for last 8 years and has involved in auditing activities with various certification schemes. Selected training which have been followed, such as RSPO Endorsed Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, Quality Management System (QMS) ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme and others internal training programs. He has involved in auditing activities, such as Sustainable Forest Management by FSC FM/COC Scheme, Sustainable Palm Oil by RSPO and ISPO Scheme, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile. During this assessment, he assessed on the aspects of Legal, Social Aspect and HCV.
Andi Pratama Pasaribu	Team Member	Bachelor degree, majoring social economy. He has several of work experiences (more than 5 years) as the operational staff since 2008. He has been followed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO) which was held by ISPO Commission in 2013 and Training of Lead Auditor Roundtable on Sustainable Palm Oil (RSPO) by Proforest and Daemeter in 2016. He has been attended several kinds of training, such as High Conservation Value (HCV) Training, Lead Auditor ISO 9001:2008, Lead Auditor ISO 14001:2005, auditor OHSAS, lead auditor RSPO supply chain by BMTRADA etc. He has some experiences of Sustainability Palm Oil scheme audit in Indonesian and Malaysia in best management practices, land legality, environmental, social and worker welfare aspect and supply chain. During this audit, he conducted stakeholder consultation and verify legal/social aspect.

**Accompanying Persons: Nil**

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**2.3 Assessment Plan**

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

Date	Time	Subjects	EP	IF	YR	AP	
			PRSPOLA, EMS, OHS, SA, SCC	PRSPO-EMS, OHS, SA, SCC	PRSPO-EMS, OHS, SA	PRSPO-SA	
Monday, 09/03/2020	05.30-08.00	Flight Jakarta – Medan	√	√	√	√	
	08.00-09.00	Travelling Kualanamu Airport – Timbang Deli Estate	√	√	√	√	
	09.00-09.30	Opening Meeting - Presentation by client (Overview of PT. Eastern Sumatra Indonesia – Bukit Maradja POM and its supply base); - Presentation by BSI team (Objective, scope, audit plan, etc.)	√	√	√	√	
	09.30-12.00	<b>Field Visit (Timbang Deli Estate):</b> Field observation and Worker interview – FFB harvesting, FFB loading, fertilizer application, IPM, road maintenance, water management, etc.	√	-	-	-	
		<b>Field Visit (Timbang Deli Estate):</b> Field observation and Worker interview - HCV's, boundaries, landfill (waste management), etc.	-	-	√	-	
		<b>Field Visit (Timbang Deli Estate):</b> Field observation and worker interview - herbicide application, chemical and fertilizer warehouse, hazardous waste storage, workshop, housing, social amenities, clinic, etc.	-	√	-	-	
		<b>Field Visit (Timbang Deli Estate) and Stakeholder consultation</b> With previous land owner, local communities, local NGO, worker union, gender committee, contractors, etc.	-	-	-	√	
	12.00-14.00	<b>Break/Lunch</b>	√	√	√	√	
	14.00-17.00	<b>(Timbang Deli Estate): RSPO Document Review</b> General information, Time bound plan, partial certification verification, RSPO P&C Best Agriculture Practice	√	-	-	-	
		<b>(Timbang Deli Estate): RSPO Document Review:</b> RSPO P&C OHS and Worker welfare	-	√	-	-	
		<b>(Timbang Deli Estate): RSPO Document Review:</b> RSPO P&C Environment and HCV	-	-	√	-	
		<b>(Timbang Deli Estate): RSPO Document Review:</b> RSPO P&C Legal and Social	-	-	-	√	
	Tuesday, 10/03/2020	08.00-12.00	<b>(Timbang Deli Estate): RSPO Document Review</b> General information, Time bound plan, partial certification verification, RSPO P&C 2018	√	-	-	-
			<b>(Timbang Deli Estate): RSPO Document Review:</b> RSPO P&C 2018	-	√	√	-
<b>Stakeholder consultation</b> With government offices in Deli Serdang Regency, local NGO, local communities, contractors, etc.			-	-	-	√	
12.00-14.00		<b>Break/Lunch</b>	√	√	√	√	

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			PRSPOLA, EMS, OHS, SA, SCC	PRSPO-EMS, OHS, SA, SCC	PRSPO-EMS, OHS, SA	PRSPO-SA
	14.00-15.00	Wash up meeting	√	√	√	√
	15.00-18.00	Travelling to Bukit Maradja POM	√	√	√	√
Wednesday, 11/03/2020	08.00-12.00	<b>(Bukit Maradja POM): RSPO Document Review</b> General information, Time bound plan, partial certification verification, RSPO P&C 2018 (for BMP and SCC)	√	-	-	-
		<b>(Bukit Maradja POM): RSPO Document Review:</b> RSPO P&C 2018 (for Legal, Social, Environment and OHS)	-	√	√	-
		<b>(Bukit Maradja POM):</b> Visit and interview with government offices in Simalungun Regency	-	-	-	√
	12.00-14.00	<b>Break/Lunch</b>	√	√	√	√
	14.00-17.00	<b>Field Visit (Bukit Maradja POM):</b> RSPO P&C 2018 (for BMP and SCC)	√	-	-	-
		<b>Field Visit (Bukit Maradja POM):</b> Visit and observing Occupational Safety and Health management, Environmental management (including but not limited to: use of PPE, safe working environment, walk ways, signs, palm oil mill effluent, diesel tanks, fire extinguishers, emission, first aiders and boxes, etc),	-	√	√	-
<b>Stakeholder Consultation:</b> Visit to local communities (head of village, cooperatives, community leader, contractors, worker union, gender committee, etc.)		-	-	-	√	
Thursday, 12/03/2020	08.00-12.00	<b>Field Visit (Bukit Maradja Estate):</b> Field observation and Worker interview – FFB harvesting, FFB loading, fertilizer application, IPM, road maintenance, water management, etc.	√	-	-	-
		<b>Field Visit (Bukit Maradja Estate):</b> Field observation and Worker interview - HCV's, boundaries, landfill (waste management), etc.	-	-	√	-
		<b>Field Visit (Kerasaan Estate):</b> Field observation and worker interview - herbicide application, chemical and fertilizer warehouse, hazardous waste storage, workshop, housing, social amenities, clinic, etc.	-	√	-	-
		<b>Field Visit (Kerasaan Estate) and Stakeholder Consultation:</b> Field observation and worker interview – boundaries, housing, social amenities, clinic, etc.	-	-	-	√
	12.00-14.00	<b>Break/Lunch</b>	√	√	√	√
	14.00-17.00	<b>(Bukit Maradja &amp; Kerasaan Estate): RSPO Document Review</b> RSPO P&C 2018 (for Best Agriculture Practices, Long Term Management Plan, Continual improvement, Legal, Social, Environment and OHS).	√	√	√	√

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			PRSPOLA, EMS, OHS, SA, SCC	PRSPO- EMS, OHS, SA, SCC	PRSPO- EMS, OHS, SA	PRSPO- SA
Saturday, 14/03/2020	11.00-12.00	<b>Closing Meeting</b>	√	√	√	√

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

- SIPEF Group Multiple Management Units / Time Bound Plan
- RSPO P&C 2018 Generic

#### 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 that is under the control of the holding company?	PT Eastern Sumatra Indonesia – Bukit Maradja Palm Oil Mill is a subsidiary of SIPEF Group. SIPEF Group has disclose all of its companies, mills and estates. The timebound plan including un-certified units/companies.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	Not all the estates and mills certified within five years after obtaining RSPO membership. However, new estates and mills are under progress to be RSPO certified after RSPO NPP carried out in 2014. Based on ACOP 2019, the company’s plan to achieve 100% of RSPO certification for all estates and mills is in year 2024.	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.	The latest acquisition noted for PT. Asri Rimba Wirabhakti in Bengkulu, announced end of 2018. Certification plan have been prepared, awaiting for RSPO LUC, RSPO RACP and RSPO NPP.	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?	Yes, there is changes from the last audit to include PT. Asri Rimba into timebound plan. Waiting for HCV ALS review, LUC review for preparation into RSPO NPP. It is consistent with the ACOP reporting.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No isolated lapse. SIPEF is able to demonstrate adequate evidence related to changes 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 <b>Major</b> non-compliance shall be raised	The delay of not able to certify all the estate within the 5 years period from the day of RSPO membership is accepted by the assessment team.	Yes
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: • Primary forest.	Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and found note "The compensation plans for PT.	Yes

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<ul style="list-style-type: none"> <li>Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	<p>Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015”.</p>	
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>All new planting after January 1<sup>st</sup>, 2010 have undergone and complies with RSPO New Planting Procedure.</p>	<p>Yes</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>. The progress on the Liabilities shall be verified and reported.</p>	<p>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint.</p> <p>On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company.</p> <p>On 28 August 2017 - Secretariat received response from the company.</p> <p>On 5 September 2017 - Complainant failed to provide the document.</p> <p>On 11 September 2017 - Secretariat has sent an email to SIPEF.</p> <p>On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter.</p> <p>On 18 June 2018 – Complaint Panel to deliver a decision.</p> <p>On 25 July 2018 – Complaint Panel to deliver a decision.</p> <p>On 23 August 2018 – Draft decision letter to be reformatted.</p> <p>On 19 September 2018 – Decision Letter – Complaints Panel.</p> <p>On 26 September 2018 – The decision letter finalised and to be delivered to Parties.</p> <p>On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018.</p>	<p>Yes</p>

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	<p>On 20 December 2018 – The complaint is officially closed.          The case tracker available on link <a href="https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail">https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</a></p> <p>Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and found note “The compensation plans for PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015”.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 6.3.</p>	<p>No labor dispute noted. The assessment team has conducted a search in internet to confirm that there is no new comments or dispute raised by the communities on those units that have not been certified.</p>	<p>Yes</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>No legal non-compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified.</p>	<p>Yes</p>
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>The internal audit against the uncertified management units requirement has been conducted for all uncertified units:</p> <ul style="list-style-type: none"> <li>• PT. Agro Rawas Ulu was conducted on 20-21 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6;</li> <li>• PT. Agro Kati Lama was conducted on 4-6 March 2019 assessing criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6;</li> <li>• PT. Agro Muara Rupit was conducted on 18-20 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6;</li> </ul> <p>Each Management Unit has provide correction and corrective action to ensure all RSPO P&amp;C and partial certification requirements are implemented.</p>	<p>Yes</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Yes. Stakeholder comments are noted. The assessment team has conducted a search in internet to confirm that there is a comment that was recorded as complaint under RSPO Case Tracker; raised by the individual on those units that have not been certified.</p>	<p>Yes</p>



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	<p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint.</p> <p>On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company.</p> <p>On 28 August 2017 - Secretariat received response from the company.</p> <p>On 5 September 2017 - Complainant failed to provide the document.</p> <p>On 11 September 2017 - Secretariat has sent an email to SIPEF.</p> <p>On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter.</p> <p>On 18 June 2018 – Complaint Panel to deliver a decision.</p> <p>On 25 July 2018 – Complaint Panel to deliver a decision.</p> <p>On 23 August 2018 – Draft decision letter to be reformatted.</p> <p>On 19 September 2018 – Decision Letter – Complaints Panel.</p> <p>On 26 September 2018 – The decision letter finalised and to be delivered to Parties.</p> <p>On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018.</p> <p>On 20 December 2018 – The complaint is officially closed.</p> <p>The case tracker available on link <a href="https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail">https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</a></p>	
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**3.3 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	There is no smallholder supplying FFB to PT. Eastern Sumatra Indonesia.	N/A

<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>PT. Eastern Sumatra Indonesia does not received FFB from smallholders, therefore does not obliged to comply with the standard within three years of the mill's initial certification.</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 Re-certification Assessment there were no Major & no Minor nonconformities raised.

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

Non-conformity			
<b>NCR Ref #</b>	<b>Nil</b>	<b>Clause &amp; Category (Major / Minor)</b>	
<b>Date Issued</b>		<b>Due Date</b>	
<b>Closed (Yes / No)</b>		<b>Date of nonconformity Closure</b>	
<b>Statement of Nonconformity:</b>			
<b>Requirement Reference:</b>			
<b>Objective Evidence:</b>			
<b>Corrections:</b>			
<b>Root Cause Analysis:</b>			
<b>Corrective Actions:</b>			
<b>Assessment Conclusion:</b>			

Opportunity for Improvements	
OFI #	Description
<b>OFI 1</b>	Point of consideration: consistency of monitoring of all license are well implemented by respective department.

Positive Findings	
PF #	Description
PF 1	Consistent records in implementation of RSPO P&C 2018
PF 2	Good hospitality during stay in PT Eastern Sumatra Indonesia’s Guest House.

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

Non-conformity			
<b>NCR Ref #</b>	<b>1754045-201903-M1</b>	<b>Clause &amp; Category (Major / Minor)</b>	RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement-Clause 5.7.2 - Major
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>3 May 2019</b>
<b>Statement of Nonconformity:</b>	PT. Eastern Sumatra Indonesia - Bukit Maradja POM have not consistently demonstrated removal of RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage.		
<b>Requirement Reference:</b>	RSPO SCCS, General Chain of Custody Requirements - Clause 5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> <li>• Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>		
<b>Objective Evidence:</b>	PT. Eastern Sumatra Indonesia – Bukit Maradja POM demonstrated some of the CSPO and CSPK transaction for other scheme and/or conventional sales have been removed from PalmTrace. However, the other transaction have not been removed: <ul style="list-style-type: none"> <li>- PT. Eastern Sumatra Indonesia – Bukit Maradja POM removed 1999.99 MT CSPO from PalmTrace through transaction ST-TR-78010e8c-e269 dated 11 June 2018 (ISCC).</li> <li>- PT. Eastern Sumatra Indonesia – Bukit Maradja POM removed 1499.94 MT CSPO from PalmTrace through transaction ST-TR-ee8d9c8d-9ff8 dated 11 June 2018 (ISCC).</li> </ul>		

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	<ul style="list-style-type: none"> <li>- PT. Eastern Sumatra Indonesia – Bukit Maradja POM removed 4199.86 MT CSPO from PalmTrace through transaction ST-TR-cdc1cda9-99ed dated 21 March 2019 (ISCC).</li> <li>- Another 1,999.18 MT CPO from confirmed ISCC sales have not been removed from PalmTrace.</li> <li>- Another 1,005.77 MT CSPO from confirmed local/conventional sales have not been removed from PalmTrace.</li> <li>- PT. Eastern Sumatra Indonesia – Bukit Maradja POM removed 2,300 MT CSPK from PalmTrace through transaction ST-TR-e0f70cf6-6783 dated 28 March 2018.</li> <li>- Another 1,583.71 MT CSPK from local/conventional sales have not been removed from PalmTrace.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Team Marketing in Head Office Medan participated in training related to RSPO SCCS v.2014 rev.2017 organized by ENC team. Training dated 16 April 2019;</li> <li>- Team Marketing in Head Office Medan communicated through email for sending all information related to: volume of certified RSPO CPO and/or PK sold under other schemes or as conventional, or in case of production shortages, loss or damage to Antwerp for removing CPO and/or PK quota at PT. Eastern Sumatra Indonesia PalmTrace account.</li> <li>- Antwerp inform every detail removing quota to the Team Marketing in Head Office Medan.</li> <li>- Manager ENC notified to Antwerp that the above procedure is mandatory.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Based on document verified, Summary of Local Sales, it was evident that "Remove" in PalmTrace are made based on Contract, e.g.:</p> <ul style="list-style-type: none"> <li>- Contract No.2019/BM-CPO/03 dated 21 May 2019 for 535.26 MT CPO sold to PT MNA has been input to RSPO PalmTrace as in Transaction ID: ST-TR-b80e2fd5-bebb.</li> <li>- Contract No.2019/LTC-CPO/ESI/11 dated 25 Jul 2019 for 1,121.62 MT CPO sold to PT S has been input to RSPO PalmTrace as in Transaction ID: ST-TR-9d60fcac-7915.</li> </ul> <p>Based on review to supply chain documentation and implementation in Bukit Maradja Palm Oil Mill, Audit Team conclude that the Major NC is remain closed.</p>

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

**3.4.2 Summary of the Nonconformities and Status**

<b>CAR Ref.</b>	<b>Category (Major / Minor)</b>	<b>P&amp;C Indicator</b>	<b>Issued Date</b>	<b>Status &amp; Date (Closure)</b>
1033270M1	Major	RSPO P&C 2.1.1	03/03/2014	Closed on 13/05/2014

1033270M2	Major	RSPO P&C 5.3.2	03/03/2014	Closed on 13/05/2014
1033270M3	Major	RSPO P&C 5.6.2	03/03/2014	Closed on 13/05/2014
1033270N1	Minor	RSPO P&C 2.1.4	03/03/2014	Closed on 28/03/2015
1033270N2	Minor	RSPO P&C 4.7.4	03/03/2014	Closed on 28/03/2015
1033270N3	Minor	RSPO P&C 4.7.5	03/03/2014	Closed on 28/03/2015
1033270N4	Minor	RSPO P&C 4.7.5	03/03/2014	Closed on 28/03/2015
1170504M1	Major	RSPO P&C 6.3.1	28/03/2015	Closed on 22/04/2015
1170504M2	Major	RSPO Supply Chain Certification Standard (November 2014) – clause D.3.1	28/03/2015	Closed on 22/04/2015
1170504N1	Minor	RSPO P&C 2.2.5	28/03/2015	Closed on 18/03/2016
1170504N2	Minor	RSPO P&C 5.3.3	28/03/2015	Closed on 18/03/2016
1170504N3	Minor	RSPO P&C 6.1.4	28/03/2015	Closed on 18/03/2016
1170504N4	Minor	RSPO P&C 6.9.3	28/03/2015	Closed on 18/03/2016
1607838-201803-M1	Major	RSPO Supply Chain Certification Standard (June 2017) – clause D.4.2	24/03/2018	Closed on 16/04/2018
1754045-201903-M1	Major	RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement-Clause 5.7.2	23/03/2019	Closed on 03/05/2019

### 3.5 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Eastern Sumatra Indonesia – Bukit Maradja POM and supply bases environmental and social performance, legal and any known dispute issues. Public notification of Recertification Assessment has been published on RSPO website at the following link: <https://www.rspo.org/certification/public-announcement> start on 14 February 2020.

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.

<b>List of Stakeholders contacted</b>	
<p><b>Internal Stakeholders</b></p> <ul style="list-style-type: none"> <li>• Gender Committee</li> <li>• Worker representatives (harvester, spraying operators, IPM, weighbridge clerk, production clerk, mill operators).</li> </ul>	<p><b>Union/Contractors</b></p> <ul style="list-style-type: none"> <li>• Pengurus Serikat Pekerja Mandiri Bukit Maradja Estate, Bukit Maradja Mill dan Kerasaan Estate</li> <li>• Local contractor PT Multi Prima Nusa (transporter TBS)</li> <li>• Local contractor/supplier UD Sumber Teknik</li> <li>• Security services (Safeguarding Solution Indonesia)</li> <li>• Pengurus Serikat Pekerja, Pengurus Komite Gender dan Koperasi Karyawan PT Timbang Deli Indonesia (Focus Group Discussion)</li> <li>• Local Contractor/Supplier (CV Biring Ndu)</li> </ul>
<p><b>Government Departments</b></p> <ul style="list-style-type: none"> <li>• Pangulu (Village Head) Nagori Sahkuda Bayu, Pardomuan Nauli, Kerasaan I, Bandar Siantar.</li> <li>• Manpower Office of Simalungun Regency</li> <li>• Agriculture and Plantation Office of Simalungun Regency.</li> <li>• Environment Office of Simalungun Regency</li> <li>• Village Head of Keramat Gajah</li> <li>• Agriculture and Plantation Office of Deli Serdang Regency</li> <li>• Environmental Office of Deli Serdang Regency</li> <li>• National Land Agency (BPN) of Deli Serdang Regency</li> </ul>	<p><b>NGO</b></p> <ul style="list-style-type: none"> <li>• Local Journalist</li> <li>• LSM Suara Inti (Desa Kerasaan I)</li> </ul>

<b>IS#</b>	<b>Stakeholders comment</b>
<b>1</b>	<p><b>Feedbacks:</b></p> <p><b>Pengurus Serikat Pekerja dan Pengurus Komite Gender PT Eastern Sumatera Indonesia (SP BUMM) dan PT Kerasaan Indonesia (SP KIM) (Focus Group Discussion)</b></p> <ul style="list-style-type: none"> <li>• The company provides opportunities for employees to gather and organize. The union administrator is given a special dispensation in carrying out organizational activities.</li> <li>• There is a Bipartite forum between management representatives (employers) and employees (worker unions) that are running very well and effectively. In general, all complaints and inputs were submitted to the forum and responded well.</li> <li>• Collective Labour Agreement (PKB) is available, the contents of which are based on mutual agreement. So far, both parties have obeyed and carried out well the agreements contained in the PKB.</li> <li>• There are no disputes related to industrial relations that are currently taking place.</li> <li>• All employees have been included in the Health Insurance (BPJS Kesehatan) and Social Insurance (BPJS Ketenagakerjaan) programs.</li> <li>• The company has disseminated company policies to employees through worker unions. For example, policies related to the prohibition of employing children, the minimum age limit, the prohibition of hiring female workers who are pregnant or breastfeeding at high risk jobs using chemicals, equal rights to work and careers, respect for human rights.</li> </ul>

	<ul style="list-style-type: none"> <li>The gender committee has disseminated its functions and roles to women workers. Including communication channels if there are complaints or harassment at work.</li> <li>There are no cases of sexual harassment currently being handled by the gender committee.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>The company is committed in freedom of association as evidenced by the Freedom of Association Policy (QMM-40-01-P12) and has been disseminated to all levels of workers during morning briefing. The company also provides special dispensation to the union administrators to carry out organization activities in the Collective Labour Agreement (PKB) between the company PT. Eastern Sumatra Indonesia and Bukit Maradja Independent Workers Union.</li> <li>PT. Eastern Sumatra Indonesia and the Bukit Maradja Independent Workers Union have formed a Bipartite Cooperation Institution that has been ratified by the Manpower Office of Simalungun Regency and has held meetings regularly every month. In general, meeting discuss complaints and input from employees or representatives.</li> <li>Collective Labour Agreements (PKB) that have been approved and signed by company known by the Simalungun Regency Manpower Office are always obeyed and executed in accordance with the agreements set forth in the Collective Labour Agreement. At this time, the PKB used and approved was for period 2018 - 2020.</li> <li>There are no disputes related to industrial relations.</li> <li>All employees of PT. Eastern Sumatra Indonesia has been registered in BPJS Kesehatan (health insurance) and BPJS Ketenagakerjaan (social insurance). Evidence of monthly payments were available.</li> <li>PT. Eastern Sumatra Indonesia has provided information to all employees regarding company policies such as child labour policies, policies that prohibit pregnant and breastfeeding women from working in chemicals, human rights policies, equal employment policies and others. The policy is delivered routinely every morning during morning briefing.</li> <li>Gender committee of PT. Eastern Sumatra Indonesia has provided information on functions and roles to all workers and holds regular meetings every month.</li> <li>There was no issue of sexual harassment at PT. Eastern Sumatra Indonesia.</li> </ul> <p><b>Audit Team Findings:</b>  Positive comments noted, no further comment needed.</p>
<p><b>2</b></p>	<p><b>Feedbacks:</b>  <b>Pangulu (Village Head) Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I, Bandar Siantar.</b></p> <ul style="list-style-type: none"> <li>Company management, represented by managers and staff, has a good and effective relationship with surrounding village heads and community leaders.</li> <li>The company's concession area has existed since the colonial era. Thus, there is no land acquisition process that involves community members.</li> <li>There are no cases of land disputes between communities and companies.</li> <li>Some positive impacts of the existence of the company are employment opportunities (although not much) for local residents, the existence of routine assistance programs for village infrastructure. maintenance (heavy equipment lending), partnerships with oil palm farmers (currently under scheme and program, socialization implemented in January 2020), providing POM waste (solid) as a mixture of animal feed etc.</li> <li>The Pangulu hoped that the information on job vacancies was conveyed more openly to them so that the workforce in the surrounding villages could prepare themselves. Existing vacancies should prioritize local residents according to their competencies.</li> <li>Simplifying the bureaucracy of heavy equipment loans. Previously only the manager's approval, but now it must be approved by the Medan HO office.</li> </ul> <p><b>Management Responses:</b></p>

	<ul style="list-style-type: none"> <li>• PT. Eastern Sumatra Indonesia is committed to maintaining good relations with surrounding communities. This can be seen based on the results of the social impact assessment conducted every year that the percentage of people stating a good relationship with the company tends to be higher. In 2019 a percentage of 72% and another 28% answered normal.</li> <li>• There was no land acquisition process because the company had existed since the colonial era.</li> <li>• There are no issues regarding disputes over PT. Eastern Sumatra Indonesia</li> <li>• In addition to providing work opportunities, the company is also committed to contribute to the surrounding community by providing assistance in the form of improving facilities and access by borrowing heavy equipment, providing solid as livestock feed, etc.</li> <li>• PT. Eastern Sumatra Indonesia has submitted information related to job vacancies to the surrounding community by providing distribution of vacancies to the surrounding village communities through village officials and distribution on the information board. For example, job vacancies in 2019 as carpenter and cooking distributed on 10 August 2019.</li> <li>• Borrowing of heavy equipment must get prior approval from the head office or not only approval from the plantation manager. This is in accordance with the provisions and procedures written in the Corporate Social Responsibility procedure (LCA-01-06/01-12-2019/Rev. 0).</li> </ul> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>• Auditor acknowledge that the company has provided public information on job vacancies through communication with village officials and information board.</li> <li>• Auditor acknowledge the company's procedure on heavy equipment uses as in Corporate Social Responsibility procedure (LCA-01-06/01-12-2019/Rev. 0).</li> </ul>
<p><b>3</b></p>	<p><b>Feedbacks:</b></p> <p><b>Local Contractor / Supplier (PT Multi Prima Nusa)</b></p> <ul style="list-style-type: none"> <li>• PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia have a FFB transport contract with PT. MPN since January 2020. In the agreement, the contractor is required to provide trucks, drivers and helpers. Each unit consists of 3 workers. With 5 units available, the contractor currently has 15 workers in the field. In addition, the contractor is also required to provide PPE for his employees for free.</li> <li>• In a work contract signed and agreed by both parties, there are several clauses for example:             <ol style="list-style-type: none"> <li>1. Not employing under age workers</li> <li>2. Contractor workers must use PPE.</li> <li>3. Registering all employees in the BPJS Kesehatan and BPJS Ketenagakerjaa program.</li> </ol> </li> <li>• There are high turnover of contractor's employee that caused the contractor cannot consistently register and pay BPJS Kesehatan and Ketenagakerjaan membership.</li> <li>• Work payments should be made monthly, but January jobs have not been paid to date.</li> <li>• The payment process should be simplified so that there are no late payments for work completed by the contractor.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>• The contractor in cooperation with PT. Eastern Sumatra Indonesia and PT. Indonesian feeling, namely PT. Multi Prima Nusa has provided PPE to all workers and gave it for free.</li> <li>• The contractor PT. Multi Prima Nusa has signed and agreed the clause on not employing under age worker, workers must use PPE, and register all employees in the BPJS Kesehatan and Ketenagakerjaan program. This is written in the work agreement that was signed together with the company.</li> <li>• The contractor PT. Multi Prima Nusa has made a statement dated 19 March 2020, that the company PT. MPN will register their employees in BPJS Kesehatan and BPJS Ketenagakerjaa in accordance with the Manpower Act.</li> <li>• Payment of PT. Multi Prima Nusa is in the process. Because the contractor, PT. Multi Prima Nusantara, is just begin since January 2020, so now the PT. Eastern Sumatra Indonesia has proposed the addition of PT. MPN as a new creditor in the Lyntramax system through request No. 01/Creditor/BMEE/2020 dated 17 March 2020. If the code for a new creditor is available in the Lyntramax system, then the payment can proceed.</li> </ul>



	<ul style="list-style-type: none"> <li>The entire payment process refers to the procedures and completeness of the supporting data, written in the Company's Operational Standard on Payment (FAD-02-02/03-26-2019/Rev.1).</li> </ul> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>Auditor acknowledge that PT. Multi Prima Nusa is a new contractor.</li> <li>Auditor acknowledge that payment process are refer to SOP of Payment (FAD-02-02/03-26-2019/Rev.1).</li> </ul>
<p><b>4</b></p>	<p><b>Feedbacks:</b></p> <p><b>Local Contractor / Supplier (UD Sumber Teknik)</b></p> <ul style="list-style-type: none"> <li>The company has partnered with UD Sumber Teknik for a long time, where UD Sumber Teknik provides building materials and building rehabilitation services (according to tender).</li> <li>So far the relationship has gone well and no party has incur losses. However, there were complaints about the long payment period because the invoices were often stalled at the Medan HO office.</li> <li>It is expected that the payment process can be simplified so that payment times are faster.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>PT. Eastern Sumatra Indonesia has been partnering with UD Sumber Teknik for the supply of building materials and building rehabilitation services.</li> <li>The relationship between the company and UD Sumber Teknik is good. Delay in payment due to every invoice that enters the HO Medan office must be checked by several related departments. After the invoice is checked and approved by several related departments, the invoice can be paid/transferred.</li> <li>All payment process refers to the procedures and completeness of the supporting data written in the Company's Operational Standard on Payment (FAD-02-02/03-26-2019/Rev.1).</li> </ul> <p><b>Audit Team Findings:</b></p> <p>Auditor acknowledge that payment process are refer to SOP of Payment (FAD-02-02/03-26-2019/Rev.1).</p>
<p><b>5</b></p>	<p><b>Feedbacks:</b></p> <p><b>Local Journalist</b></p> <p>The company has a good relationship with the community. Until now there have been no complaints or disputes between the company and surrounding communities related to land, environmental pollution and other social unrest..</p> <p><b>Management Responses:</b></p> <p>The company has established a good relationship with the community. This can also be seen from the results of the results of the social impact assessment carried out by the company to the community about once a year. Based on the results of the 2019 assessment the percentage of people who said that good relations with the company was 72% and another 28% said it was normal.</p> <p><b>Audit Team Findings:</b></p> <p>Positive comments noted, no further comment needed.</p>
<p><b>6</b></p>	<p><b>Feedbacks:</b></p> <p><b>Manpower Office of Simalungun Regency</b></p> <ul style="list-style-type: none"> <li>The company has good relationship with Manpower Office of Simalungun Regency, demonstrated by compliance with compulsory labour reporting, PKWT (contract) agreement recording and PKB registration and other employment related consultations.</li> <li>The company has a good bipartite cooperation forum and has produced a Collective Labour Agreement (PKB). So far, the contents of the PKB are the best in Simalungun Regency. The implementation went well and there were no complaints or violations of the contents of the PKB.</li> <li>There are no cases of labour disputes (industrial relations) currently taking place.</li> </ul> <p><b>Management Responses:</b></p>

	<ul style="list-style-type: none"> <li>• PT. Eastern Sumatra Indonesia maintains good relations with the Government such as the Manpower Office of Simalungun Regency. Also routinely send reports on employment of both permanent employees and PKWT (contract) as well as PKB registration and other consultations. Submission of employment report for January 2020 on 4 February 2020 with letter No. 01/G/BME/2020.</li> <li>• Companies and worker unions have formed a bipartite cooperation forum that has been ratified by the Simalungun Regency Manpower Office. The entire agreement written in the PKB has been fulfilled and there are no complaints or violations regarding the contents of the PKB.</li> <li>• There are no issues/disputes about employment in PT. Eastern Sumatra Indonesia.</li> </ul> <p><b>Audit Team Findings:</b>  Positive comments noted, no further comment needed.</p>
<p><b>7</b></p>	<p><b>Feedbacks:</b>  <b>Agriculture and Plantation Office of Simalungun Regency</b></p> <ul style="list-style-type: none"> <li>• The company has a good relationship with the government office. Demonstrated by compliance with compulsory plantation reports such as the Plantation Business Development Report (LPUP), land fire monitoring etc.</li> <li>• The company has fulfilled permits related to its business such as HGU, IUP, environmental permit etc. In addition, the company has also participated in a re-assessment of PUP in 2019.</li> <li>• There are no cases of land disputes currently taking place on company concession lands.</li> <li>• There is information that the company will enter into a partnership with oil palm farmers in the vicinity, please submit progress to the agency.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>• The company routinely submits report of Plantation Business Development Activities (LPUP) every semester and annual land fire monitoring reports. Delivery of the 2019 fire monitoring report on 29 February 2020 with letter No. 01/BME-Disbun/II/2020.</li> <li>• Business licenses of companies such as HGU, IUP, Environmental Permit, etc. have been fulfilled and overall permits are still valid. Extension of Plantation Business Valuation (PUP) has also been available based on the decision of the Regent of Simalungun No. 188.45/7712/20.5/2018 dated 23 July 2019 which stipulates that PT. Eastern Sumatra Indonesia as Class II (Good).</li> <li>• There are no cases of land disputes in the operational area of PT. Eastern Sumatra Indonesia</li> <li>• It is true that there will be a partnership with nearby oil palm farmers and this will be informed to the Agriculture and Plantation Office in Simalungun Regency after the company has obtained accurate information on the identity of the farmers, area cover, location, area boundary and land ownership status.</li> </ul> <p><b>Audit Team Findings:</b>  Auditor will verify the progress of partnership between the company and the oil palm farmers during next surveillance assessment.</p>
<p><b>8</b></p>	<p><b>Feedbacks:</b>  <b>Environmental Office of Simalungun Regency</b></p> <ul style="list-style-type: none"> <li>• The company has a good relationship with the government office, demonstrated by compliance with mandatory environmental reports such as RKL/RPL reports, liquid waste, LB3 etc.</li> <li>• The company already has an environmental permit for its operations. But the agency has not known about permits for composting activities and domestic waste management agencies, does it already have a permit.</li> <li>• Last year, a reprimand letter from the Ministry of Environment and Forestry was issued relating to the management of medical waste. How is the progress?</li> <li>• The last official visit was conducted in January 2020 together with the Commission I team of the Simalungun Regency house of representative. There are no records of environmental violations, but there are records of improvements that must be implemented by the company.</li> </ul>

	<ul style="list-style-type: none"> <li>During the last year until now, there have been no records of complaints/disputes related to environmental violations or pollution caused by operational activities.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>PT. Eastern Sumatra Indonesia has a good relationship with the Environmental Agency. The company has routinely submits RKL/RPL reports every semester. Delivery of reports is done manually to the District and Provincial Offices while to KLHK (Ministry of Environment) the delivery of reports is done online.</li> <li>The company already has an environmental permit based on the Decree of the Head of the Environmental Agency regarding environmental permits for oil palm plantation activities, POM and the use of empty fruit bunch with liquid waste for processing into compost in Nagori Pematang Sakhuda Kecamatan Gunung Malela, Simalungun Regency with No. 188.45/869/Sekrt-2015.</li> <li>Whereas the permit for domestic waste management is being process by the Environmental Office of Simalungun Regency through the OSS system. It is estimated that the permit process will be completed within a period of 3 months, until June 2020.</li> <li>In 2019, PT. Eastern Sumatra Indonesia did not receive a reprimand from the Ministry of Environment and Forestry regarding the management of medical waste. However on 18 March 2020 PT. Eastern Sumatra Indonesia has held a meeting with the Environmental Agency of Simalungun Regency related to medical waste management where management permits will be included within the temporary hazardous waste storage permits. It is estimated that the permit process will be completed within a period of 3 months, until June 2020.</li> <li>During the visit of the Simalungun Regency DPRD (House of Representatives) Commission I on 20 January 2020 at STC Bukit Maradja Estate, PT. Eastern Sumatra Indonesia was asked to provide a presentation related to the management of liquid/solid waste during the Hearing Meeting (RDP) which will be scheduled later on and PT. Eastern Sumatra Indonesia will prepare the presentation.</li> <li>There is no record of complaints/disputes related to environmental pollution due to the company's operational activities during 2019.</li> </ul> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>Auditor acknowledge that the company has permit for composting process and application.</li> <li>Auditor acknowledge that PT. Eastern Sumatra Indonesia has held a meeting with the Environmental Agency of Simalungun Regency related to medical waste management where management permits will be included within the temporary hazardous waste storage permits. It is estimated that the permit process will be completed within a period of 3 months, until June 2020.</li> <li>Auditor acknowledge that there is no record of complaints/disputes related to environmental pollution due to the company's operational activities during 2019.</li> </ul>
<p><b>9</b></p>	<p><b>Feedbacks:</b>  <b>NGO Suara Inti (Kerasaan I Village)</b>          At this time, there are no issues/complaints/dispute from community members or other stakeholders related to issues of land disputes, environmental pollution or other social unrest.</p> <p><b>Management Responses:</b>          There are no issues/complaints related to land disputes, environmental pollution and social unrest from communities around the PT. Kerasaan Indonesian.</p> <p><b>Audit Team Findings:</b>          No further comment needed.</p>
<p><b>10</b></p>	<p><b>Feedbacks:</b>  <b>Security Services (PT Safeguarding Solution Indonesia)</b></p> <ul style="list-style-type: none"> <li>PT SSI is a service company providing assets security for companies that have collaborated with SIPEF Group since 2016.</li> </ul>

	<ul style="list-style-type: none"> <li>PT SSI employees are dominated by local residents. However, there is no discrimination. All employees get their rights such as monthly salary (including benefits), uniforms, working tools and registered in the BPJS Kesehatan and Ketenagakerjaan.</li> <li>Until now, the working relationship between PT SSI and SIPEF Group is running smoothly and there are no problems. Coordination related to the security program is going well.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>The company has collaborated with PT. SSI as a security service provider company since 2016.</li> <li>Employees of PT. SSI is dominated by local residents but there are some employees who are come from other area. All SSI employees have been paid according to monthly wages, given working tools and registered in BPJS Kesehatan and Ketenagakerjaan facility.</li> <li>Company relations with PT. SSI continues to run well and coordination related to the security program works smoothly.</li> </ul> <p><b>Audit Team Findings:</b>          No further comment needed.</p>
<p><b>11</b></p>	<p><b>Feedbacks:</b>  <b>Pengurus Serikat Pekerja, Pengurus Komite Gender dan Koperasi Karyawan PT Timbang Deli Indonesia (Focus Group Discussion)</b></p> <ul style="list-style-type: none"> <li>The company supports and provides opportunities for employees to organize worker union. Support is given in the form of providing room as a worker union office, providing special dispensation for worker unions and gender committees in carrying out organizational activities.</li> <li>The company provides equal opportunities and rights for employees in work and career. There is no discrimination on the basis of ethnicity, religion, race or political choice.</li> <li>At the time of the audit, there were no cases of labour disputes between the company and employees, as well as no cases of sexual harassment/violence were reported to the gender committee.</li> <li>A collective labour agreement (PKB) has been available which has been agreed by both parties based on the results of a bipartite meeting and has been registered to the local Manpower Office. So far, both parties have respected and have carried out the commitments contained in the PKB.</li> <li>Employee cooperatives engaged in outsourced labour services for plant maintenance needs. Cooperative outsourced employees have been registered with the BPJS Kesehatan and Ketenagakerjaan.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>The company has always been committed to freedom of association as evidenced by the Freedom of Association Policy (TDI-QM/02) and has been disseminated to employees and third parties on 3 February 2020.</li> <li>The company is also committed to not practicing discrimination related ethnic, racial, religious, or political choice where this is in accordance with the Equal Employment Opportunity Policy (TDI-QM/10) which has been disseminated to all employees and third parties on 3 February 2020.</li> <li>The Company and Worker Unions always respect and carry out the commitments set forth in the PKB Period 2018 - 2020 which have been approved by all the Chairmen of the Worker Unions on 2 November 2018 and have been noted by the Manpower Office of Deli Serdang Regency.</li> <li>Cooperative outsourced employees have been registered in BPJS Kesehatan and Ketenagakerjaan.</li> </ul> <p><b>Audit Team Findings:</b>          No further comment needed.</p>
<p><b>12</b></p>	<p><b>Feedbacks:</b>  <b>Village Head of Keramat Gajah</b></p> <ul style="list-style-type: none"> <li>PT Timbang Deli Indonesia has been established since colonial era. The company's concession area originated from colonial ownership, so there is indeed no community land that has been compensated at this time. Therefore, there is no previous land owner of Timbang Deli concession.</li> </ul>

	<ul style="list-style-type: none"> <li>• So far, there are no disputes between the community and the company related to land ownership, land disputes and the environment.</li> <li>• Company management has a good relationship with the surrounding villages. Company staff have developed effective communication with village heads, staff and community leaders.</li> <li>• One of the positive impacts from the existence of the company is absorbing the workforce, although understandably, it cannot absorb the entire workforce. In addition, companies also often provide assistance/donations for the construction of village facilities such as mosque aid, road maintenance, use of cemetery in Estate area, school bus loans etc.</li> <li>• The village apparatus hopes, in the future if there is information related to job vacancies can be prioritized for the workforce in the surrounding villages first.</li> <li>• Currently the village is doing a mosque renovation. It is hoped that the company can provide donation.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>• In 2019, there are no recruitment of workers because the current workforce is in accordance with the specified budget. In 2018, the Company opened vacancies for Kindergarten Teacher, this information was informed to the surrounding villages through a Job Vacancy Information letter dated 4 July 2018.</li> <li>• The company is always committed to establishing good communication with surrounding villages. One of the company's efforts in establishing good relations is to provide aid to the surrounding villages.</li> <li>• In case of mosque renovation, the Company will provide aid if there is a proposal/application letter submitted to the Management. The assistance will be given according to Company's ability.</li> </ul> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>• Auditor has verified the Job Vacancy Information Letter.</li> <li>• Auditor has verified the Corporate Social Responsibility Program and Realisation.</li> </ul>
<p><b>13</b></p>	<p><b>Feedbacks:</b></p> <p><b>Local Contractor/Supplier (CV Biring Ndu)</b></p> <ul style="list-style-type: none"> <li>• PT Timbang Deli Indonesia has a business partnership with the local community in the form of services and procurement of goods. One of them is with CV Biring Ndu from Jaharun Village. At present, the contractor is involved in providing FFB transporter services from Timbang Deli Estate to Bukit Maradja Palm Oil Mill, as well as providing building materials needed by the company. This collaboration has been established for quite a long time.</li> <li>• Cooperation agreements with companies are written in agreement accepted by both parties. Specific clauses are included in the implementation of the RSPO/ISPO such as the obligation to provide PPE for contractor employees, register all contractor employees with BPJS Kesehatan and Ketenagakerjaan etc.</li> <li>• Payment of work and procurement of goods is carried out in a timely manner. Even if there is a delay, it is still understandable and does not violate the existing cooperation.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>• The company has established cooperation with CV Biring Ndu Cahaya Panglong No. TDI/BNCP/V/2019/04 dated 20 May 2019 concerning Work Agreement for Transporting Fresh Fruit Bunches (FFB).</li> <li>• The company supervise the contractor in accordance with the agreed clause.</li> <li>• The company pay the contractor's work in accordance with the procedures and completion of the billing documents submitted by the contractor.</li> </ul> <p><b>Audit Team Findings:</b></p> <p>No further comment needed.</p>
<p><b>14</b></p>	<p><b>Feedbacks:</b></p> <p><b>Agriculture and Plantation Office of Deli Serdang Regency</b></p> <ul style="list-style-type: none"> <li>• PT Timbang Deli Indonesia has fulfilled all legal obligations in its business activities such as HGU, environmental document IUP etc.</li> </ul>

	<ul style="list-style-type: none"> <li>The company has regularly reported its business activities/developments (LPUP). The latest report was received on 20 February 2020 (2<sup>nd</sup> Semester of 2019). In addition, routine fire monitoring reports are also sent.</li> <li>Currently there is no new permit application.</li> <li>Currently there are no reports/complaints/information on company land disputes.</li> <li>The office has not been able to show the latest PUP certificate because the person who keep the document was not present.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>The company routinely reports Plantation Business Activity/Development Report (LPUP) every semester. For 1<sup>st</sup> Semester 2019 reported on 1 July 2019 with letter No. 95/TDE-IX/2019 and for 2<sup>nd</sup> Semester 2019 reported on 20 February 2020 with letter No. 24/TDE-II/2020.</li> <li>The company has a Decree of the Deli Serdang Regent No.554 Year 2019 concerning the stipulation of Plantation Business Assessment in Deli Serdang Regency dated 13 October 2019 with the results is Class II (Good), valid until 2021.</li> </ul> <p><b>Audit Team Findings:</b> No further comment needed.</p>
<p><b>15</b></p>	<p><b>Feedbacks:</b> <b>Environmental Office of Deli Serdang Regency</b></p> <ul style="list-style-type: none"> <li>PT Timbang Deli Indonesia already has environmental documents covering all of its business activities.</li> <li>So far, there are no reports/complaints / information related to environmental pollution by companies that cause public unrest.</li> <li>The company regularly reports the environmental management and monitoring activities carried out.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>The company routinely reported environmental management and monitoring every semester, both by sending reports and updating data on the SIMPEL website.</li> <li>Available receipt of delivery of UKL/UPL Report to Environmental Office of Deli Serdang Regency on 19 September 2019 (1<sup>st</sup> Semester) and 31 January 2020 (2<sup>nd</sup> Semester).</li> <li>Available Receipt of delivery of UKL/UPL Reports to the Environmental Office of North Sumatra Province Agency on 19 September 2019 (1<sup>st</sup> Semester) and 31 January 2020 (2<sup>nd</sup> Semester).</li> <li>Electronic Receipt Available from the Ministry of Environment and Forestry for 1<sup>st</sup> Semester 2019 and 2<sup>nd</sup> Semester 2019.</li> </ul> <p><b>Audit Team Findings:</b> No further comment needed.</p>
<p><b>16</b></p>	<p><b>Feedbacks:</b> <b>National Land Agency (BPN) of Deli Serdang Regency</b></p> <ul style="list-style-type: none"> <li>At present, there is no land disputes over company concessions. In addition, no company concession land was recorded in the abandoned land database.</li> <li>There is no new permit/HGU application made by PT Timbang Deli Indonesia.</li> <li>The company has not fulfilled the obligation to report the use and utilization of the HGU to the head of the local land office, written at the end of each year as required in the ATR/BPN Regulation No. 7 of 2017 concerning the Arrangement and Procedure for Establishing Concession Rights.</li> </ul> <p><b>Management Responses:</b> The company has fulfilled the obligation to report the use and utilization of the HGU to the Land Office of Deli Serdang Regency in Lubuk Pakam on 12 March 2020 letter No. 37/TDE/III/2020 and received by the Land Office on 16 March 2020.</p> <p><b>Audit Team Findings:</b></p>


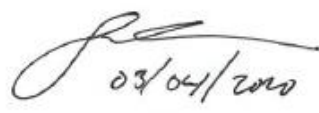
No further comment needed.
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<b>List of land owner / user contacted</b>					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
N/A					
<p><i>Note:</i>  All the unit of certification area have been existed since colonial era. The company's concession area originated from colonial ownership, there is no community land that has been compensated. Therefore, there is no previous land owner existed in Bukit Maradja Esatte, Kerasaan Estate and Timbang Deli Estate.</p>					

<b>Previous land owner / user comment</b>	
N/A	<b>Feedbacks:</b>
	<b>Management Responses:</b>
	<b>Audit Team Findings:</b>

### 3.6 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that PT Eastern Sumatra Indonesia – Bukit Maradja POM has complied with the RSPO Principles and Criteria Generic November 2018 and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of PT Eastern Sumatra Indonesia – Bukit Maradja POM is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> <b>Eko Purwanto</b>	<b>Name:</b> <b>Sander Van den Ende</b>
<b>Company Name:</b> <b>On behalf of BSI Malaysia Services Sdn Bhd</b>	<b>Company Name:</b> <b>PT Eastern Sumatra Indonesia – Bukit Maradja POM</b>
<b>Title:</b> <b>Lead Assessor</b>	<b>Title:</b> <b>Regional Director Sustainability</b>
<b>Signature:</b> 	<b>Signature:</b> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<b>Date: 3 Apr 2020</b>	<b>Date: 3 Apr 2020</b>



**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<p><b>Principle 1: Behave ethically and transparently</b> Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p><b>Criteria 1.1</b> The unit of certification provides 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.</p>			
<p>1.1.1</p>	<p><b>(C)</b> Management documents that are specified in the RSPO P&amp;C are made publicly available.</p>	<p>PT Eastern Sumatra Indonesia - Bukit Maradja POM and Estate has identified and determined document that available for public, as in "Dokumen-Dokumen yang Tersedia untuk Umum" dated 7 January 2019, consist of:</p> <ul style="list-style-type: none"> <li>• Land title</li> <li>• <i>Akta Perubahan Perusahaan</i></li> <li>• Plantation permit</li> <li>• HCV Assessment report</li> <li>• SEIA Report.</li> <li>• Land acquisition procedure.</li> <li>• Company policies.</li> <li>• Land application permit</li> <li>• Environmental evaluation document</li> <li>• Permit of EFB and effluent utilization for composting plant.</li> <li>• Temporary hazardous waste storage.</li> <li>• Environmental management and monitoring report (each semester)</li> <li>• CD/CSR report (each semester)</li> <li>• Annual OHS program</li> <li>• HCV Assessment Report.</li> <li>• Continuous improvement</li> <li>• Pollution reduce and preventive plan</li> <li>• Public summary report from certification assessment.</li> <li>• Log book incoming letter from stakeholder.</li> </ul>	<p>Comply</p>

		<p>PT Kerasaan Indonesia – Kerasaan Estate have established the document available for public as follows:</p> <ul style="list-style-type: none"> <li>• <i>Akta Perubahan Perusahaan</i></li> <li>• Plantation permit</li> <li>• Land title</li> <li>• SEIA report</li> <li>• HCV Assessment Report.</li> <li>• Temporary hazardous waste permit.</li> <li>• <i>Hinder ordonantie</i></li> <li>• Environmental management and monitoring report (each semester)</li> <li>• CD/CSR report (each semester)</li> <li>• Public summary report from certification assessment.</li> <li>• Log book incoming letter from stakeholder.</li> <li>• Land acquisition procedure.</li> <li>• Pollution reduce and preventive plan</li> <li>• Continuous improvement</li> </ul> <p>PT. Timbang Deli Indonesia – Timbang Deli have established the document available for public, as in “Prosedur Pemberian Tanggapan Terhadap Permintaan Informasi” No.SOP/TDI/09 dated 1 July 2017. The list dated 1 January 2019 consist of:</p> <ul style="list-style-type: none"> <li>• “Akta Pendirian Perusahaan PT. Timbang Deli Indonesia No.AHU-98039.AH.01.02” - Deed of Establishment, year 2008;</li> <li>• “Pemberian Hak Guna Usaha PT. Timbang Deli Indonesia No.69/HGU/BPN/97” year 1997 – decree for legal ownership of the land;</li> <li>• “Surat Pendaftaran Usaha Perkebunan sebagai Izin Usaha Perkebunan (IUP) No.209/Menhutbun.VII/2000” year 2000 – plantation business permit;</li> <li>• “Izin Usaha Tetap (IUP) No.386/I/Kehutanan/1998” – Plantation Business Permit;</li> <li>• “Sertifikat Tanda Bukti Hak No.02.04.19.20.00004” year 1997 – Land certificate;</li> <li>• “Penilaian Dampak Sosial dan Lingkungan” (SEIA) by Koompasia Enviro Institute year 2017;</li> <li>• “Dokumen Revisi UKL-UPL PT. Timbang Deli Indonesia” - (SEIA) year 2014;</li> <li>• “Penilaian NKT/HCV PT. Timbang Deli Indonesia oleh Koompasia Enviro Institute” year 2017;</li> <li>• “Izin Tempat Penyimpanan Sementara (TPS) Limbah B3 No.1107 tahun 2015” – hazardous waste storage permit in 2015;</li> </ul>	
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1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	Based on document verification, all information is provided in Bahasa. The document can be accessed through Senior Manager Operation or Office Assisstant.	Comply
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained.	<p>PT Eastern Sumatra Indonesia – Bukit Maradja Estate/Mill, PT Timbang Deli Indonesia – Timbang Deli Estate and PT Kerasaan Indonesia – Kerasaan Estate has had incoming letter logbook from stakeholder namely "<i>Permintaan Informasi dan Jawaban</i>" that listed entire incoming letter from stakeholder. For example:</p> <ul style="list-style-type: none"> <li>• Bukit Maradja Estate: sighted incoming letter dated 1 July 2019 from <i>STIKOM Tunas Bangsa Pematang Siantar</i> for apprentice opportunity request for their students. The request has been responded by unit manager on the same day via email.</li> <li>• Timbang Deli Estate: sighted incoming letter dated 6 March 2020 from Village Head of Timbang Deli regarding school bus loans. The request has been responded by estate manager on the same day.</li> <li>• Kerasaan Estate: sighted incoming letter dated 18 May 2019 from Simalungun University regarding to apprentices program request. The request has been responded on 25 March 2019.</li> </ul> <p>All incoming letter and information request are in place.</p>	Comply

<p>1.1.4</p>	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>Certificate holder has had Responding to Request for Information Procedure (ENC-01-11/04-03/2019/Rev.1) that approved by Principal Director since 18 March 2019. Some important or guidance of the procedure was:</p> <ul style="list-style-type: none"> <li>• Unit management should provide a record book of information and answers with the shelf life "CONTINUOUS/ONGOING".</li> <li>• Requested for information / data referred to this procedure are requests for written information by mail, fax, e-mail or verbally (directly delivered via telephone, including sort message service from stakeholder at the farm/mill/factory.</li> <li>• Evaluation of information request by stakeholders (publicly accessed document and non-publicly accessed document.</li> <li>• Time limit to response the information request.             <ol style="list-style-type: none"> <li>a. If needed assistance from senior manager office: within 3 working days</li> <li>b. If needed assistance from department head: within 7 working days.</li> <li>c. If needed assistance from board if director: within 25 working days.</li> </ol> </li> </ul> <p>Certificate holder also had Grievance Procedure (IAD-01-08/22-01-2020/Rev.0) approved since 30 January 2020. Some important notice written in this procedure was:</p> <ul style="list-style-type: none"> <li>• Complainants sends grievance by email, WhatsApp and messages to grievance block.</li> <li>• All complainant are to be given response within 3 days.</li> <li>• Department concerned collect information and documents to answer question of complainant.</li> <li>• A formal response referencing the original grievance will be sent within 30 days and will be informed if more than 30 days.</li> <li>• Informing that the complainant have to answer within two weeks, complainant should confirm that they are satisfied within two weeks, if no answer the case will be closed.</li> </ul> <p>The operating unit is responsible for managing and carrying out the procedure above. Head of OU appointed PIC to socialize those procedure. Sighted the evidence of socialization conducted by technical assistant to the village head of Pematang Sakhuda and his staff on 24 February 2020.</p> <p>Based on public consultation with respective village head surrounding area such as village head of Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar (PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia) and village head of Keramat Gajah (PT Timbang Deli Indonesia) obtained information that the requested information procedures and or donation proposals have been well informed. However, the village head usually requested information by phone or short message</p>	<p>Comply</p>
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		<p>services directly to the estate/mill manager. Request of information submitted usually for donation proposals or heavy equipment loans which also signed by sub district head.</p> <p>During the audit, auditor also conducted focus group discussion with internal stakeholder such as labour union and gender committee. Through the interview obtained information that if any information request usually through the bipartite meeting. Until now, all requests for information were answered well in a bipartite meeting.</p>	
<p>1.1.5</p>	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p>	<p>Certificate holder in each unit has had current list of contact and details of stakeholders as follows:</p> <ul style="list-style-type: none"> <li>• Bukit Maradja Estate: sighted stakeholder list as follows Local government: 6 stakeholders Head of Sub-District: 3 stakeholders Village head: 8 stakeholders Labor union: 3 stakeholders Local contractors: 2 stakeholders Supplier: 2 stakeholders</li> <li>• Timbang Deli Estate: sighted stakeholder list as follows Local government: 10 stakeholders Head of Sub-District: 3 stakeholders Village head: 2 stakeholders Labor union: 4 stakeholders Local contractors: 3 stakeholders Supplier: 1 stakeholder</li> <li>• Kerasaan Estate: sighted stakeholder list as follows Local government: 7 stakeholders Head of sub-district: 3 stakeholders Village head: 5 stakeholders Moslem leader: 2 stakeholders NGO: 2 stakeholders Board of labor union: 3 stakeholders Contractor and supplier: 6 stakeholders</li> </ul> <p>All list of stakeholders and their contacts are in place.</p>	<p>Comply</p>
<p><b>Criteria 1.2</b></p>			

The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	<p>Certificate holder has had ethics policy inside Responsible Plantation Policy that signed by Board of Director on 22 November 2019. The policy can be seen and downloaded at their website <a href="https://www.sipecf.com/hq/sustainability/policies/ethics-policy/">https://www.sipecf.com/hq/sustainability/policies/ethics-policy/</a>. SIPEF Ethics Policy stated that:</p> <ul style="list-style-type: none"> <li>• <i>Compliance: all relevant international and national laws will be upheld.</i></li> <li>• <i>Transparency: shareholders and stakeholders will be provided with all non-confidential information.</i></li> <li>• <i>Zero-tolerance towards bribery and corruption. Facilitation payments are actively avoided and gifts may only be given with prior approval from senior management.</i></li> <li>• <i>There is zero-tolerance of slavery or forced labour.</i></li> <li>• <i>Management and employees are prohibited from using the Group's facilities or working hours to conduct personal business.</i></li> </ul> <p><i>The individual countries have more elaborated codes of conduct that are aligned with the worldwide Sipef Group's Ethics Policy.</i></p> <p>Socialization of this policy has conducted regularly. For example, in Bukit Maradja Estate on 13 January 2020, attended by 107 worker (field supervisor, harvester and upkeep worker).</p> <p>To prove the implementation of the code of ethics, the team of auditors has interviewed board of labour union and village heads around the company's operational areas. Based on the results of interviews obtained information that the employee recruitment process has been openly informed. The results of the recruitment procedure can be accessed by prospective employees and there is no charge for the whole process. This also applies to the recruitment of SIPEF estate security services conducted by PT Safeguarding Solution Indonesia (SSI).</p>	Comply
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	<p>Certificate holder has had annual internal audit program to monitor and to ensure operational activity align with the company's procedures. Furthermore, the internal audit also ensuring all business activity are comply with SIPEF ethics policy.</p>	Comply
<b>Principle 2: Operate legally and respect rights</b>			
Implement legal requirements as the basic principles of operation in any jurisdiction.			
<b>Criteria 2.1</b>			

There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p><b>(C)</b> The unit of certification complies with applicable legal requirements.</p>	<p>Unit of Certification prepared and maintained a list of legal requirement as per describe in "Daftar Peraturan Perundangan Indonesia yang Berkaitan dengan Sistem Sustainability", update 2 March 2020. Updating of Law and Regulations conducted in monthly basis.</p> <p>As per Indonesia laws and regulations, mandatory of applicable legal requirement for Plantation Company are Deed of Establishment, Registration on Ministry of Law and Human Rights, Location Permit, Plantation Permit, Land Title and Environmental Impact Assessment or Permit.</p> <p>Bukit Maradja Palm Oil Mill as certificate holder received FFB's certified from three legal entities. There are Timbang Deli Estate (managed by PT. Timbang Deli Indonesia), Bukit Maradja Estate (managed by PT. Eastern Sumatra Indonesia) and Kerasaan Estate (managed by PT. Kerasaan Indonesia). All the FFB suppliers, including the Mill is complied with legal requirements. The compliances of legal requirement for certificate holder and its supply base as follow:</p> <p><b>PT. Timbang Deli Indonesia (Timbang Deli Estate)</b></p> <ul style="list-style-type: none"> <li>• Changes Deed of Establishment: No. 5 by Notary Lince Hutahayan, SH, dated 14 July 2017.</li> <li>• Registration on Ministry of Law and Human Rights: No. AHU-AH.01.03-0162023, dated 14 August 2017.</li> <li>• Principle Permit "Izin Prinsip No. 602/1/IP-PB/PMA/2014" dated 12 March 2014.</li> <li>• Plantation Permit: "Surat Pendaftaran Usaha Perkebunan No.209/Menhutbun-VII/2000" dated 10 March 2000. Size: 972.19 Ha, Crops: Rubber and Oil Palm.</li> <li>• Land title: HGU Certificate #4 dated 10 September 1997, land title area permitted is 972.19 Ha.</li> </ul> <p><b>PT. Eastern Sumatera Indonesia (Bukit Maradja POM and Estate)</b></p> <ul style="list-style-type: none"> <li>• Changes Deed of Establishment: No. 5 by Notary Lince Hutahayan, SH, dated 11 January 2016.</li> <li>• Registration on Ministry of Law and Human Rights: No. AHU-AH.01.03-0002497, dated 13 January 2016.</li> <li>• Plantation Permit: "Surat Pendaftaran Usaha Perkebunan No.208/Menhutbun-VII/2000" dated 10 March 2000. Size: 3,177.94 Ha, Crops: Rubber and Oil Palm, Mill capacity: 42 MT/Hour.</li> <li>• Land title: HGU Certificate #2 dated 16 October 1997, land title area permitted is 3,177.94 Ha. "SK HGU No: 108/HGU/BPN/97, dated 26 August 1997 (valid until 31 December 2023).</li> </ul> <p><b>PT. Kerasaan Indonesia (Kerasaan Estate)</b></p>	Comply

		<ul style="list-style-type: none"> <li>• Changes Deed of Establishment: No. 7 by Notary Lince Hutahayan, SH, dated 11 January 2016.</li> <li>• Registration on Ministry of Law and Human Rights: No. AHU-AH.01.03-0002496, dated 13 January 2016.</li> <li>• Plantation Permit No.180/Menhutbun-VII/2000, dated 3 November 2000 (2,362.03 Ha).</li> <li>• Land title: HGU Certificate #1 dated 1 October 1997 (2,362.03 Ha).</li> </ul>	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.	<p>Unit of Certification has established documented system for ensuring legal compliance is in procedure of changing on laws and regulation as per mention in "Prosedur Informasi Perubahan Undang-Undang dan Peraturan Pemerintah" dated 1 November 2011.</p> <p>To tracking for any changes of law and regulation, unit of certification has implement monitoring, evaluation and updating laws and regulations requirement. In example: document of "Pemantauan Penambahan atau Perubahan Undang-undang/Peraturan Tahun 2019" has monitored and updated in monthly basis.</p> <p>Evidence of legal due diligence on these requirements are implemented in Contracted Third Parties Agreement, as sample below:  <b>Timbang Deli Estate:</b>            Contract/Working Agreement CV. Biring Ndu Cahaya Panglong (FFB transporter), No. TDI/BNCP/V/2019/04 dated 20 May 2019. Within the contract in Article 6, the FFB transporter shall comply with Indonesia legal compliance such as providing Social Insurance (BPJS Ketenagakerjaan), Health Insurance (BPJS Kesehatan), Taxes, Minimum Wage, Not Employed Under 18 y.o. and PPE usage. Also, socialization of Suppliers Integrity has been conducted on 24 February 2020.  <b>Bukit Maradja POM:</b>            Working Agreement No. 01/BMM-HO/ENG/2020, dated 30 January 2020. Agreement between PT. Eastern Sumatra Indonesia and UD. Sumber Teknik for job Waste Water Treatment Construction at Bukit Maradja POM. Within the agreement, specific meeting applicable legal requirements are described in Article 3 (Taxes) and Article 7 (Insurance and OHS).            Within these working contract, legal requirement on manpower regulation has been mentioned in several Article such as Article 4, Article 5, Article 6, Article 7 and Article 8.</p>	Comply
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	<p>Based on ground verification on legal boundaries, as follow:  <b>Timbang Deli Estate:</b> Boundary pegs Map scale 1:32,000, there are 13 pegs already identified. Peg No. 5, 6 and 7.  <b>Bukit Maradja Estate</b></p>	Comply



		<p>Division 2: Peg No.26 (3°2'40.035" N; 99°11'57.41" E), Peg No.27 (3°2'36.137" N; 99°12'1.959" E), Peg No.29 (3°2'41.037" N; 99°12'7.691"E).</p> <p>Division 4: Peg No.12 (3°1'6.816" N; 99°14'35.525" E), Peg No.13 (3°0'59.064" N; 99°14'44.017" E), Peg No.23 (3°0'27.061" N; 99°14'21.334"E). Based on Map of "Peta Planting Year Bukit Maradja Estate per November 2019", Scale 1:30,000 numbering of these pegs is accurate. According this map, these pegs numbered 04, 05 and 13b (referred to Peta Gambar Situasi Khusus No. 130/09/IV/1997).</p> <p><b>Kerajaan Estate:</b>          Division 2: Peg No. 37, 38, 39, 40, 41 and 42 are visible and well maintained.          It is clearly seen that boundary pegs are visibly maintained and no planting beyond these legal boundaries within this certification scope.</p>	
<p><b>Criteria 2.2</b>          All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
<p>2.2.1</p>	<p>A list of contracted parties is maintained.</p>	<p>Unit of Certification has list of contracted parties in each unit. All the list is well maintained. Sample taken as below:  <b>Timbang Deli Estate:</b> there is only one contracted party namely CV. Biring Ndu Cahaya Panglong as FFB transporter and infrastructure material suppliers.  <b>Bukit Maradja POM:</b> based on list of stakeholder Bukit Maradja POM updated on 3 March 2020, there are nine (9) contracted third parties has been listed.  <b>Bukit Maradja Estate:</b> based on list of stakeholder Bukit Maradja Estate updated on 3 March 2020, there are seven (7) contracted third parties has been listed.          Unit of Certification has established documented system for ensuring legal compliance is in procedure of changing on laws and regulation as per mention in "Prosedur Informasi Perubahan Undang-Undang dan Peraturan Pemerintah" dated 1 November 2011.To tracking for any changes of law and regulation, unit of certification has implement monitoring, evaluation and updating laws and regulations requirement. In example: document of "Pemantauan Penambahan atau Perubahan Undang-undang/Peraturan Tahun 2019" has monitored and updated in monthly basis. unit of certification have a comprehensive list of international, national, sub-national and provincial laws, which details the requirements of specific to the mill and estate operations, including contractor activities. Employees of contractors are provided with wage slips to indicate their actual earnings and deductions.</p>	<p>Comply</p>
<p>2.2.2</p>	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements,</p>	<p>Evidence of legal due diligence on these requirements are implemented in Contracted Third Parties Agreement, as sample below:  <b>Timbang Deli Estate:</b></p>	<p>Comply</p>

	<p>and this can be demonstrated by the third party.</p>	<p>Contract/Working Agreement CV. Biring Ndu Cahaya Panglong (FFB transporter), No. TDI/BNCP/V/2019/04 dated 20 May 2019. Within the contract in Article 6, the FFB transporter shall comply with Indonesia legal compliance such as providing Social Insurance (BPJS Ketenagakerjaan), Health Insurance (BPJS Kesehatan), Taxes, Minimum Wage, Not Employed Under 18 y.o. and PPE usage. Also, socialization of Suppliers Integrity has been conducted on 24 February 2020.</p> <p><b>Bukit Maradja POM:</b> Working Agreement No. 01/BMM-HO/ENG/2020, dated 30 January 2020. Agreement between PT. Eastern Sumatra Indonesia and UD. Sumber Teknik for job Waste Water Treatment Construction at Bukit Maradja POM. Within the agreement, specific meeting applicable legal requirements are described in Article 3 (Taxes) and Article 7 (Insurance, Occupational Health &amp; Safety, and Disallowing Child Labour).</p> <p><b>Bukit Maradja Estate:</b> Working Agreement No. 01/RMO-BME/MPN/I/2020, dated 4 January 2020. Agreement between PT. Eastern Sumatra Indonesia and PT. Multi Prima Nusa related FFB Transportation for Bukit Maradja Estate. Within the agreement, specific meeting applicable legal requirements are described in Article 5 (Taxes, Insurance, Occupational Health &amp; Safety, Minimum Wage Payment, Disallowing Child Labour Policy and Prevention of Sexual Harassment Policy).</p>	
<p>2.2.3</p>	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p>	<p>Evidence of legal due diligence on these requirements are implemented in Contracted Third Parties Agreement, as sample below:</p> <p><b>Timbang Deli Estate:</b> Contract/Working Agreement CV. Biring Ndu Cahaya Panglong (FFB transporter), No. TDI/BNCP/V/2019/04 dated 20 May 2019. Within the contract in Article 6, the FFB transporter shall comply with Indonesia legal compliance such as providing Social Insurance (BPJS Ketenagakerjaan), Health Insurance (BPJS Kesehatan), Taxes, Minimum Wage, Not Employed Under 18 y.o. and PPE usage. Also, socialization of Suppliers Integrity has been conducted on 24 February 2020. Statement letter No: 04/BCD-EX/I/2020, dated 3 January 2020 made by CV. Biring Ndu Cahaya Panglong described a commitment to "No force labour and human trafficking; No corruption, fraud and thievery; Following all requirements under RSPO Supply Chain; Shall be audited by Certification Body.</p> <p><b>Bukit Maradja Estate:</b> Working Agreement No. 01/RMO-BME/MPN/I/2020, dated 4 January 2020. Agreement between PT. Eastern Sumatra Indonesia and PT. Multi Prima Nusa related FFB Transportation for Bukit Maradja Estate. Within the agreement, specific meeting applicable legal requirements are described in Article 5 (Taxes, Insurance, Occupational Health &amp; Safety, Minimum Wage Payment, Disallowing Child Labour Policy and Prevention of Sexual Harassment Policy).</p>	<p>Comply</p>

<b>Criteria 2.3</b>																											
All FFB supplies from outside the unit of certification are from legal sources.																											
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins</li> <li>Proof of the ownership status or the right/claim to the land by the grower/smallholder</li> <li>Where applicable, valid planting/operating/trading license, or is part of a cooperative which allows the buying and selling of FFB</li> </ul>	<p>Bukit Maradja POM receives directly FFB's from their own estates and affiliate estate. Supply base of Bukit Maradja POM as below:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Company</th> <th>Geo-Location GPS Coordinates</th> <th>Land Title #</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bukit Maradja Estate</td> <td>PT. Eastern Sumatra Indonesia</td> <td>03° 00' 5.27" N 99° 13' 25.09" E</td> <td>HGU Certificate #2 Year 1997, dated 16 Oct 1997</td> <td>3,177.94</td> </tr> <tr> <td>2</td> <td>Kerasaan Estate</td> <td>PT. Kerasaan Indonesia</td> <td>03° 03' 51.78" N 99° 15' 53.53" E</td> <td>HGU Certificate #1 Year 1997, dated 1 Oct 1997</td> <td>2,362.03</td> </tr> <tr> <td>3</td> <td>Timbang Deli Estate</td> <td>PT. Timbang Deli Indonesia</td> <td>03° 27' 21.06" N 98° 53' 59.14" E</td> <td>HGU Certificate #4 Year 1997, dated 10 Sep 1997</td> <td>972.19</td> </tr> </tbody> </table>	No	Estate	Company	Geo-Location GPS Coordinates	Land Title #	Area (Ha)	1	Bukit Maradja Estate	PT. Eastern Sumatra Indonesia	03° 00' 5.27" N 99° 13' 25.09" E	HGU Certificate #2 Year 1997, dated 16 Oct 1997	3,177.94	2	Kerasaan Estate	PT. Kerasaan Indonesia	03° 03' 51.78" N 99° 15' 53.53" E	HGU Certificate #1 Year 1997, dated 1 Oct 1997	2,362.03	3	Timbang Deli Estate	PT. Timbang Deli Indonesia	03° 27' 21.06" N 98° 53' 59.14" E	HGU Certificate #4 Year 1997, dated 10 Sep 1997	972.19	Comply
No	Estate	Company	Geo-Location GPS Coordinates	Land Title #	Area (Ha)																						
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2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p>	<p>Bukit Maradja POM implementing Identity Preserved (IP) in their Supply Chain, meaning that all FFB's received is directly managed by Own Estates. There are no indirectly or third parties FFB's suppliers entering the Mill. Not Applicable</p>	N/A																								
<b>PROCEDURAL NOTE:</b>																											

For Implementation Procedure for 2.3.2 refer to Annex 4.			
<b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b>			
Implement plans, procedures and systems for continuous improvement.			
<b>Criteria 3.1</b>			
There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.			
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p>	<p>The unit of certification has prepared a business plan for period 2020 – 2030. The business plan indicating the projected production of FFB, CPO and PK; cost of production, revenue and profit estimation. This projection include FFB receiving from the supply base of PT Timbang Deli Indonesia and PT Kerasaan Indonesia.</p> <p>The unit of certification demonstrated independent financial audit report for from “Deloitte” as evidence in Summary of Principal Findings PT Eastern Sumatra Indonesia – Mill &amp; Estate For Tenth Months Ended October 31<sup>st</sup>, 2019. The public accountant recommended that in order to easy in tracing FAR against physical fixed asset and increase control and accuracy of FAR, the management should complete tag number on all fixed asset with the same number record in the FAR. Independent Auditor’s report No. 00465/2.1097/AU.1/01/0568-3/1/IV/2019 dated 26 Apr 2019. Issued by Deloitte: Satrio Bing Eny &amp; Rekan, Parlindungan Siahaan (Public Accountant License No.AP.0568). In Public Accountant’s opinion, the financial statements present fairly, in all material respects, the financial position of PT Eastern Sumatra Indonesia as of December 31<sup>st</sup>, 2018 and its financial performance and its cash flows for the year then ended in accordance with Indonesian Financial Accounting Standards.</p> <p>The unit of certification demonstrated Independent Auditor’s Report No. 0046/2.1097/AU.1/01/0568-3/1/IV/2019 dated 26 Apr 2019. Issued by Deloitte: Satrio Bing Eny &amp; Rekan, Parlindungan Siahaan (Public Accountant License No.AP.0568). In Public Accountant’s opinion, the financial statements present fairly, in all material respects, the financial position of PT Kerasaan Indonesia as of December 31<sup>st</sup>, 2018 and its financial performance and its cash flows for the year then ended in accordance with Indonesian Financial Accounting Standards.</p> <p>Summary of Principal Findings PT Timbang Deli Indonesia for the period ended December 2018, by Deloitte. The public accountant recommendation:</p> <ul style="list-style-type: none"> <li>- Due to proper recording of inventory balance, the company should have any assessment and make any provision for slow moving inventory more than 1 year.</li> </ul>	Comply

		<p>- Due to proper warehouse condition, the company should make some repair to warehouse conditions. Management response: the state of the fertilizer store is totally unacceptable and the estate manager has been reprimanded. The fertilizer store is being repaired and will be checked on a regular basis.</p> <p>Bukit Maradja POM: company has business plan for period 2020-2030 including FFB receiving and processing. FFB</p> <table border="1"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="3">FFB (Ton)</th> <th rowspan="2">CPO (Ton)</th> <th rowspan="2">PK (Ton)</th> </tr> <tr> <th>Bukit Maradja Estate</th> <th>Kerasaan Estate</th> <th>Timbang Deli Estate</th> <th>Total</th> </tr> </thead> <tbody> <tr><td>2020</td><td>63,970</td><td>56,240</td><td>2,387</td><td>122,597</td><td>28,810</td><td>6,804</td></tr> <tr><td>2021</td><td>62,816</td><td>52,362</td><td>4,805</td><td>119,983</td><td>28,196</td><td>6,659</td></tr> <tr><td>2022</td><td>62,400</td><td>48,917</td><td>5,804</td><td>117,121</td><td>27,523</td><td>6,500</td></tr> <tr><td>2023</td><td>62,171</td><td>45,916</td><td>6,760</td><td>114,847</td><td>26,989</td><td>6,374</td></tr> <tr><td>2024</td><td>61,501</td><td>44,418</td><td>7,926</td><td>113,845</td><td>26,754</td><td>6,318</td></tr> <tr><td>2025</td><td>60,555</td><td>43,069</td><td>9,162</td><td>112,786</td><td>26,505</td><td>6,260</td></tr> <tr><td>2026</td><td>61,631</td><td>43,355</td><td>10,399</td><td>115,385</td><td>27,115</td><td>6,404</td></tr> <tr><td>2027</td><td>65,290</td><td>43,193</td><td>11,784</td><td>120,267</td><td>28,263</td><td>6,675</td></tr> <tr><td>2028</td><td>65,537</td><td>43,740</td><td>12,896</td><td>122,173</td><td>28,711</td><td>6,781</td></tr> <tr><td>2029</td><td>66,482</td><td>44,276</td><td>13,883</td><td>124,641</td><td>29,291</td><td>6,918</td></tr> <tr><td>2030</td><td>69,883</td><td>43,350</td><td>14,522</td><td>127,755</td><td>30,022</td><td>7,090</td></tr> </tbody> </table>	Year	FFB (Ton)			CPO (Ton)	PK (Ton)	Bukit Maradja Estate	Kerasaan Estate	Timbang Deli Estate	Total	2020	63,970	56,240	2,387	122,597	28,810	6,804	2021	62,816	52,362	4,805	119,983	28,196	6,659	2022	62,400	48,917	5,804	117,121	27,523	6,500	2023	62,171	45,916	6,760	114,847	26,989	6,374	2024	61,501	44,418	7,926	113,845	26,754	6,318	2025	60,555	43,069	9,162	112,786	26,505	6,260	2026	61,631	43,355	10,399	115,385	27,115	6,404	2027	65,290	43,193	11,784	120,267	28,263	6,675	2028	65,537	43,740	12,896	122,173	28,711	6,781	2029	66,482	44,276	13,883	124,641	29,291	6,918	2030	69,883	43,350	14,522	127,755	30,022	7,090	
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>The unit of certification has provided replanting program up to year 2030.</p> <p>Replanting Program of Bukit Maradja Estate:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Replanting (Ha)</th> </tr> </thead> <tbody> <tr><td>2020</td><td>-</td></tr> <tr><td>2021</td><td>175.61</td></tr> <tr><td>2022</td><td>193.89</td></tr> <tr><td>2023</td><td>143.06</td></tr> <tr><td>2024</td><td>192.33</td></tr> </tbody> </table>	Year	Replanting (Ha)	2020	-	2021	175.61	2022	193.89	2023	143.06	2024	192.33	Comply																																																																											
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3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	<p data-bbox="913 1152 1975 1203">Each unit conducted Management Review. Latest Management Review in Bukit Maradja POM conducted on 6 Mar 2020. Management review has discussed:</p> <ul data-bbox="913 1203 1975 1375" style="list-style-type: none"> <li>• Results of internal audits; internal audit in Bukit Maradja POM conducted on 5-7 Jan 2020, by ENC RMO NS Team, summary of finding and corrective action have been documented in Visit Report ENC Team. Such as: <ul style="list-style-type: none"> <li>○ Program for Safety Committee 2020 was available, however record of implementation was not available. Action: documented all Safety Committee activities. Status: realized program up to Feb 2020 have been documented.</li> </ul> </li> </ul>	Comply																																				

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**RSPO Public Summary Report  
Revision 9 (Nov 2019)**

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<p><b>Criteria 3.2</b></p>			
<p>The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p>	<p>Internal audit in Bukit Maradja POM has been conducted on 5-7 Jan 2020, by ENC RMO NS Team, summary of finding and corrective action have been documented in Visit Report ENC Team. Such as:</p> <ul style="list-style-type: none"> <li>• Program for Safety Committee 2020 was available, however record of implementation was not available. Action: documented all Safety Committee activities. Status: realized program up to Feb 2020 have been documented.</li> <li>• Workshop employee found operating lathe without appropriate PPE (safety glasses). Action: conducted dissemination of PPE to workshop employees; completing PPE for workshop department. Status: BMPOM has conducted dissemination of PPE on 17 Feb 2020; PPE for workshop employee have been completed.</li> </ul> <p>Continuous improvement by Bukit Maradja POM based on VPE (Vice President Engineering) visit on 8-9 Jul 2019:</p> <ol style="list-style-type: none"> <li>1. The feed pipe to all of the vibrating screens is not in the centre of the screen and also the weight are not set correctly to give the proper pattern. Status: already corrected on 28 Jul 2019.</li> <li>2. The new boiler ash conveyor for the 26t boiler should be stainless steel lined in the bottom. Status: ash scrapper for the boiler 26t has been installed stainless steel lined in the bottom on 28 Oct 2019.</li> <li>3. The 175 amp circuit breaker in the main switch board is no longer used and can be used to supply power to the new WTP upgrade, which is initially the lamella clarifier. Status: the 175 amp circuit breaker in the main switch board has been used to supply power to Lamella on 18 Nov 2019.</li> </ol> <p>Internal audit in Bukit Maradja Estate has been conducted on 3-5 Feb 2020. Findings have been recorded, such as:</p> <ol style="list-style-type: none"> <li>1. No evident of RKL-RPL report for 2<sup>nd</sup> Semester 2019. Action Plan: Established RKL-RPL report and sent it to respective agency.</li> </ol>	<p>Comply</p>

		<p>2. Review of HIRADC 2019 has not been conducted. Action Plan: communicate with Safety Officer to conduct review of risk assessment and update it for 2020.</p> <p>3. Safety shower in mixing area is not working well. Action Plan: immediately fixing the safety shower and ensure all emergency device are working well to anticipate emergency situation.</p> <p>Continuous improvement made by Bukit Maradja Estate based on VPD (Vice President Director) visit on 2-3 Oct 2019:</p> <ol style="list-style-type: none"> <li>1. Data Pre-Spraying Assessment by Agronomy: chemical mixing and packing fertilizer.</li> <li>2. Circle condition is always in good condition and maintained.</li> <li>3. Ensure all water pump and chainsaw for fire fighter are in good condition by checking in weekly basis.</li> </ol> <p>Internal audit in Kerasaan Estate has been conducted on 5-7 Feb 2020, by ENC RMO NS Team. Summary of finding and corrective action have been documented in Visit Report ENC Team. Such as:</p> <ul style="list-style-type: none"> <li>• Meeting of P2K3LHS was not discussing change of regulation and policy. Action Plan: Discussed change of regulation and policy in P2K3LHS meeting as mentioned in Manual Book ENC. Status: minutes of P2K3LHS meeting was evident in February 2020.</li> <li>• No evident for regular checking of fire extinguisher. Action Plan: completed monitoring document of fire extinguisher. Status: monitoring document of fire extinguisher was available until February 2020.</li> <li>• No evident for dissemination of PPE uses. Action Plan: conducted dissemination to employee related PPE uses. Status: record of dissemination related PPE was available dated 24 Feb 2020.</li> </ul> <p>Continuous improvement by Kerasaan Estate based on R&amp;D Visit on 3 Oct 2019:</p> <ol style="list-style-type: none"> <li>1. Harvesting: ripeness criteria of FFB that stated 8-10 loose fruit in circle has been comply to the harvesting criteria, resulted 3% under ripe FFB and increase normal rie to &gt;90%; Increase productivity of loose fruit by 2 %. Action Plan: Conduct briefing to supervisor and harvester related harvesting criteria; consistency of loose fruit picker todate December is 9.56%.</li> <li>2. Pest &amp; Disease: keep focus on P&amp;D work to ensure that respond from census interval day by treatment &lt;3 days from census. Action Plan: keep respond &lt;3 days from census.</li> <li>3. Spraying: found that two spraying operator have swing the stick of SA15 in the young palm. Action Plan: ensure that all praying operator have been re-trained and conducted competency assessment.</li> </ol>	
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3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	The company has reported Annual Communication of Progress (ACOP) 2019 to RSPO website under organization name SIPEF Group, membership number 1-0021-05-000-00. Based on the report, number of management units certified under RSPO P&C Certification are 9 units; total certified area 97,018 Ha. Scheme Smallholder FFB volume supplied that is certified are 243,571 tonnes. Total CSPO sold as RSPO-certified are 261,374 tonnes; CSPO sold under other certification schemes are 63,399 tonnes; CSPO sold as conventional are 12,880 tonnes; total CSPO are 337,653 tonnes. CSPK sold under RSPO certified are 53,902 tonnes; total CSPK are 53,902 tonnes.	Comply
<p><b>Criteria 3.3</b>          Operating procedures are appropriately documented, consistently implemented and monitored.</p>			

<p>3.3.1</p>	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p>	<p>Estate: The procedures documented in "Oil Palm Agricultural Manual" (revised April 2019), where it contains all sub section of the process, such as: Nursery, land clearing, planting in peat soil and mineral soil with zero burning, planting legume cover crops, terracing, upkeep (fertilizer and pesticides, included safe working practices), water level management, riparian and watercourse management, harvesting, replanting and FFB transport. Documented SOP are as follows:</p> <ol style="list-style-type: none"> <li>1. OPM-01-00; dated 02/10/2017; Biology of Oil Palm.</li> <li>2. OPM-02-00; dated 02/10/2017; General Information: Oil Palm Nursery.</li> <li>3. OPM-02-01; dated 02/10/2017; Land Preparation of Oil Palm Nursery – Persiapan Lahan Pembibitan Kelapa Sawit</li> <li>4. OPM-02-02; dated 02/10/2017; Oil Palm Pre Nursery – Pre Nursery Kelapa Sawit.</li> <li>5. OPM-02-03; dated 02/10/2017; Oil Palm Main Nursery – Main Nursery Kelapa Sawit.</li> <li>6. OPM-03-01; dated 02/10/2017; Survey and Mapping – Survey dan Pemetaan.</li> <li>7. OPM-03-02; dated 02/10/2017; Land Clearing – Pembersihan Lahan.</li> <li>8. OPM-03-03; dated 06/02/2019; Land Preparation – Persiapan Lahan.</li> <li>9. OPM-03-04; dated 02/10/2017; Legume Cover Crop <i>Mucuna brachteata</i> – <i>Mucuna brachteata</i> Kacangan Penutup Tanah.</li> <li>10. OPM-03-05; dated 02/10/2017; Field Planting – Penanaman ke Lapangan.</li> <li>11. OPM-04-01; dated 02/10/2017; Palm Supplying – Penyisipan Tanaman.</li> <li>12. OPM-04-02; dated 02/10/2017; Thinning Out and Removing Plant – Penjarangan dan pembongkaran Tanaman.</li> <li>13. OPM-05-01; dated 06/02/2019; Ablation and Sanitation – Ablasi dan Sanitasi.</li> <li>14. OPM-05-02; dated 06/02/2019; Harvesting – Panen.</li> <li>15. OPM-05-03; dated 06/02/2019; FFB and LF Delivery – Pengiriman TBS dan Berondolan.</li> <li>16. OPM-05-04; dated 02/10/2017; Frond Pruning – Pemangkasan Pelepah.</li> <li>17. OPM-05-05; dated 16/02/2019; Black Bunch Count – Sensus Buah.</li> <li>18. OPM-05-06; dated 02/10/2017; <i>Elaeobius camerunicus</i> Management – Pengelolaan <i>Elaeobius camerunicus</i>.</li> <li>19. OPM-06-01; dated 02/10/2017; Inorganic Fertiliser – Pupuk Inorganik.</li> <li>20. OPM-06-02; dated 02/10/2017; Organic Fertiliser – Pupuk Organik</li> <li>21. OPM-06-03; dated 02/10/2017; LSU: Palm Marking – LSU: Penandaan Tanaman.</li> <li>22. OPM-06-04; dated 02/10/2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel.</li> <li>23. OPM-07-01; dated 06/02/2019; Detection and Census – Deteksi dan Sensus.</li> <li>24. OPM-07-02; dated 02/10/2017; Pest Control – Pengendalian Hama.</li> </ol>	<p>Comply</p>
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		<ol style="list-style-type: none"> <li>2. POM-02-01-W01; Loading ramp, Pengisian FFB ke dalam Rebusan Vertical – Loading ramp, FFB loading into vertical sterilizer;</li> <li>3. POM-02-01-W02; Pengoperasian Vertical Sterilizer – Operating Vertical Sterilizer; a number of key parameter: sterilizer operating for 100 minutes, ensure manometer showing “0” prior to opening the sterilizer.</li> <li>4. POM-03-01-W01; Pengoperasian Threshing Machine – Operating Threshing Machine.</li> <li>5. POM-04-01-W01; Pengoperasian Digester – Operating Digester.</li> <li>6. POM-04-01-W02; Pengoperasian Screw Press – Operating screw press.</li> <li>7. POM-04-01-W03; Sand Trap and Vibrating Screen.</li> <li>8. POM-04-01-W04; Pengoperasian Crude Oil Tank – Operating Crude Oil Tank.</li> <li>9. POM-05-01-W01; Pengoperasian Continuous Settling Tank – Operating Continuous Settling Tank.</li> <li>10. POM-05-01-W02; Pengoperasian Clean Oil Tank – Operating Clean Oil Tank.</li> <li>11. POM-05-01-W03; Pengoperasian Sludge Tank – Operating Sludge Tank.</li> <li>12. POM-05-01-W04; Pengoperasian Oil Purifier – Operating Oil Purifier.</li> <li>13. POM-05-01-W05; Pengoperasian Vacuum Drier – Operating Vacuum Drier.</li> <li>14. POM-05-01-W06; Pengoperasian Sludge Centrifuge – Operating Sludge Centrifuge.</li> <li>15. POM-06-01-W01; Operating Depericarper.</li> <li>16. POM-06-01-W02; Pengoperasian Ripple Mill – Operating Ripple Mill.</li> <li>17. POM-06-01-W03; Operating Claybath Separator.</li> <li>18. POM-06-01-W04; Pengoperasian Sawipack Stage 1 &amp; Stage 2 – Operating Sawipack to separate kernel and shell from cracked mixture from ripple mill, through dry separation.</li> <li>19. POM-06-01-W05; Pengoperasian Kernel Silo Drier – Operating Kernel Silo Drier to reduce moisture &lt; 7%.</li> <li>20. POM-06-01-W06; Pengoperasian Hydrocyclone – Operating Hydrocyclone to separate kernel and shell from sawipack through wet method;</li> <li>21. POM-07-01-W01; Operating Cation Exchanger.</li> <li>22. POM-07-01-W02; Operating Degasifier.</li> <li>23. POM-07-01-W03; Operating Anion Exchanger.</li> <li>24. POM-07-01-W06; Operating Thermal Deaerator.</li> <li>25. POM-07-01-W07; Boiler (Mech 35 MT/hr).</li> <li>26. POM-07-01-W08; Penanganan Gangguan Sumber Tidak Bergerak Steam Boiler – Handling disturbance from static Steam Boiler.</li> <li>27. POM-08-01-W01; Operating Genset.</li> <li>28. POM-09-01-W01; Operating Water Intake.</li> </ol>	
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3.3.2	A mechanism to check consistent implementation of procedures is in place.	The company has established mechanism to check consistent implementation of procedures under SOP OPM-10-01; dated 06/02/2019; Field Quality Control. The objectives of the procedure are to check if the result of work are in accordance with existing procedures; to evaluate the work and keep in accordance with the standards; to use as a reference for making improvements. Inspections are carried out on items related to harvesting, weeding, manuring, pest and disease, replanting and nursery.	Comply
3.3.3	Records of monitoring and any actions taken are maintained and available.	Record of monitoring in Bukit Maradja POM are available under documents Action Plan Bukit Maradja POM as result Vice President Engineering visit (VPE). Description of monitoring result and action plan based on visit 9 Jul 2019 are as follows: <ol style="list-style-type: none"> <li>The feed pipe to all of the vibrating screens is not in the centre of the screen and also the weight are not set correctly to give the proper pattern. Status: already corrected on 28 Jul 2019.</li> <li>The new boiler ash conveyor for the 26t boiler should be stainless steel lined in the bottom. Status: ash scrapper for the boiler 26t has been installed stainless steel lined in the bottom on 28 Oct 2019.</li> </ol>	Comply



		<p>3. The 175 amp circuit breaker in the main switch board is no longer used and can be used to supply power to the new WTP upgrade, which is initially the lamella clarifier. Status: the 175 amp circuit breaker in the main switch board has been used to supply power to Lamella on 18 Nov 2019.</p> <p>Record of operation monitoring in Bukit Maradja Estate based on VPD (Vice President Director) visit on 2-3 Oct 2019:</p> <ol style="list-style-type: none"> <li>1. Data Pre-Spraying Assessment by Agronomy: chemical mixing and packing fertilizer.</li> <li>2. Circle condition is always in good condition and maintained.</li> <li>3. Ensure all water pump and chainsaw for fire fighter are in good condition by checking in weekly basis.</li> </ol> <p>Record of operation monitoring in Kerasaan Estate based on R&amp;D Visit on 3 Oct 2019:</p> <ol style="list-style-type: none"> <li>1. Harvesting: ripeness criteria of FFB that stated 8-10 loose fruit in circle has been comply to the harvesting criteria, resulted 3% under ripe FFB and increase normal rie to &gt;90%; Increase productivity of loose fruit by 2 %. Action Plan: Conduct briefing to supervisor and harvester related harvesting criteria; consistency of loose fruit picker todate December is 9.56%.</li> <li>2. Pest &amp; Disease: keep focus on P&amp;D work to ensure that respond from census interval day by treatment &lt;3 days from census. Action Plan: keep respond &lt;3 days from census.</li> <li>3. Spraying: found that two spraying operator have swing the stick of SA15 in the young palm. Action Plan: ensure that all praying operator have been re-trained and conducted competency assessment.</li> </ol> <p>Record of operation monitoring in Timbang Deli Estate:</p> <ol style="list-style-type: none"> <li>1. Based on Agronomist visit on 30 Jan 2020: at Block 17C01, C02 and B02 oil palm supplies are yellow. Action Plan: conducted circle weeding to yellowed supplied oil palm; applied extra fertilizer using CuSO<sub>4</sub> 75 g/palm. Status: circle weeding and extra fertilizer CuSO<sub>4</sub> 75 g/palm applied on 1 feb 2020.</li> <li>2. Based on Agronomist visit on 3 Jan 2020: at Block 17A04, 17B03 bagworm attack found. Action Plan: conduct identification of bagworm attack (routine census); collecting bagworm <i>Metisa plana</i>; Spraying bagworm using Prevathon. Status: collecting conducted on 4 jan 2020; spraying using Prevathon (Klorantranniliprol 50 g/L, dosage 1.5 L/Ha, conducted on 6 Jan 2020.</li> <li>3. Laporan Harian Mandor (Daily Supervisor Report): e.g. dated 1 Feb 2020, described activity:             <ol style="list-style-type: none"> <li>a. Harvesting helper; Block 17D01; 1 worker;</li> <li>b. Beneficial plant preparation; Block P17F03; 1 worker;</li> </ol> </li> </ol>	
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		<ul style="list-style-type: none"> <li>c. Planting beneficial plant; Block P17C03; 2 workers;</li> <li>d. Collecting bagworm; Block 17B02; 6 workers;</li> <li>e. Extra manuring ZnSO<sub>4</sub>; Block 17I01; 17H04; P18G01; P18G03; 2 workers;</li> <li>f. Upkeep collection road; Block 16B03; 3 workers;</li> <li>g. Evaluation of bagworm treatment; Block 16B03, 15B04: 2 workers.</li> </ul>	
<p><b>Criteria 3.4</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.</p>	<p>Environmental Document of PT. Timbang Deli Indonesia (Timbang Deli Estate) in form of "Upaya Pengelolaan Lingkungan and Upaya Pemantauan Lingkungan (UKL-UPL)", approved by Environmental Agency of Deli Serdang Regency as per No: APDL.P/325/VIII/2014 dated 6 August 2014. Area covering 972.19 Ha consist of Rubber crops and Oil Palm crops.</p> <p>In 2014, PT. Timbang Deli Indonesia in cooperation with "Fakultas Kehutanan Institut Pertanian Bogor" have prepared "Dokumen Laporan Social Impact Assessment (SIA)". The assessment team comprise of: Handian Purwawangsa, S.Hut, M.Si (Team Leader; Social and cultural expert); Udi Kusnidar, S.Hut (Social-economic-cultural expert); Ir. Heri Wiyono (Social and cultural expert).</p> <p>The result: PT. Timbang Deli Indonesia is administratively located in the District of Deli Serdang, Sub-District of Galang. The villages located around the licenced area are Timbang Deli, Keramat Gajah dan Jaharun A. All villages are reasonably distant from the district capital which was 4 km from Timbang Deli village, 7 km for Kramat Gajah village and only 1 km for Jaharun A village.</p> <p>From in-depth interviews and discussions, generally response from community for PT. Timbang Deli Indonesia is good, especially PT. Timbang Deli Indonesia already been there for quite a long time and most of villagers is employee or ever been employed or has relatives working at PT. Timbang Deli Indonesia or used to work at PT. Timbang Deli Indonesia. Community do not reject the existence of company in the area.</p> <p>Some social issues related with management PT. Timbang Deli Indonesia are latex and enplumps theft, fires in the dry season, cattle grazing, limited land use for villagers, potential flooding from government's land that beside (outside) PT. Timbang Deli Indonesia which planted/used by villagers. The local communities expect some positive outcomes from the development of oil palm in PT. Timbang Deli Indonesia. Increase of employment opportunities, grazing for their cattles, participation</p>	<p>Comply</p>

		<p>in social villages activities, and fire woods. Besides that, with the development of PT. Timbang Deli Indonesia, villagers could have new opportunities to make their own business as employees of PT. Timbang Deli Indonesia need goods and services that the villagers can supply. PT. Timbang Deli Indonesia also allocated some of its land for the building of Kantor Desa Timbang Deli (office for the village’s administration purpose where the head of village and his/her staff work), and schools (SDN Timbang Deli and SMKN Galang). From the interviews with community, it is gathered that PT. Timbang Deli Indonesia give almost no negative impact.</p> <p>In 2017, PT. Timbang Deli Indonesia in cooperation with “Koompasia Enviro Institut” carried out social impact assessment as reported in “Laporan Analisa Dampak Sosial PT. Timbang Deli Indonesia tahun 2017”. The assessment team comprise of: Henry Marpaung (Team Leader; Social-cultural expert; ALS licensed assessor Provisional ALS160007HM); Harry Kurniawan, (Team member; GIS and landscape); Ridho Anggara (Team member, GIS assisstant).</p> <p><b>Bukit Maradja POM:</b> Environmental Document for Composting Premise “Dokumen Evaluasi Lingkungan Hidup (DELH) Kebun Kelapa Sawit, PKS dan Pemanfaatan Janjang Kosong Kelapa Sawit Dengan Limbah Cair Untuk Diproses Menjadi Kompos di Kebun Bukit Maradja PT. Eastern Sumatra Indonesia”, June 2015.</p> <p>In PT. Eastern Sumatra Indonesia, environmental document titled “UKL – UPL” was approved “Keputusan Kepala Badan Pengendalian Dampak Lingkungan Daerah Kabupaten Simalungun No.188.4/70/Bpdl” related to finalized environmental feasibility at Palm oil mill of PT. Eastern Sumatera Indonesia (PT SIPEF), Bukit Maradja Estate, Simalungun District, North Sumatra Province dated on 26 February 2004 and last revision as in “Rencana Pengelolaan Lingkungan (RKL) dan Revisi Rencana Pemantauan Lingkungan (RPL)” with scope of study palm oil estate area 3,178 Ha and palm oil mill 30 Ton FFB/hour as stated in the “Keputusan Bapedalda Kabupaten Simalungun No.271/Bpdl/2008”.</p> <p>The Organization also has prepared the environmtal document as in “Dokumen Evaluasi Lingkungan Hidup (DELH) Kebun Kelapa Sawit PKS dan Pemanfaatan Janjang Kosong Kelapa Sawit dengan Limbah Cair untuk di Proses menjadi kompos di Kebun Bukit Maradja PT. Eastern Sumatra Indonesia”. The document has approved per “Keputusan Kepala Badan Lingkungan Hidup Kabupaten Simalungun No.188.45/833/Sekrt-2015”, dated 8 June 2015, with scope of study palm oil estate area 3,178 Ha location in N 03° 00’ 45.0’, E 099°14’08.0’.</p>	
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		PT. Kerasaan Estate have the environmental document under "Dokumen Upaya Pengelolaan dan Pemantauan Lingkungan (UKL- UPL)" is comply with letter of "Kepala Bapedalda Kabupaten Simalungun No.442/Bpdl-2005 dated on 23 Desember 2005 related agreement of "Dokumen UKL/UPL PT. Kerasaan Indonesia" and revision of "Upaya Pengelolaan Lingkungan dan Upaya Pemantauan Lingkungan (UKL/UPL)" comply with letter agreement "Kepala Badan Lingkungan Hidup Kabupaten Simalungun No.700/109/BLH/2009" dated 8 April 2009 with scope of study 2,362 Ha oil palm estates.																																																		
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	<p>The company has prepared report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester).</p> <p>The Management Plan incorporated in the "Rencana Pengelolaan Lingkungan", consist of:</p> <ul style="list-style-type: none"> <li>Physical-chemical compenent/aspect: soil fertility (monitoring once per annum); water quality (monitoring twice per annum); air quality (monitoring twice per annum); aesthetic (cleanliness).</li> <li>Social-economy-cultural component/aspects: community welfare; community perception.</li> <li>Health component: community health, hazardous waste management;</li> </ul> <p>Laporan RKL-RPL semester I tahun 2019 PT. Eastern Sumatra Indonesia</p> <ul style="list-style-type: none"> <li>Received by Dinas Lingkungan Hidup Kabupaten Simalungun (dated 20 August 2019), DLH Provinsi Sumatera Utara (20 August 2019), Kementerian Lingkungan Hidup (ID SIMPEL:1582861922-2183 dated 28 February 2020)</li> </ul> <p>Evidence of laporan RKL-RPL Semester II tahun 2019 PT. Eastern Sumatra Indonesia</p> <p>Received by Dinas Lingkungan Hidup Kabupaten Simalungun (dated 10 March 2020), DLH Provinsi Sumatera Utara (10 March 2020), Kementerian Lingkungan Hidup (ID SIMPEL:1582861922-2183 dated 28 February 2020).</p>	Comply																																																	
3.4.3	<b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	<p>The social and environmental management and monitoring plan of PT. Eastern Sumatra Indonesia is implemented according to Environmental Document Directive, such as monitoring on surface water (Bah Bolon River and Serapuh River) within 2019 as below:</p> <table border="1"> <thead> <tr> <th>parameter</th> <th>unit</th> <th>Bah Bolon Upstream</th> <th>Bah Bolon Downstream</th> <th>Serapuh Upstream</th> <th>Serapuh Downstream</th> <th>Threshold</th> </tr> </thead> <tbody> <tr> <td>TDS</td> <td>Mg/L</td> <td>300</td> <td>307</td> <td>192</td> <td>379</td> <td>1,000</td> </tr> <tr> <td>TSS</td> <td>Mg/L</td> <td>8.5</td> <td>19.5</td> <td>11.5</td> <td>21.5</td> <td>50</td> </tr> <tr> <td>pH</td> <td>Mg/L</td> <td>8.01</td> <td>8.14</td> <td>8.15</td> <td>8.12</td> <td>6-9</td> </tr> <tr> <td>BOD5</td> <td>Mg/L</td> <td>2.1</td> <td>2.64</td> <td>2.32</td> <td>2.86</td> <td>3</td> </tr> <tr> <td>COD</td> <td>Mg/L</td> <td>8.26</td> <td>9.98</td> <td>10.6</td> <td>13.7</td> <td>25</td> </tr> <tr> <td>DO</td> <td>Mg/L</td> <td>6.9</td> <td>5.8</td> <td>6.2</td> <td>5.42</td> <td>Min. 4</td> </tr> </tbody> </table>	parameter	unit	Bah Bolon Upstream	Bah Bolon Downstream	Serapuh Upstream	Serapuh Downstream	Threshold	TDS	Mg/L	300	307	192	379	1,000	TSS	Mg/L	8.5	19.5	11.5	21.5	50	pH	Mg/L	8.01	8.14	8.15	8.12	6-9	BOD5	Mg/L	2.1	2.64	2.32	2.86	3	COD	Mg/L	8.26	9.98	10.6	13.7	25	DO	Mg/L	6.9	5.8	6.2	5.42	Min. 4	Comply
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		<table border="1"> <tr> <td>Coliform</td> <td>Jml/100 mL</td> <td>4</td> <td>8</td> <td>7</td> <td>13</td> <td>5,000</td> </tr> <tr> <td>Oil &amp; Fat</td> <td>µ/L</td> <td>800</td> <td>833</td> <td>833</td> <td>700</td> <td>1,000</td> </tr> </table> <p>Reviewed and updated regularly per semester (6 month basis) and reported to Environmental Agency.</p>	Coliform	Jml/100 mL	4	8	7	13	5,000	Oil & Fat	µ/L	800	833	833	700	1,000	
Coliform	Jml/100 mL	4	8	7	13	5,000											
Oil & Fat	µ/L	800	833	833	700	1,000											
<p><b>Criteria 3.5</b> A system for managing human resources is in place.</p>																	
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.</p>	<p>Timbang Deli has had recruitment procedure (SOP/TDI/26 dated 3 June 2019). Estate manager create the amount of employee requested and sent to the Director. Sighted the record of promotion from daily worker (SKU-H) to monthly worker (SKU-B) in memorandum No. 03/TDE/I/2020 dated 8 January 2020. Is described ten parameter (analysis of rating value) as a bases of measurement.</p> <ol style="list-style-type: none"> <li>1. Understanding of duties.</li> <li>2. Ability to act an own initiative</li> <li>3. Adequate census of urgency</li> <li>4. Ability to achieve objective</li> <li>5. Control of labour/subordinates</li> <li>6. Knowledge of cost</li> <li>7. Ability to organize daily routine work</li> <li>8. Discipline</li> <li>9. Strength of career</li> <li>10. Knowledge administration</li> </ol> <p>Based on document verification, head clerk in each units (estate and mill) can showed the annual employee appraisal according to the procedure. The document consist information of promotion proposal or employees appointment. For example:</p> <ul style="list-style-type: none"> <li>✓ PT Kerasaan Indonesia: fertilizer applicator on behalf Ramlan. Based on Estate Manager's appraisal, the worker concern recommended to promote from temporary worker into daily worker (permanent) with 80 marks.</li> <li>✓ PT. Timbang Deli Indonesia: palm oil upkeep supervisor on behalf Zulfri Irawan. Based on Estate Manager's appraisal, the worker concern recommended to promote from grade P4 to P6 with 78 marks 78.</li> </ul> <p>All document are in places and accessible in each units.</p>	<p>Comply</p>														

3.5.2	Employment procedures are implemented and records are maintained.	Based on document verification in each units obtained information that each employee had a personal file that collect all information since the employee's join SIPEF Group. The document consist of employee's profile, annual appraisal record, promotion record (if any), warning letter (if any) and other document related to his/her employment data. All document are in places and kept by head clerks in each units.	Comply
<b>Criteria 3.6</b> An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<b>C)</b> All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	<p>PT Timbang Deli Indonesia has shown the procedure of hazards identification and risk assessment, no document SOP/TDI/03 version 01 issued dated 1 March 2019.</p> <p>PT Eastern Sumatera Indonesia has prepared the procedure of risk assessment as per Procedure of Hazard Identification Risk Analysis and Determining Control of OHS, No.OHS-01-01/04-02-2019/Rev.0, dated 12 March 2019.</p> <p>Timbang Deli Estate -The document of risk assessment under "Penilaian Resiko", last review on 2<sup>nd</sup> March 2020, the document was covered all activities in estate, such as: spraying, manuring, office activity, workshop, harvesting, pruning, - transport TBS.</p> <p>Bukit Maradja POM - The document of risk assessment under "Penilaian Resiko", last review on 15 January 2020, the document was covered all activities in mill, such as: security, weight bridge, loading ramp, transfer carriage, station capstan before sterilizer, sterilizer, capstan after sterilizer, hoisting crane, pressing station, clarification station, kernel plant, dispatch CPO/ PK, water treatment, boiler, engine room, workshop, godown, office, Temporary hazardous storage, effluent, bunker filling, control room, telescopic handler, wheel loader, emplacement.</p> <p>All of the mitigation plan of risk assessment has implemented, e.g: in warehouse of fertilizer has sets the maximum height at 2.5 meters for fertilizer bag stacking, fire extinguisher has instaled in fuel station and temporary hazardous waste, and all of the workers has provided PPE.</p> <p>Noise level monitoring is done at the mill. The latest noise level monitoring conducted on 31 Oct 2019, based on analysis result No.328.e/LHU/2019 dated 14 Nov 2019 issued by KAN accredited laboratory PT Itec Solution Indonesia. Based on the document, noise level at Power Hose/Boiler is 90.8 dB and</p>	Comply

		<p>at Press/Sterilizer is 85.1 dB. Noise level standard are based on Decree of Minister of Environment No.48/1996. Noise level at Bukit Maradja POM are still acceptable.</p>	
<p>3.6.2</p>	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p>	<p>PT Timbang Deli Indonesia have established an Occupational Health and Safety Policy, issued and signed by the President Director dated 1 September 2017, in point 2 mentioned the company believe in continually improving health and safety record and this will be achieved through:</p> <ul style="list-style-type: none"> <li>- Hazard and risk identification and reduction</li> <li>- Provision of adequate resources of OHS programmes and procedure, including strict compliance reviews.</li> <li>- Ensuring that the policy and procedure integrate with all other company policies.... Etc.</li> </ul> <p>PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia have established an Occupational Health and Safety Policy that was signed by President Director dated 27<sup>th</sup> March 2019, no Dok: QMM-40-01-P04/27-03/2019/Rev. In point 1 was mentioned The company support the implementation of all relevant laws and regulation of Republic of Indonesia ad of applicable international agreement and standards relevant to occupational health and safety and at point 2.b mentioned that the company committed to provision of adequate resources for effective implementation of the occupational health and safety (OHS) program and procedure, including strict compliance reviews.</p> <p>OHS Procedure under document "Prosedur Keselamatan dan Kesehatan Kerja (K3)" No. SOP/TDI/06, rev.01 dated 1 February 2019. The document of procedure consisted of:</p> <ul style="list-style-type: none"> <li>- Procedure of Hazard Identification Risk Analysis Determining Control for OHS – No: OHS-01-01</li> <li>- Procedure of Hot Work – No: OHS-01-02</li> <li>- Procedure of Potential Hazard Report – No: OHS-01-03</li> <li>- Procedure of P3K (First Aid) – No: OHS-01-04</li> <li>- Procedure of Confined Space - No: OHS-01-06</li> <li>- Procedure of Working at Heights – No: OHS-01-06</li> <li>- Procedure of Gas Pressure Management - No: OHS-01-07</li> <li>- Procedure of Incident Reporting - No: OHS-01-08</li> <li>- Procedure of Standard for Installation of Safety Sign - No: OHS-01-09</li> <li>- Procedure of Personal Protective Equipment - No: OHS-01-10</li> </ul> <p>OHS Program was demonstrated under "Program P2K3 year 2020", such as:</p> <ul style="list-style-type: none"> <li>- Meeting of OHS committee (monthly)</li> <li>- Report of OHS performance (3 months base)</li> <li>- Fire Drill (Bakartiba)</li> </ul>	<p>Comply</p>

		<ul style="list-style-type: none"> <li>- Fire extinguisher inspection (monthly)</li> <li>- Training for first aider</li> <li>- Training on handling pesticides</li> <li>- Socialization of company policies</li> <li>- Training of PPE for all workers</li> <li>- Medical Check-up test</li> <li>- Monitoring of environmental requirement (water quality, air emission)</li> </ul> <p>Record of implementation the OHS plan year 2019, such:</p> <ul style="list-style-type: none"> <li>- Monitoring of OHS equipment, e.g: 11<sup>th</sup> February 2020 for fire extinguisher in Office; reported OK</li> <li>- Training for first aider, dated 11<sup>th</sup> February 2020, location in tennis yard in Timbang Deli Estate, trainer: paramedical, was attended by 33 workers.</li> <li>- Socialization the procedure on handling of pesticides including MSDS, dated 28<sup>th</sup> January 2020</li> <li>- Report of fire drill conducted on 25<sup>th</sup> September 2019 by 44 workers include attendance list, scenario and evaluation, phograph.</li> <li>- Monitoring fire extinguisher number of 39, location Office on 29<sup>th</sup> February 2020 – result OK.</li> <li>- Monitoring of first aider in office on 04 March 2020, result OK</li> <li>- Handover of PPE, e.g: dated 14<sup>th</sup> February 2020 to Mr Dedek Kurniawan (worker in composting), PPE: apron, glove, sleeve; dated 3<sup>rd</sup> March 2020 for Mr Samsul Bahri (workers in processing), PPE: ear plug.</li> <li>- Socialization of first aid kit for field supervisor dated 2<sup>nd</sup> March 2020, location in Estate Clinic was attended by 13 workers and dated 26<sup>th</sup> July 2019 was attended by 17 workers</li> <li>- Monitoring on using of PPE for harvester (weekly), e.g: dated 21<sup>st</sup> and 28<sup>th</sup> February 2020, location in division II Kerasaan Estate – result OK.</li> <li>- The report of OHS inspection has reviewed during OHS meeting (monthly basis), e.g: OHS meeting on 22<sup>nd</sup> February 2020; agenda: review the progress action of the result last OHS meeting, review of the report of OHS inspection, etc.</li> <li>- Report of OHS performance for period October - December 2019 was sent to Manpower Agency in Simalungun Regency</li> <li>- Checklist of availability the first aid kit, dated 20<sup>th</sup> February 2020; result shown OK. Location in Timbang Deli Estate and Bukit Maradja POM.</li> </ul> <p>Based on field visit the OHS program has implemented in all of operation units.</p>	
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**Criteria 3.7**



All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&amp;C, in a form they understand, and which includes assessments of training.</p>	<p>PT Eastern Sumatera Indonesia and Timbang Deli Estate has prepared the program of Training, such as:</p> <ul style="list-style-type: none"> <li>- Training for harvesting, planned January 2020</li> <li>- Training on calibration of nozzle (spraying equipment), planned in January 2020</li> <li>- Training on fertilizer application, planned in January 2020</li> <li>- Training on management of hazardous waste, planned in February 2020</li> <li>- Training of traceability of RSPO, planned in February 2020</li> <li>- Training for spraying applicator (including for OHS training and environment) and Calibration for Spraying equipment</li> <li>- Training for LSU (leaf sampling unit)</li> <li>- Training for Boiler operator, scheduled in January 2020</li> <li>- Training for Sterilizer operator, scheduled in January 2020</li> <li>- Training for Heavy Equipment operator, scheduled in February 2020</li> </ul> <p>The record of effectiveness of implementation the OHS program, e.g:</p> <ul style="list-style-type: none"> <li>- Training on fertilizer application dated 22<sup>nd</sup> January 2020, was attended by 38 workers</li> <li>- Training for harvesting dated 31<sup>st</sup> January 2020, was attended by 20 workers</li> <li>- Refresh training for FFB quality dated 8<sup>th</sup> January 2020, was attended by 33 harvesters.</li> <li>- Refresh training for implementation RSPO SCC dated 13<sup>th</sup> February 2020, was attended by 7workers</li> <li>- Training on handling of hazardous waste dated 27<sup>th</sup> February 2020 wast attended by 18 workers</li> <li>- Training of HCV dated 8<sup>th</sup> January 2020 was attended by 33 workers</li> <li>- Training for manuring application and LSU dated 23<sup>rd</sup> November 2019</li> <li>- Training for safety driving was conducted on 16<sup>th</sup> December 2019 Training of IPM (integrated pest management), dated 19 December 2019 was attended by all related staff and workers of pest management.</li> </ul> <p>Currently there are no smallholders or outgrowers associated with Bukit Maradja POM, PT Eastern Sumatra Indonesia, therefore no training performed to the smallholders or outgrowers.</p>	Comply
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p>	<p>Record of training has shown for an individual basis as per document of "Employee Training and Education Record", e.g:</p> <p>Timbang Deli Estate - namely Mr Nasmili (warehouse keeper) training record:</p> <ul style="list-style-type: none"> <li>- Dated 8<sup>th</sup> September 2016; training of fire handling</li> <li>- 25<sup>th</sup> March 2019; training on handling pesticides</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>- Dated 8<sup>th</sup> May 2019; training for first aider</li> </ul> <p>Bukit Maradja POM - namely Mr. Agus Syahputra (sterilizer keeper) training record:</p> <ul style="list-style-type: none"> <li>- 07 June 2018; training of working instruction of loading ramp and sterilizer</li> <li>- 19 March 2019; training of risk analysis and 22<sup>th</sup> September 2019; training of first aid</li> </ul> <p>Namely Mr. Vicky Harlando (pressing keeper) training record:</p> <ul style="list-style-type: none"> <li>- 29<sup>th</sup> Augustus 2018; training of screw process</li> <li>- 25<sup>th</sup> Juli 2019; training of health and safety procedure and training of risk analysis on 17 May 2019</li> </ul> <p>Kerasaan Estate – namely Mr Suhendri (supervisor of spraying), training record:</p> <ul style="list-style-type: none"> <li>- Dated 28<sup>th</sup> March 2015; socialization the company policy</li> <li>- Dated 3<sup>rd</sup> May 201; training of MSDS of chemical material</li> <li>- Dated 6<sup>th</sup> September 2016; training on using the knapsack (spraying equipment)</li> <li>- Dated 17<sup>th</sup> November 2017; refresh training of MSDS</li> <li>- Dated 6<sup>th</sup> April 2018; training of calibration the knapsack (spraying equipment)</li> <li>- Dated 14<sup>th</sup> December 2018; training related to OHS</li> </ul> <p>Dated 9<sup>th</sup> March 2019; refresh training of standardization of pesticides application</p>	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Training Program 2020 for RSPO Supply Chain planned in March 2020. Actual training for RSPO Supply Chain conducted on 9 Mar 2020, attended by 8 personnel including weighbridge clerk, production clerk, KTU and the Mill Manager. The training subjected to RSPO P&C 2018 Criterion 3.8 (RSPO Supply Chain). Training in Bukit Maradja Estate conducted on 24 Jul 2019, attended by harvesting mandors, Field Assistants, Head Assistant and Estate Manager. Training to contractors related supply chain requirements conducted on 6 Aug 2019 and 30 Aug 2019.	Comply

**Supply chain requirements for mills.**

**Procedural note:**

The below numbering is as per the current RSPO SCCS standard and will be renumbered to become 3.8 and onwards following the revision of the RSPO SCCS in 2019. 'D' therefore refers to RSPO SCCS 'Module D – Crude Palm Oil (CPO) mills: Identity Preserved' and 'E' to RSPO SCCS 'Module E – CPO mills: Mass Balance'. Depending on the supply chain model chosen, the corresponding requirements apply as well as all general requirements (those with numbers only).

The RSPO SCCS document uses the terms 'site' and 'organisation' to refer to the unit of certification.

**Definition**

**RSPO Public Summary Report**  
**Revision 9 (Nov 2019)**

<p>Identity Preserved Mill D.1</p>	<p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.</p>	<p>Management decided PT Eastern Sumatra Indonesia – Bukit Maradja POM, to implement RSPO Supply Chain Module D CPO Mills: Identity Preserved. With the implementation of Module D CPO Mills: Identity Preserved, the POM only received and process FFB from certified company-owned estate. FFB suppliers of Bukit Mardja POM are Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.</p> <p>Bukit Maradja POM implemented the procedure of supply chain and traceability based on The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Procedure completed with the flow diagram of FFB receiving, processing in POM, CPO shipping to tank terminal; Receiving and shipping of CPO from tank terminal. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager.</p>	<p>Comply</p>
<p>Mass Balance Mill E.1</p>	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Management decided PT Eastern Sumatra Indonesia – Bukit Maradja POM, to implement RSPO Supply Chain Module D CPO Mills: Identity Preserved. With the implementation of Module D CPO Mills: Identity Preserved, the POM only received and process FFB from certified company-owned estate. FFB suppliers of Bukit Mardja POM are Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.</p> <p>Not applicable.</p>	<p>N/A Not Applicable</p>
<p><b>Explanation (Volume and product integrity)</b></p>			
<p>D.2 E.2</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public</p>	<p>The estimate annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases. Bukit Maradja POM received certified raw material (Fresh Fruit Bunch) from its own estate: Bukit Maradja Estate; Kerasaan Estate and Timbang Deli Estate.</p> <p>The certification of Estates are fall under PT Eastern Sumatra Indonesia – Bukit Maradja POM with certificate number RSPO 632266, first certification start on 17 May 2010, second certification start on</p>	<p>Comply</p>

	<p>summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> <p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>	<p>17 May 2015 and expired on 16 May 2020. Currently the unit of certification are being audit for Recertification.</p> <p>PT Eastern Sumatra Indonesia – Bukit Maradja Palm Oil Mill has been registered in RSPO IT Paltform with registered ID number RSPO_PO1000000095.</p>	
<p><b>5.3 Documented procedures</b></p>			
<p>5.3.1 D.3 E.3</p>	<p>The site shall have written procedures and/or work instructions 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"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• 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.</li> </ul>	<p>PT Eastern Sumatra Indonesia – Bukit Maradja POM has a written procedures and/work instruction for ensuring the implementation of RSPO Supply Chain Standard. The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure are complete and up to date covering the implementation of all elements in the supply chain requirements, such as:</p> <ol style="list-style-type: none"> <li>a. Sales process, covering from contract approval to delivery of oil palm product (CPO and PK) including information of supply chain mechanism;</li> <li>b. Process at the estates, covers harvesting, FFB and loose fruit delivery include harvesting record and delivery to the Palm Oil Mill;</li> <li>c. Process at Palm Oil Mill, covers FFB and Loose fruit receiving, identification, production process, delivery of product and recording.</li> </ol>	<p>Comply</p>

	<p>This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard.</p> <ul style="list-style-type: none"> <li>The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</li> </ul>		
<b>5.3.2 Internal Audit</b>			
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>Effectively implements and maintains the standard requirements within its organisation.</li> </ul> <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</p>	<p>Procedure for Internal Audit refer to SOP Routine Visit and Internal Audit No.ENC-01-02/04-03-2019/Rev.2 date 18 March 2019.</p> <p>Section 6. Frequency and Timing stipulates the internal audits are conducted at least once a year according to the standards referred to.</p> <p>Section 5.4 Implementation of Routine/Internal Audit Visits stipulates: <i>In general, non-conformities in each of the principle and criteria, rules and requirement of the sustainable system are categorized under major, minor and observation. Such findings must be immediately followed up. The unit manager may undertake to implement corrections and may also plan improvements according to result of internal audit. Recommended improvement must be completed with timeframe. A review of the non-compliance found in a previous internal audit should be made on the next visit.</i></p> <p>Internal Audit carried out on 5-7 January 2020, against RSPO P&amp;C 2018 Generic version. The internal auditor assessed Criteria 3.8 related to RSPO SCCS.</p> <p>From Internal Audit dated 5-7 January 2020, there were findings related to:</p> <ul style="list-style-type: none"> <li>- Contract of CPO Transport between PT Eastern Sumatra Indonesia and PT Sumatera Sarana Sekar Sakti, as well as Statement Letter was not found.</li> <li>- Evidence of monitoring done by Bukit Maradja POM was not available.</li> <li>- Evidence of dissemination to contractors related Supply Chain was not available.</li> </ul> <p>Audit report was evident.</p> <p>Management review dated 6 March 2020 – (7 personnel including Bukit Maradja POM Manager) as recorded in minutes of meeting:</p> <ul style="list-style-type: none"> <li>• Result of internal audits, covering RSPO Supply Chain Certification Standard: Internal audit for Bukit Maradja POM carried out on 5-7 Jan 2020, resulting 2 finding, all findings have been closed.</li> <li>• Customer feedback: No complaint received related to CSPO and/or CSPK product.</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>• Status of preventive and corrective actions: status of preventive and corrective action related to internal audit have been discussed during management review meeting. This including opportunity for improvements.</li> <li>• Follow-up actions from management reviews: To continue consistent implementation of RSPO SCCS for CPO Mill: continued awareness on the requirements and control documented in Supply Chain Certification SOPs and implementation of the process on the ground.</li> <li>• Changes that could affect the management system: there is change in FFB Grading Procedure as in LAB-01-10/15-02-2019/rev.02, addition in Specification of Sortation Process No. LAB-01-10-SPEC-01.</li> <li>• Recommendations for improvement: to perform follow up action related internal audit findings.</li> </ul> <p>The management review output, as recorded in minutes of management review meeting dated 6 March 2020:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes:             <ul style="list-style-type: none"> <li>◦ Coordinating with Marketing Department for buyer satisfaction evaluation.</li> </ul> </li> <li>• Resources needs: PT Eastern Sumatra Indonesia – Bukit Maradja POM is committed to continue provision of adequate and relevant resources for the implementation, maintenance and improvement of RSPO SCC requirement.</li> </ul>	
<b>5.4 Purchasing Goods In</b>			
<p>D.4.1/ D.4.2 E.4.1/E.4.2</p>	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	<p>PT Eastern Sumatra Indonesia – Bukit Maradja POM has ensured that certified FFB received are RSPO certified based on the source of FFB. These FFB source are certified under PT Eastern Sumatra Indonesia – Bukit Maradja POM certificate (RSPO 632266). Based on interview with weighbridge clerk and FFB receiving station, Bukit Maradja POM only received certified FFB from sustainable source: Bukit Mardja Estate; Kerasaan Estate and Timbang Deli Estate. There is no FFB received from other source.</p> <p>Bukit Maradja POM does not need to check the certificate validity of the FFB source on the RSPO website, because the certification of the FFB suppliers is fall under PT Eastern Sumatra Indonesia – Bukit Maradja POM.</p> <p>PT Eastern Sumatra Indonesia – Bukit Maradja POM has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Chapter 5.2 of the procedure indicates the Weighbridge Clerk has responsibility to input data and print "Receiving Slip" based on FFB Delivery Note, covering information e.g. estate name and block number, mill name,</p>	<p>Comply</p>

		<p>date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>The procedure SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019 explains Operating Unit can coordinate to an evaluation with CB about the quota between the OU and the CB. During this annual surveillance assessment, Bukit Maradja POM was not over sold the CPO and PK production.</p> <p>The procedure SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019 explains control of product non-conformity refer to Marketing Department Manual - SOP Customer Complaint Handling No.MKT-03-02/26-04/2018/rev.1 dated 30 April 2018. The procedure covers returned of all non-conforming product and/or documents. The responsible is Operating Unit Manager and Senior Manager Marketing. Based on audit, Bukit Maradja POM only receive and processed sustainable FFB. There have been no complaint from buyer.</p> <p>Delivery of FFB from Field "SPB" No.6/F2/SP/20 dated 2 Mar 2020 from Bukit Maradja Estate, Block A06A, A07A; planting year 2010, 2011; total 358 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB20002816W, Bukit Maradja Estate (BME) dated 2 Mar 2020; D/O No.06/F2/SP/2020; Block ID 10A06A, 11A07A; planting year 2010, 2011; total bunches 358; nett weight 6,940 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No.KRE/255 dated 2 Mar 2020 from Kerasaan Estate, Block H03, G03 and G04; planting year 2013, 2013 and 1997; total 481 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB20002797W, Kerasaan Estate dated 2 Mar 2020; D/O No.KRE/255; Block ID 97G04, 13G030 and 13H03; planting year 2003 and 1997; total bunches 481; nett weight 8,150 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No.03/III/TDE/20 dated 7 Mar 2020 from Timbang Deli Estate, Block D01 and F02; planting year 2017 and 2016; total 758 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB20003081W, Timbang Deli Estate dated 7 Mar 2020; D/O No.03/III/TDE/2020; Block ID 16F02 and 17D01; planting year 2016 and 2017; total bunches 758; nett weight 4,260 kg. Stamp Sustainable Product-IP.</p>	
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		<p>Daily Production Figure, dated 10 Mar 2020, stated that FFB received that day was 334.09 MT (Bukit Maradja Estate 181.37 MT; Kerasaan Estate 152.72 MT; Timbang Deli Estate: 0); month todate was 2,620.20 MT and year todate was 20,881.89 MT.</p> <p>Daily Production Figure, dated 7 Mar 2020, stated that FFB received that day was 284.67 MT (Bukit Maradja Estate: 148.23 MT; Kerasaan Estate: 132.18 MT and Timbang Deli Estate: 4.26 MT); month todate was 1,970.90 MT and year todate was 20,232.59 MT.</p> <p>Daily Production Figure, dated 30 Dec 2019, stated that FFB received that day was 161.35 MT (Bukit Maradja Estate: 92.93 MT; Kerasaan Estate: 64.66 MT and Timbang Deli Estate: 3.76 MT); month todate was 7,238.19 MT and year todate was 111,901.24 MT.</p>	
<b>5.5 Outsourcing Activities</b>			
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 mill 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 organisation (not the tank farm manager).</p>	<p>The transport for RSPO certified sustainable CPO and PK delivery were carried out by several contractors. Some contractors were appointed, contracted and instructed by PT Eastern Sumatra Indonesia, and some other appointed, contracted and instructed by the buyer.</p> <p>During transport using the certificate holder’s contractors, legal ownership of CSPO and CSPK are still under PT Eastern Sumatra Indonesia. This evident by sales contract that between PT Eastern Sumatra Indonesia and the buyer.</p>	Comply



<p>5.5.2</p>	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a) The site has legal ownership of all input material to be included in outsourced processes;</p> <p>b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	<p>During transport using the certificate holder’s contractors, legal ownership of CSPO and CSPK are still under PT Eastern Sumatra Indonesia. This evident by sales contract that between PT Eastern Sumatra Indonesia and the buyer.</p> <p>Agreement between PT. Eastern Sumatra Indonesia with transporters:</p> <ul style="list-style-type: none"> <li>- “Perjanjian Pengangkutan PT. Eastern Sumatra Indonesia dengan Pengangkutan Sahabat No.2015/Angkutan/CPO/BM-Dumai/01” signed on 15 January 2015. CV. Angkutan Sahabat issued a statement letter signed by Mr. Gunawan Ruslan, dated 11 January 2018. The statement “CV Angkutan Sahabat bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan CV Angkutan Sahabat bersedia dilakukan audit jika badan sertifikasi memerlukannya” – CV Angkutan Sahabat is following requirement from RSPO Supply chain, and CV Angkutan Sahabat available for audit if needed by certification body.</li> <li>- “Perjanjian Pengangkutan PT. Eastern Sumatra Indonesia dengan CV Jasa Sahabat Abadi No.2015/Angkutan/CPO/BM-Dumai/06” signed on 21 October 2015. CV. Jasa Sahabat Abadi issued a statement letter signed by Mr. Darmin Tanjudjaja, dated 23 March 2018. The statement “CV Jasa Sahabat Abadi bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan CV Jasa Sahabat Abadi bersedia dilakukan audit jika badan sertifikasi memerlukannya” – CV Jasa Sahabat Abadi is following requirement from RSPO Supply chain, and CV Jasa Sahabat Abadi available for audit if needed by certification body.</li> <li>- “Perjanjian Pengangkutan PT. Eastern Sumatra Indonesia dengan PO. Sumber Agung No.2015/Angkutan/CPO/BM-Dumai/02” signed on 15 January 2015. “Addendum Perjanjian Pengangkutan No.2015/Angkutan/CPO/BM-Dumai/02 dated 1 November 2015” shifting the transporter name from PO Sumber Agung to CV. Sejahtera Abadi. CV. Sejahtera Abadi issued a statement letter signed by Mr. Harsono Sukijung, dated 26 February 2019. The statement “CV. Sejahtera Abadi bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan CV. Sejahtera Abadi bersedia dilakukan audit jika badan sertifikasi memerlukannya” – CV. Sejahtera Abadi is following requirement from RSPO Supply chain, and CV. Sejahtera Abadi available for audit if needed by certification body.</li> <li>- “Perjanjian Pengangkutan PT. Eastern Sumatra Indonesia dengan Pengangkutan Felindo No.2015/Angkutan/CPO/BM-Dumai/04” signed on 15 January 2015. Pengangkutan Felindo issued a statement letter signed by Drs. Sutrisno Sukijung, dated 1 March 2019. The statement “Pengangkutan Felindo bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan Pengangkutan Felindo bersedia dilakukan audit jika badan sertifikasi memerlukannya” – Pengangkutan Felindo is following requirement from RSPO Supply chain, and Pengangkutan Felindo available for audit if needed by certification body.</li> </ul>	<p>Comply</p>
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		<p>PT Eastern Sumatra Indonesia – Bukit Maradja POM has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Section 5.4 Evaluation by Certification Body stipulates the Contractor Control: POM ensures that related contractors in the product supply chain have followed applicable procedures and audited contractors by internal/external if necessary.</p> <p>Means of control by Bukit Maradja POM: “Buku Pemeriksaan Kendaraan CPO dan PK”, sampled: CPO truck No. BK 9012 CL from CV Sejahtera Abadi; inspected to deliver CPO from Bukit Maradja POM to PT SMART Tbk - Belawan, dated 7 Mar 2020. CPO truck No. BK 8020 CG from Pengangkutan Felindo; inspected to deliver CPO from Bukit Maradja POM to PT SMART Tbk - Belawan, dated 27 Feb 2020. CPO truck No. BK 8761 FA from CV Angkutan Sahabat; inspected to deliver CPO from Bukit Maradja POM to PT SMART Tbk - Belawan, dated 7 Mar 2020.</p> <p>PK truck No. BK 8898 XD from UD Serba Guna inspected to deliver PK from Bukit Maradja POM to buyer PT SMART Tbk - Belawan, dated 22 Jan 2020. PK truck No. BK 8422 XA from CV Sawita Sejahtera Logistic, inspected to deliver PK from Bukit Maradja POM to buyer PT SMART Tbk - Belawan, dated 7 Dec 2019. PK truck No. BK 9416 VV from CV Jasa Sahabat Abadi, inspected to deliver PK from Bukit Maradja POM to buyer PT SMART Tbk - Belawan, dated 16 Jan 2020. Transport instruction made by buyer.</p>																
<p>5.5.3</p>	<p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products. 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.</p>	<p>Registered CPO Transporter of PT Eastern Sumatra Indonesia:</p> <table border="1" data-bbox="913 970 1823 1209"> <thead> <tr> <th>Contractor</th> <th>Contact Person</th> <th>Address</th> </tr> </thead> <tbody> <tr> <td>CV Angkutan Sahabat</td> <td>Mr. Gunawan Ruslan</td> <td>Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.</td> </tr> <tr> <td>CV Jasa Sahabat Abadi</td> <td>Mr. Darmin Tanjudjaja</td> <td>Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring</td> </tr> <tr> <td>CV. Sejahtera Abadi</td> <td>Mr. Harsono Sukijung</td> <td>Jl. Jati No.65 Pulo Brayan Bengkel Kec. Medan Timur, Medan 20239</td> </tr> <tr> <td>Pengangkutan Felindo</td> <td>Mr. Sutrisno Sukijung</td> <td>Jl. Gunung Krakatau Ujung No. 62, Medan</td> </tr> </tbody> </table>	Contractor	Contact Person	Address	CV Angkutan Sahabat	Mr. Gunawan Ruslan	Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.	CV Jasa Sahabat Abadi	Mr. Darmin Tanjudjaja	Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring	CV. Sejahtera Abadi	Mr. Harsono Sukijung	Jl. Jati No.65 Pulo Brayan Bengkel Kec. Medan Timur, Medan 20239	Pengangkutan Felindo	Mr. Sutrisno Sukijung	Jl. Gunung Krakatau Ujung No. 62, Medan	<p>Comply</p>
Contractor	Contact Person	Address																
CV Angkutan Sahabat	Mr. Gunawan Ruslan	Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.																
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<p>5.5.4</p>	<p>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.</p>	<p>Bukit Maradja POM updates the names and contact details of all transporters and bulking storage tank. Currently there is no bulking storage service use by Bukit Maradja POM, sales of certified CPO and PK are always performed from Bukit Maradja POM to buyer.</p>	<p>Comply</p>															

<b>5.9 Record keeping</b>			
5.9.1	The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	PT Eastern Sumatra Indonesia – Bukit Maradja POM maintains accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements. The organization has implemented RSPO Supply Chain Certification Standard based on procedure SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure explains all aspects of supply chain and traceability scope in PT Eastern Sumatra Indonesia: FFB harvesting, harvest recording and delivery to Palm Oil Mill; FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for export; Shipping instruction and preparation; CPO and PK stock balancing post-shipping.	Comply
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.	<p>Procedure Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/rev.0 dated 18 March 2019 – Section 5.2 Production Process in Mill stipulated storage and control of records related to production process in the mill are kept for shelf life of at least five (5) years or determined by operating unit.</p> <p>PT. Eastern Sumatra Indonesia – Bukit Maradja POM have determined the retention time for all records and reports related to implementation of RSPO SCCS in “Daftar Induk Masa Simpan Dokumen” dated 18 September 2017:</p> <ul style="list-style-type: none"> <li>- Dokumen terkait Traceability 10 years;</li> <li>- FFB receiving report 10 years;</li> <li>- Weighbridge ticket for CPO and PK 10 years;</li> <li>- Delivery Order from Marketing Department for CPO and PK 10 years;</li> <li>- Monthly Progress Report 10 years;</li> <li>- Production Report, Despatch CPO &amp; PK 10 years;</li> <li>- Mill Processing Data 10 years;</li> <li>- Processing Daily Report 10 years;</li> <li>- Surat Pengantar FFB 10 years;</li> <li>- Weighbridge ticket for FFB receiving 10 years.</li> </ul>	Comply
5.9.3	The organisation 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	PT Eastern Sumatra Indonesia – Bukit Maradja POM is able to provide estimate volume of CPO and PK in 12 months period as in “Budget Produksi Bulanan” consists estimate of FFB receiving from Bukit Maradja Estate, Kerasaan Estate, and Timbang Deli Estate.	Comply

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	volume purchased (input) and claimed (output) over a period of twelve (12) months.	Estimate of FFB volume received and processed in Bukit Maradja POM for period Mar 2020 to Feb 2021 is 122,510 MT. Estimated volume for CPO is 28,981 MT and estimated volume for PK is 6,114 MT.	
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	<p>The organization has implemented SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure explains in all aspects of supply chain and traceability scope in Bukit Maradja POM and Supply Bases, starting from FFB harvesting, harvest recording and delivery to Palm Oil Mill; FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill, Shipping instruction and preparation, CPO and PK stock balancing post-shipping.</p> <p>Sample 1: CPO dispatch from Bukit Maradja POM:  - Despatch Slip No.CPO19000913W, dated 6 Nov 2019; from Bukit Maradja POM; product CPO; quantity 25.42 MT; D/O No.2019/ESI-CPO/LTC/DO/83 (party of 250 MT); Certificate RSPO 632266; Cert ISCC; Vehicle No. BK 8761 FA; Transporter CV Angkutan Sahabat.  - Delivery Order: 2019/ESI-CPO/LTC/DO/83 dated 4 Nov 2019, 250 MT party .  - Contract: 2019/LTC-CPO/ESI/17.</p> <p>Sample 2: CPO dispatch from Bukit Maradja POM:  - Despatch Slip No.CPO19000519W, dated 5 Jul 2019; from Bukit Maradja POM; product CPO; quantity 26.17 MT; D/O No. 2019/ESI-CPO/LTC/DO/42 (party of 250 MT); Certificate RSPO 632266; Sustainable Product IP; Vehicle No. BK 8519 BS; Transporter CV Sejahtera Abadi.  - Delivery Order: 2019/ESI-CPO/LTC/DO/42 dated 4 Jul 2019, 250 MT party.  - Contract: 2019/LTC-CPO/ESI/09.  - Include in Shipping Announcement TR-d86bb616-87f8.</p> <p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded and balanced on a real-time basis as documented in "Sustainable Production". The document recorded FFB received, CPO and PK beginning stock, production, despatched, adjustment, buyer name, ending stock, OER and KER.</p>	Comply
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 real-time basis and / or three-monthly basis.	Bukit Maradja POM implement RSPO Supply Chain model Identity Preserved, therefore this indicator is not applicable.	N/A Not Applicable

	<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 (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)</p>		
<b>5.10 Conversion Factors</b>			
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. Organisations 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).	Conversion rate is applied to provide reliable estimation of CPO and PK produced. For year 2019, the budget for conversion from FFB into CPO is 23.50%, whilst from FFB to PK is 5.5%. Actual conversion for year 2019 from FFB to CPO is 23.91%, whilst from FFB to PK 5.08% PT Eastern Sumatra Indonesia – Bukit Maradja POM reported the conversion factors based on averaged actual monthly OER and KER.	Comply
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	<p>The actual conversion rates in form of Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in Daily Production Figure.</p> <p>Daily Production Report 10 Mar 2020: FFB Stock is 159.25 MT; FFB received is 334.09 MT; FFB processed is 336.75 MT; CPO Production 79.84 MT; OER 23.71%; PK Production 17.16 MT; KER 5.10%.</p> <p>Daily Production Report 30 Dec 2019: FFB Stock is 136.131 MT; FFB received is 161.350 MT; FFB processed is 297.481 MT; CPO Production 71.47 MT; OER 24.03%; PK Production 12.59 MT; KER 4.23%.</p>	Comply
Processing D.6	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from	Based on audit, PT Eastern Sumatra Indonesia – Bukit Maradja POM did not receive any non-certified FFB. Therefore, no non-certified FFB being entered the process, no non-certified CPO and PK being	Comply

	non- certified oil palm product including during transport and storage to strive for 100% separation.	produced, no non-certified product being dispatched. Storage tank for CPO dedicated only for certified oil. Silo for PK used to store only certified product.	
<b>5.6 Sales and goods out</b>			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer;</p> <ul style="list-style-type: none"> <li>• The name and address of the seller;</li> <li>• The loading or shipment / delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number.</li> <li>• 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).</li> <li>• 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.</li> </ul>	<p>The SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019 regulated that several information required by the standard have to be available in the sales and goods out document. Sales and goods out documents seen are as follows:</p> <p>Sample 1: CPO dispatch from Bukit Maradja POM:</p> <ul style="list-style-type: none"> <li>- Dispatch Slip No.CPO19000519W, dated 5 Jul 2019; from Bukit Maradja POM; product CPO; quantity 26.17 MT; D/O No.2019/ESI-CPO/LTC/DO/42 (party of 250 MT); Certified Product RSPO IP; deliver to PT SMART Tbk - Belawan; Vehicle No. BK 8519 BS; Transporter CVS.</li> <li>- Delivery Order: 2019/ESI-CPO/LTC/DO/42 dated 4 Jul 2019, party of 250 MT</li> <li>- Contract: 2019/LTC-CPO/ESI/09, dated 25 Jun 2019, Location of Handover: Bukit Maradja Palm Oil Mill, PO No. 9100053447. Transporter: Sejahtera Abadi.</li> <li>- Include in Shipping Announcement TR-d86bb616-87f8.</li> </ul> <p>Sample 2: PK dispatch from Bukit Maradja POM:</p> <ul style="list-style-type: none"> <li>- Delivery Order: 2019/LTC-PK/BM/DO/10, dated 4 Nov 2019, party of 600 MT.</li> <li>- Contract: 2019/LTC-PK/BM/10, dated 25 Oct 2019, Location of Handover: Bukit Maradja Palm Oil Mill.</li> <li>- Include in Shipping Announcement TR-b8dedd7a-7850.</li> </ul> <p>Information are complete and presented in several document, e.g. Despatch Slip, Delivery Order and Sales Contract.</p> <p>The information completely available in the documents:</p> <ul style="list-style-type: none"> <li>- The name and address of the buyer: PT SMART Tbk; Jl. Belmera BAru III, Belawan II, Belawan.</li> <li>- The name and address of the seller: PT Eastern Sumatra Indonesia, Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9, Medan 20112.</li> <li>- The loading or shipment/delivery date: 5 Jul 2019 on Dispatch Slip No. CPO19000519W.</li> <li>- The date on which the documents were issued: on 4 Jul 2019 on Delivery Order: 2019/ESI-CPO/LTC/DO/42 and 25 Jun 2019 on Contract: 2019/LTC-CPO/ESI/09.</li> <li>- A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Palm Oil – Sustainable Product IP on Dispatch Slip.</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>- The quantity of the products delivered; 26.17 MT on Dispatch Slip No. CPO19000519W.</li> <li>- Any related transport documentation: Dispatch Slip No.CPO19000519W.</li> <li>- Supply chain certificate number of the seller; RSPO Certificate No. RSPO 632266 on Dispatch Slip.</li> </ul> <p>A unique identification number: CPO19000519W on Dispatch Slip.</p>	
<b>5.7 Registration of Transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>• Are mills, traders, crushers and refineries; and</li> <li>• 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.</li> </ul>	<p>PT Eastern Sumatra Indonesia – Bukit Maradja POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000000095.</p>	Comply
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: 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> <p>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</p>	<p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, PT Eastern Sumatra Indonesia – Bukit Maradja POM has made Shipping Announcement for certified CPO and PK sold.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>- Shipping Announcement transaction ID TR-d86bb616-87f8 dated 15 Nov 2019; for 2,446.63 MT CSPO IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM as Seller to Buyer PT SMART Tbk.</li> <li>- Shipping Announcement transaction ID TR-b8dedd7a-7850 dated 13 Dec 2019; for 600 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM as Seller to Buyer PT SMART Tbk.</li> </ul> <p>PT Eastern Sumatra Indonesia – Bukit Maradja POM is producing sustainable CPO and PK. The RSPO P&amp;C certification scope does not go beyond refinery. "Trace" is not applicable.</p> <p>PT Eastern Sumatra Indonesia – Bukit Maradja POM has done "Remove" in the RSPO IT Platform for CSPO sold as other scheme (ISCC or conventional), e.g.:</p>	Comply

	<p>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> <p>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</p> <p>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</p>	<ul style="list-style-type: none"> <li>- Transaction ID: ST-TR-e695b4bf-3138; dated 13 Dec 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 924.18 MT. Sold to PT SMART Tbk as ISCC.</li> <li>- Transaction ID: ST-TR-d48e13a3-0add; dated 13 Dec 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 499.55 MT. Sold to PT SMART Tbk as ISCC.</li> <li>- Transaction ID: ST-TR-d032cecb-1f8e; dated 2 Oct 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 164.74 MT. Sold to PT Multimas Nabati Asahan as conventional.</li> </ul> <p>PT Eastern Sumatra Indonesia – Bukit Maradja POM is a palm oil mill, which does not need to confirm any purchase of FFB. "Confirm" is not applicable.</p>	
<b>5.11 Claims</b>			
5.11.1	<p>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.</p>	<p>The procedure for claims is stated in SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. PT Eastern Sumatra Indonesia – Bukit Maradja POM made claim regarding the sales of RSPO certified oil palm products, as evidence in Dispatch Slip and Delivery Order by stating the product is certified RSPO IP. The organization has good understanding on the RSPO Rules on Market Communications and Claims.</p>	Comply
<b>General corporate communications</b>			
4.1	<p>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.</p>	<p>PT Eastern Sumatra Indonesia is a subsidiary of RSPO registered member, SIPEF Group. SIPEF Group, the parent company of PT Eastern Sumatra Indonesia is highlighting its commitment to the principles of RSPO – therefore making an off product communication. The corporate communication of SIPEF Group can be seen in the corporate website: <a href="http://www.sipef.com">www.sipef.com</a>.</p>	Comply
4.2	<p>In corporate communications a member is allowed to:</p> <ol style="list-style-type: none"> <li>a. Display its RSPO membership status</li> <li>b. Display the RSPO web address (<a href="http://www.rspo.org">www.rspo.org</a>)</li> </ol>	<p>Corporate communication in SIPEF Group website:</p> <ol style="list-style-type: none"> <li>a. Display its RSPO membership status: No, SIPEF did not display its RSPO membership status.</li> <li>b. Display the RSPO web address: Not in direct manner. SIPEF made a link to RSPO website.</li> </ol>	Comply



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	<p>c. State that the member supports the work of the RSPO</p> <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <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>c. State the member supports the work of the RSPO: Not in direct manner. In the website, SIPEF wrote “We believe in a landscape approach to new oil palm developments, guided by the methodology endorsed by the RSPO”.</p> <p>d. State the member’s history with regards to the RSPO: No. SIPEF did not state their history with regards to the RSPO.</p> <p>e. Use of RSPO Trademark to promote its membership of the RSPO: No, SIPEF did not use RSPO trademark in its corporate communication such in website.</p>	
4.3	<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>No, SIPEF did not display its RSPO membership status.</p> <p>It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	Comply
4.4	<p>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.</p>	<p>No, SIPEF did not display its RSPO membership status.</p> <p>It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the SIPEF’s own products.</p>	Comply
4.5	<p>Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications &amp; Claims document. This is for the sole use of the RSPO secretariat.</p>	<p>No, SIPEF Group did not display the RSPO Corporate Logo in the website as well as in the correspondence letter.</p>	Comply
<b>Business to business communications</b>			
5.1	<p>Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the</p>	<p>PT Eastern Sumatra Indonesia stating RSPO IP in the sales document. The RSPO IP notation adhere to the requirements of RSPO SCCS. PT Eastern Sumatra Indonesia – Bukit Maradja POM is certified against RSPO P&amp;C 2018 that include RSPO Supply Chain requirements for CPO Mills. All of the palm oil mills process and handling are managed to demonstrate integrity of supply chain model identity</p>	Comply

	supply chain about the use of certified sustainable oil palm products.	preserved. During sales of CSPO and CSPK, PT Eastern Sumatra Indonesia made clear that the product is Identity Preserved.	
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.	PT Eastern Sumatra Indonesia stating RSPO IP in the sales document. The RSPO IP notation adhere to the requirements of RSPO SCCS. PT Eastern Sumatra Indonesia – Bukit Maradja POM is certified against RSPO P&C 2018 that include RSPO Supply Chain requirements for CPO Mills. All of the palm oil mills process and handling are managed to demonstrate integrity of supply chain model identity preserved. During sales of CSPO and CSPK, PT Eastern Sumatra Indonesia made clear that the product is Identity Preserved.	Comply
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: 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.	PT Eastern Sumatra Indonesia – Bukit Maradja POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFB into CPO and PK. Not Applicable.	N/A
5.4	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	PT Eastern Sumatra Indonesia – Bukit Maradja POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached. Not applicable.	N/A

	<p>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>		
<b>Business to consumer communication</b>			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>PT Eastern Sumatra Indonesia – Bukit Maradja POM is an RSPO certificate holder with certificate number RSPO 632266 valid until 16 May 2020. Currently in process of recertification. The certificate holder sold its oil palm product in bulk, no product label attached. No 'product-specific' claims are used.</p> <p>Not applicable.</p>	N/A
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>PT Eastern Sumatra Indonesia – Bukit Maradja POM is an RSPO certificate holder with certificate number RSPO 632266 valid until 16 May 2020. Currently in process of recertification. The certificate holder sold its oil palm product in bulk, no product label attached. No RSPO trademark and/or RSPO label claims are used.</p> <p>Not applicable.</p>	N/A
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	<p>PT Eastern Sumatra Indonesia – Bukit Maradja POM sold its oil palm product in bulk, no product pack are used.</p> <p>Not applicable.</p>	N/A
6.4	<p>Business to consumer communication shall not include information about the claimant's RSPO membership status.</p>	<p>PT Eastern Sumatra Indonesia – Bukit Maradja POM communication has not stated information about the claimant's RSPO membership status.</p>	Comply

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6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	PT Eastern Sumatra Indonesia – Bukit Maradja POM is certified RSPO P&C, selling CSPO and CSPK. PT Eastern Sumatra Indonesia – Bukit Maradja POM and the parent company - SIPEF Group did not make any communication about their supplier's RSPO membership status.	Comply
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.	The site sold its oil palm product in bulk, up to this moment, PT Eastern Sumatra Indonesia – Bukit Maradja POM has not use RSPO trademark.	Comply
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.	Up to this moment, PT Eastern Sumatra Indonesia – Bukit Maradja POM has not use any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products.	Comply
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in	PT Eastern Sumatra Indonesia – Bukit Maradja POM is not a retailer or food service company. Not applicable.	N/A

	keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .		
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	PT Eastern Sumatra Indonesia – Bukit Maradja POM did not received FFB from non-certified source, therefore the site implement RSPO Supply Chain Model Identity Preserved (IP).	Comply
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	PT Eastern Sumatra Indonesia – Bukit Maradja POM did not received FFB from non-certified source, therefore the site implement RSPO Supply Chain Model Identity Preserved (IP).	Comply
	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.	PT Eastern Sumatra Indonesia – Bukit Maradja POM managed to demonstrated that the traceability is intact throughout the supply chain. There is no percentage of non-certified oil palm contaminating/commingling with the certified product.	Comply
<b>Labelling and trademark (IP)</b>			
	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	PT Eastern Sumatra Indonesia – Bukit Maradja POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached. Not applicable.	N/A

	<p>trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</p>		
<b>Messaging (IP)</b>			
	<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"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>	<p>Up to this moment, PT Eastern Sumatra Indonesia – Bukit Maradja POM has not use any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products. The site sold its product in bulk, no product label attached.</p> <p>Not applicable.</p>	<p>N/A</p>

<p><b>Principle 4: Respect community and human rights and deliver benefit</b>          Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p><b>Criteria 4.1</b>          The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>Certificate holder has had a policy to respect human rights that signed by Board of Management on 10 June 2015. SIPEF committed to:</p> <ul style="list-style-type: none"> <li>• <i>Recognizes that Human Rights are universal and apply to all, without any form of distinction.</i></li> <li>• <i>Supports the implementation of the International Bill of Human Rights, and of the ILO.</i></li> <li>• <i>Declaration on Fundamental Principles and Rights at Work, as they are transcribed into the laws and regulations of the countries where we operate.</i></li> <li>• <i>Charges of violation of Human Rights, where substantiated, will result in disciplinary action up to and including dismissal, and may also lead to legal action.</i></li> <li>• <i>This Policy applies to all Companies under the Management of SIPEF.</i></li> </ul> <p>This policy can be downloaded at <a href="https://www.sipecf.com/hq/sustainability/policies/human-rights-policy/">https://www.sipecf.com/hq/sustainability/policies/human-rights-policy/</a>. It policy also installed in notice board. During the audit, sighted the policy has also installed in the public area such as in the notice board in each units.</p> <p>Based on interview with board of labor union and gender committee from Bukit Maradja Estate/Mill, Kerasaan Estate and Timbang Deli Estate obtained information that SIPEF respect in human rights. There is no discrimination based on races, religion, ethnics, gender etc. Each worker assessed objectively based on their annual performances.</p>	Comply
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p>	<p>During the audit, through the public consultation with village head surrounding the company areas, local government, NGO's and local journalist obtained information that there is no record of land dispute case between the company and villagers/local communities. The company did not using violence approach to handle all case related to their operational activity. There is no evidences of mercenaries and paramilitaries usage in their operations.</p>	Comply
<p><b>Criteria 4.2</b>          There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>			

4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>Certificate holder has had internal grievance regulated under "<i>Mekanisme Keluh Kesah dengan Pihak Internal</i>" Doc.No.SOP/TDI/08 dated 1 February 2019. Procedure for external complaint and grievance "<i>Prosedur Keluh Kesah dengan Pihak Eksternal</i>" Dok.No.SOP/TDI/07, dated 1 February 2019. The procedure explains steps to convey complaint and receive complaint from internal and external party, as well providing appropriate response. The document complemented with flow chart. Within both procedures, company policy is to ensure anonymity of complainants and whistleblowers, where requested. It was stated in section 6.2 in Internal grievance procedure and in section 7.2 in External grievance procedure.</p> <p>According to the stakeholder consultation with labor union and gender committee obtained information that they has been informed about this procedure. All employees are free to submit their complaints to the management. However, employees usually submitted their complaints to the labor union which was deliver it to the monthly meeting of bipartite.</p>	Comply
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p>	<p>During the audit, sighted all of company policies has also installed in the public area such as in the notice board in each units.</p> <p>According to the stakeholder consultation with labor union and gender committee obtained information that they has been socialized about the policies. All employees are treated humanely without discrimination. Female employees also have reproductive rights such as menstruation and maternity leave and they remain paid during that leave.</p>	Comply
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p>	<p>Certificate holder has had Responding to Request for Information Procedure (ENC-01-11/04-03/2019/Rev.1) that approved by Principal Director since 18 March 2019. Some important or guidance of the procedure was:</p> <ul style="list-style-type: none"> <li>• Unit management should provide a record book of information and answers with the shelf life "CONTINUOUS/ONGOING".</li> <li>• Requested for information / data referred to this procedure are requests for written information by mail, fax, e-mail or verbally (directly delivered via telephone, including sort message service from stakeholder at the farm/mill/factory.</li> <li>• Evaluation of information request by stakeholders (publicly accessed document and non-publicly accessed document.</li> <li>• Time limit to response the information request.             <ul style="list-style-type: none"> <li>d. If needed assistance from senior manager office: within 3 working days</li> <li>e. If needed assistance from department head: within 7 working days.</li> </ul> </li> </ul>	Comply



		<p>f. If needed assistance from board if director: within 25 working days.</p> <p>Certificate holder also had Grievance Procedure (IAD-01-08/22-01-2020/Rev.0) approved since 30 January 2020. Some important notice written in this procedure was:</p> <ul style="list-style-type: none"> <li>• Complainants sends grievance by email, WhatsApp and messages to grievance block.</li> <li>• All complainant are to be given response within 3 days.</li> <li>• Department concerned collect information and documents to answer question of complainant.</li> <li>• A formal response referencing the original grievance will be sent within 30 days and will be informed if more than 30 days.</li> <li>• Informing that the complainant have to answer within two weeks, complainant should confirm that they are satisfied within two weeks, if no answer the case will be closed.</li> </ul> <p>The operating unit is responsible for managing and carrying out the procedure above. Head of OU appointed PIC to socialize those procedure. Sighted the evidence of socialization conducted by technical assistant to the village head of Pematang Sakhuda and his staff on 24 February 2020.</p> <p>Based on public consultation with respective village head surrounding area such as village head of Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar (PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia) and village head of Keramat Gajah (PT Timbang Deli Indonesia) obtained information that the requested information procedures and or donation proposals have been well informed. However, the village head usually requested information by phone or short message services directly to the estate/mill manager. Request of information submitted usually for donation proposals or heavy equipment loans which also signed by sub district head.</p> <p>During the audit, auditor also conducted focus group discussion with internal stakeholder such as labour union and gender committee. Through the interview obtained information that if any information request usually through the bipartite meeting. Until now, all requests for information were answered well in a bipartite meeting.</p>	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as	The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The mechanism has defined the compensation process through FPIC process, document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights,	Comply

	observers, as well as the option of a third-party mediator.	statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter. All procedures/information available in Bahasa Indonesia.  Based on public consultation with related stakeholder during the audit obtained information that there is no record of complaint or dispute between certificate holder and their stakeholders at this time. However, certificate holder allow the complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	
<b>Criteria 4.3</b>			
The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated.	Based on public consultation with related stakeholder during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that the company has help the local communities especially in road maintenance activities. The road maintenances usually propose by village head.  The company also provides regular donation for religious celebrations, repairs / construction of worship places, education and sports events organized by village youth groups. The record of donation and corporate social responsibility are in places.	Comply
<b>Criteria 4.4</b>			
Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	Bukit Maradja POM (PT. Eastern Sumatera Indonesia) as Certificate Holder has obtained land title for its plantation and their supply bases, under "Hak Guna Usaha (HGU)", in detail: 1. "Surat Kepala Kepala BPN No.69/HGU/BPN/97 tentang Pemberian Perpanjangan Hak Guna Usaha Atas Tanah PT. Timbang Deli Indonesia atas tanah di Kabupaten Deli Serdang, Provinsi Sumatera Utara dengan luas 972.19 Ha" dated 10 July 1997. The HGU valid until 1 December 2024. Land title: HGU Certificate #4 dated 10 September 1997, land title area permitted is 972.19 Ha. <b>(Timbang Deli Estate)</b> . 2. "Surat Keputusan BPN No.46/HGU/DA/75 tentang Pemberian HGU atas nama PT. Eastern Sumatera Rubber Estate (Indonesia) di Kabupaten Simalungun, Provinsi Sumatera Utara seluas 3,177.94 Ha", dated 21 October 1975. The permit valid until 31 December 1998. <b>(Bukit Maradja Estate &amp; POM)</b>	Comply

		<p>3. The HGU extension as per "melalui Surat Keputusan Menteri Negara Agraria/Kepala BPN No.108/HGU/BPN/97, tentang Pemberian Perpanjangan Hak Guna Usaha atas Tanah terletak di Kabupaten Simalungun, Provinsi Sumatera Utara atas nama PT. Eastern Sumatra Indonesia", dated 26 August 1997. The name have been changed into PT. Eastern Sumatra Indonesia from previously PT. Eastern Sumatra Rubber Estate (Indonesia) as legalized by "Menteri Kehakiman No.C2-2217-HT.01.04.TH 97" dated 17 March 1997, as per "Akte Notaris Kartini Muljadi, SH No.58 tahun 1986". The land title/HGU covers 3,177.94 Ha, located in "Kecamatan Siantar, Kabupaten Simalungun, Provinsi Sumatera Utara". As mandated, "Kantor Pertanahan Kabupaten Simalungun issued "Pergantian Sertifikat HGU No.2 Tahun 1997" for piece of land located in "Desa Pematang Sakhuda" dated 16 October 1997. This is accurate as per "Surat Ukur No.02.09.03.34.2.00348/1997" dated 16 October 1997. The certificate valid until 31 December 2023. <b>(Bukit Maradja Estate &amp; POM)</b></p> <p>4. As per "Surat Keputusan Menteri Dalam Negeri No.SK.45/HGU/DA/75 atas nama PT. Perusahaan Perkebunan Laras Indonesia dengan luas 2,468 Ha" dated 21 October 1975. Subsequently issued with "Sertifikat HGU No.1" dated 16 January 1978 valid until 31 December 1998.</p> <ul style="list-style-type: none"> <li>• Note: In 1988 the company identity was changed from PT. Perusahaan Perkebunan Laras Indonesia into PT. Kerasaan Indonesia, based on "Akta Berita Acara Rapat Umum Luar Biasa Para Pemegang Saham Perseroan Terbatas yang dibuat dihadapan Notaris Kartini Muljadi, SH; No. 102" dated 27 July 1988. The change approved by ministry of justice "No.C2-10477-HT.01.04-TH88" dated 16 November 1988.</li> <li>• In 1997, company apply for HGU extension as in "Surat Keputusan Menteri Agraria/Kepala BPN No.90/HGU/BPN/97 tentang Pemberian Perpanjangan HGU atas Tanah Terletak di Kabupaten Simalungun, Provinsi Sumatera Utara dengan Luas Izin Sebesar 2,362.03 Ha terletak di Kecamatan Bandar, Kabupaten Simalungun, Provinsi Sumatera Utara yang Semula Atas Nama PT. Perusahaan Perkebunan Laras Indonesia menjadi PT. Kerasaan Indonesia" dated 5 August 1997. The HGU extension valid for 25 years. <b>(Kerasaan Estate)</b></li> </ul> <p>Documents related to the history of land tenure and the actual legal use of the land are kept in Legal Department. At the moment, during Re-certification assessment, unit of certification has no more land compensation process from the certified area.</p>	
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<p>4.4.2</p>	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making</p>	<p>Certificate holder concession and its supply bases which is Bukit Maradja Estate - PT. Eastern Sumatera Indonesia, Kerasaan Estate – PT Kerasaan Indonesia and Timbang Deli Estate – PT Timbang Deli Indonesia had established since the colonial era approximately since 1919 under Anglo Dutch Estates Agency. After the Indonesian independence day, all Dutch concession especially Anglo Dutch Agency nationalized by Indonesian government according to the national act No. 86 year 1958 dated 27 December 1958 regarding to <i>Nasionalisasi Perusahaan-Perusahaan Milik Belanda (Nationalization of Dutch Companies)</i> and Government Regulation No. 19 year 1959 regarding <i>Penentuan Perusahaan Pertanian/Perkebunan Milik Belanda Yang Dikenakan Nasionalisasi (Determination of Dutch-Owned Agricultural / Plantation Companies that Were Nationalized)</i>. After that nationalization process, all concession of SIPEF run by Indonesian Government.</p> <p>On 29 April 1968, Société Internationale de Plantations et de Finance (SIPEF Group) under PT Tolan Tiga Indonesia has got concession from Indonesian Government.</p> <p>PT Tolan Tiga Indonesia itself was established within the framework of the Foreign Capital Investment Loan No. 1 year 1967, based upon notarial deed No. 40 dated September 7, 1961 of Professor Meester Raden Soedja, public notary in Jakarta. The deed of establishment was approved by the Minister of Justice in his decision letter No. J.A 5/98/22 dated September 21, 1961 and was published in State Gazette of the Republic of Indonesia No. 97 dated December 5, 1961, Supplement No. 650.</p> <p>Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.</p> <p>According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the colonial era. There is no previous land owner existed. There is also no record of land dispute case informed by related agencies of Simalungun and Deli Serdang District.</p>	<p>Comply</p>
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	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken	According to explanation the previous indicator known that there is no land acquisition process. All company concessions had existed since the colonial era.	
	4.4.2c Evidence that the legal, economic, environmental and social implications of 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 unit of certification's title, concession or lease on the land.	According to explanation the previous indicator known that there is no land acquisition process. All company concessions had existed since the colonial era.	
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	According to explanation the previous indicator known that there is no land acquisition process. All company concessions had existed since the colonial era.	Comply
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	According to explanation the previous indicator known that there is no land acquisition process. All company concessions had existed since the colonial era.	Comply
4.4.5	<b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	According to explanation the previous indicator known that there is no land acquisition process. All company concessions had existed since the colonial era.	Comply
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	According to explanation the previous indicator known that there is no land acquisition process. All company concessions had existed since the colonial era.	Comply

<b>Criteria 4.5</b>			
No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	<p>Currently, during Re-certification assessment, unit of certification has no land extension or land compensation process from the certified area. Unit of Certification has obtaining Land Title as mentioned in Indicator 4.4.1 above.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>Based on the results of public consultation with the surrounding villages (Pangulu Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I, Bandar Siantar and Desa Keramat Gajah) stated that during the few last years have been no reports from the public related to land disputes between the community and the company.</p>	Comply
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	<p>Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.</p> <p>According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the colonial era. There is no previous land owner existed. There is also no record of land dispute case informed by related agencies of Simalungun and Deli Serdang District</p>	Comply
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the	<p>Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.</p> <p>According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained</p>	Comply

	unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed. There is also no record of land dispute case informed by related agencies of Simalungun and Deli Serdang District	
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.  According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed. There is also no record of land dispute case informed by related agencies of Simalungun and Deli Serdang District	Comply
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.  According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed. There is also no record of land dispute case informed by related agencies of Simalungun and Deli Serdang District	Comply
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.  According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan	Comply

		I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed. There is also no record of land dispute case informed by related agencies of Simalungun and Deli Serdang District	
4.5.7	New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.  According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed. There is also no record of land dispute case informed by related agencies of Simalungun and Deli Serdang District	Comply
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.	Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.  According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed. There is also no record of land dispute case informed by related agencies of Simalungun and Deli Serdang District	Comply

**Criteria 4.6**

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.



4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	According to the HCV assessment report that conducted on 2009 in PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia and on 2017 in PT Timbang Deli Indonesia concluded that there is no customary rights near the concession areas. The same information also obtained in SIA/SEIA reports.  Based on that fact, there is no need documented negotiations concerning compensation for loss of legal, customary or user rights with local communities/customary people or other stakeholders.	Comply
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	Refer to previous indicator, there is no customary rights near the concession areas, there is no need documented negotiations concerning compensation for loss of legal, customary or user rights with local communities/customary people or other stakeholders.	Comply
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.	Refer to previous indicator, there is no customary rights near the concession areas, there is no need documented negotiations concerning compensation for loss of legal, customary or user rights with local communities/customary people or other stakeholders.	Comply
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	Refer to previous indicator, there is no customary rights near the concession areas, there is no need documented negotiations concerning compensation for loss of legal, customary or user rights with local communities/customary people or other stakeholders.	Comply
<p><b>Criteria 4.7</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.	Certificate holder concession and its supply bases which is Bukit Maradja Estate - PT. Eastern Sumatera Indonesia, Kerasaan Estate – PT Kerasaan Indonesia and Timbang Deli Estate – PT Timbang Deli Indonesia had established since the Dutch era approximately since 1919 under Anglo Dutch Estates Agency. After the Indonesian independence day, all Dutch concession especially Anglo Dutch Agency nationalized by Indonesian government according to the national act No. 86 year 1958 dated 27 December 1958 regarding to <i>Nasionalisasi Perusahaan-Perusahaan Milik Belanda (Nationalization of Dutch Companies)</i> and Government Regulation No. 19 year 1959 regarding <i>Penentuan Perusahaan</i>	Comply

		<p><i>Pertanian/Perkebunan Milik Belanda Yang Dikenakan Nasionalisasi (Determination of Dutch-Owned Agricultural / Plantation Companies that Were Nationalized)</i>. After that nationalization process, all concession of SIPEF run by Indonesian Government.</p> <p>Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.</p> <p>Refer to HCV assessment report that conducted on 2009 in PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia and on 2017 in PT Timbang Deli Indonesia concluded that there is no customary rights near the concession areas. The same information also obtained in SIA/SEIA reports.</p> <p>According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed. There is also no record of land dispute case informed by related agencies of Simalungun and Deli Serdang District.</p> <p>Based on that fact above, there is no need to demonstrate or to show the evidence of FPIC and negotiated agreements.</p>	
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	Refer to explanation on previous indicator, certificate holder no need to demonstrate or to show the evidence of FPIC and negotiated agreements.	Comply
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Refer to explanation on previous indicator, certificate holder no need to demonstrate or to show the evidence of FPIC and negotiated agreements.	Comply
<b>Criteria 4.8</b>			

The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p>	<p>Refer to HCV assessment report that conducted on 2009 in PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia and on 2017 in PT Timbang Deli Indonesia concluded that there is no customary rights near the concession areas. The same information also obtained in SIA/SEIA reports.</p> <p>Until this audit, certificate holder has had land title, plantation permit and other legal compliance against plantation business that covered whole concession and operational activity. There is no land acquisition process due to whole concession areas came from the Dutch concession. However, certificate holder has had grievance procedure as follows:</p> <ul style="list-style-type: none"> <li>• Procedure for internal complaint and grievance "Prosedur Keluh Kesah dengan Pihak Internal" Dok.No.SOP/TDI/07 dated 1 July 2017. The procedure explains steps to convey complaint and receive complaint from internal party, as well providing appropriate response. The document complemented with flow chart.</li> <li>• Procedure for external complaint and grievance "Prosedur Keluh Kesah dengan Pihak Eksternal" Dok.No.SOP/TDI/06, dated 1 July 2017. The procedure explains steps to convey complaint and receive complaint from internal party, as well providing appropriate response. The document complemented with flow chart.</li> </ul> <p>According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed. There is also no record of land dispute case informed by related agencies of Simalungun and Deli Serdang District.</p>	Comply
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any</p>	<p>As explained in previous indicator (4.8.1), there is no land dispute cases until this audit. According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed. There is also no record of land dispute case informed by related agencies of Simalungun and Deli Serdang District.</p>	Comply

	unresolved conflict through appropriate conflict resolution mechanisms.		
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use right, there claims will be settled using the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4)	As explained in previous indicator (4.8.1), there is no land dispute cases until this audit. According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed. There is also no record of land dispute case informed by related agencies of Simalungun and Deli Serdang District.	Comply
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable)	As explained in previous indicator (4.8.1), there is no land dispute cases until this audit. According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed. There is also no record of land dispute case informed by related agencies of Simalungun and Deli Serdang District.	Comply
<p><b>Principle 5: Support smallholder inclusion</b>          Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p><b>Criteria 5.1</b>          The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	PT Eastern Sumatra Indonesia – Bukit Maradja POM does not receive and process FFB from third-party sources. Bukit Maradja POM was receiving FFB only from company owned source and sister company, which is Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.  This indicator was not applicable for Bukit Maradja POM.	N/A
5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	PT Eastern Sumatra Indonesia – Bukit Maradja POM does not receive and process FFB from third-party sources. Bukit Maradja POM was receiving FFB only from company owned source and sister company, which is Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.  This indicator was not applicable for Bukit Maradja POM.	N/A

5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	PT Eastern Sumatra Indonesia – Bukit Maradja POM does not receive and process FFB from third-party sources. Bukit Maradja POM was receiving FFB only from company owned source and sister company, which is Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.  This indicator was not applicable for Bukit Maradja POM.	N/A
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	PT Eastern Sumatra Indonesia – Bukit Maradja POM does not receive and process FFB from third-party sources. Bukit Maradja POM was receiving FFB only from company owned source and sister company, which is Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.  This indicator was not applicable for Bukit Maradja POM.	N/A
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	There is no contract related FFB supplies. Other type of contract seen: <ul style="list-style-type: none"> <li>- PT Timbang Deli Indonesia has established cooperation with CV Biring Ndu Cahaya Panglong No. TDI/BNCP/V/ 2019/04 dated 20 May 2019 concerning Work Agreement for Transporting Fresh Fruit Bunches (FFB).</li> <li>- Surat Perjanjian Kerja (contract agreement) no.03/TDE/KM/V/2018 related Land Clearing for Replanting dated 7 May 2018; detail of work contains: Uprooting, dispose root, stacking, ripper 4rd, plough 2rd, harrowing 3rd, making main drain 2 m X 1 m X 1 m, making collection drain 1 m X 1 m X 0.75 m, upkeep main drain, upkeep main road, upkeep collection road, making collection road; location in Block P18A03, P18B03, P18H01, P18H02, P18G01 and P18 H04.</li> <li>- Surat Perjanjian Kerja No.04/III/TDE/DIV OP/2019 between Robinson Sitepu, Field Assistant Oil Palm Division as first party and Koperasi Jasa Timbang Deli second party, regarding agreement of field work at Division I for March 2019, such as: circle spraying, pest and disease census, black bunch count.</li> <li>- PT Eastern Sumatra Indonesia made work agreement with contractor for replanting: "Surat Perjanjian Kerja No.03/GMO-BME/AS/X/2018 antara PT Eastern Sumatra Indonesia dengan PT Aneka Sumatrindo tentang Replanting", dated 15 October 2018. Work agreement covers obligation of both parties, governing policies in PT. Eastern (no child worker, HSE, legal compliance, etc.), work schedule, payment terms, sanction, dispute.</li> </ul> <p>Based on review, contracts are fair, legal and transparent and have an agreed timeframe.</p>	Comply

5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	<p>Evidence of payment is reviewed and it was seen paid in timely manner, e.g.:</p> <ul style="list-style-type: none"> <li>- Transfer information from PT Timbang Deli Indonesia, account no. 1050092005804 to CV Karya Mandiri, account no. 0420474733, dated 15 February 2019 for Land Clearing work; remark: 02KMTDEI2019; amount IDR 915,964,524.00.</li> <li>- Summary of Cash Requisition for the month of March 2019 for payment to UD Andini as rice supplier; amount IDR 78,036,600.00.</li> <li>- Summary of Cash Requisition for the month of March 2019 for payment to CV Sekawan Sukses as contractor of security wall infrastructure; amount IDR 26,250,000.00.</li> </ul> <p>PT. Eastern Sumatra Indonesia made scheduled payment for replanting contractor based on work progress. Record sighted: Invoice PT. Aneka Sumatrindo No.2018-BME-2612 dated 26 December 2018 based on SPK No.03/GMO-BME/AS/X/2018. "Kwitansi PT. Aneka Sumatrindo atas selesai 100% pekerjaan replanting 2019 sesuai SPK No.03/GMO-BME/AS/X/2018" – payment made 13 February 2019.</p> <p>Based on interviews with cooperative management and non-permanent employees stated that PT. Timbang Deli Indonesia, PT. Eastern Sumatra Indonesia and PT. Kerasaan Indonesia has made payments according to the agreements work in the Letter of Employment Agreement.</p>	Comply
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).	<p>Bukit Maradja POM weighbridge certificate was evidence based on "Surat Keterangan Hasil Pengujian" No. 510.3/2281/ML.1-PS dated 15 Nov 2019. Issued by UPTD metrology Legal Pematang Siantar. Details: Electronic weighbridge capacity 40,000 kg; user PT Eastern Sumatra Indonesia; Brand Avery Weigh Tronix; Type E.1205; S/N 102750224. "Surat Keterangan Hasil Pengujian" No. 510.3/2282/ML.1-PS dated 15 Nov 2019. Issued by UPTD metrology Legal Pematang Siantar. Details: Electronic weighbridge capacity 40,000 kg; user PT Eastern Sumatra Indonesia; Brand Avery Weigh Tronix; Type E.1205; S/N 102750264. Both certificate valid until November 2020.</p>	Comply
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	<p>The certificate holder has plan to develop partnership with independent smallholder to provide fertilizer, agrochemical and knowledge of good agriculture practice, include formed an organization for Internal Control System (ICS) such as farmer group or Cooperative. The unit certification will act as middleman in FFB sales from independent smallholder. There will be a partnership with nearby oil palm farmers and this will be informed to the Agriculture and Plantation Office of Simalungun Regency after the company has obtained accurate information on the identity of the farmers, area cover, location, area boundary and land ownership status.</p>	Comply

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5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	The unit of certification has prepared the procedure External Grievance (HRA-04-02/01-02-2018/Rev.0) as guidance for external grievance management process including smallholders. Complainants can submit their complaints via email at <a href="http://www.tolantiga.co.id">http://www.tolantiga.co.id</a> or directly to the respective person. Person whom directly supervises the complainants should discuss with the complainants to solve the issue. Timeframe for resolving grievance is 30 days. It was evident grievance documentation under "Rekaman Keluh Kesah Internal & Eksternal". For example: from Head of Timbang Deli Village dated 6 <sup>th</sup> March 2020; has been responded by management on 10 <sup>th</sup> March 2020	Comply
<b>Criteria 5.2</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	<p>The unit of certification has prepared procedure External Grievance (HRA-04-02/01-02-2018/Rev.0) as guidance for external grievance management process including smallholders. Complainants can submit their complaints via email at <a href="http://www.tolantiga.co.id">http://www.tolantiga.co.id</a> or directly to the respective person. Person whom directly supervises the complainants should discuss with the complainants to solve the issue.</p> <p>Women and other partners as supply base of the certification unit are involved during assessment of the needs for support to develop the smallholder cooperative.</p>	Comply
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	The unit of certification has implemented livelihood improvement programmes. The unit of certification provides technical guidance, financial credit, fertilizer support and receiving the FFB production from smallholder around the company	Comply
<b>PROCEDURAL NOTE:</b> The RSPO is currently developing a separate standard for Independent Smallholders.			
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	The unit of certification provides technical guidance, financial credit, fertilizer support and receiving the FFB production from smallholder around the company	Comply

5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Training of pesticide handling to the smallholders. Training of IPM (integrated pest management), dated 19 December 2019 was attended by all related staff and workers of pest management.	Comply
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	PT Eastern Sumatera Indonesia was regularly review and reported the progress of plantation including Smallholders to the relevant stakeholder. The report also described Production, Sales, Fertilizer applied, Agrochemical used and Labour used.	Comply
<p><b>Principle 6: respect workers' rights and conditions</b>          Protect workers' rights and ensure safe and decent working conditions.</p>			
<p><b>Criteria 6.1</b>          Any form of discrimination is prohibited.</p>			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	<p>Certificate holder has had policy related to non-discrimination and equality. This policy signed by Board of Director on 10 June 2015. The policy stated:</p> <p>SIPEF is committed to a non-discriminatory workplace and will abide by the relevant Anti-discrimination and Equal Employment laws and regulations of the countries where it operates.</p> <ol style="list-style-type: none"> <li>1. SIPEF is not discriminating against anyone during recruitment or in the performance of its business operations.</li> <li>2. The company recruitment selection process is based on merit, so all applicants with the desired qualification and experience will be considered for the open position. The successful applicant will be the person who best meets the specific requirements of the position offered.</li> <li>3. Promotions, but also sanctions, are handled on the same basis of non-discrimination.</li> <li>4. Non-compliance with this policy will result in disciplinary action and might also result in legal action.</li> <li>5. This Policy applies to all Companies under the Management of SIPEF.</li> </ol> <p>This policy can be seen and downloaded in SIPEF Website <a href="https://www.sipef.com/hq/sustainability/policies/equal-employment-opportunity-policy/">https://www.sipef.com/hq/sustainability/policies/equal-employment-opportunity-policy/</a>.</p> <p>Based on interview with labor union, gender committee and random worker in estates and mill obtained information that they has been informed towards the company policies. There is no discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual</p>	Comply



		orientation, gender identity, union membership, political affiliation or age. Annual employee appraisal has been conducted objectively. There was no complaints/grievance on this matter.	
6.1.2	<b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.	According to public consultation result with surrounding communities during the audit (village head from Keramat Gajah – PT Timbang Deli Indonesia, Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I and Bandar Siantar – PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia), obtained information that there is no discrimination for worker especially women worker from surrounding communities. There is no migrant worker in Bukit Maradja Estate/Mill, Kerasaan Estate and Timbang Deli Estate.	Comply
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	<p>Each unit such as Timbang Deli has had recruitment procedure (SOP/TDI/26 dated 3 June 2019). Estate manager create the amount of employee requested and sent to the Director. Sighted the record of promotion from daily worker (SKU-H) to monthly worker (SKU-B) in memorandum No. 03/TDE/I/2020 dated 8 January 2020. Is described ten parameter (analysis of rating value) as a base of measurement.</p> <ol style="list-style-type: none"> <li>1. Understanding of duties.</li> <li>2. Ability to act an own initiative</li> <li>3. Adequate census of urgency</li> <li>4. Ability to achieve objective</li> <li>5. Control of labour/subordinates</li> <li>6. Knowledge of cost</li> <li>7. Ability to organize daily routine work</li> <li>8. Discipline</li> <li>9. Strength of career</li> <li>10. Knowledge administration</li> </ol> <p>Based on document verification, head clerk in each units (estate and mill) can showed the annual employee appraisal according to the procedure. The document consist information of promotion proposal or employees appointment. For example:</p> <ul style="list-style-type: none"> <li>✓ PT Kerasaan Indonesia: fertilizer applicator on behalf Ramlan. Based on Estate Manager’s appraisal, the worker concern recommended to promote from temporary worker into daily worker (permanent) with 80 marks.</li> <li>✓ PT. Timbang Deli Indonesia: palm oil upkeep supervisor on behalf Zulfri Irawan. Based on Estate Manager’s appraisal, the worker concern recommended to promote from grade P4 to P6 with 78 marks 78.</li> </ul>	Comply

		All worker hiring, training and promoting based on their competencies and capabilities.	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	Based on public consultation with board of gender committee representatives and women worker in estates obtained information that the women worker has had a reproduction rights such as menstruation and maternity leaves. Pregnant and breastfeeding women worker cannot work with agro chemical such as pesticide and fertilizer. They will transferred into non-chemical station if identified as pregnant or breastfeeding.	Comply
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Based on public consultation with board of gender committee representatives and women worker in estates obtained information gender committee has socialized women worker rights. Boards of gender committee also conducted several program to socialize against sexual harassment, reproduction health, Integrated Healthcare Center for babies etc.	Comply
6.1.6	There is evidence of equal pay for the same work scope.	Based on public consultation with board of labour union representatives obtained information that the company has implemented of payments according to the collective labour agreement which is always higher than minimum wage that stipulated by local government. There is no dispute against the payments. It also no record of payment that non complies with regulation in labour agencies of Simalungun and Deli Serdang District. All worker has been paid according to the work position, including their overtime or incentives.	Comply
<b>Criteria 6.2</b>			
Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in language they understand.	<p>Unit of certification are implementing collective working agreement or "Perjanjian Kerja Bersama" as industrial relationship. Document of its agreement is available in Bahasa Indonesia and documentation pay and conditions are available within.</p> <p>PT. Timbang Deli Indonesia has shown the document of Collective Working Agreement (PKB) year 2018 – 2020 between PT. Timbang Deli Indonesia and labour union (Pengurus Serikat Pekerja Timbang Deli Mandiri) as reference in working regulation. Collective Worker Agreement was approved by Head of Manpower Agency of Deli Serdang Regency, dated 2 November 2018. Individual contract agreement between company and each worker are available. Documentation of pay and conditions are available to the workers in Bahasa Indonesia.</p> <p>Sample of individual seasonal contract "Perjanjian Kerja Waktu Tertentu (PKWT)", as below:</p> <ol style="list-style-type: none"> <li>1. Mrs. I***N Trj***I (kindergarten teacher), dated 2 Jan 2020.</li> </ol>	Comply

		<p>2. Mrs. E** M. D. P***I (kindergarten teacher), dated 2 Jan 2020. Sample of individual contract of casual worker (PHL), based on Working Agreement "Ketua Koperasi Jasa PT. Timbang Deli", as below:</p> <ol style="list-style-type: none"> <li>No. 49/KJK/VII/2019, dated 2 July 2019 (Mr. T***Y S), agreed date 1 August 2019.</li> <li>No. 51/KJK/VII/2019, dated 2 July 2019 (Mr. I*****I), agreed date 1 August 2019.</li> </ol> <p>Detail pay and condition is described in Article 5 or "Pasal 5".</p>																																														
<p>6.2.2</p>	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.</p>	<p><b>Bukit Maradja Estate:</b> Based on interview with sample of workers: 3 harvester (Div.1); 5 sprayer (Div.1); 8 manuring workers (Div.3) their employment status is permanent workers (SKU). Based on document verification, sample of Casual Worker (BHL) salary Payment Slip period Nov'19 – Feb'20 as below:</p> <table border="1" data-bbox="913 715 1841 1037"> <thead> <tr> <th>Worker Name</th> <th>Nov 2019</th> <th>Dec 2019</th> <th>Jan 2020</th> <th>Feb 2020</th> </tr> </thead> <tbody> <tr> <td>Mr. Jemi (selective/creep weeding)</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>- Salary Receives</td> <td>863,063</td> <td>767,072</td> <td>384,788</td> <td>-</td> </tr> <tr> <td>- Work days</td> <td>18</td> <td>13</td> <td>9</td> <td></td> </tr> <tr> <td>- Output</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Mrs. Aryani (packing fertilizer)</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>- Salary Receives</td> <td>818,898</td> <td>461,487</td> <td>629,077</td> <td>1,088,597</td> </tr> <tr> <td>- Work days</td> <td>17</td> <td>17</td> <td>18</td> <td>11</td> </tr> <tr> <td>- Output:</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>Employment contracts "Kesepakatan Kerja Ketua Koperasi Kasa PT. Eastern Sumatra Indonesia dengan Para Pekerja Harian Lepas" No. 01/KJ/01/2020, dated 1 February 2020. Output of these casual workers are calculated as piece rate. For Packing Fertilizer based on "Kalibrasi Packing Pupuk/Until" dated 3 May 2019.</p> <p>Calibration formula for piece rate as below: Wage/day = Min. Wage/25 = IDR 2,402,626/25 = IDR 96,105. Wage per hour = wage per day/7 hour = IDR 96,105/7 = IDR 13,729/hour. Average of worker output per hour = 78 bags. Cost per bag = wage per hour/avg. bag = IDR 13,729/78 = IDR 177/bag.</p>	Worker Name	Nov 2019	Dec 2019	Jan 2020	Feb 2020	Mr. Jemi (selective/creep weeding)					- Salary Receives	863,063	767,072	384,788	-	- Work days	18	13	9		- Output					Mrs. Aryani (packing fertilizer)					- Salary Receives	818,898	461,487	629,077	1,088,597	- Work days	17	17	18	11	- Output:					<p>Comply</p>
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		<p>Meanwhile, for Selective Weeding, calculation as per calibration "Kalibrasi Selective Weeding" dated 21 May 2019, as below:            Calibration formula as follow:            wage per day = Min. Wage/25 = IDR 2,402,626/25 = IDR 96,105.            Avg. worker output = 11.31 Ha/worker.            Cost per hectare = IDR 96,105/11.31 Ha = IDR 8,498/Ha.</p> <p><b>Kerasaan Estate:</b>            All workers are categorized as permanent workers.            Sample of payment slip February 2020 based on direct interview as follow:</p> <p>1. Ibu E**** P***** (Sprayer).            - Wage: IDR2.763.000            - Rice allowance: IDR147.420            - Social Insurance "BPJS Ketenagakerjaan": IDR131.842            - Pension "BPJS Pensiun": IDR58.080            Total: IDR3.100.342            Deduction: IDR1.492.257            Nett Wage: IDR1.608.085</p> <p>2. Ibu H***** W*** (Fertilizer Operator).            - Wage: IDR2.763.000            - Rice allowance: IDR147.420            - Social Insurance "BPJS Ketenagakerjaan": IDR131.842            - Health Insurance "BPJS Kesehatan": IDR110.520            - Pension "BPJS Pensiun": IDR58.080            Total: IDR3.210.862            Deduction: IDR888.612            Nett Wage: IDR2.322.250</p>	
6.2.3	<b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	As per Indonesia legal labour requirements refer to Manpower Act No. 13 Year 2013, regular working hours divided into two types, i.e: 7 hours/day or 40 hours/week (6 working days) and 8 hours/day or 40 hours/week (5 working days). Unit of certification applied 6 working days, which is 7 hours/day. For overtime, unit of certification applying calculation as per Ministry of Manpower Decree "SK Menakertrans No: KEP-102/MEN/VI/2004", as below: (Nett income per month + price of primary food/rice per month) : 173	Comply

		<p>Daily working days: 1<sup>st</sup> hour of overtime will paid 1.5 x wage per hour. Next hour of overtime will be paid 2 time per hour.</p> <p>Working on holiday (6 working days): First of 7 hours will be paid twice. Hour 8 will be paid 3 times; Hour 9 to 10 will be paid 4 times.</p> <p>Evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements, already stated clearly within Collaborative Working Agreements or "Perjanjian Kerja Bersama" period 2018-2020.</p>	
6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>Unit of Certification have provided adequate facilities for their workers. According to database from sample of unit which verified, as follow:</p> <p>List of General facility in Bukit Maradja POM updated in February 2020, such as:</p> <ul style="list-style-type: none"> <li>- Labour Housing (120 units),</li> <li>- Water tank (1 unit),</li> <li>- Mosque (1 unit),</li> <li>- Church (1 unit),</li> <li>- Sports facilities (badminton court),</li> <li>- Islamic school (1 unit)</li> <li>- Kindergarten (1 unit)</li> <li>- Electricity and</li> <li>- Clean water.</li> </ul> <p>Timbang Deli Estate, List of general facility dated 3 February 2020, such as:</p> <ul style="list-style-type: none"> <li>- Housing G-2 (192 units),</li> <li>- Polyclinic (1 unit),</li> <li>- Mosque (1 unit),</li> <li>- Employee hall (1 unit),</li> <li>- Sports facilities (volley ball, field tennis, football)</li> <li>- Elementary school (1 unit), Kindergarten (1 unit), Islamic School (1 unit)</li> <li>- Junior and vocational school (1 unit),</li> <li>- School bus (1 unit),</li> <li>- Electricity by PLN</li> <li>- Water Tank (1 unit)</li> </ul>	Comply

		Based on field visit at housing complex at Timbang Deli Estate, Bukit Maradja Estate and Kerasaan Estate, those facilities is well maintained and adequate. The unit of certification monitors water quality at clean water wells in 5 locations of employee housing, to determine whether there is pollution from factory activities. The location are clean water wells at Division I, Division II, Division III, Division IV-Staff housing and Division IV-Nursery. The latest monitoring results were carried out in 25 Oct 2019 with the Water Quality Standards based on Minister of Health Regulation No.32/2017. Water quality analysis are done by KAN accredited laboratory, PT Mutu Agung Lestari. The results show all parameters in accordance with quality standards.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	Unit of Certification located along provincial road, where distance from labour housing complex to Pematang Siantar township only 1 hour. Therefore, to obtain affordable food and adequate drink water is close. Unit of certification also provide adequate water in Estate and Mill to washing and bathing.	Comply
6.2.6	A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.	<p>Unit of Certification has prepared the prevailing wage calculation. The company referred to RSPO Guidance for Implementing Decent Living Wage. Company have taken into calculation the component:</p> <ul style="list-style-type: none"> <li>• Reference family size (incl. Total Fertility Rate/TFR and Child Mortality Rate/CMR – Indonesia year 2019);</li> <li>• Full time equivalent per Family (incl. Labor Force Participation Rate/LFPR, Unemployment rate, People Working Part Time – Indonesia year 2019);</li> <li>• Food cost (with 2,100 calories, footnote 19 RSPO Guidance on Implementing DLW) and noted company provided in kind benefit, rice;</li> <li>• Housing cost (provided by company);</li> <li>• Non Food Non Housing cost (electricity, clean water, medical treatment, education, school children transportation cost – provided by company);</li> <li>• Mandatory deduction (from tax and BPJS levy);</li> </ul> <p>Sample of DLW calculation:  <b>Timbang Deli Estate</b> dated 22 February 2020, as follow:            Minimum Wage of Deli Serdang Regency in 2019 is IDR 2,873,725.            Gross Living Wage at IDR.3,602,862;            Prevailing wage at IDR. 3,642,230;            Living Wage Gap at IDR.39,458 (positive);</p> <p><b>Bukit Maradja POM &amp; Estate:</b>            Minimum Wage of Simalungun Regency in 2019 is IDR 2,710,188.</p>	Comply

		<p>Gross Living Wage at IDR.3,697,048; Prevailing wage at IDR. 3,898,324; Living Wage Gap at IDR.201,276 (positive);</p> <p><b>Kerasaan Estate:</b> Minimum Wage of Simalungun Regency in 2019 is IDR 2,695,988. Gross Living Wage at IDR.3,665,547; Prevailing wage at IDR. 4,069,957; Living Wage Gap at IDR.404,410 (positive);</p>	
<p><b>PROCEDURAL NOTE:</b> The RSPO Labour Task Force will prepare guidance on the DLW implementation, including details on how to calculate a DLW, expected for 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist.</p>			
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p>	<p>Workers status in Unit of Certification consist of permanent workers (SKU-B or SKU-H) and seasonal contracted workers (PKWT). <b>Bukit Maradja POM:</b> Total workers: 101 workers, consist of Permanent (96 workers) and Seasonal or "PKWT" (5 workers). Estate: 306 workers (242 SKU-H; 37 SKU-B; 27 PKWT) Man (264); Women (42)</p> <p>Based on interview with representative of Worker Union, it was informed clearly that certificate holder employed permanent workers for all core work performed, such as Harvester, FFB Loader, Manuring and several Pesticide applicator. There is only two type of worker status at the company, Permanent workers (daily or monthly basis) and contracted workers (PKWT).</p>	Comply
<p><b>Criteria 6.3</b> The unit of certification 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>			
6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>The unit of certification has a policy related to freedom of association set in Policy No. QMM-40-01-P13 (Freedom of Association Policy) dated 1 March 2014. The policy stated that "the company recognizes the role of lawful and independent workers and employees representative organizations in creating a constructive working environment". Unit of Certification implement one type of union, Independent Labour/Worker Union (Serikat Pekerja Mandiri).</p>	Comply

		Based on information gathered during stakeholder consultation with Manpower Agency of Labuhanbatu Selatan Regency and Deli Serdang Regency, it was informed that both union (Labour union and Bipartite organisation) has been officially registered.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.	Last meeting of LKS Bipartit conducted on 23 December 2019. Topic to be discussed during the meeting are : <ul style="list-style-type: none"> <li>- Arrangement to proceed Driving License to all workers.</li> <li>- Cooperative Payment</li> <li>- Medical Insurance (BPJS Kesehatan) for workers that have new family member.</li> <li>- Food provision for transport workers.</li> <li>- Meeting with Workers Union conducted in monthly basis.</li> </ul>	Comply
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	Based on interview with representative of Worker Union (Serikat Pekerja Umbul Mandiri) at Bukit Maradja Estate and Timbang Deli Estate, membership of worker union is optional and freely chosen.	Comply
<b>Criteria 6.4:</b>			
Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019. The policy stated that "PT. Eastern Sumatera Indonesia is committed not to employ children under 18 years of age, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".	Comply
6.4.2	<b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	Based on verification of job vacancy announcement documents as well as job application requirements data, it shows that each applicant file must attach a copy of National Identity Card (KTP) to verify data of age and citizenship status. Sample of List Workers Database at Timbang Deli Estate, period February 2020 as follow: <ul style="list-style-type: none"> <li>• Mr. A***** E** S. (Spraying). Born: 30 Nov 1993, Join to work: 1 Feb 2012 (age 19 y.o). Current age: 27 y.o.</li> <li>• Mr. I**** T***** (Kindergarten Teacher). Born: 7 Aug 1993, Join to work: 1 Jan 2019 (age 26 y.o). Current age: 27 y.o.</li> </ul>	Comply



6.4.3	<b>(C)</b> Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.	<p>As outlined in indicator 6.4.1, The unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019. The policy stated that "PT. Eastern Sumatera Indonesia is committed not to employ children under 18 years of age, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".</p> <p>Sample of List Workers Database at Timbang Deli Estate, period February 2020 as follow:</p> <ul style="list-style-type: none"> <li>• Mr. A***** E** S. (Spraying). Born: 30 Nov 1993, Join to work: 1 Feb 2012 (age 19 y.o). Current age: 27 y.o.</li> <li>• Mr. I**** T***** (Kindergarten Teacher). Born: 7 Aug 1993, Join to work: 1 Jan 2019 (age 26 y.o). Current age: 27 y.o.</li> </ul> <p>Based on verification of worker documents for period December 2019 in each unit (Estate and Mill), there are no workers who are less than 18 year old when hired as workers or worked at hazardous area.</p>	Comply
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	<p>Based on interviews with Kramat Gajah village Head (Timbang Deli Estate), workers union officials, local NGO's and workers in field, showed that they have understood company policies to prohibit the use of child labour in all types of company operational activities.</p> <p>Based on document verification, shows that the unit of certification has disseminated the policy prohibiting the use of child labor through:</p> <ol style="list-style-type: none"> <li>1. Post the policy on the bulletin board in each estate/mill office</li> <li>2. Conducting verbal dissemination to workers, especially types of work which are vulnerable to use "informal workers" such as in the harvesting.</li> </ol> <p>Include a clause of prohibiting the use of child labor in each contract document with the contractor.</p>	Comply
<p><b>Criteria 6.5:</b>          There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	Unit of certification has a policy on prevention of sexual harassment/ violence as outlined in policy No. QMM-40-01-P10, Rev 1 (Sexual Harassment Policy) dated 27 March 2019. Based on interview with sample of female workers and Gender Committee representative, it is clearly that they have understood the company's policies on prevention of sexual harassment.	Comply

6.5.2	<b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	The unit of certification has a policy on protection of reproductive rights as outlined in policy No. QMM-40-01-P11, Rev 1 (Protection of Reproductive Rights Policy) dated 27 March 2019. Based on interview with sample of female workers and Gender Committee representative, it is clearly that company are respectful on protection of reproductive rights. In example, female workers who has children are given to breastfeeding time for 30-45 minutes every day.	Comply
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	Based on interview with sample of female workers and Gender Committee representative, it is clearly that company are respectful on protection of reproductive rights. In example, female workers who has children are given to breastfeeding time for 30-45 minutes every day.	Comply
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	Based on direct interview with sample of female workers and Gender Committee, they already understood how the company procedures to resolving disputes, grievance and complaints. Anonymity and complainants are protected as requested by them.	Comply
<b>Criteria 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<b>(C)</b> All work is voluntary and following are prohibited: <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	Based on interview with workers and workers union, stated that the unit of certification does not practiced such thing as follows: <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	Comply

6.6.2	<b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.	Based on direct interview with workers and representative of labour union, it is informed that unit of certification are employed local workers, resident of surrounding villages (Keramat Gajah village – Timbang Deli Estate, Pangulu Nagori Sakhuda Bayu, Pardomuan Nauli, Kerasaan I village – Kerasaan Estate) and Indonesian citizen from other regencies or provincial. There is no migrant workers and only two type of working status, permanent (SKU-H/B) and contracted workers (PKWT)	Comply
<b>Criteria 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<b>(C)</b> The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	<p>OHS Committee was registered as per Surat Keputusan Kepala UPT Wilayah II tahun Pengawas Ketenagakerjaan Dinas Tenaga Kerja Propinsi Sumatera Utara, nomor 26-7/DTK/WIL II/SU/2019 tanggal 30 September 2019.            Ketua: A Rahim Tanjung            Sekertaris: Rizky Dwi Nurmansyah</p> <p>OHS Expert namely Mr Paduman Simanjutak, license number 79259/PK3/AJ/12/2019/PO, dated 4 December 2019 – valid until 3 years.</p> <p>Bukit Maradja POM            OHS Committee was registered as per Surat Keputusan Kepala Dinas Tenaga Kerja Kabupaten Simalungun, nomor 188.45/654/23.4/2019 dated 16 October 2019            Ketua: Ricardo Sihombing            Sekertaris: Berdikari Sembiring</p> <p>OHS Expert namely Mr. Berdikari Sembiring, license number 4981/PK3/AJ/17/2017/P2, dated 20 September 2017 – valid until 3 years.</p> <p>Minute of OHS meeting dated 17<sup>th</sup> February 2020, location in Bukit Maradja Estate. Agenda: review of result last meeting, monitoring of OHS inspection report, review of accidents report.            Timbang Deli Estate - Report of OHS performance (three month bases) for period October-December 2019 was sent to UPT Pengawasan Ketenagakerjaan Wilayah II (Kabupaten Deli Serdang).            Kerasaan Estate - Report of OHS performance to Manpower Agency in Simalungun Regency for period October-December 2019</p>	Comply
6.7.2	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the	The has established the procedure of accident response under "Prosedur Keselamatan dan Kesehatan Kerja (K3), No.SOP/TDI/05" dated 1 July 2017. The procedure of Emergency situation, e.g:	Comply

	<p>appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<ul style="list-style-type: none"> <li>- Emergency procedure for hazardous waste, "SOP Tanggap Darurat Limbah B3 No.SOP/TDI/01", dated 1 July 2017.</li> <li>- Emergency procedure for pesticide spillage "WI Penganganan Tumpahan Pesticida dan Herbisida No.GMO-NS/ENC/WI/K3/04", dated 1 April 2014</li> <li>- Emergency procedure for fertilizer spillage "WI Penanganan Tumpukan Pupuk No.GMO-NS/ENC/K3/03", dated 1 April 2014</li> <li>- Emergency procedure for fuel, oil and lubricant spillage "WI Penanganan Tumpahan Bahan Bakar Minyak, Oil dan Pelumas No.GMO-NS/ENC/WI/K3/05", dated 1 April 2014.</li> </ul> <p>Data verified:</p> <ul style="list-style-type: none"> <li>- Training for first aider on 25 September 2019 attended by 44 workers.</li> <li>- Training for first aider was conducted on 30<sup>th</sup> October 2020, location Central Clinic in Bukit Maradja Estate, was attended by 20 workers.</li> <li>- Licence of first aider number 566/524-7/P3K/DTK/2020 namely Mr. Bobby Sutanto, dated 02 March 2020 – valid until 5 years issued by Dinas Tenaga Kerja Provinsi Sumatera Utara.</li> <li>- Monitoring of First Aid Kit (including portable kit) as per "Daftar Pemegang Kotak P3K Portable" updated in January 2020 – there was 14 first aid kit. During the RAV – March 2020 the auditor was inspected in mixing area, the first aid kit condition in OK to comply with regulation.</li> </ul>	
<p>6.7.3</p>	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>PT Eastern Sumatera Indonesia has shown the document of workers in appropriate PPE.</p> <p>Data seen: Bukit Maradja Estate - Record of handover PPE as per "Serah Terima APD", dated 15<sup>th</sup> February 2020 for manuring applicators, e.g: masks (quantity 20 pcs)</p> <ul style="list-style-type: none"> <li>- Kerasaan Estate - Record of handover PPE as per "Serah Terima Konvensasi Alat Kerja dan APD Spraying", e.g: dated 2<sup>nd</sup> December 2019 consisted of AP boot, mask, safety goggles, rubbers glove, wear pack.</li> <li>- Record of monitoring on using of PPE (monthly), e.g: in February 2020 in division II reported all of harvester was using PPE (OK).</li> <li>- Muster Chit Field Work dated 27<sup>th</sup> February 2020, location in division F4 for safety induction – reported OK.</li> <li>- Licenses for machinery operators (name: SIO as Surat Izin Operator), e.g:             <ul style="list-style-type: none"> <li>• License for OHS tractor operator No 152260-OPK3-LT/PAA/VIII/2019, namely Mr Suprpto, dated 30<sup>th</sup> August 2019 – valid until 5 years</li> <li>• Certificate of Competence No Reg JIP 024.0000260.2014, namely Mr Eko Praja with qualification 3G-SMAW (welding process).</li> </ul> </li> </ul>	<p>Comply</p>

- License for OHS Excavator Operator No. 79592-OPK3-LT/PAA/XI/2016, namely Mr Oktavianus Karo-Karo – valid until 23<sup>rd</sup> November 2021.
- List of machinery in POM, such as:
  - Boiler 1, permit number AI: 02/F.0038.A, last inspection on 12 February 2020 conducted by manpower agency North Sumatera Province - valid until 2 years
  - Sterilizer No.1, permit number AI: 02/F.001.A, last inspection on 28 September 2017 conducted by manpower agency North Sumatera Province - valid until 4 years
  - Weighbridge A, number 69046184, last inspection on 28 October 2019 conducted by UPT Metrologi valid until 1 year
  - Turbine No. 2, permit number IP: 01/PTP/DTK-TR/III/2011, last inspection on 12 February 2020 conducted by manpower agency North Sumatera Province - valid until 1 years

List of emergency responses and preparedness equipment, updated in February 2020.

No	Equipment	Quantity
1	Helmet	30 pcs
2	Lamp	30 pcs
3	Safety googles	30 pcs
4	Mask	30 pcs
5	Safety gloves	30 pcs
6	Safety belt/safety harness	30 pcs
7	AP booth for fire response	30 pcs
8	Apron	30 pcs
9	First aid kit	4 pcs
10	Tower for fire monitoring	2 units
11	Water pump capacity 25HP (Shibaura)	2 pcs
12	Water pump capacity 5HP (Robin)	4 pcs
13	Hose power (8 meters)	2 pcs
14	Hose power (20 meters)	28 pcs
15	Nozzle	4 pcs
16	Water tank	3 pcs
17	Y connector	2 pcs
18	GPS	4 pcs

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6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection.	<p>PT Timbang Deli, PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia have registered all workers into BPJS Ketenagakerjaan and BPJS Kesehatan. All workers have been provided with medical check up. Accident insurance for permanent workers and Contract worker covered by BPJS.</p> <p>PT Tiimbang Deli Estate, all workers have been registered with insurance and medical care. Evidence: Bill payment of BPJS Ketenagakerjaan month January 2020 reference: 201902271500042145, total payment IDR X9,234.543 dated 10 February 2020, covering for 224 workers.</p>	Comply															
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Eastern Sumatera Indonesia and PT Timbang Deli Indonesia has shown the record of injuries using lost time accident (LTA) metrics as in "Laporan Kehilangan Waktu Kerja – LTA" year 2019.</p> <ul style="list-style-type: none"> <li>Bukit Maradja, there was 3 cases of accidents with total of lost time accident year of 2019 is 63 days. Each accident has conducted the investigation and followed up with corrective action. The recommendation of investigation result has been followed up.</li> <li>Timbang Deli Estate and Kerasaan Estate, during year 2019 there was no accident reported</li> </ul>	Comply															
<b>Principle 7:</b>																		
Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.																		
<b>Criteria 7.1:</b>																		
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																		
7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.	<p>Integrated Pest Management plan in Bukit Maradja Estate is evident, as titled "Program Pengendalian Hama Terpadu 2020", established 2 January 2020. Program consist of monitoring of barn-owl box; Planting Turnera; Upkeep Turnera; census of leaf-eater caterpillar; identification of beneficial weeds and ganoderma census.</p> <p>Realization of IPM verified in document e.g. "Owl Monitoring" Division 1 BME, observed barn owl box in Block 05E03A and 97E26A in good condition. Field visit of barn-owl box was conducted in Block 97E26A, it was in good condition. Upkeep of beneficial plant verified as in document "Oil Palm, Mucuna</p>	Comply															

		<p>bracteata and Beneficial Plant Nursery Report” dated 2 Mar 2020; it was observed that there is 4,300 bag of <i>Turnera subulatta</i>, 640 bags of <i>Antigonon leptopus</i> and 1,262 bags of <i>Casia cobanensis</i>. Based on “Pest &amp; Disease Control of Bagworm and Nettle Caterpillar” period February 2020, bagworm and nettle caterpillar attack level was light.</p> <p>Integrated Pest Management plan in Kerasaan Estate is evident, as titled “Program Pengendalian Hama Terpadu 2020”, established 2 January 2020. Program consist of monitoring of barn-owl box; Planting Turnera; Upkeep Turnera; census of leaf-eater caterpillar; identification of beneficial weeds and ganoderma census.</p> <p>Realization of IPM verified in document e.g. “Pest &amp; Disease Control of Bagworm – Nettle Caterpillar” Division 1 Kerasaan Estate. In February 2020 found that attack level have been reduced to “light”. “Summary Penggunaan Chemical Periode January 2020” Division 2 revealed that area threatened is 79.09 Ha, material Asefat used 77.77 lt. “Owl Monitoring” Division 3, observed barn owl box in good condition in Block L03, D03, M07 and K09.</p> <p>Integrated Pest Management plan in Timbang Deli Estate is evident, as titled “Program Pengendalian Hama Terpadu 2020”, established 2 January 2020. Program consist of Nursery Beneficial Plant; Planting Turnera; Upkeep Turnera; Planting Casiatora, Upkeep Casiatora; Planting Antigonon; Upkeep Antigonon; Pest &amp; Disease Census; upkeep Barn owl box and monitoring.</p>	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	The unit of certification has a list of Global Invasive Species, and evaluate the status of existence in certified area. Some species are naturally exist in the area and the spreading are controlled manually, e.g. <i>Achatina fulica</i> , <i>Ageratum conizoides</i> , <i>Clidemia hirta</i> , <i>Imperata cylindrica</i> , <i>Lantana camara</i> , <i>Mikania micranta</i> and <i>Mimosa pudica</i> . The are no species in the list that used to managed areas in unit of certification.	Comply
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. [For NI to define process]	Based on field visit and document review, there is no use of fire for pest control in whole area of Bukit Maradja Estate, Kerasaan Estate, and Timbang Deli Estate.	Comply
<p><b>Criteria 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			

7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p>	<p>The company has recorded list of herbicide used, completed with active ingredient, WHO class, trademark, target, registration number and expiry date.</p> <table border="1" data-bbox="907 446 1832 1359"> <thead> <tr> <th>Trademark</th> <th>Active Ingredient</th> <th>WHO Class</th> <th>Target</th> <th>Registration Number</th> <th>Expiry date</th> </tr> </thead> <tbody> <tr> <td>Smart 486 AS</td> <td>Isopropil amina glifosat 486 g/l</td> <td>U</td> <td>Grasses weed</td> <td>RI.01030119971313</td> <td>12/11/2023</td> </tr> <tr> <td>Basta 150 SL</td> <td>Amonium glufosinat 150 g/l</td> <td>III</td> <td>Grass weed, broad leaf</td> <td>RI.01030119921113</td> <td>12/11/2023</td> </tr> <tr> <td>Becano 500 SL</td> <td>indaziflam</td> <td>III</td> <td>Brush weed/ wood</td> <td>RI.01030120124279</td> <td>02/05/2022</td> </tr> <tr> <td>Elang 480 SL</td> <td>Isopropilamina glifosat 480 g/l</td> <td>U</td> <td>Grasses weed</td> <td>RI.01030119941170</td> <td>30/12/2021</td> </tr> <tr> <td>Kenlon 480 EC</td> <td>Triklopir 480 g/l</td> <td>III</td> <td>Brush weed/ wood</td> <td>RI.01030120062433</td> <td>12/12/2021</td> </tr> <tr> <td>Metsulindo 20 WP</td> <td>Metil metsulfuron 20%</td> <td>U</td> <td>Ferns, Broad Leaf, Sedges</td> <td>RI.01030119991484</td> <td>11/05/2021</td> </tr> <tr> <td>Garlon 670</td> <td>Triklopir butoksi etil ester</td> <td>III</td> <td>Brush weed/ wood</td> <td>RI.0103011984695</td> <td>30/12/2023</td> </tr> <tr> <td>Garlon Mix 333/17</td> <td>Aminopiralid potassium 17 g/l</td> <td>III</td> <td><i>Tetracera indica, Melastoma malabatricum, Clidemia hirta, Lantana camara</i></td> <td>RI.01030120155148</td> <td>13/05/2020</td> </tr> <tr> <td>Starane 290 EC</td> <td>Fluroksipir 290 g/l</td> <td>U</td> <td>Broad leaf</td> <td>RI.0103011988854</td> <td>12/11/2023</td> </tr> <tr> <td>Starthene 75 WDG</td> <td>Acephate 75%</td> <td>III</td> <td>Bagworm, nettle caterpillar</td> <td>RI.01010120072983</td> <td>08/08/2022</td> </tr> <tr> <td>Thuricide WP</td> <td>Bacillus thuringiensis 16,000 iu/mg</td> <td>U</td> <td>Thosea, Bagworm</td> <td>RI.0101011977298</td> <td>05/05/2022</td> </tr> </tbody> </table>	Trademark	Active Ingredient	WHO Class	Target	Registration Number	Expiry date	Smart 486 AS	Isopropil amina glifosat 486 g/l	U	Grasses weed	RI.01030119971313	12/11/2023	Basta 150 SL	Amonium glufosinat 150 g/l	III	Grass weed, broad leaf	RI.01030119921113	12/11/2023	Becano 500 SL	indaziflam	III	Brush weed/ wood	RI.01030120124279	02/05/2022	Elang 480 SL	Isopropilamina glifosat 480 g/l	U	Grasses weed	RI.01030119941170	30/12/2021	Kenlon 480 EC	Triklopir 480 g/l	III	Brush weed/ wood	RI.01030120062433	12/12/2021	Metsulindo 20 WP	Metil metsulfuron 20%	U	Ferns, Broad Leaf, Sedges	RI.01030119991484	11/05/2021	Garlon 670	Triklopir butoksi etil ester	III	Brush weed/ wood	RI.0103011984695	30/12/2023	Garlon Mix 333/17	Aminopiralid potassium 17 g/l	III	<i>Tetracera indica, Melastoma malabatricum, Clidemia hirta, Lantana camara</i>	RI.01030120155148	13/05/2020	Starane 290 EC	Fluroksipir 290 g/l	U	Broad leaf	RI.0103011988854	12/11/2023	Starthene 75 WDG	Acephate 75%	III	Bagworm, nettle caterpillar	RI.01010120072983	08/08/2022	Thuricide WP	Bacillus thuringiensis 16,000 iu/mg	U	Thosea, Bagworm	RI.0101011977298	05/05/2022	Comply
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7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p>	<p>Document "Rekapitulasi Penggunaan Pestisida Tahun 2019" recorded pesticides use including active ingredients, LD50, area treated, amount of active ingredients applied per Ha and per ton FFB.</p> <p>Pesticide use in Bukit Maradja Estate in 2019:</p> <table border="1"> <thead> <tr> <th>Trademark</th> <th>Volume (L or kg)</th> <th>Area applied (Ha)</th> </tr> </thead> <tbody> <tr><td>Becano 500SC</td><td>7.50</td><td>Nursery</td></tr> <tr><td>Benstar</td><td>3.20</td><td>Nursery</td></tr> <tr><td>Dipel WG</td><td>247.90</td><td>20.00</td></tr> <tr><td>Decis 2.5 EC</td><td>4.59</td><td>0.20</td></tr> <tr><td>Elang 480 SL</td><td>318.00</td><td>Nursery</td></tr> <tr><td>Garlon Mix 333/17</td><td>292.10</td><td>58.80</td></tr> <tr><td>Marathon 500 SL</td><td>217.50</td><td>52.70</td></tr> <tr><td>Marshall 5 GR</td><td>2,096.40</td><td>150.80</td></tr> <tr><td>Metsulindo 24 WP</td><td>404.94</td><td>16.43</td></tr> <tr><td>Phosthene 97 WG</td><td>5,248.92</td><td>586.80</td></tr> <tr><td>Regent 50 EC</td><td>392.80</td><td></td></tr> <tr><td>Smart 486 AS</td><td>4,321.40</td><td>587.60</td></tr> <tr><td>Starane 290 EC</td><td>225.70</td><td>10.60</td></tr> <tr><td>Thuricide HP</td><td>273.90</td><td>97.50</td></tr> <tr><td>Tikumin 0.0375 BB</td><td>574.30</td><td>20.20</td></tr> </tbody> </table> <p>Pesticide use in Kerasaan Estate in 2019:</p> <table border="1"> <thead> <tr> <th rowspan="2">Trademark</th> <th colspan="2">2019</th> <th colspan="2">2020</th> </tr> <tr> <th>Volume (L or kg)</th> <th>Areal Applied (Ha)</th> <th>Volume (L or kg)</th> <th>Areal Applied (Ha)</th> </tr> </thead> <tbody> <tr> <td>Metsulindo 20 WP</td> <td>105.96</td> <td>7,973.19</td> <td>24.94</td> <td>2,459.82</td> </tr> </tbody> </table>	Trademark	Volume (L or kg)	Area applied (Ha)	Becano 500SC	7.50	Nursery	Benstar	3.20	Nursery	Dipel WG	247.90	20.00	Decis 2.5 EC	4.59	0.20	Elang 480 SL	318.00	Nursery	Garlon Mix 333/17	292.10	58.80	Marathon 500 SL	217.50	52.70	Marshall 5 GR	2,096.40	150.80	Metsulindo 24 WP	404.94	16.43	Phosthene 97 WG	5,248.92	586.80	Regent 50 EC	392.80		Smart 486 AS	4,321.40	587.60	Starane 290 EC	225.70	10.60	Thuricide HP	273.90	97.50	Tikumin 0.0375 BB	574.30	20.20	Trademark	2019		2020		Volume (L or kg)	Areal Applied (Ha)	Volume (L or kg)	Areal Applied (Ha)	Metsulindo 20 WP	105.96	7,973.19	24.94	2,459.82	Comply
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7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p>	<p>Use of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticide are only use to reduce / eliminate existing pest, which has exceeded the economic threshold.</p> <p>Agrochemical budget of Bukit Maradja Estate 2020:</p> <table border="1"> <thead> <tr> <th>Material</th> <th>Area Applied (Ha)</th> <th>Volume (L or Kg)</th> </tr> </thead> <tbody> <tr> <td>Garlon Mix 333/17</td> <td>2,724.92</td> <td>928.90</td> </tr> <tr> <td>Metsulindo 20 WP</td> <td>3,268.42</td> <td>93,940.00</td> </tr> <tr> <td>Smart 480 AS</td> <td>5,993.34</td> <td>3,222.83</td> </tr> </tbody> </table> <p>Agrochemical budget of Kerasaan Estate:</p> <table border="1"> <thead> <tr> <th>Material</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>Basta 150 SL</td> <td>50.84</td> <td>23,385.00</td> </tr> </tbody> </table>	Material	Area Applied (Ha)	Volume (L or Kg)	Garlon Mix 333/17	2,724.92	928.90	Metsulindo 20 WP	3,268.42	93,940.00	Smart 480 AS	5,993.34	3,222.83	Material	2019	2020	Basta 150 SL	50.84	23,385.00	Comply																																										
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		Kenlon 480 EC/Garlon	86.11	44.09	
		Metsulindo	123.87	117.21	
		Smart 486 AS	3,592.00	3,289.00	
		Thuricide WP	408.00	628.42	
		Tikumin 0.0375BB	366.00	366.00	
		Phosthene 97 WG	2,888.00	2,578.75	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best	There is no use of prophylactic use of pesticides throughout Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate. Pesticide are only use to reduce / eliminate existing pest, which has exceeded the economic threshold.			Comply
7.2.5	<p>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, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat</p> <p>7.2.5b Why there is no other alternative which can be used</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative</p> <p>7.2.5d What is the process to limit the negative impacts of the application</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>There is no use of WHO Class 1A or 1B pesticide in whole plantation operation. The use of paraquat has been stopped since 2017. The company's General Manager of North Sumatera has issued Memorandum No.117/GMO-All Estate/XI/2016, dated 1 December 2015. The memorandum stated that the use of paraquat as contact pesticide is not allowed as of 1 January 2017. Target: Zero use of paraquat effective since 1 January 2017.</p> <p>Based on visit in field operation and agrochemical storage in Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate., there was no paraquat found. Based on report of "Daftar Pesticida yang digunakan di Tahun 2019" as well as 2020 – there was no paraquat noted in the report.</p> <p>There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p> <p>There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p> <p>There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p> <p>There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p> <p>There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p>			Comply

<p>7.2.6</p>	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p>	<p>All Estate (Timbang Deli, Bukit Maradja and Kerasaan Estate) have provided basic training related to pesticide, understanding material safety data sheet/MSDS, limited pesticide training, emergency condition training and first aid training.          Chemical warehouse and its infrastructure is ready (see criterion 4.6.6).</p> <p>Standard PPE for sprayer: goggle, masker, apron, rubber glove, rubber boot. Standard PPE for chemical mixer/chemical storekeeper: faceshield, masker, apron, rubber glove, safety boot.</p> <p>Record of training for person who handling pesticides, such as:</p> <ul style="list-style-type: none"> <li>- Attendance list of "Pelatihan Kaliberasi Sprayer dan Perawatan Alat kerja" dated 11<sup>th</sup> January 2020, location in Mixing Area Bukit Maradja Estate, was attended by 18 workers.</li> <li>- Attendance list of "Training Pencampuran Pestisida", dated 2<sup>nd</sup> March 2020, location in Go-Down Bukit Maradja Estate, was attended by 7 workers.</li> <li>- Training of Pesticide use and handling on 13 Feb 2020</li> </ul>	<p>Comply</p>
<p>7.2.7</p>	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p>	<p>The storage is equipped with sufficient air ventilation to provide air circulation. Hazard signs, emergency shower, secondary containment, spill kit, appropriate PPE (face shield, permeable gloves, apron and mask) is available and ready for use.          Working instruction for pre-mixing, stacking and storing pesticide is current, MSDS is also readily available. Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the areas of mixing. These were all seen be controlled by date and were readily available. No concentrates are taken into the field as all spray solutions are pre- mixed in a designated area.          Empty pesticide container was triple rinsed before sent for temporary hazardous waste storage.</p> <p>Timbang Deli Estate          Based on visit in storage of pesticides has been according to recognized best practices. All of pesticides container has disposed to hazardous waste storage (TPS limbah B3 berijin).</p> <p>Bukit Maradja Estate – Kerasaan Estate          Based on visit to storage for all pesticide is in good condition. A standard storage system appears to be implemented across the company.</p> <p>The company supplies two sets of overalls to all pesticide operators so that one can always be considered clean. Overalls are washed at the pesticide mixing areas in specially constructed wash areas so that sprayers and mixers do not need to take them home and therefore the risk of cross contamination with family members is reduced and eliminated.</p>	<p>Comply</p>

7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	<p>All chemical and hazardous waste are stored in temporary hazardous waste storage.</p> <p>Temporary hazardous waste has permitted as per document of "Keputusan Kepala Badan Lingkungan Hidup Kabupaten Simalungun No.188.45/893/Sekrt-2015 tentang Izin Pengelolaan Limbah B3 untuk Kegiatan Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT. Eastern Sumatera Indonesia" dated 29 June 2015 and valid for 5 years. The storage permitted empty pesticide container, fertilizer sheet, used battery, used oil, used lamp bulb, used oil filter, printer cartridge, contaminated material, used paint can. All chemical and their containers from Mill and Estates were collected and kept in temporary waste storage for 180 days prior disposal.</p> <p>Auditor visited the storage (TPS Limbah B3) in Bukit Maradja POM date 12 March 2020 there was verified and found the appropriate storage has been provided with consideration of safety and environmental aspects such as second containment, spill-kit, warning signs, PPE, fire extinguisher, alarm and first-aid kit.</p> <p>Bukit Maradja POM and Estate have shown the document of management of waste and monitoring through several records:</p> <ul style="list-style-type: none"> <li>- "Lembar Neraca Limbah B3 PT. Kerasaan Indonesia" month January and February 2020</li> <li>- "Berita Acara Serah Terima Limbah Bahan Berbahaya dan Beracun (LB3) No.11/BMPOM-External/II/2020, dated 6<sup>th</sup> February 2020 was sent to PT. Amindy Barokah Sumut, consist of: Filter used (9.5 Kg), empty container pesticides (680 Kg), oil used (72 Kg) and medical waste (8.5 liters)</li> <li>- Hazardous Waste Manifest nomor AVT 00014331 for oil used (800 liters), dated 6<sup>th</sup> February 2020 to PT. Amindy Barokah, vehicle BK 8798 MN;</li> <li>- Hazardous Waste Manifest nomor AVT 00014333 for filter oil used (59kg), dated 6<sup>th</sup> February 2020 to PT. Amindy Barokah, vehicle BK 8798 MN;</li> <li>- Hazardous Waste Manifest nomor AVT 00014331 for oil used (800 liters), dated 6<sup>th</sup> February 2020 to PT. Amindy Barokah, vehicle BK 8798 MN;</li> </ul>	Comply
7.2.9	<b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant	There is no aerial application of pesticide in whole operation area of Timbang Deli Estate, Bukit Maradja Estate and Kerasaan Estate.	Comply

	information is provided to affected local communities at least 48 hours prior to application of aerial spraying.		
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	PT Eastern Sumatera Indonesia was regularly conducted the special medical check-up for pesticides operators. Data verified: - Annually - Report of special medical check-up dated 12 <sup>th</sup> September 2019, conducted by accreditation laboratory (Klinik Spesialis Anugerah Ibu Medan), was attended by 71 workers in Bukit Mardja Estate, consisted of spraying applicator, chemical storage keepers, supervisor for chemical applicator, manuring applicator. The medical check-ups have include cholinesterase test. Revealed that there is no case of low blood cholinesterase levels. Per 3 months – Special medical check-up was conducted by paramedical for workers in high risk area, last MCU on 19 <sup>th</sup> December 2019 attended by 75 workers. Record seen: Formulir Pemeriksaan Medis, e.g; namely Mr Ivan Arnando (chemical operator), Mrs Susiati (manuring applicator).	Comply
7.2.11	<b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	PT Eastern Sumatera Indonesia was prepared the procedure on Using and Storing Agrochemicals No: OPM-09-03/22-03/2019/Revision.4, dated 27 <sup>th</sup> March 2019, in point 5.6 mentioned "make sure workers who use pesticides area healthy and not pregnant or breastfeeding."  Data verified: - Monitoring of spraying team no pregnant and breastfeeding (monthly), last monitoring month January and February 2020, women workers name e.g: Mrs Sumaiti, Mrs Rainti, Mrs Mesgiati. - Based on list of workers in high risk area month February 2020, there was no workers under the age of 18, the youngest workers is a Mr Syawal Pranoto (age: 25 years old)	Comply
<b>Criteria 7.3:</b>			
Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	Timbang Deli Estate was prepared the document of waste management plan, updated on 14 <sup>th</sup> February 2020.	Comply
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	Permit of temporary hazardous waste based on Decree of Deli Serdang Regent No.159 Year 2019 regarding "Izin Pengelolaan Limbah Bahan Berbahaya dan Beracun Kegiatan Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun (LB3) PT Timbang Deli Indonesia" dated 1 <sup>st</sup> April 2019.	Comply

		Data seen on implementation the hazardous waste management, e.g: <ul style="list-style-type: none"> <li>- Record on handover of hazardous waste to third party (dated 16<sup>th</sup> January 2020) PT Amindy Barokah as per "Penegiriman Dokumen Manifest".</li> <li>- Electronic receipt (ID: 1583466710-4099) of Report of Hazardous Waste Document period October to December 2019, was submitted to Deli Serdang Regency on 6<sup>th</sup> March 2020.</li> <li>- Hazardous manifest no AVT001898 for oil used (64 litters), hazardous manifest no AVT0013899 for filter oil used (1.4 kg), hazardous manifest no AVT0013901 for empty chemical container (535.77 kg)</li> </ul>	
7.3.3	The unit of certification does not use open fire for waste disposal.	The unit of certification has prepared the procedure of waste disposal as per procedure of use, store and discharge pesticide no OPM-09-03/02-10-2017/Rev.2, in point 5.7 was mentioned Ex-pesticides container is not allowed to be thrown away, burned or buried in the soil. As procedure have been disseminated to all landfill employees, all Landfill employees are well trained on environmental requirements, such as no ex-pesticides container to be thrown away, burned or buried in the soil.  Landfill for domestic waste in Timbang Deli Estate was prepared in block 04D09. Landfill for domestic waste in Bukit Mardja Estate was prepared in block C15A, Division II. All landfills are secured with fence, monitored weekly, completed with date of open and close, and the location distance are far from housing and water sources.	Comply
<b>Criteria 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	The unit of certification has numbers of procedure for good agriculture practices to maintain soil fertility and minimize environmental impact, as available under SOP: <ol style="list-style-type: none"> <li>1. OPM-06-01; Inorganic Fertiliser – Pupuk Inorganik.</li> <li>2. OPM-06-02; Organic Fertiliser – Pupuk Organik</li> <li>3. OPM-06-03; LSU: Palm Marking – LSU: Penandaan Tanaman.</li> <li>4. OPM-06-04; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel.</li> </ol> Fertilizer are applied to maintain and increase soil fertility, fertilizer applied following the fertilizer recommendation which established based on soil and leaf analysis as seen on "Oil Palm Fertilizer Recommendation for PT Eastern Sumatra Indonesia – Bukit Maradja Estate 2020", "Oil Palm Fertilizer Recommendation for PT Kerasaan Indonesia – Kerasaan Estate 2020" and "Oil Palm Fertilizer Recommendation for PT Timbang Deli Indonesia – Timbang Deli Estate 2020. Fertilizer application records are documented in "Monthly Manuring Program Sheet". Based on interview, fertilizer application are performed according to the SOP that refer Best Agriculture Practice and minimize the	Comply

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		environmental impacts. By using methods correct type, correct target and correct dosage. Application near the drainage are avoided. Field visit to fertilizer application conducted in Block 17C05 Division III, type of fertilizer TSP, dosage 1 kg/palm.	
7.4.2	Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	<p>Last periodical leaf sample analysis in Bukit Maradja Estate conducted in December 2019 for preparing fertilizer recommendation 2020. Leaf and Rachis Analysis Report 2019 and fertilizer recommendation 2020 were evident. Leaf Analysis Report was issued by Verdant Bioscience Plant and Soil Nutrition Laboratory dated 21 Feb 2020. Sample seen Lab No. B5292; Sample type-Leaf; Estate: BME; Division: II; Block 05C16-17A; Sampling date: 20/12/2019; Material PM01; Plant Year 2005; 46.81 Ha; Analysis Result: 2.68% N; 0.158% P; 0.89% K; 0.23% Mg; 0.56% Ca; 15 ppm B; 3 ppm Cu; and 17 ppm Zn. Sample seen Lab No. B5295; Sample type-Rachis; Estate-BME; Division: II; Block 10A05-10A06A; Sampling date 19/12/2019; Material PM02; Planting Year 2010; 50.13 Ha; Analysis Result: 0.37% N; 0.204% P; 2.35% K; 0.12% Mg and 0.61% Ca.</p> <p>Soil analysis evident in Report of Testing, e.g. No. 0090-0091/MDN-AGRI/VIII/19, date of test 10/06/2019-27/06/2019. Sample Code 0-20 cm; Organic material: 3.67% C; 0.39% N; &lt;0.001% oil &amp; fat; pH H<sub>2</sub>O 6.7; C/N 9.41; 18.48 ppm P Bray; 0.51 Ca; 0.49 Mg; 0.34 K; 0.41 Na; 17.42 (in cmol(+)/kg); 10.05% BS; &lt;0.001 ppm Pb; &lt;0.001 ppm Cd; 0.39 ppm Cu; 0.24 ppm Zn; 25.6% sand; 35.8% silt and 38.6% clay.</p> <p>The last periodical leaf sample analysis in Kerasaan Estate conducted in July 2019 for preparing fertilizer recommendation 2020. Leaf and Rachis Analysis Report 2020 and fertilizer recommendation 2020 were evident. Leaf Analysis Report was issued by Verdant Plant and Soil Nutrition Laboratory with Ref number 10/STC-spl/VII/19, received date 11 Jul 2019, number of samples 4 bags, analysis date 25 Jul 2019, document number PSNL/TTI/VII/19/270. Sample seen Lab No.B1425; Sample type-Leaf; Estate-KRE; Div-II; Block 07J08A; Sampling date 11/06/2019; Material SJ; Plant Year 2007; 19.3 Ha. Analysis result: 2.55% N; 0.158% P; 0.95% K; 0.25% Mg; 0.56% Ca; 9 ppm B; 4 ppm Cu and 18 ppm Zn. Sample seen Lab No.B1428; Sample type-Rachis; Estate-KRE; Div-II; Block 12H01, H02; Sampling date 11/06/2019; Material BLRS; Plant Year 2012; 39.8 Ha. Analysis result: 0.34% N; 0.158% P; 2.39% Mg; and 0.20% Ca.</p>	Comply
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	Permit of POME for land application as per "Keputusan Bupati Simalungun No.188.45/3440/LingHup-2015 tentang Perpanjangan Izin Pemanfaatan Air Limbah Industri Minyak Kelapa Sawit pada Tanah di Perkebunan Kelapa Sawit PT Eastern Sumatera Indonesia" dated 23 October 2015 valid for 5 years. The unit of certification processed EFB and POME into compost. Compost are applied in Bukit Maradja	Comply



		<p>Estate, recorded in "Aplikasi Compost ke Lapangan". Detail application record of composting in January 2020 are as follows:</p> <table border="1" data-bbox="913 421 1832 785"> <thead> <tr> <th>Division</th> <th>Block</th> <th>Area (Ha)</th> <th>Tonnage</th> <th>Area Applied (Ha)</th> <th>Ton/Ha</th> </tr> </thead> <tbody> <tr><td>II</td><td>06B14</td><td>20.67</td><td>312.66</td><td>20.67</td><td>15.126</td></tr> <tr><td>II</td><td>06B15</td><td>20.45</td><td>311.00</td><td>20.45</td><td>15.208</td></tr> <tr><td>II</td><td>06B16</td><td>20.67</td><td>314.73</td><td>20.67</td><td>15.226</td></tr> <tr><td>II</td><td>06B17</td><td>20.43</td><td>301.60</td><td>20.43</td><td>14.763</td></tr> <tr><td>II</td><td>06B18</td><td>22.80</td><td>39.90</td><td>2.60</td><td>15.346</td></tr> <tr><td>I</td><td>19D14</td><td>20.86</td><td>90.53</td><td>20.86</td><td>4.340</td></tr> <tr><td>I</td><td>19D13</td><td>20.63</td><td>92.00</td><td>20.63</td><td>4.460</td></tr> <tr><td>I</td><td>19D12</td><td>20.80</td><td>11.13</td><td>2.58</td><td>4.314</td></tr> <tr><td colspan="3">Total</td><td>1,473.55</td><td>128.89</td><td>11.433</td></tr> </tbody> </table> <p>There is no application of EFB, POME or Composting in Timbang Deli Estate or Kerasaan Estate due to long distance from Bukit Maradja POM.</p>	Division	Block	Area (Ha)	Tonnage	Area Applied (Ha)	Ton/Ha	II	06B14	20.67	312.66	20.67	15.126	II	06B15	20.45	311.00	20.45	15.208	II	06B16	20.67	314.73	20.67	15.226	II	06B17	20.43	301.60	20.43	14.763	II	06B18	22.80	39.90	2.60	15.346	I	19D14	20.86	90.53	20.86	4.340	I	19D13	20.63	92.00	20.63	4.460	I	19D12	20.80	11.13	2.58	4.314	Total			1,473.55	128.89	11.433	
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7.4.4	Records of fertiliser inputs are maintained.	<p>Fertilizer recommendation 2019 described the fertilizer need for each Estate. Records of fertilizer inputs are available in "Monthly Manuring Program" for each division and "Rekapitulasi Penggunaan Fertilizer Tahun 2019" for estate recapitulation. Fertilizer recommendation 2020 for each Estate were also available.</p> <p>Record of fertilizer input in Bukit Maradja Estate (in kg) are as follow:</p> <table border="1" data-bbox="913 1046 1639 1398"> <thead> <tr> <th>Fertilizer Type</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr><td>Borate</td><td>9,700</td><td>-</td></tr> <tr><td>Dolomite</td><td>160,750</td><td>-</td></tr> <tr><td>Kieserite</td><td>156,977</td><td>-</td></tr> <tr><td>MOP</td><td>432,435</td><td>74,900</td></tr> <tr><td>NPK 12:12:17:2</td><td>3,852</td><td>-</td></tr> <tr><td>NPK 15:15:6:4</td><td>140</td><td>-</td></tr> <tr><td>Rhizoplex</td><td>91</td><td>-</td></tr> <tr><td>RP</td><td>423,959</td><td>25,763</td></tr> <tr><td>TSP</td><td>103,085</td><td>-</td></tr> <tr><td>Urea</td><td>543,129</td><td>27,800</td></tr> </tbody> </table>	Fertilizer Type	2019	2020	Borate	9,700	-	Dolomite	160,750	-	Kieserite	156,977	-	MOP	432,435	74,900	NPK 12:12:17:2	3,852	-	NPK 15:15:6:4	140	-	Rhizoplex	91	-	RP	423,959	25,763	TSP	103,085	-	Urea	543,129	27,800	Comply																											
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<p><b>Criteria 7.5:</b>  Practices minimise and control erosion and degradation of soils.</p>																														
<p>7.5.1</p>	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p>	<p>In Bukit Maradja Estate and Kerasaan Estate; JH Agriculture Service conducted the Semi-Detailed Soil Survey in October 2009 for PT. Eastern Sumatera Indonesia, within the semi-detailed soil survey report, topographic condition, soil fertility status and other information has been accounted into. Soil map for Bukit Maradja Estate is available, indicating that there are 2 major soil series identified and demarcated, which is Bukit Maradja series (2,437 Ha or 78%) sandy loam and Kerasaan series (687 Ha or 22%) sandy clay texture. Topography map for Bukit Maradja Estate is available, the area is flat (0 – 2°).</p> <p>Soil map for Kerasaan Estate is available based on Semi Detail Soil Survey of PT. Kerasaan Indonesia – Kerasaan Estate, October 2009, indicating topography of the estate is raised flat, with slope not exceeding 2°, there are 2 major soil series identified and demarcated, consist Kerasaan series (1,343 ha or 58%) with coarse sandy clay sub-soil texture and Bukit Maradja series (972 Ha or 42%) with coarse sandy loam texture.</p> <p>Soil map for Timbang Deli Estate is available under "Soil Profile", scale 1:28,000 indicating soil type: <i>Typic Endoaquepts</i>, <i>Typic Kandiudalfs</i> and <i>Typic Kandiudults</i>; soil series: Keladang Series (KLD) and Sorek Series (SRK). Data Sources: Field Survey of PT. Timbang Deli, Aerial Photograph (February 2017), soil report by JH Agriculture (2014). Coordinate system: North UTM 47, datum: WGS 1984, grid system: Geographic Lat/Long, map date: 27 July 2017.</p>	<p>Comply</p>																											

7.5.2	There is no extensive replanting of oil palm on steep terrain.	Based on semi detail soil survey, total area of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate are low lying flat. There is no steep terrain in whole area of certification unit. No extensive replanting of oil palm on steep terrain.	Comply
7.5.3	There is no new planting of oil palm on steep terrain.	Based on semi detail soil survey, total area of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate are low lying flat. There is no steep terrain in whole area of certification unit. No extensive replanting of oil palm on steep terrain.	Comply
<b>Criteria 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	<p>In Bukit Maradja Estate and Kerasaan Estate; JH Agriculture Service conducted the Semi-Detailed Soil Survey in October 2009 for PT. Eastern Sumatera Indonesia, within the semi-detailed soil survey report, topographic condition, soil fertility status and other information has been accounted into. Soil map for Bukit Maradja Estate is available, indicating that there are 2 major soil series identified and demarcated, which is Bukit Maradja series (2,437 Ha or 78%) sandy loam and Kerasaan series (687 Ha or 22%) sandy clay texture. Topography map for Bukit Maradja Estate is available, the area is flat (0 – 2°).</p> <p>Soil map for Kerasaan Estate is available based on Semi Detail Soil Survey of PT. Kerasaan Indonesia – Kerasaan Estate, October 2009, indicating topography of the estate is raised flat, with slope not exceeding 2°, there are 2 major soil series identified and demarcated, consist Kerasaan series (1,343 ha or 58%) with coarse sandy clay sub-soil texture and Bukit Maradja series (972 Ha or 42%) with coarse sandy loam texture.</p> <p>Soil map for Timbang Deli Estate is available under "Soil Profile", scale 1:28,000 indicating soil type: <i>Typic Endoaquepts</i>, <i>Typic Kandiuclafs</i> and <i>Typic Kandiuclults</i>; soil series: Keladang Series (KLD) and Sorek Series (SRK). Data Sources: Field Survey of PT. Timbang Deli, Aerial Photograph (February 2017), soil report by JH Agriculture (2014). Coordinate system: North UTM 47, datum: WGS 1984, grid system: Geographic Lat/Long, map date: 27 July 2017.</p>	Comply
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	There is no extensive planting conducted by the unit of certification including on marginal and fragile soils.	Comply

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7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	The unit of certification is able to present map, consist of information related to the soil type and topographic condition of the Estates. Based on identified soil type, the plantation located on flat area. Soil surveys and topographic information from Agronomy Department has guide the company in planning of drainage, irrigation systems, roads and other infrastructure.	Comply
<b>Criteria 7.7</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Based on Semi Detailed Soil Survey Report, October 2009 by JH Agriculture there is no indication of area with peat soil in the Bukit Maradja and Kerasaan Estate. The soil limitation to oil palm growth is sandy soil with low soil moisture holding capacity and high leaching loss of applied fertilizer. Drainability assessment is not applicable.  Based on soil map under "Soil Profile", scale 1:28,000 all area of Timbang Deli Estate is mineral soil, there is no peat soil in Timbang Deli Estate. Drainability assessment is not applicable.	Comply
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	Based on Semi Detailed Soil Survey Report, October 2009 by JH Agriculture there is no indication of area with peat soil in the Bukit Maradja and Kerasaan Estate. The soil limitation to oil palm growth is sandy soil with low soil moisture holding capacity and high leaching loss of applied fertilizer. Drainability assessment is not applicable.  Based on soil map under "Soil Profile", scale 1:28,000 all area of Timbang Deli Estate is mineral soil, there is no peat soil in Timbang Deli Estate. Drainability assessment is not applicable.	Comply
<b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).			
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised.	Based on Semi Detailed Soil Survey Report, October 2009 by JH Agriculture there is no indication of area with peat soil in the Bukit Maradja and Kerasaan Estate. The soil limitation to oil palm growth is sandy soil with low soil moisture holding capacity and high leaching loss of applied fertilizer. Drainability assessment is not applicable.  Based on soil map under "Soil Profile", scale 1:28,000 all area of Timbang Deli Estate is mineral soil, there is no peat soil in Timbang Deli Estate. Drainability assessment is not applicable.	Comply
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place.	Based on Semi Detailed Soil Survey Report, October 2009 by JH Agriculture there is no indication of area with peat soil in the Bukit Maradja and Kerasaan Estate. The soil limitation to oil palm growth is sandy soil with low soil moisture holding capacity and high leaching loss of applied fertilizer. Drainability assessment is not applicable.	Comply

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7.7.5	<b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.	<p>Based on Semi Detailed Soil Survey Report, October 2009 by JH Agriculture there is no indication of area with peat soil in the Bukit Maradja and Kerasaan Estate. The soil limitation to oil palm growth is sandy soil with low soil moisture holding capacity and high leaching loss of applied fertilizer. Drainability assessment is not applicable.</p> <p>Based on soil map under "Soil Profile", scale 1:28,000 all area of Timbang Deli Estate is mineral soil, there is no peat soil in Timbang Deli Estate. Drainability assessment is not applicable.</p>	Comply
<p><b>PROCEDURAL NOTE:</b> Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.</p> <p><b>PROCEDURAL NOTE:</b> PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues].</p>			
7.7.6	<b>(C)</b> All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	<p>Based on Semi Detailed Soil Survey Report, October 2009 by JH Agriculture there is no indication of area with peat soil in the Bukit Maradja and Kerasaan Estate. The soil limitation to oil palm growth is sandy soil with low soil moisture holding capacity and high leaching loss of applied fertilizer. Drainability assessment is not applicable.</p> <p>Based on soil map under "Soil Profile", scale 1:28,000 all area of Timbang Deli Estate is mineral soil, there is no peat soil in Timbang Deli Estate. Drainability assessment is not applicable.</p>	Comply

7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2018) and associated audit guidance.</p>	<p>Based on Semi Detailed Soil Survey Report, October 2009 by JH Agriculture there is no indication of area with peat soil in the Bukit Maradja and Kerasaan Estate. The soil limitation to oil palm growth is sandy soil with low soil moisture holding capacity and high leaching loss of applied fertilizer. Drainability assessment is not applicable.</p> <p>Based on soil map under “Soil Profile”, scale 1:28,000 all area of Timbang Deli Estate is mineral soil, there is no peat soil in Timbang Deli Estate. Drainability assessment is not applicable.</p>	Comply
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**Criteria 7.8**  
Practices maintain the quality and availability of surface and groundwater.

7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p>	<p>The Company has prepared water management plan under “Program Pengelolaan Air” issued on 4 Jan 2019. The program consisted of reporting of deep water usage; quality analysis of deep water; establish silt pit at terrace contour; making individual terrace on plant that have high risk of erosion; pesticide mixing only done in mixing area.</p> <p>The Estate management monitor the progress monthly. The Estate has provided access to clean water for the communities. The Estate has eliminated potential pollution to the water course by conduct mixing of pesticide in the mixing area only.</p> <p>The water management plan explains on the water intake/consumption, permit, water need for palm oil mill – based on water consumption/ton FFB processed, water need for domestic use, plan to record the water consumption – on monthly basis.</p> <table border="1" data-bbox="913 1142 1559 1382"> <thead> <tr> <th>Month</th> <th>FFB Processed (tons)</th> <th>Water usage (m<sup>3</sup>)</th> <th>Water usage (m<sup>3</sup>/ton FFB)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>9,651.48</td> <td>13,686</td> <td>1.42</td> </tr> <tr> <td>Feb</td> <td>8,544.27</td> <td>9,086</td> <td>1.06</td> </tr> <tr> <td>Mar</td> <td>8,586.25</td> <td>8,221</td> <td>0.96</td> </tr> <tr> <td>Apr</td> <td>7,815.38</td> <td>7,187</td> <td>0.92</td> </tr> <tr> <td>May</td> <td>10,147.44</td> <td>8,599</td> <td>0.85</td> </tr> </tbody> </table>	Month	FFB Processed (tons)	Water usage (m <sup>3</sup> )	Water usage (m <sup>3</sup> /ton FFB)	Jan	9,651.48	13,686	1.42	Feb	8,544.27	9,086	1.06	Mar	8,586.25	8,221	0.96	Apr	7,815.38	7,187	0.92	May	10,147.44	8,599	0.85	Comply
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	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>PT. Eastern Sumatera Indonesia and PT. Kerasaan Indonesia have identified the river flow during HCV Identification exercise and explained under HCV Identification report. Example: Bahbolon river, Seragu river.</p> <p>The company has demonstrated effort to minimize erosion, trough planting trees in river buffer zone and not applying agrochemical in designated river buffer zone.</p> <p>Water source of Timbang Deli Estate is 3 deep water well. Quality of water are analysed twice a year by independent laboratory based on UKL-UPL matrix PT. Timbang Deli Indonesia.</p>																																		
<p>7.8.2</p>	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO</p>	<p>Bukit Maradja POM has CDM Project and discharge effluent to block land applications, effluent sampling is taken regularly every month by independent third party (Binalab), e.g. water sample in "Effluent Final Discharge Pond" by BINALAB.</p>		<p>Comply</p>																																

	Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	Based on verification the monitoring of BOD sampling analysis has shown that no more than 5,000 mg/Liter as regulated in "Peraturan Menteri Lingkungan Hidup No. 28, year 2003".																																																																									
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	<p>Bukit Maradja POM has CDM Project and discharge effluent to block land applications, effluent sampling is taken regularly every month by independent third party (Binalab), e.g. water sample in "Effluent Final Discharge Pond" by BINALAB.</p> <p>Permit for land application Keputusan Bupati Simalungun nomor 188.45/3440/Lingkup-2015 tentang Perpanjangan Izin Pemanfaatn Ai Limbah Kelapa Sawit PT Eastern Sumatera Indonesia, dated 23<sup>rd</sup> October 2015</p> <p>Result of BOD sampling analysis has shown that no more than 5,000 mg/Liter as regulated in "Peraturan Menteri Lingkungan Hidup No. 28, year 2003". Records for monitoring/test result of effluent especially BOD for year 2019 available as below:</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Satuan</th> <th>July</th> <th>Aug</th> <th>Sept</th> <th>Oct</th> <th>Nov</th> <th>Dec</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>mg/l</td> <td>7.43</td> <td>6.27</td> <td>6.88</td> <td>6.27</td> <td>7.8</td> <td>7.67</td> </tr> <tr> <td>BOD<sub>5</sub></td> <td>mg/l</td> <td>972</td> <td>826</td> <td>810</td> <td>863</td> <td>957</td> <td>852</td> </tr> <tr> <td>COD</td> <td>mg/l</td> <td>1980</td> <td>1720</td> <td>1628</td> <td>1787</td> <td>1822</td> <td>1659</td> </tr> <tr> <td>Minyak &amp; lemak</td> <td>mg/l</td> <td>&lt;5.0</td> <td>&lt;5.0</td> <td>&lt;5.0</td> <td>&lt;5.0</td> <td>&lt;5.0</td> <td>&lt;5.0</td> </tr> <tr> <td>Cu</td> <td>mg/l</td> <td>&lt;0.015</td> <td>&lt;0.015</td> <td>&lt;0.015</td> <td>&lt;0.015</td> <td>&lt;0.015</td> <td>&lt;0.015</td> </tr> <tr> <td>Pb</td> <td>mg/l</td> <td>&lt;0.0017</td> <td>&lt;0.0017</td> <td>&lt;0.0017</td> <td>&lt;0.0017</td> <td>&lt;0.0017</td> <td>&lt;0.0017</td> </tr> <tr> <td>Cd</td> <td>mg/l</td> <td>&lt;0.0022</td> <td>&lt;0.0022</td> <td>&lt;0.0022</td> <td>&lt;0.0022</td> <td>&lt;0.0022</td> <td>&lt;0.0022</td> </tr> <tr> <td>Zn</td> <td>mg/l</td> <td>0.062</td> <td>0.94</td> <td>0.8</td> <td>0.96</td> <td>0.12</td> <td>0.087</td> </tr> </tbody> </table>	Parameter	Satuan	July	Aug	Sept	Oct	Nov	Dec	pH	mg/l	7.43	6.27	6.88	6.27	7.8	7.67	BOD <sub>5</sub>	mg/l	972	826	810	863	957	852	COD	mg/l	1980	1720	1628	1787	1822	1659	Minyak & lemak	mg/l	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	Cu	mg/l	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	Pb	mg/l	<0.0017	<0.0017	<0.0017	<0.0017	<0.0017	<0.0017	Cd	mg/l	<0.0022	<0.0022	<0.0022	<0.0022	<0.0022	<0.0022	Zn	mg/l	0.062	0.94	0.8	0.96	0.12	0.087	Comply
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Minyak & lemak	mg/l	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0																																																																				
Cu	mg/l	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015																																																																				
Pb	mg/l	<0.0017	<0.0017	<0.0017	<0.0017	<0.0017	<0.0017																																																																				
Cd	mg/l	<0.0022	<0.0022	<0.0022	<0.0022	<0.0022	<0.0022																																																																				
Zn	mg/l	0.062	0.94	0.8	0.96	0.12	0.087																																																																				
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Permit for using the ground water for mill processing as per document of "Keputusan Gubernur Sumatera Utara Nomor 546.2/949/DIS PM/PPTSP/6/X.3.f/V/2018 tentang Izin Pengusahaan Air Tanah, registration number 12.27.240 (sumur 3 artesis), debit: 5 liters/second.</p> <p>Bukit Maradja POM recording the mill water use per tonne FFB. The record of water use available in "Pemakaian air dan HSD Oil per metrik FFB". The budget of water use for FFB process sets at 1 m<sup>3</sup>/ton FFB processed.</p> <p>Record of water consumption year 2019 and 2020</p>	Comply																																																																								



Month	FFB Processed (tons)	Water usage (m <sup>3</sup> )	Water usage (m <sup>3</sup> /ton FFB)
Jan	9,651.48	13,686	1.42
Feb	8,544.27	9,086	1.06
Mar	8,586.25	8,221	0.96
Apr	7,815.38	7,187	0.92
May	10,147.44	8,599	0.85
Jun	9,651.84	7,152	0.74
Jul	9,371.84	6,979	0.74
Aug	11,165.65	8,979	0.80
Sep	10,082.16	8,136	0.81
Oct	10,579.95	8,026	0.76
Nov	8,939.48	7,045	0.79
Dec	7,363.03	5,189	0.70
Total	111,901.24	98,287	0.88

Since 2020, the water consumption in January and February are 0.80 m<sup>3</sup>/tonnage of FFB

**Criteria 7.9:**  
Efficiency of fossil fuel use and the use of renewable energy is optimised

7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is in place, monitored and reported	<p>Optimizing renewable energy in Bukit Maradja POM from fibre and shell for fuel, recorded in "Rekaman Monitoring Penggunaan Energi Terbarukan". The use of fiber and shell from FFB in boiler generates heat; which drives electricity-generating turbines. The use of renewable energy is consistent in the percentage against non – renewable energy.</p> <p>In 2019, the records of both monitoring of kilowatt hours per tonnage of palm product (FFB and CPO) maintained.</p> <p>Calculation for total renewable energy per ton CPO</p> <table border="1"> <thead> <tr> <th>Month year 2019</th> <th>FFB Processed (tons)</th> <th>Fruit Fibers @13% of FFB process (MT)</th> <th>Total renewable Energy /Ton CPO (kcal)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>9,651.48</td><td>1,351.78</td><td>2,074</td></tr> <tr><td>Feb</td><td>8,544.27</td><td>1,196.19</td><td>2,080</td></tr> <tr><td>Mar</td><td>8,586.25</td><td>1,202.07</td><td>1,716</td></tr> </tbody> </table>	Month year 2019	FFB Processed (tons)	Fruit Fibers @13% of FFB process (MT)	Total renewable Energy /Ton CPO (kcal)	Jan	9,651.48	1,351.78	2,074	Feb	8,544.27	1,196.19	2,080	Mar	8,586.25	1,202.07	1,716	Comply
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Mar	8,586.25	1,202.07	1,716																

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Apr	7,815.38	1,094.15	1,755
May	10,147.44	1,420.64	1,734
Jun	9,651.84	1,531.28	1,698
Jul	9,371.84	1,312.16	1,679
Aug	11,165.65	1,563.28	1,695
Sep	10,082.16	1,411.26	1,671
Oct	10,579.95	1,481.13	1,754
Nov	8,939.48	1,251.53	1,764
Dec	7,363.03	1,030.83	1,789
Sum up total	111,901.24	15,666.17	1,779

Bukit Mardja POM has also demonstrated the record on improving efficiency of the use of fossil fuels and to optimize renewable energy, e.g:

Month (2019)	HSD fuel use (liter)	FFB production (ton)	HSD oil (liter) / FFB (ton)
Jan	5,520	9,651.48	0.57
Feb	5,160	8,544.27	0.60
Mar	4,618	8,586.25	0.54
Apr	3,240	7,815.38	0.41
May	4,790	10,147.44	0.47
Jun	3,710	9,651.84	0.38
Jul	4,660	9,371.84	0.50
Aug	3,880	11,165.65	0.35
Sep	3,630	10,082.16	0.26
Oct	2,300	10,579.95	0.22
Nov	4,420	8,939.48	0.49
Dec	2,880	7,363.03	0.39
Total	47,800	111,901.24	0.43

**Criteria 7.10:**

Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

<p>7.10.1</p>	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.</p>	<p>PT Eastern Sumatera Indonesia – Bukit Maradja POM has prepared procedure Calculation and Mitigation of Green House Gas Emission No.ENC 01-12/04-03-2019/Rev.1 dated 18 March 2019, whereby provide guidance to register source of emissions as a result of company operation, mointor and reduce the use of materials emitting GHG emission, calculate GHG emission from company operational activities. Source of emission inventory from estate operation: use of inorganic fertilizer Urea (N), Dolomite (CaO), MOP (K<sub>2</sub>O), Rock Phospate (P<sub>2</sub>O<sub>5</sub>), use of pesticide, use HSD fuel, planted area, mature oil palm, FFB production, distance estate to POM, distance POM to bulking tank, OER %, KER %, presence of methane capture facility, etc.</p> <p>Identification of pollution source has been documented under “Environmental Aspect &amp; Impact List”. Assessments have been carried out on all recognized polluting activities and include gas and smoke emissions, particulate and soot emissions, effluent control, treatment and discharge. Any significant pollutants and emissions have been identified. There is a plan in place to reduce pollution – this is included in the aspects/impacts register.</p> <p>Assessment of polluting activities including gaseous emission, particulate emission and effluent has also been done identified in the document “Pengelolaan lingkungan hidup (RKL) dan Pemantauan lingkungan hidup (RPL)”.</p> <p>The company has GHG calculation based on PalmGHG calculator V4 database period January – December 2019 and provided in attachment BM POM GHG_Palm Calculator Appendix C.</p> <p>GHG reduction plan identified under “Rencana Pengurangan Emisi Gas Rumah Kaca (GHG Emission)”:</p> <table border="1" data-bbox="913 1029 1971 1358"> <thead> <tr> <th>Stages/Activity type</th> <th>Mitigation Plan</th> <th>Implementation</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Fertilizer application</td> <td>Effective fertilizer application as per recommendation</td> <td rowspan="4"> <ul style="list-style-type: none"> <li>Leaf sampling analysis for accurate fertilizer recommendation</li> <li>Implement SOP fertilizer application</li> </ul> </td> </tr> <tr> <td>No fertilizer application in rainy season</td> </tr> <tr> <td>No fertilizer application on river buffer zone/riparian area</td> </tr> <tr> <td>Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer application</td> </tr> </tbody> </table>	Stages/Activity type	Mitigation Plan	Implementation	Fertilizer application	Effective fertilizer application as per recommendation	<ul style="list-style-type: none"> <li>Leaf sampling analysis for accurate fertilizer recommendation</li> <li>Implement SOP fertilizer application</li> </ul>	No fertilizer application in rainy season	No fertilizer application on river buffer zone/riparian area	Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer application	<p>Comply</p>
Stages/Activity type	Mitigation Plan	Implementation										
Fertilizer application	Effective fertilizer application as per recommendation	<ul style="list-style-type: none"> <li>Leaf sampling analysis for accurate fertilizer recommendation</li> <li>Implement SOP fertilizer application</li> </ul>										
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	No fertilizer application on river buffer zone/riparian area											
	Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer application											

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		Use of fossil fuel for transportation (FFB, fertilizer, manpower)	Maintenance the vehicle on regular basis	<ul style="list-style-type: none"> <li>• Vehicle maintenance record</li> <li>• Planting record</li> <li>• Evaluation on vehicle use (incl. fuel efficiency)</li> </ul>	
			Planting trees		
			Transportation arrangement (effective and efficient)		
			Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel		
		Fertilizer and pesticide application		Planting beneficial plant	<ul style="list-style-type: none"> <li>• Leaf sampling analysis for accurate fertilizer recommendation</li> <li>• Implement SOP fertilizer application</li> <li>• Utilize recommended pesticide</li> </ul>
				Spraying knapsack calibration	
				Spraying based on weed percentage >60%	
				Effective fertilizer application as per recommendation	
		Use of fossil fuel for electric generation		Maintenance the machinery (genset) on regular basis	<ul style="list-style-type: none"> <li>• Vehicle maintenance record</li> <li>• Planting record</li> <li>• Evaluation on Genset's fuel efficiency</li> </ul>
				Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel; and electricity efficiency	
				Emission monitoring on regular basis	
		Use of fossil fuel for transportation (FFB, CPO, PK, EFB)		Maintenance the vehicle on regular basis	<ul style="list-style-type: none"> <li>• Vehicle maintenance record</li> <li>• Evaluation on electricity efficiency</li> </ul>
Socialization to all level of worker on GHG mitigation plan related to electricity efficiency					
Operation of POM's machinery including boiler		Maintenance the POM's machinery on regular basis	<ul style="list-style-type: none"> <li>• Machinery maintenance record</li> <li>• Evaluation on boiler's efficiency</li> <li>• Emission monitoring report</li> </ul>		
		Socialization to all level of worker on GHG mitigation plan related to emission			
		Emission monitoring on regular basis			

7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimize them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p>	<p>There is no new development of after 2014 in Bukit Maradja Estate and Kerasaan Estate</p> <p>Bukit Maradja Estate:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Hectare</th> <th>Remarks</th> </tr> </thead> <tbody> <tr><td>2019</td><td>96.78 Ha</td><td>OP 2000</td></tr> <tr><td>2020</td><td>184.41 Ha</td><td>OP 1999</td></tr> <tr><td>2021</td><td>185.09 Ha</td><td>OP 2001</td></tr> <tr><td>2022</td><td>143.06 Ha</td><td>OP 1993, 1994, 1996</td></tr> <tr><td>2023</td><td>192.33 Ha</td><td>OP 1996, 1997</td></tr> <tr><td>2024</td><td>203.59 Ha</td><td>OP 1996, 1997</td></tr> <tr><td>2025</td><td>148.95 Ha</td><td>OP 1996, 2002</td></tr> <tr><td>2026</td><td>173.68 Ha</td><td>OP 2002</td></tr> <tr><td>2028</td><td>158.40 Ha</td><td>OP 2003</td></tr> <tr><td>2029</td><td>105.34 Ha</td><td>OP 2003</td></tr> </tbody> </table> <p>Kerasaan Estate</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Hectare</th> <th>Remarks</th> </tr> </thead> <tbody> <tr><td>2020</td><td>101.68 Ha</td><td>OP 2003</td></tr> <tr><td>2021</td><td>142.37 Ha</td><td>OP 1998 and 2005</td></tr> <tr><td>2022</td><td>107.48 Ha</td><td>OP 1996</td></tr> <tr><td>2023</td><td>74.96 Ha</td><td>OP 1996</td></tr> <tr><td>2024</td><td>102.85 Ha</td><td>OP 1996</td></tr> <tr><td>2025</td><td>39.10 Ha</td><td>OP 1996</td></tr> <tr><td>2026</td><td>79.71 Ha</td><td>OP 1997</td></tr> <tr><td>2027</td><td>123.63 Ha</td><td>OP 1997</td></tr> <tr><td>2028</td><td>67.95 Ha</td><td>OP 1997</td></tr> <tr><td>2029</td><td>111.62 Ha</td><td>OP 2006</td></tr> </tbody> </table> <p>Timbang Deli Estate:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Hectare</th> <th>Remarks</th> </tr> </thead> <tbody> <tr><td>2019</td><td>24.42 Ha</td><td></td></tr> <tr><td>2021</td><td>117.89 Ha</td><td>Will be fell in 2020, fallow</td></tr> <tr><td>2022</td><td>61.78 Ha</td><td></td></tr> <tr><td>2023</td><td>11.14 Ha</td><td>Will be fell in 2022, fallow</td></tr> </tbody> </table>	Year	Hectare	Remarks	2019	96.78 Ha	OP 2000	2020	184.41 Ha	OP 1999	2021	185.09 Ha	OP 2001	2022	143.06 Ha	OP 1993, 1994, 1996	2023	192.33 Ha	OP 1996, 1997	2024	203.59 Ha	OP 1996, 1997	2025	148.95 Ha	OP 1996, 2002	2026	173.68 Ha	OP 2002	2028	158.40 Ha	OP 2003	2029	105.34 Ha	OP 2003	Year	Hectare	Remarks	2020	101.68 Ha	OP 2003	2021	142.37 Ha	OP 1998 and 2005	2022	107.48 Ha	OP 1996	2023	74.96 Ha	OP 1996	2024	102.85 Ha	OP 1996	2025	39.10 Ha	OP 1996	2026	79.71 Ha	OP 1997	2027	123.63 Ha	OP 1997	2028	67.95 Ha	OP 1997	2029	111.62 Ha	OP 2006	Year	Hectare	Remarks	2019	24.42 Ha		2021	117.89 Ha	Will be fell in 2020, fallow	2022	61.78 Ha		2023	11.14 Ha	Will be fell in 2022, fallow	Comply
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7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p>	<p>Based on Significant pollution and GHG emission was identified, for Mill comes from waste pond, reducing program has been implemented by using methane trap and for estates comes from using of pesticides, action plan to reducing pesticide was made such as program of integrated pest control where minimize to use chemical/pesticides. Graph of emission and pollutant were provided to monitor trend of them in monthly basis.</p> <ul style="list-style-type: none"> <li>• Using EFB as organic fertilizer.</li> <li>• Planting beneficial plant</li> <li>• Efficiency of fossil fuel.</li> <li>• Increasing renewable energy usage.</li> </ul> <p>Identification of significant pollution and GHG emission in each unit/station as documented in "Environmental Aspect &amp; Impact List", consist of: input, environmental aspect, caused, environmental impact potential, and control.</p> <p>Management have prepared identification and management plan for estate/plantation:</p> <ol style="list-style-type: none"> <li>1. Reduce use of herbicide and pesticide</li> </ol>	Comply													

		<ul style="list-style-type: none"> <li>• No application of herbicide in riparian area</li> <li>• Planting LCC such as <i>Mucuna bracteata</i> and planting beneficial plant such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptosus</i></li> <li>• Spraying tool calibration</li> <li>• Conduct spraying on area with weed growth over 45%.</li> <li>• No use of <i>paraquat</i></li> </ul> <p>2. Reduce fossil fuel use</p> <ul style="list-style-type: none"> <li>• Conduct vehicle and generator set inspection</li> <li>• Transportation arrangement</li> <li>• Road maintenance</li> </ul> <p>3. Efficiency in use of fertilizer</p> <ul style="list-style-type: none"> <li>• Conduct fertilizer application as per recommendation</li> <li>• Prohibit fertilizer application on river buffer zone/water body</li> </ul> <p>4. Planting trees</p> <ul style="list-style-type: none"> <li>• Planting trees around housing</li> <li>• Planting trees around HCV area and river buffer zone</li> </ul> <p>5. Recycle and reuse empty chemical container</p> <ul style="list-style-type: none"> <li>• Hazardous waste collected and disposed off responsibly</li> </ul> <p>Handing over hazardous waste to licensed contractor</p>	
<p><b>Criteria 7.11:</b>          Fire is not used for preparing land and is prevented in the managed area.</p>			
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	<p>Based on field visit and document review there is no new planting or replanting preparation carried out by burning.</p> <p>Timbang Deli Indonesia have Policy for Zero Burning No Document: SOP/TDI/18, rev.01 dated 1 February 2019</p>	Comply
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.	<p>Based on field visit and document review there is no new planting or replanting preparation carried out by burning.</p>	Comply
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	<p>PT Eastern Sumatera Indonesia has established fire prevention committee as documented in "Tim Satuan Tugas Pengendalian Kebakaran Lahan Perkebunan" dated 19 Nov 2019. The committee consist of: Chairman; Secretary; PIC for prevention; PIC for control; PIC for Logistic; Main Team</p>	Comply

		consist of 2 team; Support Team consist of 2 team; Helper Team consist of 2; team each team consist of 5 personnel.	
<p><b>Criteria 7.12:</b>          Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p><b>PROCEDURAL NOTE for 7.12:</b>          The 2018 RSPO P&amp;C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Toolkit in the revised standard.          The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems.          High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards.           Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs).          The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available.</p>			
7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p>	<p>In the beginning, PT. Eastern Sumatra Indonesia (PT ESI) was established in 1921 under the name SA SIPEF NV with an area of ± 5,000 ha. Before 1921 the plantation area was planted with coffee plants which were replaced in rubber in 1921. In 1972 rubber plants were replaced with oil palm. Then in 1986 some rubber plants were uprooted and replaced with cocoa. From 1999, this plantation, which had consisted of 3 commodity crops, remained 1 type of plant, namely oil palm.</p> <p>PT. Eastern Sumatra Indonesia have prepared a Document Identification of High Conservation Value (HCV) in September 2009 and cooperation with Yayasan Sawit Berkelanjutan Indonesia (YASBI) with the following results:          Identified three types of HCV (HCV 1, HCV 4 and HCV 6) with a total area of 97.71 Ha, consist of buffer to spring water, riparian area to Bah Bolon River, riparian area to Seragu River, riparian area to Sukarakyat Village's River and public cemeteries.</p>	Comply



		<p>Company has prepared a HCV Management and Monitoring Plan for HCV PT. Eastern Sumatra Indonesia; which outlines the activities of management and monitoring areas HCV afterwards detailed in the Program and Actual Area Management HCV. Example: Monitoring of HCV including species presence; Conservation cadet Training; Upkeep HCV signboards; planting in HCV Area and upkeep.</p> <p>PT. Kerasaan Indonesia have compiled a Document Identification of High Conservation Value (HCV) in September 2009 and cooperate with the Yayasan Sawit Berkelanjutan Indonesia (YASBI) with the following results: Identified three types of HCV (HCV 1, HCV 4 and HCV 6) with a total area of 26.42 Ha, consist of: Riparian area for Simpang Kiri River, riparian area for water spring and public cemeteries. Company has compiled a HCV Management and Monitoring Plan which outlines the activities of management and monitoring HCV areas. The program: plant and wildlife monitoring; Control <i>Mucuna bracteata</i> plants in the corridor; planting native species in the forest area and training the HCV area management for cadet. At the time of preparation of the two HCV documents above, no ALS scheme, nevertheless the Team Leader was compiled a document is an "assessor of RSPO HCV Approved".</p> <p>PT Timbang Deli Indonesia have completed High Conservation Value Assessment, as reported under "Laporan Identifikasi Nilai Konservasi Tinggi PT Timbang Deli Indonesia, Kabupaten Deli Serdang, Provinsi Sumatera Utara". HCV Assessment conducted by Koompasia Enviro Institute in 2017. Period of assessment are 31 August 2017 to 8 September 2017. Team of assessor led by Henry Marpaung as Team Leader (Provisional ALS160007HM).</p> <p>Based on the report, assessment results are:</p> <ol style="list-style-type: none"> <li>1. Division I:             <ol style="list-style-type: none"> <li>a. HCV 4:                 <ul style="list-style-type: none"> <li>• Sempadan Alur Buangan Air Galang Kota (0.332 Ha);</li> <li>• Sempadan Alur Jembatan KA (0.517 Ha);</li> <li>• Sempadan Alur Jembatan Sei Galang 2 (1.230 Ha);</li> <li>• Sempadan Alur Kantor Penelitian (0.272 Ha);</li> <li>• Sempadan Alur Pembibitan (1.357 Ha).</li> </ul> </li> <li>b. HCV 6:                 <ul style="list-style-type: none"> <li>• Kuburan Belanda (0.002 Ha);</li> <li>• Kuburan Sampun (0.002 Ha).</li> </ul> </li> </ol> </li> <li>2. Division II:             <ol style="list-style-type: none"> <li>a. HCV 1 &amp; 4:</li> </ol> </li> </ol>	
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		<ul style="list-style-type: none"> <li>• Resapan Air (1.972 Ha);</li> </ul> <p>b. HCV 4:</p> <ul style="list-style-type: none"> <li>• Sempadan Alur Buangan Air Galang Kota (0.577 Ha);</li> <li>• Sempadan Alur Jembatan Sei Galang 2 (2.590 Ha);</li> <li>• Sempadan Alur Kantor Penelitian (1.263 Ha);</li> <li>• Sempadan Alur Rendahan (0.123 Ha);</li> <li>• Sempadan Sei Ular (0.850 Ha).</li> </ul> <p>c. HCV 6:</p> <ul style="list-style-type: none"> <li>• Kuburan Cina (0.003 Ha);</li> <li>• TPU Muslim (0.865 Ha).</li> </ul> <p>Total HCV area of PT Timbang Deli Indoensia is 11.955 Ha.</p> <p>Therefore, unit of certification have no land clearing since November 2005 or damaged primary forest or any area required to protect or enhance HCVs.</p>	
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p>	<p>Bukit Maradja POM and its supply bases is long-established plantation. HCV assessment conducted in 2009 and still using RSPO HCV Approved assessor. Whereby, in Timbang Deli Estate HCV Assessment conducted in 2017 with HCV provisional ALS ((Provisional ALS160007HM). There is no land clearing after 15 November 2018 by unit of certification.</p>	Comply
	<p>7.12.2 b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>Bukit Maradja POM and its supply bases is long-established plantation. HCV assessment conducted in 2009 and still using RSPO HCV Approved assessor. Whereby, in Timbang Deli Estate HCV Assessment conducted in 2017 with HCV provisional ALS ((Provisional ALS160007HM). There is no land clearing after 15 November 2018 by unit of certification.</p>	
<p><b>PROCEDURAL NOTE for 7.12.2:</b> For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p>			

<p>7.12.3</p>	<p><b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>PT. Timbang Deli Indonesia have conducted HCV assessment in cooperation with “Fakultas Kehutanan Institut Pertanian Bogor” in 2014. The assessment team comprise of: Dr. Ir Nyoto Santoso, MS (Team Leader, wildlife expert; RSPO approved HCV Assessor), Eko Adhiyanto, S.Hut, (vegetation expert; RSPO approved HCV Assessor), Handian Purwawangsa, S.Hut, M.Si, (social aspect expert; RSPO approved HCV Assessor), Udi Kusnidar, S.Hut, (social expert; RSPO approved HCV Assessor), Ir. Heri Wiyono, (social expert), Irham Fauzi, S.Hut, (GIS expert).</p> <p>The HCV assessment refers to “Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by “Konsorsium Revisi HCV Toolkit Indonesia”, July 2008. The field exercise for primary data collection dated 7 - 11 March 2014. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 11 March 2014 – whereby attended by 19 individuals and representatives of stakeholders such as “Badan Pertanahan Kabupaten Deli Serdang” and “Badan Lingkungan Hidup Kabupaten Deli Serdang”. As part of reporting process, the assessment have been peer-reviewed by Dr. Rahmad Hermawan in May 2014.</p> <p>Based on the HCV identification and analysis, no indication/presence of primary forest or peat soil in the scope area. The majority of HGU PT. Timband Deli Indonesia was rubber plantation, while the rest consist of infrastructure such as road, worker housing, offices, laboratory and <i>arboretum</i>.</p> <p>Based on the HCV assessment report, it was known that some flora and fauna identified in the concession area. Flora: found 170 types of flora from 63 families, consist of:</p> <ul style="list-style-type: none"> <li>• <i>Pteridophyta</i>: found 10 families with 12 spesies. No protected species; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Spermatophyta</i>:             <ul style="list-style-type: none"> <li>- <i>Gymnospermae</i>: found 2 families with 2 spesies and no protected species as in “Peraturan Pemerintah No.7 tahun 1999”; and 1 spesies under category VU under IUCN Redlist which was Pine (<i>Pinus merkusii</i>).</li> </ul> </li> <li>• <i>Angiospermae</i>:             <ul style="list-style-type: none"> <li>- <i>Monocotyledonae</i>: found 17 families with 53 spesies where no protected spesies noted, as listed under “Peraturan Pemerintah No.7 tahun 1999”; No spesies under category of CR, EN, VU based on IUCN Redlist.</li> <li>- <i>Dicotyledonae</i>: found 34 families with 103 spesies where no protected spesies noted, as listed under “Peraturan Pemerintah No.7 tahun 1999”; found 1 spesies under VU category which was “Mahoni” (<i>Swietenia macrophylla</i>).</li> </ul> </li> </ul> <p>Fauna: found 50 spesies from 34 families, consist of:</p>	<p>N/A</p>
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		<ul style="list-style-type: none"> <li>• <i>Mammals</i>: found 2 species under 2 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Aves</i>: found 41 species of birds from 26 <i>families</i> whereby 6 species protected under "Peraturan Pemerintah No.7 tahun 1999" (<i>Elanus caeruleus</i>, <i>Haliastur indus</i>, <i>Halcyon chloris</i>, <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Necatirina malacensis</i>). No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Reptilia</i> and <i>Amphibia</i>: found 4 species under 4 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> </ul> <p>For the purpose of new planting - a plan to develop oil palm plantation, conversion from rubber plantation; PT. Timbang Deli Indonesia conducted HCV assessment in cooperation with "Koompasia Enviro Institute" in 2017. The assessment team comprise of: Henry Marpaung (Team Leader; Social-cultural expert; ALS licensed assessor Provisional ALS160007HM); Wibowo A. Djatmiko (Team member; Ecology/biodiversity); Riswan, (Team member; Environmental Service expert); Harry Kurniawan, (Team member; GIS and landscape); Ridho Anggara (Team member, GIS assisstant).</p> <p>The HCV assessment refers to "Panduan Identiikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008 – and "Common Guidance for the Identification of HCV", 2013.</p> <p>The field exercise for primary data collection dated 6-8 September 2017. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 8 September 2017 – whereby attended by 20 individuals and representatives of stakeholders. As part of reporting process, the assessment have been peer-reviewed by Dr. Kunkun J. Gurmaya in 20 October 2017 as reported in "Peer Review Report Penilaian HCV di Kebun PT. Timbang Deli Indonesia, Kabupaten Deli Serdang, Provinsi Sumatera Utara".</p> <p>From the 2017 HCV assessment found the area is not a primary forest. Most of the area surrounding the license area is covered by rubber and oil palm owned by villagers and others plantation companies. HCV identification showed that HCV 1 is covers 1.972 Ha, HCV 4 is found on 11.083 Ha; HCV 6 is found 0.872 Ha. Total HCV area indentified in PT. Timbang Deli Indonesia was 11.955 Ha or 1,23% of the total permanent land use title (972,19 Ha). In addition, as per high carbon stock assessment, there was an additional 2.82 Ha from riparian zone and lowland area to be set aside as HCV (part of it; 1.57 Ha was overlapping with HCV4). The total HCV area was 13.53 Ha.</p> <p>Not Applicable.</p>	
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**PROCEDURAL NOTE for 7.12.3:**

There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&C requirements apply, including FPIC and HCV requirements.

<p>7.12.4</p>	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>PT. Timbang Deli Indonesia have conducted HCV assessment in cooperation with "Fakultas Kehutanan Institut Pertanian Bogor" in 2014. The assessment team comprise of: Dr. Ir Nyoto Santoso, MS (Team Leader, wildlife expert; RSPO approved HCV Assessor), Eko Adhiyanto, S.Hut, (vegetation expert; RSPO approved HCV Assessor), Handian Purwawangsa, S.Hut, M.Si, (social aspect expert; RSPO approved HCV Assessor), Udi Kusnidar, S.Hut, (social expert; RSPO approved HCV Assessor), Ir. Heri Wiyono, (social expert), Irham Fauzi, S.Hut, (GIS expert).</p> <p>The HCV assessment refers to "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008. The field exercise for primary data collection dated 7 - 11 March 2014. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 11 March 2014 – whereby attended by 19 individuals and representatives of stakeholders such as "Badan Pertanahan Kabupaten Deli Serdang" and "Badan Lingkungan Hidup Kabupaten Deli Serdang". As part of reporting process, the assessment have been peer-reviewed by Dr. Rahmad Hermawan in May 2014.</p> <p>Based on the HCV identification and analysis, no indication/presence of primary forest or peat soil in the scope area. The majority of HGU PT. Timband Deli Indonesia was rubber plantation, while the rest consist of infrastructure such as road, worker housing, offices, laboratory and <i>arboretum</i>.</p> <p>Based on the HCV assessment report, it was known that some flora and fauna identified in the concession area. Flora: found 170 types of flora from 63 families, consist of:</p> <ul style="list-style-type: none"> <li>• <i>Pteridophyta</i>: found 10 families with 12 spesies. No protected species; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Spermatophyta</i>:             <ul style="list-style-type: none"> <li>- <i>Gymnospermae</i>: found 2 families with 2 spesies and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; and 1 species under category VU under IUCN Redlist which was Pine (<i>Pinus merkusii</i>).</li> </ul> </li> <li>• <i>Angiospermae</i>:             <ul style="list-style-type: none"> <li>- <i>Monocotyledonae</i>: found 17 families with 53 spesies where no protected species noted, as listed under "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> </ul> </li> </ul>	<p>Comply</p>
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		<p>- <i>Dicotyledonae</i>: found 34 families with 103 spesies where no protected species noted, as listed under "Peraturan Pemerintah No.7 tahun 1999"; found 1 species under VU category which was "Mahoni" (<i>Swietenia macrophylla</i>).</p> <p>Fauna: found 50 species from 34 families, consist of:</p> <ul style="list-style-type: none"> <li>• <i>Mammals</i>: found 2 species under 2 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Aves</i>: found 41 species of birds from 26 families whereby 6 species protected under "Peraturan Pemerintah No.7 tahun 1999" (<i>Elanus caeruleus</i>, <i>Haliastur indus</i>, <i>Halcyon chloris</i>, <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Necatirina malacensis</i>). No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Reptilia</i> and <i>Amphibia</i>: found 4 species under 4 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> </ul> <p>For the purpose of new planting - a plan to develop oil palm plantation, conversion from rubber plantation; PT. Timbang Deli Indonesia conducted HCV assessment in cooperation with "Koompasia Enviro Institute" in 2017. The assessment team comprise of: Henry Marpaung (Team Leader; Social-cultural expert; ALS licensed assessor Provisional ALS160007HM); Wibowo A. Djatmiko (Team member; Ecology/biodiversity); Riswan, (Team member; Environmental Service expert); Harry Kurniawan, (Team member; GIS and landscape); Ridho Anggara (Team member, GIS assisstant).</p> <p>The HCV assessment refers to "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008 – and "Common Guidance for the Identification of HCV", 2013.</p> <p>The field exercise for primary data collection dated 6-8 September 2017. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 8 September 2017 – whereby attended by 20 individuals and representatives of stakeholders. As part of reporting process, the assessment have been peer-reviewed by Dr. Kunkun J. Gurmaya in 20 October 2017 as reported in "Peer Review Report Penilaian HCV di Kebun PT. Timbang Deli Indonesia, Kabupaten Deli Serdang, Provinsi Sumatera Utara".</p> <p>From the 2017 HCV assessment found the area is not a primary forest. Most of the area surrounding the license area is covered by rubber and oil palm owned by villagers and others plantation companies. HCV identification showed that HCV 1 is covers 1.972 Ha, HCV 4 is found on 11.083 Ha; HCV 6 is found 0.872 Ha. Total HCV area indentified in PT. Timbang Deli Indonesia was 11.955 Ha or 1,23% of the total permanent land use title (972,19 Ha). In addition, as per high carbon stock assessment,</p>	
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		there was an additional 2.82 Ha from riparian zone and lowland area to be set aside as HCV (part of it; 1.57 Ha was overlapping with HCV4). The total HCV area was 13.53 Ha.	
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	Timbang Deli Estate: HCV Area Monitoring Checklist dated 21 December 2019. All identified HCV in well condition and managed. HCV 6: (Sampun Cemetery, Dutch Cemetery and Chinese Cemetery); HCV 4 (Buffer zone of Sei Ular River), based on field check in these HCV area, there is no reduction of the rights. Because in Chinese Cemetery Block 16F02 is still visited by Chinese people in some time.	Comply
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	PT. Timbang Deli Indonesia have conducted HCV assessment in cooperation with "Fakultas Kehutanan Institut Pertanian Bogor" in 2014. The assessment team comprise of: Dr. Ir Nyoto Santoso, MS (Team Leader, wildlife expert; RSPO approved HCV Assessor), Eko Adhiyanto, S.Hut, (vegetation expert; RSPO approved HCV Assessor), Handian Purwawangsa, S.Hut, M.Si, (social aspect expert; RSPO approved HCV Assessor), Udi Kusnidar, S.Hut, (social expert; RSPO approved HCV Assessor), Ir. Heri Wiyono, (social expert), Irham Fauzi, S.Hut, (GIS expert).  The HCV assessment refers to "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008. The field exercise for primary data collection dated 7 - 11 March 2014. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 11 March 2014 – whereby attended by 19 individuals and representatives of stakeholders such as "Badan Pertanahan Kabupaten Deli Serdang" and "Badan Lingkungan Hidup Kabupaten Deli Serdang". As part of reporting process, the assessment have been peer-reviewed by Dr. Rahmad Hermawan in May 2014.  Based on the HCV identification and analysis, no indication/presence of primary forest or peat soil in the scope area. The majority of HGU PT. Timband Deli Indonesia was rubber plantation, while the rest consist of infrastructure such as road, worker housing, offices, laboratory and <i>arboretum</i> .  Based on the HCV assessment report, it was known that some flora and fauna identified in the concession area. Flora: found 170 types of flora from 63 families, consist of:  <ul style="list-style-type: none"> <li>• <i>Pteridophyta</i>: found 10 families with 12 spesies. No protected species; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Spermatophyta</i>:</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>- <i>Gymnospermae</i>: found 2 families with 2 spesies and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; and 1 species under category VU under IUCN Redlist which was Pine (<i>Pinus merkusii</i>).</li> <li>• <i>Angiospermae</i>:             <ul style="list-style-type: none"> <li>- <i>Monocotyledonae</i>: found 17 families with 53 spesies where no protected species noted, as listed under "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>- <i>Dicotyledonae</i>: found 34 families with 103 spesies where no protected species noted, as listed under "Peraturan Pemerintah No.7 tahun 1999"; found 1 species under VU category which was "Mahoni" (<i>Swietenia macrophylla</i>).</li> </ul> </li> </ul> <p>Fauna: found 50 species from 34 families, consist of:</p> <ul style="list-style-type: none"> <li>• <i>Mammals</i>: found 2 species under 2 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Aves</i>: found 41 species of birds from 26 <i>families</i> whereby 6 species protected under "Peraturan Pemerintah No.7 tahun 1999" (<i>Elanus caeruleus</i>, <i>Haliastur indus</i>, <i>Halcyon chloris</i>, <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Necatirina malacensis</i>). No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Reptilia</i> and <i>Amphibia</i>: found 4 species under 4 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> </ul> <p>For the purpose of new planting - a plan to develop oil palm plantation, conversion from rubber plantation; PT. Timbang Deli Indonesia conducted HCV assessment in cooperation with "Koompasia Enviro Institute" in 2017. The assessment team comprise of: Henry Marpaung (Team Leader; Social-cultural expert; ALS licensed assessor Provisional ALS160007HM); Wibowo A. Djatmiko (Team member; Ecology/biodiversity); Riswan, (Team member; Environmental Service expert); Harry Kurniawan, (Team member; GIS and landscape); Ridho Anggara (Team member, GIS assisstant).</p> <p>The HCV assessment refers to "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008 – and "Common Guidance for the Identification of HCV", 2013.</p> <p>The field exercise for primary data collection dated 6-8 September 2017. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 8 September 2017 – whereby attended by 20 individuals and representatives of stakeholders. As part of reporting process, the assessment have been peer-reviewed by Dr. Kunkun</p>	
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**RSPO Public Summary Report**  
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		<p>J. Gurmaya in 20 October 2017 as reported in "Peer Review Report Penilaian HCV di Kebun PT. Timbang Deli Indonesia, Kabupaten Deli Serdang, Provinsi Sumatera Utara".</p> <p>From the 2017 HCV assessment found the area is not a primary forest. Most of the area surrounding the license area is covered by rubber and oil palm owned by villagers and others plantation companies. HCV identification showed that HCV 1 is covers 1.972 Ha, HCV 4 is found on 11.083 Ha; HCV 6 is found 0.872 Ha. Total HCV area indentified in PT. Timbang Deli Indonesia was 11.955 Ha or 1,23% of the total permanent land use title (972,19 Ha). In addition, as per high carbon stock assessment, there was an additional 2.82 Ha from riparian zone and lowland area to be set aside as HCV (part of it; 1.57 Ha was overlapping with HCV4). The total HCV area was 13.53 Ha.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>Bukit Maradja POM and its supply bases is long-established plantation. HCV assessment conducted in 2009 and still using RSPO HCV Approved assessor. Whereby, in Timbang Deli Estate HCV Assessment conducted in 2017 with HCV provisional ALS ((Provisional ALS160007HM).</p> <p>There is no land clearing after 15 November 2018 by unit of certification.</p> <p>PT. Timbang Deli Indonesia have conducted HCV assessment in cooperation with "Fakultas Kehutanan Institut Pertanian Bogor" in 2014. The assessment team comprise of: Dr. Ir Nyoto Santoso, MS (Team Leader, wildlife expert; RSPO approved HCV Assessor), Eko Adhiyanto, S.Hut, (vegetation expert; RSPO approved HCV Assessor), Handian Purwawangsa, S.Hut, M.Si, (social aspect expert; RSPO approved HCV Assessor), Udi Kusnidar, S.Hut, (social expert; RSPO approved HCV Assessor), Ir. Heri Wiyono, (social expert), Irham Fauzi, S.Hut, (GIS expert).</p> <p>The HCV assessment refers to "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008. The field exercise for primary data collection dated 7 - 11 March 2014. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 11 March 2014 – whereby attended by 19 individuals and representatives of stakeholders such as "Badan Pertanahan Kabupaten Deli Serdang" and "Badan Lingkungan Hidup Kabupaten Deli Serdang". As part of reporting process, the assessment have been peer-reviewed by Dr. Rahmad Hermawan in May 2014.</p> <p>Based on the HCV identification and analysis, no indication/presence of primary forest or peat soil in the scope area. The majority of HGU PT. Timband Deli Indonesia was rubber plantation, while the rest consist of infrastructure such as road, worker housing, offices, laboratory and <i>arboretum</i>.</p> <p>Based on the HCV assessment report, it was known that some flora and fauna identified in the concession area. Flora: found 170 types of flora from 63 families, consist of:</p>	Comply

		<ul style="list-style-type: none"> <li>• <i>Pteridophyta</i>: found 10 families with 12 spesies. No protected species; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Spermatophyta</i>:             <ul style="list-style-type: none"> <li>- <i>Gymnospermae</i>: found 2 families with 2 spesies and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; and 1 species under category VU under IUCN Redlist which was Pine (<i>Pinus merkusii</i>).</li> </ul> </li> <li>• <i>Angiospermae</i>:             <ul style="list-style-type: none"> <li>- <i>Monocotyledonae</i>: found 17 families with 53 spesies where no protected species noted, as listed under "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>- <i>Dicotyledonae</i>: found 34 families with 103 spesies where no protected species noted, as listed under "Peraturan Pemerintah No.7 tahun 1999"; found 1 species under VU category which was "Mahoni" (<i>Swietenia macrophylla</i>).</li> </ul> </li> </ul> <p>Fauna: found 50 species from 34 families, consist of:</p> <ul style="list-style-type: none"> <li>• <i>Mammals</i>: found 2 species under 2 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Aves</i>: found 41 species of birds from 26 families whereby 6 species protected under "Peraturan Pemerintah No.7 tahun 1999" (<i>Elanus caeruleus</i>, <i>Haliastur indus</i>, <i>Halcyon chloris</i>, <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Necatirina malacensis</i>). No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Reptilia</i> and <i>Amphibia</i>: found 4 species under 4 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> </ul> <p>For the purpose of new planting - a plan to develop oil palm plantation, conversion from rubber plantation; PT. Timbang Deli Indonesia conducted HCV assessment in cooperation with "Koompasia Enviro Institute" in 2017. The assessment team comprise of: Henry Marpaung (Team Leader; Social-cultural expert; ALS licensed assessor Provisional ALS160007HM); Wibowo A. Djatmiko (Team member; Ecology/biodiversity); Riswan, (Team member; Environmental Service expert); Harry Kurniawan, (Team member; GIS and landscape); Ridho Anggara (Team member, GIS assistant).</p> <p>The HCV assessment refers to "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008 – and "Common Guidance for the Identification of HCV", 2013.</p>	
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		<p>The field exercise for primary data collection dated 6-8 September 2017. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 8 September 2017 – whereby attended by 20 individuals and representatives of stakeholders. As part of reporting process, the assessment have been peer-reviewed by Dr. Kunkun J. Gurmaya in 20 October 2017 as reported in “Peer Review Report Penilaian HCV di Kebun PT. Timbang Deli Indonesia, Kabupaten Deli Serdang, Provinsi Sumatera Utara”.</p> <p>From the 2017 HCV assessment found the area is not a primary forest. Most of the area surrounding the license area is covered by rubber and oil palm owned by villagers and others plantation companies. HCV identification showed that HCV 1 is covers 1.972 Ha, HCV 4 is found on 11.083 Ha; HCV 6 is found 0.872 Ha. Total HCV area indentified in PT. Timbang Deli Indonesia was 11.955 Ha or 1,23% of the total permanent land use title (972,19 Ha). In addition, as per high carbon stock assessment, there was an additional 2.82 Ha from riparian zone and lowland area to be set aside as HCV (part of it; 1.57 Ha was overlapping with HCV4). The total HCV area was 13.53 Ha.</p>	
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p>	<p>Bukit Maradja POM and its supply bases is long-established plantation. HCV assessment conducted in 2009 and still using RSPO HCV Approved assessor. Whereby, in Timbang Deli Estate HCV Assessment conducted in 2017 with HCV provisional ALS ((Provisional ALS160007HM).</p> <p>There is no land clearing after 15 November 2018 by unit of certification.</p>	Comply

**Appendix B: Approved Time Bound Plan**

Name of company	Name of Mill	Location	Supply Base	Time Bound Plan	Target Year for RSPO
PT. Agro Muko	Muko Muko Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Muko Muko Estate, Sei Betung Estate, Tanah Rekah Estate, Talang Petai Estate, Sei Kiang Estate and KMD	2011	Certified
	Bunga Tanjung Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Bunga Tanjung Estate, Air Bikuk Estate, Air Buluh Estate and KMD	2011	Certified
			PT. Mukomuko Agro Sejahtera: - Air Manjuntio Estate - Malin Deman Estate	2014	Certified
			Ex. PT. Asri Rimba Wirabhakti (acquisition in 2018)	2020	A new NPP will be submitted waiting for HCV, LUC review
PT. Tolan Tiga	Bukit Maradja Mill	Simalungun Regency, North Sumatera, Indonesia	- Bukit Maradja Estate (PT. Eastern Sumatera Indonesia) - Kerasaan Estate (PT. Kerasaan Indonesia) - Timbang Deli Estate (PT. Timbang Deli Indonesia)	2010  2018	Certified May 2010  Certified in 2018 as supply base of Bukit Maradja POM, PT Eastern Sumatera Indonesia
	Perlamban Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	Perlamban Estate and Tolan Estate.	2010	Certified May 2010
PT. Umbul Mas Wisesa	Umbul Mas Wisesa Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South Estate, UMW North Estate and Toton Usaha Mandiri Estate	2014	Certified in March 2015
PT. Agro Kati Lama		Musirawas Regency, South Sumatera, Indonesia		2021	developed (It has been RSPO NPP), RSPO public Notification on 31 <sup>st</sup> March 2014.
PT. Agro Rawas Ulu		Musirawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 <sup>st</sup> March 2014.
PT. Agro Muara Rupit		Musirawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 <sup>st</sup> March 2014.
Hargy Oil Palm Limited (HOPL)	Hargy Mill	East of Biialla, West New Britain Province, PNG	Hargy Estate	2009	Certified in April 2009
	Navo Mill	50 Kms East of Biialla, West New Britain Province, PNG	Navo Estate, Bakada Estate and Mengan Estate	2009	Certified in April 2009
	Barema Mill	30 km East of Biialla, West New Britain Province, PNG	Barema Estate	2014	RSPO Certified in April 2014

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PT. Dendy Maker Indah Lestari	Dendy Maker Mill	Musirawas Utara Regency, South Sumatera Province, Indonesia	Sei Mandang Estate, Sei Liam Estate	2015	Acquired on 1 August 2017. RSPO certified in 2015.
PT Citra Sawit Mandiri	N/A	Labuhan Batu Regency, North Sumatera, Indonesia	Citra Sawit Mandiri Estate	2023	<ul style="list-style-type: none"> <li>• AMDAL/SEIA completed</li> <li>• RaCP process in progress including LUCA, HCV and FPIC verification</li> </ul>

Note: The unit of certification has sent documentation related lack of social liability at PT Eastern Sumatera Indonesia on 25 Feb 2020, and RSPO has confirmed the receive of the documentation on 26 Feb 2020.

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **January 2019 – December 2019** for **Bukit Maradja 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 **January 2019 – December 2019** for **Bukit Maradja POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.03
PK	1.03

Extraction	%
OER	23.91
KER	5.08

Production	t/yr
FFB Process	111,901.24
CPO Produced	26,755.59
PKO Produced	5,684.58

Land Use	Ha
Oil palm planted on mineral soil	5,583.38
Oil palm planted area on peat	0
Conservation area (forested)	0
Conservation area (non-forested)	136
Total Planted area	5,583.38
Conservation area	136.09
FFB Production per hectare	20.04

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission Source</b>								
Land Conservation	30,320.16	9.79	0.53	2,741.45	11.61	4.31	0	0
CO <sub>2</sub> Emission from fertilizer	1,631.74	0.53	0.03	445.89	1.89	0.7	0	0
NO <sub>2</sub> Emission from peat	0	0	0	0	0	0	0	0
NO <sub>2</sub> Emission from fertilizer	1,551.79	0.5	0.03	324.84	1.38	0.51	0	0
Fuel Consumption	126.51	0.04	0	63.5	0.27	0.1	0	0
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-28,441.41	-0.18	-0.5	-2,211.52	-9.36	-3.470	0	0
Conservation Sequestration	0	0	0	0	0	0	0	0
<b>Total</b>	<b>5,288.79</b>	<b>3,088.57</b>	<b>57,653.22</b>	<b>1,364.16</b>	<b>236.22</b>	<b>645.97</b>	<b>0</b>	<b>0</b>

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	21,934.5	0.2
Fuel Consumption	149.14	0
Grid Electricity Utilization	4,885.64	0.04
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>26,969.27</b>	<b>0.24</b>

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

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

\*This mill has no kernel crusher operation.

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

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

**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	March 2019	8,601.41	-	8,601.41
2	April 2019	7,824.49	-	7,824.49
3	May 2019	10,047.30	-	10,047.30
4	June 2019	9,755.88	-	9,755.88
5	July 2019	9,371.17	-	9,371.17
6	August 2019	11,167.88	-	11,167.88
7	September 2019	10,086.59	-	10,086.59
8	October 2019	10,571.55	-	10,571.55
9	November 2019	8,921.35	-	8,921.35
10	December 2019	7,238.19	-	7,238.19
11	January 2020	9,032.61	-	9,032.61
12	February 2020	9,229.08	-	9,229.08
<b>Total</b>		<b>111,847.50</b>	<b>-</b>	<b>111,847.50</b>
<b>Note:</b>				
<i>Last Audit: March 2019</i>				

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	March 2019	2,063.14	430.53
2	April 2019	1,837.11	380.40
3	May 2019	2,413.56	470.10
4	June 2019	2,344.24	463.81
5	July 2019	2,302.73	471.99
6	August 2019	2,716.39	570.02
7	September 2019	2,487.91	518.10
8	October 2019	2,487.14	561.85
9	November 2019	2,090.09	460.76
10	December 2019	1,697.61	374.20
11	January 2020	2,134.53	456.16
12	February 2020	2,155.41	477.66
<b>Total</b>		<b>26,729.88</b>	<b>5,635.57</b>
<b>Note:</b>			
<i>Last Audit: March 2019</i>			



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<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading License Number</b>	<b>Certified CPO Sold (mt)</b>	<b>Certified PK Sold (mt)</b>
1	Buyer "MNA"	TR-caa2f453-0c82	-	200.00
2	Buyer "S"	TR-cd818631-d55e	-	150.00
3	Buyer "S"	TR-74c5036f-dab2	-	500.00
4	Buyer "S"	TR-329f3316-b6f2	-	321.61
5	Buyer "S"	TR-67235fec-7a73	-	288.39
6	Buyer "S"	TR-bfc12d77-483d	-	161.64
7	Buyer "S"	TR-214a4c62-0deb	-	53.39
8	Buyer "S"	TR-5b043479-0dc0	-	300.00
9	Buyer "S"	TR-ef7de1d5-8a2f	-	509.75
10	Buyer "S"	TR-44ba5cd9-3e27	-	90.25
11	Buyer "S"	TR-d75575eb-754b	-	392.24
12	Buyer "S"	TR-c7534940-aa83	-	57.76
13	Buyer "S"	TR-6efe619b-2793	-	499.81
14	Buyer "S"	TR-26efc4b0-8eb0	-	0.19
15	Buyer "S"	TR-cf205c2e-f88c	-	516.47
16	Buyer "S"	TR-1ff8d10b-63a7	-	200.00
17	Buyer "S"	TR-d86bb616-87f8	2,446.63	-
18	Buyer "S"	TR-356aa354-1c69	37.91	-
19	Buyer "S"	TR-5bf4484b-15a7	-	33.53
20	Buyer "S"	TR-b8dedd7a-7850	-	600.00
21	Buyer "S"	TR-3e7e5a62-ade2	-	350.75
22	Buyer "S"	TR-368e499e-b9cb	-	99.25
23	Buyer "S"	TR-fb57ece5-0bad	-	403.24
			<b>2,484.54</b>	<b>4,106.63</b>

**Note:**  
*Last Audit: March 2019*

<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Scheme Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
1	Buyer "S"	ISCC	1,997.18	-
2	Buyer "S"	ISCC	1,990.30	-
3	Buyer "IMT"	ISCC	499.06	-
4	Buyer "IMT"	ISCC	1,508.20	-
5	Buyer "IMT"	ISCC	469.86	-
6	Buyer "S"	ISCC	499.17	-
7	Buyer "S"	ISCC	1,177.66	-
8	Buyer "S"	ISCC	293.15	-
9	Buyer "S"	ISCC	178.72	-
10	Buyer "S"	ISCC	1,197.95	-
11	Buyer "IMT"	ISCC	66.15	-
12	Buyer "S"	ISCC	27.53	-
13	Buyer "S"	ISCC	319.70	-
14	Buyer "S"	ISCC	998.01	-

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15	Buyer "S"	ISCC	1,121.62	-
16	Buyer "S"	ISCC	176.36	-
17	Buyer "S"	ISCC	1,173.39	-
18	Buyer "S"	ISCC	1,003.11	-
19	Buyer "S"	ISCC	170.71	-
20	Buyer "S"	ISCC	499.44	-
21	Buyer "S"	ISCC	494.75	-
22	Buyer "S"	ISCC	1,742.17	-
23	Buyer "S"	ISCC	4.59	-
24	Buyer "S"	ISCC	6.24	-
25	Buyer "S"	ISCC	499.55	-
26	Buyer "S"	ISCC	386.69	-
27	Buyer "S"	ISCC	924.18	-
28	Buyer "S"	ISCC	112.52	-
29	Buyer "S"	ISCC	574.03	-
30	Buyer "S"	ISCC	499.41	-
31	Buyer "S"	ISCC	987.13	-
<b>Total</b>			<b>21,598.53</b>	<b>-</b>

**Note:**

*Last Audit: March 2019*

**E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)**

No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Buyer "MNA"	500.00	-
2	Buyer "MNA"	231.58	-
3	Buyer "M"	-	140.51
4	Buyer "MNA"	-	300.00
5	Buyer "MNA"	268.42	-
6	Buyer "M"	-	283.71
7	Buyer "M"	-	16.29
8	Buyer "MNA"	535.26	-
9	Buyer "MNA"	164.74	-
		<b>1,700.00</b>	<b>740.51</b>

**Note:**

*Last Audit: March 2019*

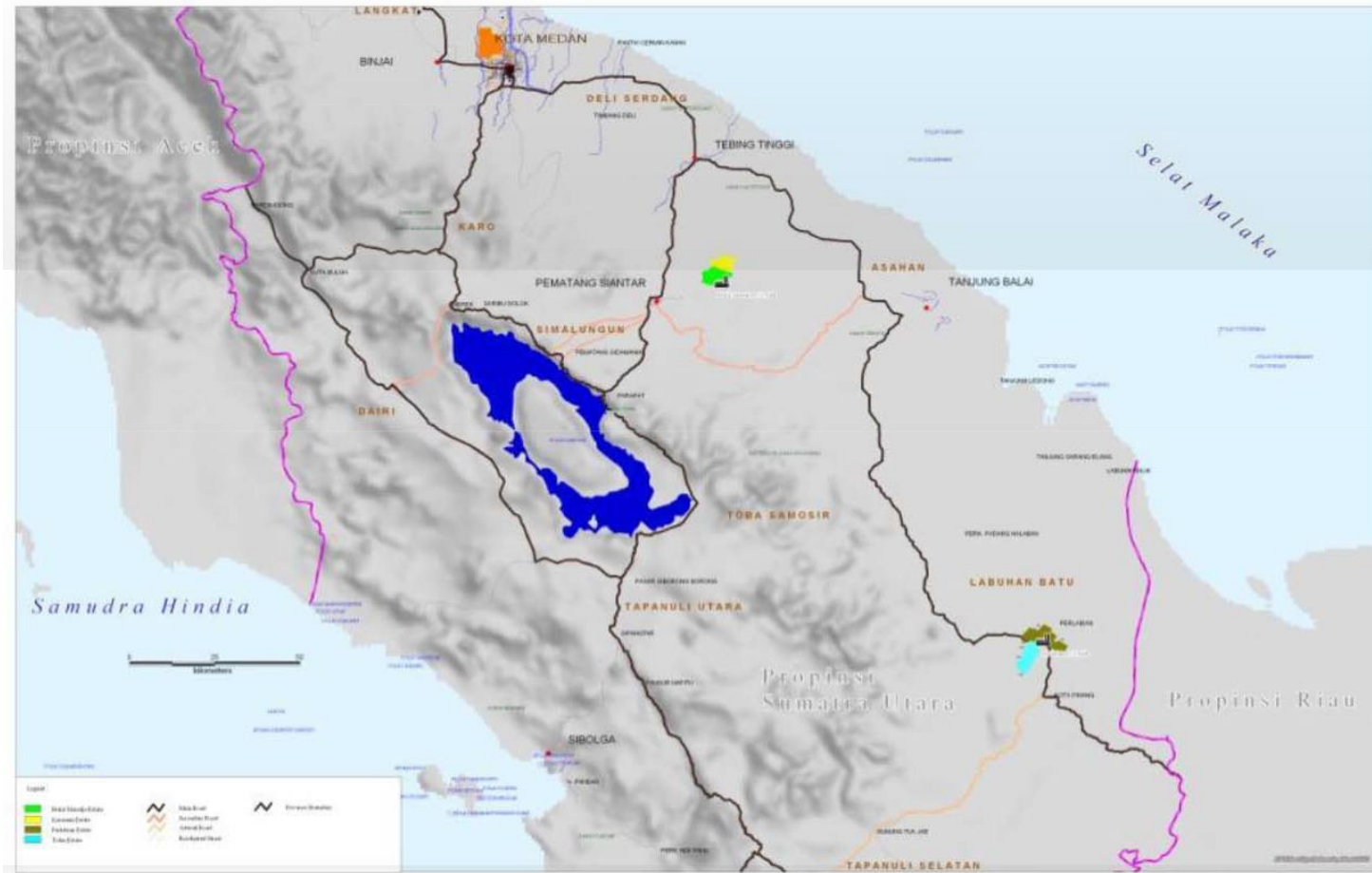
**F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)**

No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		

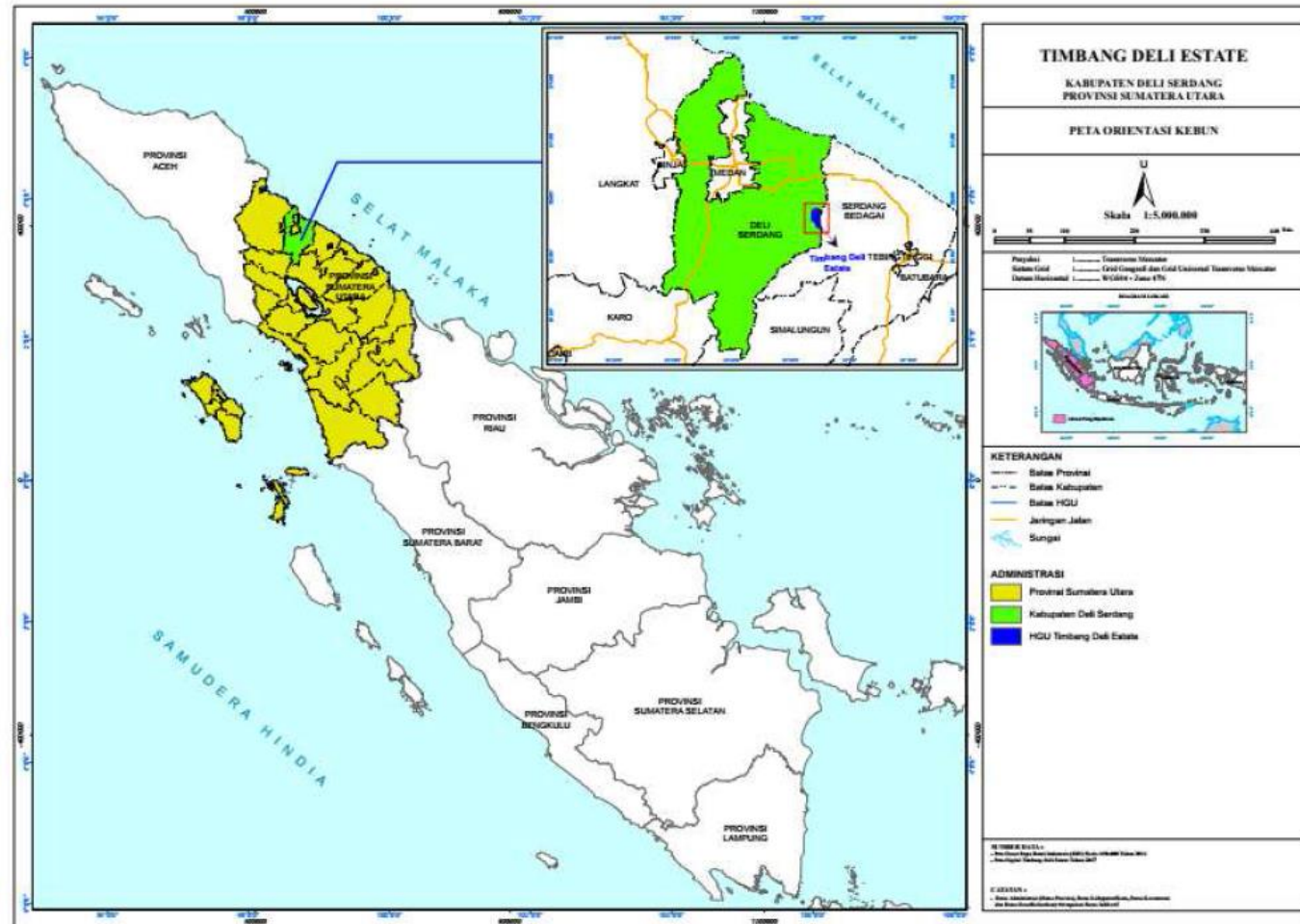
**Note:**

*Last Audit: March 2019*

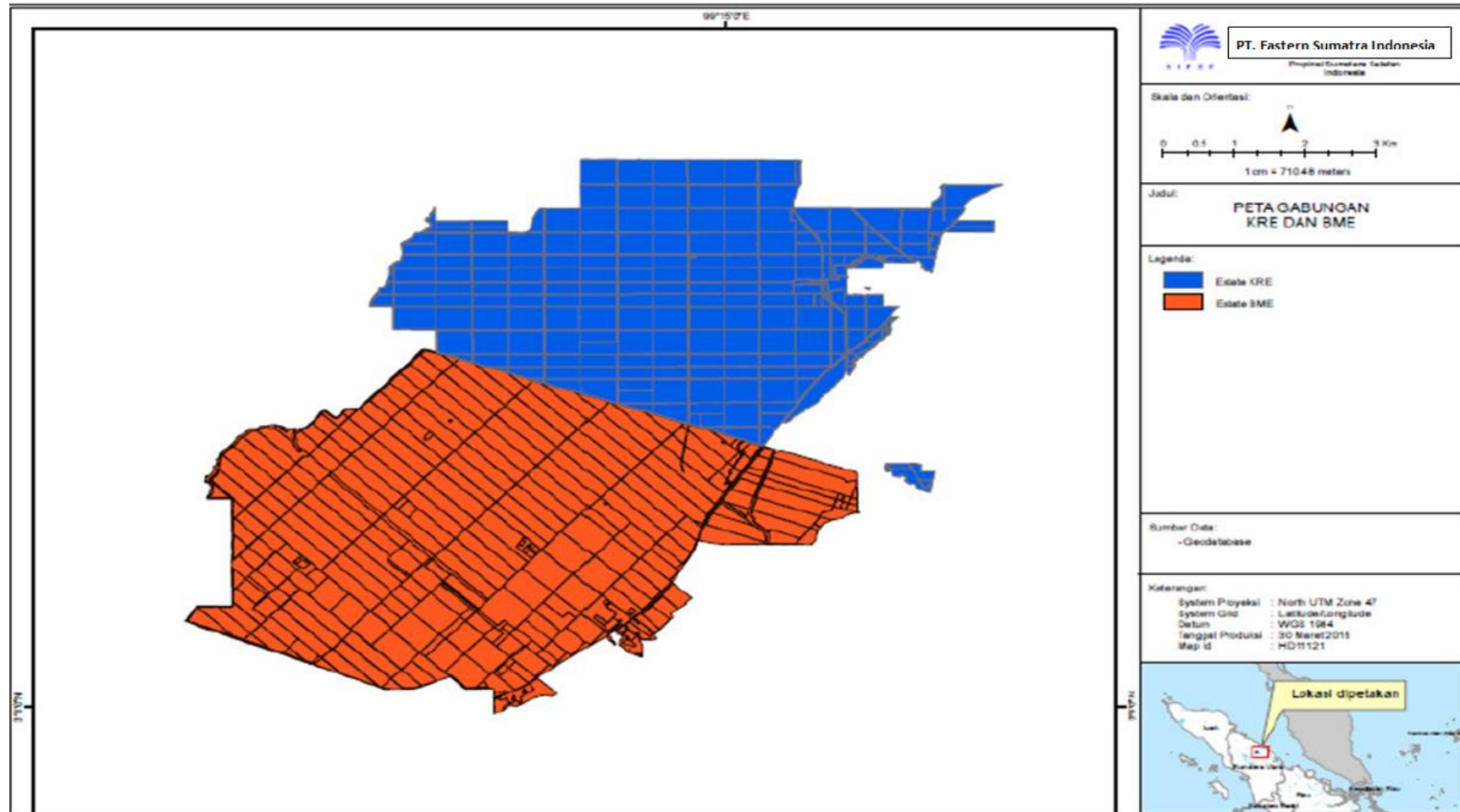
**Appendix E: Location Map of Certification Unit and Supply bases**



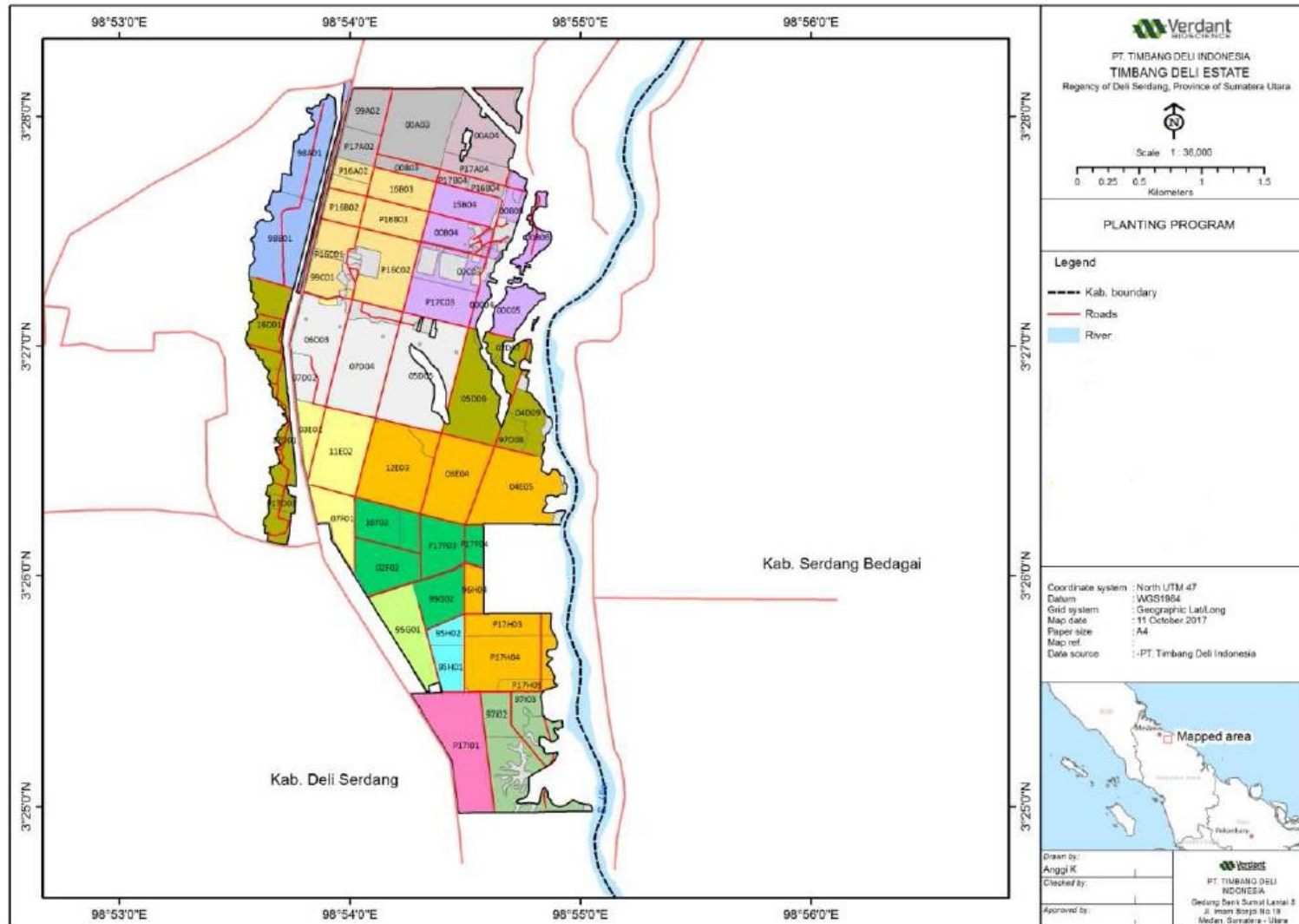
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**Appendix F: Estate Field Map**



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**Appendix G: List of Smallholder Sampled**

Not Applicable (N/A)

## Appendix H: 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