

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (2\_2, 2\_3)**
- Recertification Assessment (Choose an item.)**
- Extension of Scope**

<p><b>Client Company name (Parent Company):</b>  <b>Sime Darby Plantation Berhad</b></p>
<p>Client company Address:  <b>New Britain Palm Oil Limited – West New Britain</b>  3.5KM Bebere Road, Bebere Plantation, Mosa, New Britain Province, Papua New Guinea</p>
<p>Certification Unit:  <b>Mosa Mill, Kumbango Mill, Waraston Mill, Kapiura Mill and Numundo Mill and Supply Base</b>  Location of Certification Unit:  3.5KM Bebere Road, Bebere Plantation, Mosa, New Britain Province, Papua New Guinea</p>
<p>Date of Final Report:  5/10/2021</p>

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## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	Sime Darby Plantation Berhad		
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	07/09/2004
<b>Address</b>	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	New Britain Palm Oil Limited – West New Britain Mosa Mill, Kumbango Mill, Waraston Mill, Kapiura Mill and Numundo Mill and Supply Base		
<b>Location / Address</b>	3.5KM Bebere Road, Bebere Plantation, Mosa, New Britain Province, Papua New Guinea		
<b>Website</b>	<a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>		
<b>Management Representative</b>	Zaralyn Yakopa	<b>E-mail</b>	<a href="mailto:zaralyn.yakopa@nbpol.com">zaralyn.yakopa@nbpol.com</a>
<b>Telephone</b>	+675 7107133	<b>Facsimile</b>	+675 9852003

2. Certification Information			
<b>Certificate Number</b>	RSPO 728122	<b>Certificate Start Date</b>	10/09/2018
<b>Date of First Certification</b>	10/09/2008	<b>Certificate Expiry Date</b>	09/09/2023
<b>Scope of Certification</b>	Production of Palm Oil and Palm Kernel		
<b>Visit Objectives</b>	The objective of the assessment is to conduct a combine Annual Surveillance Audit 2_2 and 2_3 with increased 50% in sampling to confirm that the elements of the proposed scope of registration and the management system are conforming the requirements of the assessment standard; to confirm that the organization has effectively implemented and addressed the management system and to confirm the ability of the management system is able to meet applicable statutory and regulatory, contractual requirements, organization policies and wherever are applicable.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2, ASA 2_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> PNG & SI National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	Please refer table 4
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
RA-G-100813	RA Sustainability Agriculture Standard 2017	NEPCon	02/05/2022
NBPOL -111-212-C1/Y9	Halal Australian Standard	Halal Australia	01/05/2022

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base / Group Manager / Smallholders)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Mosa Oil Mill (60mt/hr)	Bebere Plantation, Mosa, West New Britain, Papua New Guinea	5° 37' 20.93"S	150° 14' 13.74"E
Kumbango Oil Mill (60mt/hr)	Kumbango Plantation, Mosa, West New Britain, Papua New Guinea	5° 35' 31.00"S	150° 12' 43.00"E
Kapiura Oil Mill (60mt/hr)	Bilomi Plantation, Kapiura, West New Britain, Papua New Guinea	5° 37' 25.00"S	150° 41' 03.00"E
Numundo Oil Mill (80mt/hr)	Healla Plantation, Healla, West New Britain, Papua New Guinea	5° 14' 00.00"S	150° 02' 01.00"E
Waraston Oil Mill (60mt/hr)	Numundo Plantation, Talasea, West New Britain, Papua New Guinea	5° 29' 02.00"S	150° 05' 12.00"E
Bebere Estate	Mosa, West New Britain, Papua New Guinea	5° 36' 50.69"S	150° 15' 03.60"E
Kumbango Estae	Mosa, West New Britain, Papua New Guinea	5° 36' 19.08"S	150° 11' 49.02"E
Togula Estate	Mosa, West New Britain, Papua New Guinea	5° 40' 02.53"S	150° 11' 11.00"E
Dami / Waisisi Estate	Hoskins, West New Britain, Papua New Guinea	5° 30' 51.05"S	150° 27' 07.41"E
Kautu Estate	Kapiura, West New Britain, Papua New Guinea	5° 31' 16.57"S	150° 03' 18.45"E
Kaurausu Estate	Kapiura, West New Britain, Papua New Guinea	5° 31' 14.88"S	150° 45' 09.36"E
Morao Estate	Kapiura West New Britain, Papua New Guinea	5° 31' 15.47"S	150° 45' 09.32"E
Bilomi / Loata Estate	Kapiura, West New Britain, Papua New Guinea	5° 37' 02.99"S	150° 40' 40.79"E
Healla Estate	Healla, West New Britain, Papua New Guinea	5° 31' 16.57"S	150° 2' 55.536"E
Garu Estate	Healla, West New Britain, Papua New Guinea	5° 30' 46.42"S	149° 59' 34.72"E
Daliavu Estate	Kulu, West New Britain, Papua New Guinea	5° 34' 18.56"S	150° 01' 21.42"E
Sapuri Estate	Kulu, West New Britain, Papua New Guinea	5° 34' 11.14"S	149° 59' 34.72"E
Malalimi Estate	Rigula, West New Britain, Papua New Guinea	5° 39' 26.64"S	150° 26' 29.39"E
Rigula Estate	Malilimi, West New Britain, Papua New Guinea	5° 37' 09.48"S	150° 47' 31.56"E
Numundo Estate	Talasea, West New Britain, Papua New Guinea	5° 29' 58.92"S	150° 05' 11.76"E
Navarai / Karato Mini Estate / Kavugara Development Cooperation European Union	Talasea, West New Britain, Papua New Guinea	5° 21' 35.96"S	150° 02' 09.38"E
Volupai / Lotomgam Natupi / Goruru Estate	Talasea, West New Britain, Papua New Guinea	5° 15' 53.99"S	150° 00' 34.20"E

Lolokoru Estate	Talasea, West New Britain, Papua New Guinea	5° 06' 52.20"S	150° 03' 31.67"E
Ove Estate	Silovuti, West New Britain, Papua New Guinea	5° 34' 48.36"S	149° 41' 39.84"E
Tamare Estate	Silovuti, West New Britain, Papua New Guinea	5° 37' 32.88"S	149° 44' 07.08"E
Kaipura Division Smallholders	Kapiura, West New Britain, Papua New Guinea	5° 32' 56.01"S	150° 52' 6.63"E
Talasea Division	Talasea, West New Britain, Papua New Guinea	5° 16' 49.33"S	150° 00' 22.39"E
Nahavio Division	Mosa, West New Britain, Papua New Guinea	5° 35' 38.83"S	150° 13' 35.18"E
Kavui Division	Mosa, West New Britain, Papua New Guinea	5° 35' 37.32"S	150° 18' 39.24"E
Siki Division	Hoskins, West New Britain, Papua New Guinea	5° 28' 08.44"S	150° 27' 08.92"E
Buvussi Division	Malalimi, West New Britain, Papua New Guinea	5° 37' 42.96"S	150° 22' 46.02"E
Community Planting	West New Britain, Papua New Guinea	5° 30' 19.01"S	150° 32' 08.37"E
Independent Farms (more than 50 ha)	West New Britain, Papua New Guinea	5° 39' 03.38"S	150° 01' 22.43"E

<b>5. Description of Supply Base</b>					
<b>New Planting Development</b>	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
<b>Estate / Smallholders</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>
Bebere Estate	1,881.00	0.00	345.71	2,226.71	84.47
Kumbango Estate	2,243.10	0.00	367.70	2,610.80	85.92
Togula Estate	1,364.30	0.00	144.90	1,509.20	90.40
Dami / Waisisi Estate	924.30	0.00	582.70	1,507.00	61.33
Kautu Estate	2,952.00	552.56	776.04	4,280.60	68.96
Kaurausu Estate	1,900.00	451.44	36.20	2,387.64	79.58
Moroa Estate	807.00	0.00	41.16	848.16	95.15
Bilomi / Loata Estate	2,572.50	225.00	954.29	3,751.79	68.57
Haella Estate	2,876.80	67.19	1,276.31	4,220.30	68.17
Garu Estate	2,562.40	596.00	551.20	3,709.60	69.07
Daliavu Estate	2,058.60	0.00	425.50	2,484.10	82.87
Sapuri Estate	1,773.40	0.00	407.50	2,180.90	81.32
Malalimi Estate	2,527.00	63.00	1,247.00	3,837.00	65.86
Rigula Estate	2,519.60	952.00	248.40	3,720.00	67.73
Numundo Estate	1,509.40*	216.81	918.96	2,645.17	57.06
Navarai / Karato Mini Estate / Kavugara Development Cooperation European Union	687.40	0.00	416.37	1,103.77	62.24

Volupai / Lotomgam / Natupi / Goruru Estate	1,492.40	0.00	500.19	1,992.59	74.90
Lolokoru Estate	2,049.60	0.00	403.50	2,453.10	83.55
Ove Estate	2,374.50	0.00	1,166.50	3,541.00	67.06
Tamare Estate	1,957.90**	868.00	715.10	3,541.00	55.29
Kaipura Division Smallholders	4,096.09	128.57	1,348.53	5,573.19	73.50
Talasea Division Smallholders	2,804.10	0.00	0.00	2,804.10	100.00
Nahavio Division Smallholders	4,035.30	224.14	749.09	5,008.53	80.57
Kavui Division Smallholders	5,332.85	25.64	398.08	5,756.57	92.64
Siki Division Smallholders	4,566.38	1.84	756.15	5,324.37	85.76
Buvussi Division Smallholders	4,446.36	0.81	506.36	4,953.53	89.76
Community Planting	529.40	2.67	623.58	1,155.65	45.81
Independent Farms (>50 ha)	675.00	0.36	25.01	700.37	96.38
<b>Total</b>	<b>65,518.28</b>	<b>4,376.03</b>	<b>15,932.03</b>	<b>85,826.34</b>	<b>76.32</b>

**Note:** Conservation areas are included in Infrastructure & Others

\* Value is decrease compare to ASA2\_1 report due to data error by previous CB.

\*\* Value is decrease compare to ASA2\_1 report due to calculation error by previous CB.

\*\*\* In previous ASA2\_1 report, only environmental conservation area was reported. In actual, the total conservation, infrastructure & others areas are more. In which this has changed the total certified area as compared to ASA2\_1 audit.

<b>6. Plantings &amp; Cycle</b>							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bebere Estate	25.00	1,031.00	825.00	0.00	0.00	1,856.00	25.00
Kumbango Estate	233.10	469.60	1540.40	0.00	0.00	2,243.10	0.00*
Togula Estate	0.00	0.00	1,364.30	0.00	0.00	1,364.30	0.00
Dami / Waisisi Estate	67.00	92.00	721.10	44.20	0.00	867.20	57.10*
Kautu Estate	247.10	636.10	2,068.80	0.00	0.00	2,704.90	247.10
Kaurasu Estate	185.00	1,004.10	710.90	0.00	0.00	1,715.00	185.00
Moroa Estate	0.00	0.00	0.00	807.00	0.00	807.00	0.00
Bilomi / Loata Estate	180.60	565.40	1,826.50	0.00	0.00	2,572.50	0.00*
Haella Estate	1,215.07	206.40	454.00	1,001.33	0.00	2,113.84	762.96
Garu Estate	1,184.20	0.00	0.00	1,378.20	0.00	1,378.20	1,184.20
Daliavu Estate	0.00	0.00	761.30	1,297.30	0.00	2,058.60	0.00
Sapuri Estate	0.00	0.00	1,773.40	0.00	0.00	1,773.40	0.00
Malilimi Estate	302.90	350.80	1,629.50	243.80	0.00	2,224.10	302.90
Rigula Estate	0.00	0.00	2,519.60	0.00	0.00	2,519.60	0.00
Numundo Estate**	392.10	0.00	210.80	906.50	0.00	1,117.30	392.10

Navarai / Karato Mini Estate / Kavugara Development Cooperation European Union	0.00	0.00	467.00	220.00	0.00	687.00	0.00
Volupai / Lotomgam / Natupi / Goruru Estate	0.00	0.00	312.60	1,179.80	0.00	1,492.40	0.00
Lolokoru Estate	0.00	0.00	2,049.60	0.00	0.00	2,049.60	0.00
Ove Estate	0.00	1749.90	624.60	0.00	0.00	2,374.50	0.00
Tamare Estate***	595.20	1,362.70	0.00	0.00	0.00	1,362.70	595.20
Kaipura Division Smallholders	155.00	534.00	1,930.00	948.00	529.09	3,941.09	155.00
Talasea Division Smallholders	68.00	436.00	1,830.00	336.00	134.10	2736.10	68.00
Nahavio Division Smallholders	153.00	480.00	1,923.00	1,118.00	361.30	3,882.30	153.00
Kavui Division Smallholders	183.00	375.00	2,666.00	1,693.00	415.85	5,149.85	183.00
Siki Division Smallholders	195.00	302.00	2,232.00	1,378.00	459.38	4,371.38	195.00
Buvussi Division Smallholders	118.00	418.00	1,730.00	1,208.00	972.36	4,328.36	118.00
Community Planting	0.00	235.00	115.00	84.00	95.40	529.40	0.00
Independent Farms (>50 ha)	7.00	148.00	428.00	55.00	37.00	668.00	7.00
<b>Total (ha)</b>	<b>5,506.27</b>	<b>10,396.00</b>	<b>34,173.40</b>	<b>13,898.13</b>	<b>3,004.48</b>	<b>60,887.72</b>	<b>4,630.56</b>

**Note:** \*NBPOL-WNB considered maturational start from year 3. Hence the Mature area may include some planting between 0-3 years.

\*\* Value is decrease compare to ASA2\_1 report due to data error by previous CB.

\*\*\* Value is decrease compare to ASA2\_1 report due to calculation error by previous CB.

## 7. Summary of Certified Tonnage of FFB (Own Certified Scope)

Estate / Smallholders	Tonnage / year			
	Estimated last year (Sept 19 – Oct 21)	Actual (Sept 19 – July 21)		Forecast (Sept 21 – Aug 22)
		Previous license period (Sept 2019 – Sept 2020)	Current license period (Oct 2020 – Jul 2021)	
Bebere Estate	121,558.00	65,035.09	45,695.91	60,779.00
Kumbango Estate	131,224.00	68,721.27	51,767.73	65,612.00
Togula Estate	77,642.00	38,968.36	32,473.64	38,821.00
Dami / Waisisi Estate	57,291.00	31,953.82	21,128.18	28,645.50
Kautu Estate	162,448.00	85,401.64	62,501.36	81,224.00
Kaurausu Estate	106,699.00	55,058.73	45,882.27	53,349.50
Moroa Estate	49,120.00	29,476.18	15,396.82	24,560.00
Bilomi / Loata Estate	157,386.00	72,807.64	53,006.36	78,693.00
Haella Estate	102,079.00	57,211.09	42,175.91	51,039.50
Garu Estate	96,453.00	48,046.91	34,539.09	48,226.50
Daliavu Estate	109,486.00	57,699.82	41,083.18	54,743.00
Sapuri Estate	99,216.00	56,900.18	41,916.82	49,608.00

Malilimi Estate	125,063.00	68,169.82	54,808.18	62,531.50
Rigula Estate	158,920.00	85,936.36	61,113.64	79,460.00
Numundo Estate	65,038.00	34,952.18	21,626.82	32,519.00
Navarai / Karato Mini Estate / Kavugara Development Cooperation European Union	49,834.00	26,844.00	22,370.00	24,917.00
Volupai / Lotomgam / Natupi / Goruru Estate	88,357.00	45,918.36	32,598.64	44,178.50
Lolokoru Estate	119,563.00	61,101.82	50,918.18	59,781.50
Ove Estate	145,573.00	77,986.00	53,655.00	72,786.50
Tamare Estate	23,205.00	9,474.00	6,895.00	11,602.50
Kaipura Division Smallholders	61,494.47	23,605.48	17,671.23	42,513.61
Talasea Division	48,139.09	27,231.22	15,359.35	36,255.00
Nahavio Division	82,521.34	45,116.94	31,909.46	63,500.06
Kavui Division	119,739.22	62,727.82	52,273.18	90,845.25
Siki Division	73,495.75	37,606.95	31,339.13	53,877.12
Buvussi Division	84,155.58	38,242.26	22,368.55	62,351.43
Community Planting	19,880.99	9,892.87	8,244.06	17,924.77
Independent Farms (>50 ha)	13,885.90	5,940.40	4,101.93	13,948.72
<b>Total</b>	<b>2,549,467.34*</b>	<b>2,302,846.84</b>		<b>1,404,293.46</b>

**Note:** \* The volume includes all volume extended. Approved volume for period Sept 2019 – Aug 2020 was 1,428,626.10mt

\*\* Previous period is Sept 2019 – Sept 2020 is set following the actual PalmTrace period which is 10/09/2019 to 09/09/2020.

### 8. Summary of Certified Tonnage of FFB (from other certified unit(s))

Estate / Smallholders	Tonnage / year			
	Estimated last year (Sept 19 – Oct 21)	Actual (Sept 19 – July 21)		Actual (Sept 21 – Aug 22)
		Previous license period (Sept 2019 – Sept 2020)	Current license period (Oct 2020 – Jul 2021)	
<b>Total</b>		<b>N/A</b>		

**Note:** No receiving of FFBs from other certified unit.

### 9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)

Out growers / smallholders	Tonnage / year			
	Estimated last year (Sept 19 – Oct 21)	Actual (Sept 19 – July 21)		Forecast (Sept 21 – Aug 22)
		Previous license period (Sept 2019 – Sept 2020)	Current license period (Oct 2020 – Jul 2021)	



<b>Total</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>Note:</b> No receiving of uncertified FFBs.			

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	September 2019	92,973.00	-	92,973.00
2	October 2019	104,835.00	-	104,835.00
3	November 2019	104,584.00	-	104,584.00
4	December 2019	105,242.00	-	105,242.00
5	January 2020	113,929.37	-	113,929.37
6	February 2020	103,019.43	-	103,019.43
7	March 2020	111,491.59	-	111,491.59
8	April 2020	105,553.87	-	105,553.87
9	May 2020	114,039.00	-	114,039.00
10	June 2020	105,323.52	-	105,323.52
11	July 2020	101,474.48	-	101,474.48
12	August 2020	82,848.02	-	82,848.02
13	September 2020	82,713.94	-	82,713.94
14	October 2020	82,533.94	-	82,533.94
15	November 2020	83,125.60	-	83,125.60
16	December 2020	94,520.80	-	94,520.80
17	January 2021	102,567.72	-	102,567.72
18	February 2021	94,174.66	-	94,174.66
19	March 2021	106,640.64	-	106,640.64
20	April 2021	100,987.12	-	100,987.12
21	May 2021	105,300.36	-	105,300.36
22	June 2021	107,325.78	-	107,325.78
24	July 2021	97,643.00	-	97,643.00
<b>TOTAL</b>		<b>2,302,846.84</b>	<b>-</b>	<b>2,302,846.84</b>
<b>Note:</b> Previous reporting in ASA2_1 is up to August 2019				

**10. Summary of Certified Tonnage (not applicable for ISS)**

Estimated last year (Sept 19 – Oct 21)	Actual (Sept 19 – July 21)		Forecast (Sept 21 – Aug 22)
	Previous license period (Sept 2019 – Sept 2020)	Current license period (Oct 2020 – July 2021)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
2,549,467.34*	1,328,027.22	974,819.62	1,404,293.46
	2,302,846.84		
<b>CPO (OER: 23.00 %)</b>	<b>CPO (OER: 21.91 %)</b>		<b>CPO (OER: 22.86 %)</b>
546,933.20**	288,802.69	215,682.97	321,021.50
	504,485.66		
<b>PK (KER: 6.10 %)</b>	<b>PK (KER: 6.11 %)</b>		<b>PK (KER: 6.17 %)</b>
146,919.20***	80,763.69	59,860.68	86,644.94
	140,624.37		

**Note:**

\* The volume includes all volume extended. Approved volume for period Sept 2019 – Aug 2020 was 1,428,626.10mt

\*\* The volume includes all volume extended. Approved volume for period Sept 2019 – Aug 2020 was 328,584.00 mt.

\*\*\* The volume includes all volume extended. Approved volume for period Sept 2019 – Aug 2020 was 87,146.20 mt.

**Estimated by mill (Sept 19 – Oct 21)**

Mill	FFB	FFB Smallholders	CPO	PK
Mosa Oil Mill	439,406.22	426,139.24	113,296.00	29,272.24
Kumbango Oil Mill	442,854.22	0	115,306.80	31,575.24
Numundo Oil Mill	538,927.26	0	138,670.16	38,077.09
Kapiura Oil Mill	454,508.22	0	119,766.80	31,997.24
Waraston Oil Mill	247,632.18	0	59,953.44	15,997.39
<b>TOTAL</b>	<b>2,123,328.10</b>	<b>426,139.24</b>	<b>546,993.20</b>	<b>146,919.20</b>

**Actual by mill (Sept 19 – July 21)**

Mill	FFB	FFB Smallholders	CPO	PK
Mosa Oil Mill	438,988.61	415,427.64	187,177.25	52,174.93
Kumbango Oil Mill	413,954.56	0	90,685.23	25,279.16
Numundo Oil Mill	580,942.08	0	127,267.27	35,475.23
Kapiura Oil Mill	453,533.95	0	99,355.91	27,695.05
Waraston Oil Mill	0	0	0	0
<b>TOTAL</b>	<b>1,887,419.20</b>	<b>415,427.64</b>	<b>504,485.66</b>	<b>140,624.37</b>

**Note:** Waraston mill was not operating. However since this is a multi-mills certification the supply base should be interchangeable and hence as long as the total actual production is not more than estimated, it shall be accepted.

**Forecast by mill (Sept 2021 – Aug 2022)**

Mill	FFB	FFB Smallholders	CPO	PK
Mosa Oil Mill	83,205.31	197,653.38	64,204.30	17,328.99
Kumbango Oil Mill	190,013.44	90,845.25	64,204.30	17,328.99
Numundo Oil Mill	300,775.43	36,255.00	77,045.16	20,794.78
Kapiura Oil Mill	224,396.36	56,462.33	64,204.30	17,328.99
Waraston Oil Mill	224,686.96	0	51,363.44	13,863.19
<b>TOTAL</b>	<b>1,023,077.50</b>	<b>381,215.96</b>	<b>321,021.50</b>	<b>86,644.94</b>

**10A. Monthly Records of Certified CPO & PK since the last audit**

No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	September 2019	21,055.00	5,628.00
2	October 2019	23,750.00	6,347.00
3	November 2019	23,690.00	6,332.00
4	December 2019	23,849.00	6,368.00
5	January 2020	24,195.80	5,761.93
6	February 2020	21,408.44	6,670.32
7	March 2020	23,480.02	6,945.43
8	April 2020	22,034.42	6,217.43
9	May 2020	24,656.62	7,589.47
10	June 2020	22,809.30	6,658.15
11	July 2020	22,059.35	6,119.68
12	August 2020	17,898.00	5,273.31
13	September 2020	17,916.74	4,852.97
14	October 2020	18,062.19	5,366.18
15	November 2020	18,157.93	4,997.90
16	December 2020	21,277.07	5,729.11
17	January 2021	23,620.86	6,094.81
18	February 2021	20,011.75	5,519.93
19	March 2021	22,792.70	6,334.54
20	April 2021	22,260.06	6,002.20
21	May 2021	23,620.49	6,709.62
22	June 2021	23,508.99	6,708.61
24	July 2021	22,370.93	6,397.78
<b>TOTAL</b>		<b>504,485.66</b>	<b>140,624.37</b>

**Note:**

### 11. Summary of Actual Volume sold

#### Current License period (Oct 2020 – July 2021)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	188,957.11	0	0	16,576.45	205,533.56
<b>PK (MT)</b>	44,629.87	0	0	0	44,629.87
<b>Credits</b>	0	0	0	0	0

#### Previous License period (Sept 2019 – Sept 2020)

<b>CPO (MT)</b>	290,449.20	0	0	0	290,449.20
<b>PK (MT)</b>	74,821.00	0	0	0	74,821.00
<b>Credits</b>	0	0	0	0	0

**Note:** Conventional is RSPO certified material but sold as non-RSPO.

Previous period is Sept 2019 – Sept 2020 is set following the actual PalmTrace period which is 10/09/2019 to 09/09/2020.

Period	Oct 2020 – July 2021		Sept 2019 – Sept 2020	
	CPO	PK	CPO	PK
Waraston	26,120.84	289.39	25,097.00	13,928.00
Mosa	52,014.05	6,076.00	63,711.07	17,050.00
Kumbango	33,255.00	13,338.24	66,803.00	11,396.00
Kapiura	27,556.22	9,942.24	64,209.76	17,355.00
Numundo	50,011.00	14,984.00	70,628.37	15,092.00

### 11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)

No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Kumbango Kernel Mill	Various Numbers consolidated	-	119,450.87
2	Company U	Various Numbers consolidated	87,056.85	-
3	Company H	Various Numbers consolidated	11,858.00	-
4	Company SL	Various Numbers consolidated	35,239.78	-
5	Company F	Various Numbers consolidated	7,977.00	-
6	Company Z	Various Numbers consolidated	6,586.00	-
7	Company Q	Various Numbers consolidated	84,732.93	-
8	Company O	Various Numbers consolidated	245,955.77	-
<b>TOTAL</b>			<b>479,406.33</b>	<b>119,450.87</b>

**Note:** Details of the buyers are provided to auditors during audit but requested to be classified as confidential.

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
N/A				
<b>TOTAL</b>			N/A	N/A
<b>Note:</b>				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Company ABC	800.00	
2	Company ABC	2,040.00	
3	Company ABC	13,736.446	
<b>TOTAL</b>		<b>16,576.45</b>	
<b>Note:</b> Details of the buyers are provided to auditors during audit but requested to be classified as confidential.			

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
N/A			
<b>TOTAL</b>			N/A
<b>Note:</b>			

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (N/A)			Actual (N/A)			Forecast (N/A)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									

<b>13. Independent Smallholders Actual Sold Tonnage / Volume</b>						
	<b>FFB</b>	<b>FFB Conventional</b>	<b>FFB Other schemes</b>	<b>IS-CSPO</b>	<b>IS-CSPK</b>	<b>IS-CSPKE</b>
<b>Current License period (N/A)</b>						
<b>Credits</b>						
<b>Physical</b>						

## 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 92,000 certified locations and clients in over 193 countries. BSI 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.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 02/08/2021 – 14/08/2021. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment is a combined ASA 2\_2 and ASA 2\_3 which involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24<sup>th</sup> March 2020. The remote audit was conducted on 08/07/2020 – 10/07/2020.

This certification is a multi-mill certification with inter-changeable supply base. The approach to the audit was to treat the mills and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

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. PNG & Solomon Islands National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula  $(\sqrt{y}) \times (z)$ ; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E. However due the audit is a combined of two Annual Surveillance Audits, the sampling intensity was increased by 50%. This means additional 50% of estates and smallholders were sampled while additional 50% of mandays were considered when auditing the mills.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

<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>
Mosa Oil Mill	X	X	X	X	X
Kumbango Oil Mill	X	X	X	X	X
Kapiura Oil Mill	X	X	X	X	X
Numundo Oil Mill	X	X	X	X	X
Waraston Oil Mill	X	X	X	X	X
Bebere Estate			X	X	
Kumbango Estate		X			
Togula Estate	X				
Dami / Waisisi Estate					X
Kautu Estate		X			
Kaurusu Estate			X	X	
Moroa Estate			X	X	
Bilomi / Loata Estate			X	X	
Haella Estate	X				X
Garu Estate		X			
Daliavu Estate	X				X
Sapuri Estate		X			
Malilimi Estate	X				
Rigula Estate	X				
Numundo Estate					X
Navarai / Karato Mini Estate / Kavugara Development Cooperation European Union			X	X	
Volupai / Lotomgam / Natupi / Goruru Estate	X		X	X	
Lolokoru Estate		X	X	X	
Ove Estate			X	X	
Tamare Estate	X				X



Kaipura Division Smallholders	X	X	X	X	X
Talasea Division	X	X	X	X	X
Nahavio Division	X	X	X	X	X
Kavui Division	X	X	X	X	X
Siki Division	X	X	X	X	X
Buvussi Division	X	X	X	X	X
Community Planting	X	X	X	X	X
Independent Farms (>50 ha)	X	X	X	X	X

**Tentative Date of Next Visit:** July 11, 2022 - July 22, 2022

**Total Number of Mandays:** 45 mandays

## 2.2 BSI Assessment Team

Name	Role	Competency
Nicholas Cheong	Team Leader	<p><b>Education:</b> He holds a Master Degree in Environmental Management from University Putra Malaysia and a Bachelor Degree in Science (Food Science) from Charles Sturt University, Australia.</p> <p><b>Work Experience:</b> He has more than 10 years of working experience in sustainability auditing for palm oil industry (ISCC, CDM, RSPO) and hydropower plant (CDM, WCD). He is also an expert in Greenhouse Gas emissions accounting. He has also 2 years of working experience in palm oil mill advisory and wastewater treatment and operations.</p> <p><b>Training attended:</b> He completed ISO 9001, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO P&amp;C Refresher Course, Endorsed RSPO SCCS Lead Assessor Course, Endorsed RSPO SCCS Refresher Course, Introduction to HCV, HCS &amp; GIS training, RBA Labour and RBA Labour &amp; Ethic Lead Auditor Course.</p> <p><b>Aspect covered in this audit:</b> During this assessment, he covers, policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land &amp; Legal issue, GHG and RSPO supply chain requirement</p> <p><b>Language proficiency:</b> He is fluent in English.</p>
Mohamed Hidhir	Team Member	<p><b>Education:</b> He holds a Bachelor Degree in Chemical Engineering from National University of Malaysia</p> <p><b>Work Experience:</b> He has 7 years working experience in palm oil industry and 5 years specifically on palm oil milling. He is also experiences third party auditing for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO, RSPO P&amp;C, RSPO SCCS, RBA.</p> <p><b>Training attended:</b> He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO P&amp;C Refresher Course, MSPO Awareness Training, Endorsed RSPO SCCS Lead Auditor Course, Endorsed RSPO SCCS Refresher Course, Introduction to HCV, HCS &amp; GIS training, RBA Labor &amp; Ethic Training and SMETA requirement training.</p>

		<p><b>Aspect covered in this audit:</b> During this assessment, he covers policy and commitment, Social requirements, contract agreement, human rights, and workers' welfare.</p> <p><b>Language proficiency:</b> He is fluent in English.</p>
Muhammad Fadzli	Team Member	<p><b>Education:</b> He holds a Bachelor of Forestry Science from University Putra Malaysia</p> <p><b>Work Experience:</b> He has more than 10 years working experience in palm oil industry as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations and sustainability implementation experience including workers' welfare, workers' occupational, health &amp; safety, environment conservation and protection at buffer areas and continuous improvement management plans.</p> <p><b>Training attended:</b> He completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO P&amp;C Refresher Course, Endorsed RSPO SCCS Lead Assessor Course, Endorsed RSPO SCCS Refresher Course, Introduction to HCV, HCS &amp; GIS training and SMETA requirement training.</p> <p><b>Aspect covered in this audit:</b> Occupation Health Safety requirement, HIRARC, Environment responsibility, training, environment impact assessment, management plan economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management and HCV</p> <p><b>Language proficiency:</b> He fluent in English.</p>
Valence Shem	Team Member	<p><b>Education:</b> He a holds Bachelor Degree in Industrial Technology from University of Science Malaysia</p> <p><b>Work Experience:</b> He has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&amp;C, RSPO SCCS, MSPO and SMETA.</p> <p><b>Training attended:</b> He completed the ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO P&amp;C Refresher Course, Endorsed RSPO SCCS Lead Assessor Course, Endorsed RSPO SCCS Refresher Course, MSPO Awareness Training, ISO 45000 Lead Auditor Course, Introduction to HCV, HCS &amp; GIS training and SMETA requirement training.</p> <p><b>Aspect covered in this audit:</b> Occupation Health Safety requirement, HIRARC, Environment responsibility, training, environment impact assessment, management plan economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management and HCV</p> <p><b>Language proficiency:</b> He is fluent in English.</p>
Vijay Kanna	Team Member	<p><b>Education:</b> He holds a Bachelor Degree in Agribusiness Science Management with Honours from University Utara Malaysia.</p> <p><b>Work Experience:</b> He has more than 10 years working experience in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&amp;C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019.</p>

		<p><b>Aspect covered in this audit:</b> During this assessment, he covers Smallholders field audits, smallholders training and records, GAP for smallholders.</p> <p><b>Language proficiency:</b> He is fluent in English.</p>
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**Accompanying Persons:**

Name	Role
Pamela Avusi	Local Audit Facilitator / local expert / translator. She holds a Bachelor Degree in Forestry Science and Management has experience in FSC auditing. She also works for a local NGO in PNG.
Max Kuduk	Local Audit Facilitator / local expert / translator. He holds a Master of Science Majoring in Morden Botanical Methods and a Bachelor of Science majoring in Plant Science. He has experience in environmental and health & safety auditing. He has conducted conservation assessment for oil palm industry.
Eliuda Pilake	Local Audit Facilitator / local expert / translator. He holds a Bachelor of Science in Forestry. He has experience in environmental and health & safety internal audits. He worked in the palm oil industries as environmental officer and has experience in PNG land related matters.

**1.3 Assessment Plan**

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

Date	Time	Subjects	NC	MH	VS	MF	VK	EP	PA	MK	ICT Planned	
Saturday, 31/07/2021	AM/PM	Auditor Facilitators / Local Experts arrive to Mosa Guest House								X		
Sunday, 01/08/2021	AM/PM	Auditor Facilitators / Local Experts arrive to Mosa Guest House						X	X	X		
Monday, 02/08/2021	8:30 – 9:00 (6:30 MY)	<b>Opening Meeting (Management Office – Bebere Office)</b> • Opening Presentation by Audit Team Leader • Confirmation of assessment scope, term and condition, document access and finalize of audit plan	X	X	X	X	X	X	X	X	MS Teams	
	9:00 – 12:00 (7:00 MY)	<b>Dami Office</b> General Documentation review including policies, management plans, operations procedures, SEIA, Risk assessment, soil analysis, mapping, employment procedures, internal audits, legal compliances and general contracts, land titles, CSR program, decent living wage (prevailing wage/in-kind benefit)	X	X	X	X			X	X	MS Teams (2 discussion Rooms)	
		Smallholders block interview & visit covering <b>Sarakolok</b> areas (10 smallholders)					X	X			WhatsApp	
	12:00 – 13:00	<b>Lunch Break</b>										
	13:00 – 16:00 (11:00 MY)	Documentation review and smallholder blocks visit at <b>Sarakolok</b> continue		X	X	X	X	X	X	X	X	MS Teams / WhatsApp
		Supply Chain element	X									
16:00 – 16:30	Daily interim	X	X	X	X	X	X	X	X	X	MS Teams	
Tuesday, 03/08/2021	8:30 – 9:00 (6:30 MY)	<b>Mosa Mill</b> Daily briefing and planning	X	X	X	X	X	X	X	X	MS Teams	
	9:00 – 12:00 (7:00 MY)	Covering operations, waste management, environmental protection, workers interviews, OHS implementations, milling best practices and FFB receiving			X	X			X	X	MS Teams / WhatsApp	
		Workers contracts, Salary & Payment, contractors contract		X							MS Teams	
		Grievance mechanism and records, land rights and dispute mechanism, Young person employment, implementation of policies	X								MS Teams	
		Smallholders block visit covering <b>Kapore</b> and <b>Sarakolok</b> areas (11 smallholders)					X	X			WhatsApp	
	12:00 – 13:00	<b>Lunch Break</b>										
13:00 – 16:00	Records review for <b>Mosa</b> mill – including diesel consumptions, training records, safety records, PPE distribution, training records RSPO Metrics data verification, waste/POME/emissions records,			X	X					X	MS Teams	

Date	Time	Subjects	NC	MH	VS	MF	VK	EP	PA	MK	ICT Planned
	(11:00 MY)	Housing compound, clinic facility, medical checkup (continue with workers contracts, Salary & Payment, contractors contract)		X					X		MS Teams / WhatsApp
		Main workshop, chemical stores, chemical handling and storage				X				X	MS Teams / WhatsApp
		Mill supply chain records	X								MS Teams
		Continue smallholders interview & block visit covering <b>Kapore</b> and <b>Sarakolok</b> areas (11 smallholders)					X	X			WhatsApp
	16:00 – 16:30	Daily interim	X	X	X	X	X	X	X	X	MS Teams
Wednesday 04/08/2021	8:30 – 9:00 (6:30 MY)	<b>Kumbango Mill</b> Daily briefing and planning	X	X	X	X	X	X	X	X	MS Teams
	9:00 – 12:00 (7:00 MY)	Covering operations, waste management, environmental protection, workers interviews, OHS implementations, milling best practices and FFB receiving			X	X			X	X	MS Teams / WhatsApp
		Workers contracts, Salary & Payment, contractors contract		X							MS Teams
		Stakeholder consultations, Union worker interview, Gender committee interview, new mothers consultation	X								MS Teams
			Smallholders interview & block visit covering <b>Ubai</b> areas (11 smallholders)					X	X		WhatsApp
	12:00 – 13:00	<b>Lunch Break</b>									
	13:00 – 16:00 (11:00 MY)	Records review for <b>Kumbango</b> mill – including diesel consumptions, training records, safety records, PPE distribution, training records RSPO Metrics data verification, waste/POME/emissions records,				X	X				X
Workers interview, Social management plan implementation, and continue workers contracts, Salary & Payment, contractors contract			X						X		MS Teams
Mill supply chain records		X									MS Teams
Continue with smallholders block visit covering <b>Ubai</b> areas (11 smallholders)							X	X			WhatsApp
	16:00 – 16:30	Daily interim	X	X	X	X	X	X	X	X	MS Teams
Thursday 05/08/2021	8:30 – 9:00 (6:30 MY)	<b>Numundo Mill</b> Daily briefing and planning	X	X	X	X	X	X	X	X	MS Teams

Date	Time	Subjects	NC	MH	VS	MF	VK	EP	PA	MK	ICT Planned	
	9:00 – 12:00 (7:00 MY)	Covering operations, waste management, environmental protection, workers interviews, OHS implementations, milling best practices and FFB receiving			X	X			X		MS Teams / WhatsApp	
		Social management plan implementation, Workers contracts, Salary & Payment, contractors contract		X							MS Teams	
		<b>Rapamira</b> estate field visit, Mill supply chain records	X							X	WhatsApp	
		Smallholders interview & block visit covering <b>Dilima</b> areas (10 smallholders) *Vijay will be off for COVID-19 Vaccination from 10:30 – 12:30 (8:30 MY)					X	X			WhatsApp	
	12:00 – 13:00	<b>Lunch Break</b>										
	13:00 – 16:00 (11:00 MY)	Records review for <b>Numundo</b> mill – including diesel consumptions, training records, safety records, PPE distribution, training records RSPO Metrics data verification, waste/POME/emissions records,			X	X					X	MS Teams
		Housing compound, clinic facility, medical checkup (continue with workers contracts, Salary & Payment, contractors contract)		X						X		MS Teams / WhatsApp
		Smallholder support inclusion (FFB records, payment, contacts)	X									MS Teams
		Continue smallholders block visit covering <b>Dilima</b> areas (10 smallholders)					X	X				WhatsApp
	16:00 – 16:30	Daily interim	X	X	X	X	X	X	X	X	X	MS Teams
Friday 06/08/2021	8:30 – 9:00 (6:30 MY)	<b>Waraston Mill</b> Daily briefing and planning	X	X	X	X	X	X	X	X	MS Teams	
	9:00 – 12:00 (7:00 MY)	Covering operations, waste management, environmental protection, workers interviews, OHS implementations, milling best practices and FFB receiving			X	X			X	X	MS Teams / WhatsApp	
		Social management plan implementation, Workers contracts, Salary & Payment, contractors contract,		X							MS Teams	
		<b>Peter Prior</b> estate field visit, Mill supply chain records	X								MS Teams	
		Smallholders interview & block visit covering <b>Mai</b> and <b>Morokea</b> areas (13 smallholders)					X	X			WhatsApp	
	12:00 – 13:00	<b>Lunch Break</b>										
13:00 – 16:00	Records review for <b>Waraston</b> mill – including diesel consumptions, training records, safety records, PPE distribution, training records RSPO Metrics data verification, waste/POME/emissions records,			X	X					X	MS Teams	

Date	Time	Subjects	NC	MH	VS	MF	VK	EP	PA	MK	ICT Planned	
	(11:00 MY)	Housing compound, clinic facility, medical checkup, workers interview (continue with workers contracts, Salary & Payment, contractors contract)		X					X		MS Teams / WhatsApp	
		Continue smallholder support inclusion (FFB records, payment, contacts)	X									
		Continue smallholders block visit covering <b>Mai</b> and <b>Morokea</b> areas (13 smallholders)					X	X			WhatsApp	
	16:00 – 16:30	Daily interim	X	X	X	X	X	X	X	X	MS Teams	
Saturday, 07/08/2021	8:30 – 9:00 (6:30 MY)	<b>Kapiura Mill</b> Daily briefing and planning	X	X	X	X	X	X	X	X	MS Teams	
	9:00 – 12:00 (7:00 MY)	Covering operations, waste management, environmental protection, workers interviews, OHS implementations, milling best practices and FFB receiving			X	X			X	X	MS Teams / WhatsApp	
		Social management plan implementation, Workers contracts, Salary & Payment, contractors contract,		X							MS Teams	
		Mill supply chain records, Smallholder support inclusion (FFB records, payment, contacts)	X									
		Smallholders interview & block visit covering <b>Galewale</b> areas (11 smallholders)					X	X			WhatsApp	
	12:00 – 13:00	<b>Lunch Break</b>										
	13:00 – 16:00 (11:00 MY)	Records review for <b>Kapiura</b> mill – including diesel consumptions, training records, safety records, PPE distribution, training records RSPO Metrics data verification, waste/POME/emissions records,			X	X					X	MS Teams
		Housing compound, clinic facility, medical checkup (continue with workers contracts, Salary & Payment, contractors contract)		X						X		MS Teams / WhatsApp
		Main workshop, chemical stores, chemical handling and storage				X					X	WhatsApp
		Continue smallholder support inclusion (FFB records, payment, contacts)	X									MS Teams
Continue smallholders block visit covering <b>Galewale</b> areas (11 smallholders)						X	X				WhatsApp	
16:00 – 16:30	Daily interim	X	X	X	X	X	X	X	X	X	MS Teams	
Sunday, 08/08/2021	<b>Rest Day</b>											
	6:00 – 8:30	Travel to <b>Ove Estate</b>						X				

Date	Time	Subjects	NC	MH	VS	MF	VK	EP	PA	MK	ICT Planned	
Monday, 09/08/2021		Travel to <b>Lolokoru Estate</b>							X			
	8:30 – 9:00 (6:30 MY)	Daily briefing and planning	X	X	X	X	X	X	X	X	MS Teams	
	9:00 – 12:00 (7:00 MY)	<b>Ove Estate</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, SEIA requirement workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management (landfill).				X					X	WhatsApp
		Documentation review – trainings, social management plan implementation, complaints and grievance, implementation of HCV plan	X									MS Teams
		<b>Lolokoru Estate</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, SEIA requirement workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management (landfill).			X					X		WhatsApp
		Documentation review – trainings, social management plan implementation, complaints and grievance, implementation of HCV plan		X								MS Teams
		Smallholders interview & block visit covering <b>Gavaiva</b> areas (11 smallholders)						X	X			WhatsApp
		<b>Lunch Break</b>										
	13:00 – 16:00 (11:00 MY)	<b>Ove Estate</b> Documentation review - Fertilizer records, IPM Plan, road maintenance, safety implementation, waste records, fossil fuel consumptions				X						MS Teams / WhatsApp
		Field visit covering housing, clinic, workers interview	X								X	WhatsApp
		<b>Lolokoru Estate</b> Documentation review - Fertilizer records, IPM Plan, road maintenance, safety implementation, waste records, fossil fuel consumptions			X							MS Teams / WhatsApp
		Field visit covering housing, clinic, workers interview	X							X		WhatsApp
Continue smallholders block visit covering <b>Gavaiva</b> areas (11 smallholders)											WhatsApp	
16:00 – 16:30	Daily interim	X	X	X	X	X	X	X	X	X	MS Teams	



Date	Time	Subjects	NC	MH	VS	MF	VK	EP	PA	MK	ICT Planned	
Tuesday, 10/08/2021	6:30 – 8:30	Travel to <b>Kaurausu / Moroa Estate</b>						X				
		Travel to <b>Bilomi / Loata Estate</b>							X			
	8:30 – 9:00 (6:30 MY)	Daily briefing and planning	X	X	X	X	X	X	X	X	MS Teams	
	9:00 – 12:00 (7:00 MY)	<b>Kaurausu / Moroa Estate</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, SEIA requirement workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management.				X					X	WhatsApp
		Documentation review – trainings, social management plan implementation, complaints and grievance, implementation of HCV plan	X									MS Teams
		<b>Bilomi / Loata Estate</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, SEIA requirement workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management			X					X		WhatsApp
		Documentation review – trainings, social management plan implementation, complaints and grievance, implementation of HCV plan		X								MS Teams
		Smallholders interview & block visit covering <b>Galai</b> and <b>Valoka</b> areas (11 smallholders)					X	X				WhatsApp
	12:00 – 13:00	<b>Lunch Break</b>										
	13:00 – 16:00 (11:00 MY)	<b>Kaurausu / Moroa Estate</b> Documentation review - Fertilizer records, IPM Plan, road maintenance, safety implementation, waste records, fossil fuel consumptions				X						MS Teams / WhatsApp
		Field visit covering housing, clinic, workers interview	X								X	WhatsApp
		<b>Bilomi / Loata Estate</b> Documentation review - Fertilizer records, IPM Plan, road maintenance, safety implementation, waste records, fossil fuel consumptions			X							MS Teams / WhatsApp
		Field visit covering housing, clinic, workers interview	X							X		WhatsApp
Continue smallholders block visit covering <b>Galai</b> and <b>Valoka</b> areas (11 smallholders)											WhatsApp	

Date	Time	Subjects	NC	MH	VS	MF	VK	EP	PA	MK	ICT Planned	
	16:00 – 16:30	Daily interim	X	X	X	X	X	X	X	X	MS Teams	
Wednesday, 11/08/2021	6:30 – 8:30	Travel to <b>Navarai Estate</b>						X				
		Travel to <b>Volupai Estate</b>							X			
	8:30 – 9:00 (6:30 MY)	Daily briefing and planning	X	X	X	X	X	X	X	X	MS Teams	
	9:00 – 12:00 (7:00 MY)	<b>Navarai Estate</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, SEIA requirement workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management.				X					X	WhatsApp
		Documentation review – trainings, social management plan implementation, complaints and grievance, implementation of HCV plan	X									MS Teams
		<b>Volupai Estate</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, SEIA requirement workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management			X					X		WhatsApp
		Documentation review – trainings, social management plan implementation, complaints and grievance, implementation of HCV plan		X								MS Teams
		Smallholders interview and block visit covering <b>Galai</b> areas (13 smallholders)						X	X			WhatsApp
	12:00 – 13:00	<b>Lunch Break</b>										
	13:00 – 16:00 (11:00 MY)	<b>Navarai Estate</b> Documentation review - Fertilizer records, IPM Plan, road maintenance, safety implementation, waste records, fossil fuel consumptions				X						MS Teams / WhatsApp
Field visit covering housing, clinic, workers interview		X								X	WhatsApp	
<b>Volupai Estate</b> Documentation review - Fertilizer records, IPM Plan, road maintenance, safety implementation, waste records, fossil fuel consumptions				X							MS Teams / WhatsApp	
Field visit covering housing, clinic, workers interview		X							X		WhatsApp	

Date	Time	Subjects	NC	MH	VS	MF	VK	EP	PA	MK	ICT Planned	
		Continue smallholders block visit covering <b>Galai</b> areas (13 smallholders)					X	X			WhatsApp	
	16:00 – 16:30	Daily interim	X	X	X	X	X	X	X	X	MS Teams	
Thursday, 12/08/2021	8:30 – 9:00 (6:30 MY)	<b>Bebere Estate</b> Daily briefing and planning	X	X	X	X	X	X	X	X	MS Teams	
	9:00 – 12:00 (7:00 MY)	Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, SEIA requirement workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management.		X	X	X		X			WhatsApp	
		Documentation review – trainings, social management plan implementation, complaints and grievance, implementation of HCV plan		X						X		MS Teams
		Independent estate block visit and interview ( <b>Lakiemata, Polapolagama</b> )	X								X	WhatsApp
		Smallholders interview and block visit covering <b>Silanga</b> areas (10 smallholders)					X	X			WhatsApp	
	12:00 – 13:00	<b>Lunch Break</b>										
	13:00 – 16:00 (11:00 MY)	<b>Bebere Estate</b> Documentation review - Fertilizer records, IPM Plan, road maintenance, safety implementation, waste records, fossil fuel consumptions					X					MS Teams / WhatsApp
Field visit covering housing, clinic, workers interview			X						X		WhatsApp	
Independent estate block visit and interview ( <b>Karapi, Mapakakea</b> )		X								X	WhatsApp	
Continue smallholders interview and block visit covering <b>Silanga</b> areas (10 smallholders)						X	X				WhatsApp	
16:00 – 16:30	Daily interim	X	X	X	X	X	X	X	X	X	MS Teams	
Friday, 13/08/2021	8:30 – 12:00 (6:30 MY)	<b>Dami Office</b> Outstanding and document follow up	X	X	X	X	X		X		MS Teams	
		Smallholders interview and block visit covering <b>Silanga</b> areas (9 smallholders)	X				X	X		X	WhatsApp	
	12:00 – 13:00	<b>Lunch Break</b>										
	13:00 – 16:00 (11:00 MY)	<b>Dami Office</b> Outstanding and document follow up	X	X	X	X	X		X		MS Teams	

Date	Time	Subjects	NC	MH	VS	MF	VK	EP	PA	MK	ICT Planned	
		<b>Smallholder Office</b> Smallholders documentation review and follow up	X				X	X		X	WhatsApp	
	16:00 – 16:30	Daily interim	X	X	X	X	X	X	X	X	MS Teams	
Saturday, 14/08/2021	8:30 – 12:00 (6:30 MY)	<b>Dami Office</b> Outstanding and document follow up	X	X	X	X	X		X		MS Teams	
		<b>Smallholder Office</b> Outstanding and document follow up	X				X	X		X	MS Teams	
	12:00 – 13:00	<b>Lunch Break</b>										
	13:00 – 15:00 (11:00 MY)	<b>Dami Office</b> Outstanding and document follow up	X	X	X	X	X			X		MS Teams
		<b>Smallholder Office</b> Outstanding and document follow up	X				X	X			X	MS Teams
	15:00 – 16:00 (13:00 MY)	Auditors time / closing meeting preparation	X	X	X	X	X	X	X	X	X	MS Teams
	16:00 (14:00 MY)	Closing Meeting	X	X	X	X	X	X	X	X	X	MS Teams

## Section 3: Assessment Findings

### 3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	<p>Yes. Sime Darby Plantation Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>On 16/01/2020, Sime Darby Plantation Berhad under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a></p>	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>Yes. Generally all estates and mills excepted stated below or in the TBP are certified with RSPO.</p> <p>Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management.</p>	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	There is no new acquisitions as per the latest TBP 2021.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there are deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.	Complied
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?	<p>Yes.</p> <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi</p>	Complied

	<p>Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.</p> <p>PT Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019.</p> <p>Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public notification letter: <a href="http://www.rspo.org/certification/public-announcement">www.rspo.org/certification/public-announcement</a></p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a></p> <p>ACOP 2019 has been cross-referenced as below: <a href="http://www.rspo.org/members/29">www.rspo.org/members/29</a></p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>Although there lapses has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&amp;C criterion 7.12.</p>	<p>Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly</p>	<p>Complied</p>

	are due to awaiting to receive land titles at the Indonesia management units.	
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification</p> <ol style="list-style-type: none"> <li>1. NBPOL (Poliamba Limited) 23/05/2020 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-plantation-berhad-nbpol-poliamba-limited">https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-plantation-berhad-nbpol-poliamba-limited</a></li> <li>2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd</a></li> <li>3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-ramu-agri-industries-ltd">https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-ramu-agri-industries-ltd</a></li> <li>4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-ramu-agri-industries-limited">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-ramu-agri-industries-limited</a></li> <li>5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-higaturu-oil-palms">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-higaturu-oil-palms</a></li> <li>6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamawan-png">https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamawan-png</a></li> <li>7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamendauen-png">https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamendauen-png</a></li> <li>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-roka-mini-estate">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-roka-mini-estate</a></li> <li>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website</li> </ol>	Complied

	<p><a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-j-estate">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-j-estate</a></p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-limited-higaturu-oil-palm">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-limited-higaturu-oil-palm</a></p> <p>11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc-new-planting-assessment">https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc-new-planting-assessment</a></p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment-1">https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment-1</a></p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment">https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment</a></p> <p>Management units for 11 – 13 above were disposed.</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 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of 14/07/2021, 10 LUCAs were approved with 0 conservation liability and remaining 9 are still pending from RSPO.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p>	<p>Complied</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>Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</p>	<p>Complied</p>



<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted between July 2020 – August 2020.</p> <p>The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.</p>	<p>Complied</p>
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>No any critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company</p>	<p>Complied</p>

### 3.2 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>
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>By the definition of the National Interpretation, the smallholders and outgrowers attached to NBPOL-WNB are considered as independent smallholders. However, NBPOL-WNB has ensure that these smallholders are certified together with the current certification.</p>	<p>Complied</p>

## Approved Time Bound Plan

SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	Sungai Dingin	Sungai Dingin Oil Mill	-	Karangan, Kedah	Certified	12/08/2011	-
		Anak Kulim Estate					
		Sungai Dingin Estate					
		Somme Estate					
		Bukit Selarong Estate					
		Padang Buluh Estate					
		Bukit Hijau Estate					
Jentayu Estate							
2	Chersonese	Chersonese Oil Mill	-	Kuala Kurau, Perak	Certified	05/10/2011	-
		Chersonese Estate					
		Kalumpong Estate					
		Tali Ayer Estate					
		Holyrood Estate					
3	Elphil	Elphil Oil Mill	-	Sungai Siput, Perak	Certified	16/08/2011	-
		Kamuning Estate					
		Elphil Estate					
		Kinta Kellas Estate					
4	Flemington	Flemington Oil Mill	-	Teluk Intan, Perak	Certified	05/10/2011	-
		Flemington Estate					
		Bagan Datoh Estate					
		Sabak Bernam Estate					
		Sg. Samak Estate					

5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan, Perak	Certified	03/03/2011	-
		Selaba Oil Mill					
		Seri Intan (+ Selaba) Estate					
		Sabrang Estate					
		Sogomana Estate					
		Sg. Wangi Estate					
		Bikam Estate					
		Cluny (+ Bedford) Estate					
6	Tennamaram	Tennamaram Oil Mill	-	Bestari Jaya, Selangor	Certified	03/03/2011	-
		Tennamaram Estate					
		Sungai Buluh Estate					
		Bukit Talang Estate					
7	Bukit Kerayong	Bukit Kerayong Oil Mill	-	Kapar Selangor	Certified	15/04/2011	-
		Bukit Kerayong Estate					
		Bukit Cheraka Estate					
		Elmina Estate					
8	East	East Oil Mill	-	Carey Island, Selangor	Certified	19/05/2011	-
		East Estate					
		Sepang Estate					
		Dusun Durian Estate					
9	West	West Oil Mill	-	Carey Island, Selangor	Certified	19/05/2011	-
		West Estate					
10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	07/07/2011	-
		Bukit Puteri Estate					
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	07/07/2011	-
		Kerdau Estate					
		Jentar Estate					

		Mentakab Estate					
		Chenor Estate					
		Sg Mai Estate					
12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	07/07/2011	-
		Jabor Estate					
13	Labu	Labu Oil Mill	-	Nilai, Negeri Sembilan	Certified	30/12/2011	New Labu Estate has become a division of Labu Estate.
		Labu Estate					
14	Tanah Merah	Tanah Merah Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	19/05/2010	-
		Tanah Merah Estate					
		Bukit Pelandok Estate					
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	18/02/2014	Siliao Estate has now been merged into Salak Estate and Bradwall Estate.
		Sua Betong Estate					
		Sengkang Estate					
		Bradwall Estate					
		PD Lukut Estate					
		Tampin Linggi Estate					
		Sg. Bahru Estate					
		Salak Estate					
16	Kok Foh	Kok Foh Oil Mill	-	Bahau, Negeri Sembilan	Certified	07/07/2011	-
		Muar River Estate					
		Sg. Senarut Estate					
		Sg. Gemas Estate					
		Kok Foh Estate					
		Bukit Pilah Estate					
		St. Helier Estate					
		Sungai Sabaling Estate					
		Pertang Estate					

17	Kempas	Kempas Oil Mill	-	Jasin, Melaka	Certified	19/05/2010	-
		Kempas Estate					
		Tangkah Estate					
		Kemuning Estate					
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	-	Jasin, Melaka	Certified	05/10/2011	-
		Serkam Estate					
		Diamond Jubilee Estate					
		Bukit Asahan Estate					
19	Pagoh	Pagoh Oil Mill	-	Muar, Johor	Certified	28/1/2014	-
		Pagoh Estate					
		Welch Estate					
		Lanadron Estate					
		Pengkalan Bukit Estate					
20	Chaah	Chaah Oil Mill	-	Chaah, Johor	Certified	18/11/2010	-
		Chaah Estate					
		Sg. Simpang Kiri Estate					
		North Labis Estate					
21	Gunung Mas	Gunung Mas Oil Mill	-	Kluang, Johor	Certified	19/05/2010	* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bkt Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
		Gunung Mas Estate					
		Kempas Klebang Estate					
		Bukit Paloh Estate					
		Yong Peng Estate					
22	Bukut Benut	Bukit Benut Oil Mill	-	Kluang, Johor	Certified	05/11/2011	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate					
		Lambak Elaeis Estate					
		CEP Nyior Estate					

23	Ulu Remis	Ulu Remis Oil Mill	-	Layang-Layang, Johor	Certified	11/04/2011	-
		Ulu Remis Estate					
		Cenas Estate					
		Bukit Badak Estate					
		Tun Dr. Ismail Estate					
		Pekan Estate					
		Sembrong Estate					
24	Hadapan	Hadapan Oil Mill	-	Layang-Layang, Johor	Certified	29/3/2011	-
		Sri Pulau Estate					
		Kulai Estate					
		Layang Estate					
		CEP Renggam Estate					
26	Sandakan Bay	Sandakan Bay	-	Sandakan, Sabah	Certified	01/10/2008	-
		Tun Tan Siew Sin					
		Tunku Estate					
		Tigowis Estate					
		Sentosa Estate					
		Segaliud Estate					
27	Melalap	Melalap Oil Mill	-	Tenom, Sabah	Certified	21/1/2011	-
		Melalap Estate					
		Sapong Estate					
28	Binuang	Binuang Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-
		Binuang Estate					
		Sungang Estate					
		Tingkayu Estate					
		Jeleta Bumi Estate					
29	Giram	Giram Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-

		Giram Estate					
		Mostyn Estate					
30	Merotai	Merotai Oil Mill	-	Tawau, Sabah	Certified	16/1/2009	-
		Merotai Estate					
		Imam Estate					
		Tiger Estate					
		Table Estate					
31	Layang	Lavang Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Lavang Estate					
		Rasan Estate					
		Belian Estate					
		Kelida Estate					
		Lavang (Special) Estate					
		Pekaka Estate					
		Ruai Estate					
		Dulang Estate					
		Charquest Estate					
		Paroh Estate					
32	Rajawali	Rajawali Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Rajawali Estate					
		Samudera Estate					
		Semarak Estate					
		Bayu Estate					
33	Derawan	Derawan Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Derawan Estate					
		Sahua Estate					
		Takau Estate					
		Damai Estate					

34	Pekaka	Pekaka Mill	-	Bintulu, Sarawak	Withdrawn	NA	Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang.
35	Bintang	Bintang Oil Mill	-	Johor	NA	NA	* SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction.

SDP - RSPO Certification for Time Bound Plan - Indonesia Operations

No	Management Unit	Mill and Supply Base	Time Bound Plan	Latest Internal / External	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name			Audit Date				
1	PT Lahan Tani Sakti	Alur Dumai Mill	-	-	Rokan Hilir District – Riau	Certified	16/01/2012	-
		Alur Dumai Estate						
2	PT Sajang Heulang	Mustika Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	03/07/2013	-
		Mustika Estate						
		KKPA-2 PT.SHE Estate						
		KKPA-3 PT.SHE Estate						
		KKPA-5 PT.SHE Estate						
3	PT Ladangrumpun Suburabadi	Angsana Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	06/07/2021	-
		Angsana Estate						
		Pantai Bonati Estate						
		Gunung Sari Estate						
		KKPA-1 PT.SHE Estate						
		KKPA-4 PT.SHE Estate						



		Subur Abadi Plasma 1 Estate	2021	2020		stage 2		
4	PT Langgeng Muaramakmur	Bebunga Mill	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	Previously KKPA Sg. Cengal. Sime Darby Plantation does not have management control over the plasma scheme.
		Bebunga Estate						
		Sungai Cengal Estate						
		Bakau Estate						
		KKPA LMR	2021	2020				
5	PT Kridatama Lancar	Sukamandang Mill	-		Seruyan and East– Kotawaringin District Central Kalimantan	Certified	05/07/2011	-
		Sukamandang Estate						
		Sapiri Estate						
		Barasdanum Estate						
		Kuala Kuayan Estate						
6	PT Bahari Gembira Ria	Ladang Panjang Mill	-		Muaro Jambi District - Jambi	Certified	09/07/2012	Only Division 3 (1200ha) was certified. Division 1 & 2 with 1792 Ha received HGU recently. The unit is getting ready for certification. Plan for certification in 2020. Total Ladang Panjang Estate is 2992 ha. Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR.
		Ladang Panjang Estate						
		Plasma BGR Estate	2020	2020				
7	PT Tunggal Mitra Plantations	Manggala Mill	-		Rokan Hilir District – Riau	Certified	25/11/2010	-
		Manggala 1 Estate						
		Manggala 2 Estate						
		Manggala 3 Estate						
8		Pondok Labu Mill	-			Certified	16/03/2012	-

	PT Paripurna Swakarsa	Pondok Labu Estate			Kotabaru District – South Kalimantan			
		Binturung Estate						
		Rampa Estate						
		Sesulung Estate						
9	PT Bersama Sejahtera Sakti	Gunung Aru Mill			Kotabaru District – South Kalimantan	Certified	05/07/2011	-
		Gunung Aru Estate						
		Gunung Kemas Estate						
		Laut Timur Estate						
		Pantai Timur Estate						
		KKPA MBP	2021	2020				Currently in nursery stage and not yet due for harvesting, the year of planting was in 2014. Internal Audit for 2019 is planned in Dec 2019.
10	PT Guthrie Pecconina	Rantau Panjang Mill			Musi Banyuasin District – South Sumatera	Certified	16/03/2012	Remarks: Land legalisation process for 4152.70 ha is still in process.
		Rantau Panjang Estate						
		Bumi Ayu Estate						
		Karang Ringin Estate						
		Napal Estate						
		Mangun Jaya Estate						
				Sungai Jernih Estate and GPI KKPA Estate				
11	PT Laguna Mandiri	Rantau Mill			Kotabaru District – South Kalimantan	Certified	30/12/2011	
		Rantau Estate						
		Matalok Estate						
		Betung Mill						
		Betung Estate						
				Sekayu Estate				

12	PT Indotruba Tengah	Sekunyir Mill	-		Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23/11/2010	-
		Sekunyir						
		Seruyan Estate						
13	PT Swadaya Andika	Selabak Mill	-		Kotabaru District – South Kalimantan	Certified	16/03/2012	Mill closed down and all the supply bases was transferred to Rantau Mill – PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri – Rantau Factory certification.
		Selabak Estate						
		Randi Estate						
		Sangkoh Estate						
		Lanting Estate						
14	PT Bina Sains Cemerlang	Sungai Pinang Mill	-		Musi Rawas District – South Sumatera	Certified	11/09/2012	Remarks: Land legalisation process for 308.35 ha is still in process.
		Sungai Pinang Estate						
		Bukit Pinang Estate						
15	PT Teguh Sempurna	Pemantang Mill	-		Seruyan and East Kotawaringin District – Central Kalimantan	Certified	05/07/2011	-
		Pemantang Estate						
		Kawan Batu Estate						
		Hatan Tiring Estate						
		Batang Garing Estate						
16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill	-		Indra Giri Hilir District – Riau	Certified	11/10/2011	-
		Teluk Bakau Estate						
		Nusa Lestari Estate						
		Nusa Perkasa Estate					01/04/2014	
		Mandah Mill						
		Mandah Estate						
		Rotan Semelur Estate						
17	PT Aneka Intipersada	Teluk Siak Mill	-		Pekanbaru, Siak District – Riau	Certified	11/10/2011	-
		Teluk Siak Estate						
		Pinang Sebatang Estate						

		Aneka Persada Estate								
18	PT Tamaco Graha Krida	Ungkaya Mill	-		Morowali District – Sulawesi Tengah	Certified	10/7/2012	-		
		Ungkaya Estate								
		Plasma TGK Estate	2021	2020		-	Usage Approval ( <i>Perijinan</i> ) process is ongoing			
19	PT SIME Indo Agro	Bukit Ajong Mill	-		Sanggau District – West Kalimantan	Certified	18/10/2010	Land legalisation process for East Est for 5815.64 ha is still in process.		
		West Estate								
		East Estate								
		East* Estate /Sei Mawang Estate	2021	2020		-	Land legalisation for Sei Mawang is still in process			
		East Plasma Estate	-			Certified	18/7/2016	-		
		West Plasma Estate								
20	PT Padang Palma Permai /PT Perkasa Subur Sakti	Blang Simpo Mill	-		Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified	03/05/2013	-		
		Tamiang (PT PPP) Estate								
		Batang Ara (PT PSK) Estate								
		Blang Simpo-01 Estate								
		Blang Simpo-02 Estate								
21	PT Sandika Natapalma	Lembiru Mill	-		Ketapang District – West Kalimantan	Certified	03/07/2014	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.		
		Lembiru Estate								
		Awatan Estate								
		Karya Palma Estate	2021	2020		-	Usage Approval ( <i>Perijinan</i> ) process is ongoing			
		KKPA SNP Estate	2021	2020		-	Usage Approval ( <i>Perijinan</i> ) process is ongoing			
22	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Estate	-		Ketapang District – West Kalimantan	Certified	03/07/2019	-		
		Sungai Putih (PT BAL) Estate	2021	2020					-	Land Approval is obtained in 2015 while the other approvals are still in processing HGU obtained as per May 2018
		Beturus (PT BAL) Estate	2021	2020					-	

		KKPA BAL Estate	2021	2020		-		
23	PT Mitral Austral Sejahtera	MAS Mill	NA	NA	Sanggau District – West Kalimantan	NA	NA	The properties was sold and currently SDP have no control in the management. Please find latest information on 'Updates on PT MAS' worksheet and updates to RSPO Secretariat.
		MAS 1 Estate						
		MAS 2 Estate						
		MAS 4 Estate						
		Plasma MAS Estate						

SDP - RSPO Certification for Time Bound Plan – Papua New Guinea / Solomon Islands Operations

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	-	Guadalcanal Province, Solomon Islands	Certified	18/03/2011	-
		Tetere Estate					
		Ngalimbiu Estate					
		Mbalisuna Estate					
		Smallholders – West Zone (83)					
		Smallholders – Central Zone (53)					
		Smallholders – MBA East Zone (59)					
		Smallholders – MBE East Zone (37)					
2	Milne Bay Estate (MEB)	Hagita Oil Mill	-	Milne Bay Province, PNG	Certified	15/02/2018	-
		Giligili Estate					
		Hagita Estate					
		Waigani Estate					
		Sagarai Estate					
		Padipadi Estate					
		Mariawatte Estate					
		Smallholders – East Gurney Estate (264)					
		Smallholders – West Gurney Estate (229)					

		Smallholders – East Sagarai Estate (157)					
		Smallholders – West Sagarai Estate (221)					
3	Poliamba (POL)	Poliamba Oil Mill	-	New Ireland Province, PNG	Certified	19/03/2012	-
		Kara Estate					
		Nalik Estate					
		West Coast Estate					
		Noatsi Estate					
		Madak Estate					
		Smallholders -North Division (615)					
		Smallholders- South Division (868)					
		Smallholders -West Division (309)					
4	Ramu Agricultural Industrial Ltd (RAIL)	Gusap Mill	-	Morobe Province, PNG	Certified	05/08/2010	-
		Gusap East (Gusap) Estate					
		Gusap West (Paddox) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	-	Oro Bay Province, PNG	Certified	01/02/2013	-
		Mamba Oil Mill					
		Embi Estate					
		Ambogo Estate					
		Sangara Estate					
		Sumbiripa Estate					
		Mamba Estate					
		Sambogo Estate					

		Scheme Smallholder Sorovi Division(2019)				
		Scheme Smallholder Saiho Division(842)				
		Scheme Smallholder Aeka Division (911)				
		Scheme Smallholder Igora Division (1367)				
		Scheme Smallholder Ilimo Division (671)				
6	West New Britain (WNB)	Mosa Oil Mill	-	Kimbe, West New Britain, PNG	Certified	10/09/2008
		Kumbango Oil Mill				
		Kapiura Mill				
		Numundo Mill				
		Waraston Mill				
		Bebere Estate				
		Kumbango Estate				
		Togulo Estate				
		Dami Estate				
		Waisisi Estate				
		Kautu Estate				
		Karassu Estate				
		Moroa Estate				
		Bilomi Estate				
		Loata Estate				
		Haella Estate				
		Garu Estate				
		Daliavu Estate				
Sapuri Estate						
Malilimi Estate						
Rigula Estate						

		Numundo Estate					
		Navarai / Karato ME /KDC EU Estate					
		Volupai / Lotomgam / Natupi / Goruru Estate					
		Lolokoru Estate					
		Ove Estate					
		Tamare Estate					
		Smallholders LSS Mosa (1822)					
		Smallholders VOP East (1817)					
		Smallholders VOP Central (1964)					
		Smallholders VOP West (1279)					
		Smallholders LSS Kapiura (551)					
		Smallholders VOP Kapiura (850)					
		Smallholder Kaulong / Akami / Pushiki / Repamira / Sakapei					
7	Markham Farms Company Limited (MFCL) / Markham Agro Pte Ltd	Erap Mill	-	Markham Farms	Certified	27/3/2020	There is total area NPP: 710.30ha which is currently excluded from the certification scope until the NPP is approved
		Munum Estate					
		Maralumi Estate					
		Erap Estate					



### 3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were no Critical; two (2) Minor nonconformities and five (5) Opportunity For Improvement raised. The Mosa Mill, Kumbango Mill, Waraston Mill, Kapiura Mill and Numundo Mill and Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

<b>Non-conformity</b>			
<b>NCR Ref #</b>	2092717-202107-N1	<b>Date Issued</b>	14/08/2021
<b>Due Date</b>	Next Annual Surveillance	<b>Date of nonconformity Closure</b>	Next Annual Surveillance
<b>Clause &amp; Category (Critical / Minor)</b>	3.3.3 – Minor		
<b>Statement of Nonconformity:</b>	Records of monitoring and action taken are not consistently maintained and available		
<b>Requirement Reference:</b>	Records of monitoring and any actions taken are maintained and available		
<b>Objective Evidence:</b>	Deviation of latest inspection results (PF29) against actual physical condition of house were observed at the following mills and estates <ul style="list-style-type: none"> <li>• Mosa Oil Mill - DLQ house (24A, 6B &amp; 19A)</li> <li>• Kumbango Oil Mill - DLQ house (17, 13 &amp; 25)</li> <li>• Kapiura Oil Mill - DLQ house (3, 14 &amp; 29)</li> <li>• Lolokuru Estate - QLQ house (6, 17 &amp; 26)</li> <li>• Bilomi Estate - DLQ house (2,12 &amp; 20)</li> </ul> Based on site verification at operating unit's housing compound, deviation of inspection results against actual physical condition of house were observed. Interview with the house occupants have confirmed that most of the problems were reported to their immediate superior/supervisor and the work order issuance process to the management and construction team still in progress. Thus, timely completion on the request for house repair were not made available for verification.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>• Appointment of Housing Officer under Construction Department to record, monitor and ensure notifications addressed to Construction are acted on and addressed with an update given to requesting Department.</li> <li>• SOP for Housing Urgent Repair drawn up and circulated with training and awareness scheduled to complete by end of September early October 21.</li> <li>• Monthly update on housing population census with reporting process in place with a centralized tracker.</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>• No designated personnel to record concerns and consistently monitor to ensure notifications are raised and to follow up on the actions taken at each Department / Plantation level.</li> <li>• No SOP to follow through on Housing Urgent Repairs process and to have in place a centralized housing population census.</li> </ul>		

<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>Appoint personnel at site / department level to oversee, maintain records and monitor process of ensuring timely inspection are done as per quarterly schedule and concerns raised are captured with monitoring of defects being addressed and feedback given to worker.</li> <li>Closer monitoring to ensure there is effectiveness in the process through the internal quarterly audits.</li> </ul>
<b>Assessment Conclusion:</b>	<p>The corrective action plan was evaluated. The corrections implemented have addressed the objective evidence while the corrective actions provided are able to eliminate the root cause analysis while the root cause analysis is robust to eliminate the non-conformance.</p> <p>The Housing Defects Urgent Reporting SOP and was developed and the format of to check the housing statistic was reviewed by the audit team and deemed the corrections has able to correct the objective evidence found. The housing officer Anna Smith was appointed to manage this correction.</p> <p>The implementation of corrective actions will be evaluated during next surveillance audit.</p>

Non-conformity			
<b>NCR Ref #</b>	2092717-202107-N2	<b>Date Issued</b>	14/08/2021
<b>Due Date</b>	Next Annual Surveillance	<b>Date of nonconformity Closure</b>	Next Annual Surveillance
<b>Clause &amp; Category (Critical / Minor)</b>	7.3.1 – Minor		
<b>Statement of Nonconformity:</b>	Some wastes were inadequately addressed in the waste management plan.		
<b>Requirement Reference:</b>	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
<b>Objective Evidence:</b>	<p>Based on the Environment Permit [ref.: EP-L2(411), dated 27/04/2017] issued by the PNG Conservation and Environment Protection Authority (CEPA), New Britain Palm Oil Limited is required to comply with the applicable requirements under the Environmental Code of Practice for Papua New Guinea Oil Palm Processing Industry, DEC, 2013. Among the requirements are:</p> <ul style="list-style-type: none"> <li>Rainfall on piled EFB within the mill area should be collected and diverted into the effluent treatment system (Clause 4.3.7).</li> <li>Wastes contaminated with hydrocarbons such as oil filters, from which as much oil as possible has been drained, must be disposed in a designated hydrocarbon waste location that is impermeable so that there is no possibility of groundwater contamination. If there are circumstances where the location is permeable or may be susceptible to surface to groundwater transfer, every effort must be made to ensure that there is no liquid exchange by installing and impermeable lining (Clause 4.3.11.2).</li> </ul> <p>The above requirements were inadequately addressed in the management plan. In addition to that, based on the site visits, the following lapses were observed:</p> <ul style="list-style-type: none"> <li>Leachate or potential leachate from EFB pile at MOM, NOM, WOM and KAPOM was not channeled into the effluent treatment system. It was discharged into the environment through storm drain instead.</li> </ul>		

	<ul style="list-style-type: none"> <li>At the designated hydrocarbon wastes pits located at landfill areas, it was observed that no impermeable lining installed.</li> </ul>
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>Engaging contractors to clear out EFB daily to reduce stock piling with ongoing monitoring by Mill Managers and a plan in place to divert leachate into effluent pond.</li> <li>SOP for digging of new landfill sites drafted up to include installing of lining.</li> </ul>
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>EFB Pile / Leachate – No proposed plan in place as yet until it was raised, due to the PNG Oil Palm Processing Industry Environmental Code of Practice 1.3 indicate to achieve compliance within 10 years of the publication of the Code of Practice which is by July 2023.</li> <li>No SOP in place for new landfill .</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>Leachate from the EFB diverted to mill sludge pit and discharged into the mill effluent pond. Pump and pipe details confirmed, with the project scheduled to complete within 6-months' time (Feb 22).</li> <li>Arrangement made by Group Sustainability to engage CEPA (Department of Environment – Government) for a site visit. All NBPOL sites have been visited except WNB. They will schedule to visit in October 2021.</li> <li>EIA in progress on all Landfill within operation and survey is scheduled to be carried out with installation of landfill liner with the use of clay considering its suitability and availability.</li> </ul>
<b>Assessment Conclusion:</b>	<p>The corrective action plan was evaluated. The corrections implemented have addressed the objective evidence while the corrective actions provided are able to eliminate the root cause analysis while the root cause analysis is robust to eliminate the non-conformance.</p> <p>The implementation of corrections and corrective actions will be evaluated during next surveillance audit.</p>

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
2092717-202107-I1	The overall NBPOL's policies implementation is satisfactory. However the changeover of the Parent Company's policies and procedures could be further improved and accelerated.
2092717-202107-I2	The grievance registers/mechanism could be further improve to incorporate a centralized / standardized grievances monitoring to ensure all grievances are monitored and addressed effectively.
2092717-202107-I3	The delivering of FFBs by third party contractors could be improved in the aspect of not overloading and drivers carries proper driving documents.
2092717-202107-I4	It was noted that some of site-specific issues has yet to be included in the social management plan (SMP) for improvement. Issues such as expensive pricing at trade store and water shortage/rationing issues to be incorporated in the SMP and ensure that planned action, timeline of completion being met and monitored effectively.
2092717-202107-I5	The grievance registers/mechanism could be further improve to incorporate a centralized / standardized grievances monitoring to ensure all grievances are monitored and addressed effectively.

Positive Findings	
PF #	Description
PF 1	Land issues are maintained well and clear.
PF 2	Proactive social programs to address adequate, sufficient and affordable food.
PF 3	Well maintained stakeholder and smallholders engagements.
PF 4	Well maintained training for workers and smallholders
PF 5	Risk assessment has been conducted extensively
PF 6	Good community contribution especially in managing COVID-19

### 3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	N/A	Date Issued	N/A
Due Date	N/A	Date of nonconformity Closure	N/A
Clause & Category (Critical / Minor)	N/A		
Statement of Nonconformity:	N/A		
Requirement Reference:	N/A		
Objective Evidence:	N/A		
Corrections:	N/A		
Root Cause Analysis:	N/A		
Corrective Actions:	N/A		
Assessment Conclusion:	N/A		

Opportunity for Improvement	
OFI#	Description
OFI 1	<p><b>OFI Statement:</b> The social management plan could be enhance with input from the social dialog, environment and safety &amp; health assessments</p> <p><b>Verification / Follow-up actions:</b>            During this audit, it was verified that the inputs from the social, environment and Safety &amp; health assessment has been included in the management plan.</p>
OFI 2	<p><b>OFI Statement:</b> The procedures for management and monitoring system could be enhance for smallholder documents.</p> <p><b>Verification / Follow-up actions:</b>            The management of procedures has improved. Example the Independent Estate procedures are kept in the Smallholder Affairs Office.</p>

### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
<i>No ref from Previous CB</i>	Minor	4.1.2 (P&C 2013)	11/08/2017	Closed 26/07/2018
<i>No ref from Previous CB</i>	Minor	5.1.3 (P&C 2013)	11/08/2017	Closed 26/07/2018
2092717-202107-N1	Minor	3.3.3	14/08/2021	Next Annual Surveillance
2092717-202107-N2	Minor	7.3.1	14/08/2021	Next Annual Surveillance

### 3.4 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 Mosa Mill, Kumbango Mill, Waraston Mill, Kapiura Mill and Numundo Mill and Supply Base Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal stakeholder	Human Resource Team	Face to face online interview
Internal stakeholder	Gender Committee	Face to face online interview
Internal stakeholder	Housing compound community	Face to face online interview
Internal stakeholder	Community health workers/nursing officer/doctor	Face to face online interview
Internal stakeholder	House maintenance/construction department head	Face to face online interview
NGO	Forcert	Face to face online interview
External	Community Police	Face to face online interview
External	School teachers	Face to face online interview
Association	Hoskins Oil Palm Association	Face to face online interview
Association	Oil Palm Industry Corporation	Face to face online interview
Internal Stakeholder	NBPOL Women Empowering Women	Face to face online interview

Internal Stakeholder	Union Leader	Face to face online interview
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<b>Stakeholders comment</b>	
<b>1</b>	<p><b>Feedbacks: Forcert</b> – NBPOL is able to demonstrate the overall compliance of sustainable palm oil. The main concern is since NBPOL has been merged with Sime Darby Plantation from Malaysia for 3 years but the implementation of the Group policies are relatively slow.</p> <p><b>Audit Team verification and response:</b> Discussion the Head of Transformation understood that the delay in implementing the SDP Groups policies was due to the COVID-19 pandemic while she was not able to travel to PNG. Gap analysis within the NBPOL current system and SDP system has been evaluated. The remaining transformation will be incorporating the SDP processes into the NBPOL operations. As this exercise is relatively complex due to corporate merging, the audit team agrees time is required and especially approximately 18 months has been affected by COVID-19. However, the audit team has raised an OFI regarding this matter. Please refer to indicator 1.2.1</p>
<b>2</b>	<p><b>Feedbacks: Community Police (Mr Moses Narol)</b> – During the discussion with Mr Moses he has raised several issues related to the surroundings of NBPOL-WNB sites.</p> <ol style="list-style-type: none"> <li>1. Within the vicinity of Tamare Estate, there are many ex-NBPOL-WNB workers who are not repatriated back to their original province. These ex-workers are staying on the customary land and had caused nuisance surrounding community.</li> <li>2. Transporter of FFB at Silovuti sometimes violates the road regulation. Example overload the trucks and drivers not carrying proper driving documents.</li> <li>3. There are some social and household issues within the compound. These cases are being resolved by NBPOL-WNB and sometimes bring to higher authority. Hence it is important to improve the security at Silovuti area.</li> </ol> <p><b>Audit Team verification and response:</b> The audit team have several discussion with Land &amp; Mini Estate officer and Silovuti Plantation Manager regarding the 3 issues raised.</p> <ol style="list-style-type: none"> <li>1. Discussion with Lillian Holland confirmed that NBPOL-WNB has taken action to request for the police station to be setup at Silovuti area. A meeting with Member of Parliament, Honorable Sasindran Muthuvel on 14/07/2021 had discussed the issue that the nearest police station is Kimbe when police assistance is required at Silovuti. The distance to travel between Kimbe and Silovuti is very far.</li> <li>2. Lillian Holland has also confirmed to the audit team that several actions was taken to address the nuisance caused by the ex-NBPOL-WNB workers. The actions includes reporting to the Police Commander on 22/12/2020 and addressing the issue with Talasea ILG Committee. NBPOL-WNB has requested the ILG to issue eviction of the ex-workers.</li> <li>3. When the audit team discuss the issue why the ex-workers are not repatriated back to their original province, it was informed to the audit team that these workers are no eligible to enjoy free repatriation as they are themselves came to the WNB province for opportunities. Hence it would be their own responsible to pay for the expenses to return to their province. The company act is according to the company General Policies &amp; Regulation clause on Repatriation and Passage Allowance.</li> <li>4. Discussion with Mr Mohd Nasir regarding the FFB transportation issues happening in Silovuti area. He had acknowledge the issues and has shown the audit team the improvement plan which includes introduction of netting for the FFB Trucks; the weighbridge operator at the estate is required not to issue the delivery docket if the truck was overloaded and to develop a clear SOP to check the cartage activities. Other than that Contractors will be included in the OHS committee meeting to ensure their awareness on the issues. Since the issue have been acknowledge and actions has been continuously taken, an OFI was raised to allow further implementation. Please refer to indicator 2.2.2</li> </ol>
<b>3</b>	<p><b>Feedbacks: Augustine Kapi (Hoskins Oil Palm Grower Association)</b> commented that the company is doing fine and smallholder department is trying their best to address issues. He commented that OPIC and Oil Palm Research Association (OPRA) need to communicate and work closely with NBPOL when blocks are undergoing replanting especially to ensure the buffer zone are setup properly.</p>

	<p><b>Audit Team verification and response:</b> The Smallholders Affairs Manager are able to demonstrate that continuous training are provided to smallholders during Field Days. The topics include buffer zone and what are the dos and don'ts at buffer zone.</p>
<b>4</b>	<p><b>Feedbacks: Ruth Jordan Som (NBPOL Women Empowering Women Chairlady)</b> commented that social incident such as rape do happens within NBPOL. She commented that safety of women in the plantation is still a concern.</p> <p><b>Audit Team verification and response:</b> The company with all efforts have regularly create awareness on gender base violence and sexual harassment. Regular meeting are held with the SQM team on women safety so actions can be identified to further improve situation. The company have made more effort by employing a social Welfare Officer Peter Mirio to focus in addressing the concerns. NBPOL-WNB does not tolerate such actions and behaviours. Person that was being reported with solid evidence will be terminate from the company. Samples of the cases happened on 22/02/2021 and 20/01/2021 was reviewed.</p>
<b>5</b>	<p><b>Feedbacks: Alois Bomai (President of West New Britain Oil palm Workers Union)</b> commented several issues during the discussion</p> <ol style="list-style-type: none"> <li>1. Workers that are staying outside does not get travel allowance which is a cost to this workers to go to work.</li> <li>2. Meeting with the Union was not fulfilled by NBPOL-WNB managers</li> <li>3. Living conditions of the compounds have to improve.</li> <li>4. Pay rates of the workers have to improve.</li> </ol> <p><b>Audit Team verification and response:</b> The audit team have several discussion with Human Resource Team and Plantation Heads related the issue raised.</p> <ol style="list-style-type: none"> <li>1. According to the company General Policies &amp; Regulation – Housing Allowance clause 5, stated that if company provide transport to transfer workers to work, there shall be no further allowance. If there is no transport provided Transport Allowance of K5.00 per day is payable each fortnight.</li> <li>2. Discussion with Human Resource Manager regarding the Union meeting schedule. As explained by the Human Resource Manager, he only missed 1 meeting so far due to other commitments and he has sent the Welfare officer to attend the Union Meeting.</li> <li>3. The physical condition of the compounds was verified during the audit and it was found that there are deviations against the inspections records. Hence a non-conformance was raised against indicator 3.3.3.</li> <li>4. The pay rate of the workers are paid according to the national minimum wage with exemption given by the authority. The mechanism to increase pay on annual basis is in place following workers evaluation. Furthermore once NBPOL-WNB completed the Decent Living wage, there could be significant gap that salary shall be increase accordingly despite having an exemption from authority.</li> </ol>
<b>6</b>	<p><b>Feedbacks: HR team (Department head/Welfare/Industrial Relation/Housing Officer)</b> – HR team has given a brief introduction of their roles in managing HR issues. General overview on how HR processes being implemented was explained to auditor for more clarification based some inputs from worker interview and document verification. General Policies and Regulations Handbook dated May 2010 is referred as main terms and conditions of employment as well as entitlement and perks for those employed by WNB. There are issues of domestic violence as well as industrial relation disputes reported and were properly handled by team. Noted that the housing officer has mentioned on the gap in terms of rectifying the repair request and an SOP being developed for the said issue.</p> <p><b>Audit Team verification and response:</b> Noted on the explanation by HR team with their current roles and responsibility in managing companywide HR issues.</p>
<b>7</b>	<p><b>Feedbacks: Gender Committee Representatives</b> – The female workers understand the function of Gender committee and aware of the complaint mechanism if there is any issues. They were treated equally without any discrimination by the management.</p> <p><b>Audit Team verification and response:</b> The management will respect the rights of female employees and monitor if there is any case of sexual harassment and domestic violence issues occurred.</p>

<b>8</b>	<p><b>Feedbacks: House occupants</b> – Based on site visit (with the assistance of facilitator) at DLQ and QLQ houses, noted that some of the houses required further repair. Most the occupants complaining on the repair request which still pending which they have reported to their immediate superior verbally.</p> <p><b>Audit Team verification and response:</b> Noted there is a gap on the process to ensure any repair request done on timely manner especially for the verbal request by each house occupants. An NC was raised on this issue under clause 3.3.3.</p>
<b>9</b>	<p><b>Feedbacks: House maintenance/construction department head</b> – Housing repair/maintenance and refurbishment is being handled by construction department team. A request of repair will be recorded in the PF29 @ housing repair and maintenance checklist which will be done by site team on quarterly basis. Any request for repair will be later recorded via SAP system and work order will be issued for each specific repair request. Any request of repair which exceed K1000 will require general manager approval.</p> <p><b>Audit Team verification and response:</b> As required by PNG Employment Act 1978, housing need to be maintained in a clean and sanitary condition. Current process of inspection using PF29 checklist was able to identify problem reported at each house on quarterly basis.</p>
<b>10</b>	<p><b>Feedbacks: Community health workers/nursing officer/doctor</b> – Interview was done with the community health workers (Waraston Oil Mill clinic), nursing officer (Kaipura Oil Mill clinic) and doctor (Mosa Main clinic). Normal outpatient review and physical medical check-up will be done at site clinics. Mosa main clinic has bigger roles on the full medical check-up (biological test @ blood test) for malaria and bio-chemistry test on 6 monthly basis for those expose to chemical. Ratio of health workers and patient treated per day is currently sufficient with average of 15-20 outpatient cases per day. Basic medical facilities for normal treatment available at the clinics with adequate supply of medicine and drugs. Emergency case will be referred to local general hospital as all clinics are equipped with ambulance. On average of 15-20 malaria cases reported per month and most of the cases are treatable. Medical waste will be properly segregated dressing waste and sharp/needle waste in a durable container. Disposal of medical waste is by incineration.</p> <p><b>Audit Team verification and response:</b> Based on site visit (with the assistance of facilitator) and document review, it was confirmed that all visited clinics were available and readily open to accept any outpatient and emergency case. Medical supplies were properly managed by ensuring no expired drugs being used for patient. Mosa Main clinic has a proper cold storage facility for vaccines and drugs that require to be stored in controlled temperature. It was also verified that medical removal protection process is in place for relocation of workplace for unfit workers.</p>

<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>It is deemed that there is no previous land user / owner as the company has planted the second generation of oil palms. NBPOL-WNB has been in operations since 1960s.</p>					

<b>Previous land owner / user comment</b>	
N/A	<p><b>Feedbacks:</b> N/A</p> <p><b>Audit Team verification and response:</b> N/A</p>



### 3.5 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.

#### Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that NBPOL West New Britain – Mosa, Numundo, Kapiura, Kumbango, Waraston Oil Mills and supply base has complied with the PNG &amp; Solomon Islands National Interpretation 2019 of the RSPO P&amp;C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that NBPOL West New Britain – Mosa, Numundo, Kapiura, Kumbango, Waraston Oil Mills and supply base is remain certified.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Nicholas Cheong	<b>Name:</b> Zaralyn Yakapo
<b>Company Name:</b> BSI Services Malaysia Sdn Bhd	<b>Company Name:</b> NBPOL-WNB
<b>Title:</b> Lead Auditor	<b>Title:</b> Sustainability Manager
<b>Signature:</b> 	<b>Signature:</b>  <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>
<b>Date:</b> 23/09/2021	<b>Date:</b> 25/09/2021

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 1: Behave ethically and transparently</b>		
<b>Criterion 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.		
1.1.1 <b>(C)</b> Management documents that are specified in the RSPO P&C are made publicly available. <b>Smallholder Requirement:</b> Organization that is managing the smallholders shall hold relevant documents and make available to interested parties on request. - Critical (Major) compliance -	<p>The list of documents that are made publicly available to relevant stakeholders includes Land titles/user rights; Occupational Health &amp; Safety Plans; Details of complaints &amp; grievances; Grievance procedure; pollution prevention &amp; reduction plans; Waste management plan; Natural resource management plan; HCV documentation; negotiation procedures; Continual improvement plans; public summary of certification assessment report; human rights policy; NBPOL WNB Policy Booklet; and Policy on protection of HRD / Whistleblowers.</p> <p>Other than the listed documents, NBPOL has also published the Sustainability Policies and Positions; Sustainability Structure; Sustainability Reports; Certification and Indices; Stakeholder consultations; and NBPOL Foundation in NBPOL website (<a href="http://www.nbpol.com.pg">www.nbpol.com.pg</a>).</p> <p>The list of documents were issued by NBPOL-WNB Sustainability Department and updated in April 2021</p> <p>Additionally, the Sime Darby Plantation Group policies and whistleblower mechanism are published in the Sime Darby Plantation website.</p> <p>The management has sent an email correspondence on 26/04/2021 related to the 2021 Publicly Available Documents listing for the sites to displayed at the notice boards. Seen the list of Publicly Available Documents issued by Sustainability &amp; Quality Management Department dated April 2021.</p> <p>All the documents listed could be made available at request and at the discretion of the General Manager. As for the smallholders, relevant documents were available at the Smallholders Department for the access of the smallholders.</p>	Complied

1.1.2	<p>Documented Information is provided in English and accessible to relevant stakeholders. Explanatory information may be provided in writing or orally in Tok Pisin (PNG) or SI Pijin (Solomon Islands)</p> <p>- Minor compliance -</p>	<p>The Publicly Available Documents list that could be assessed by relevant stakeholder are published in English and Tok Pisin. Both documents are reviewed in April 2021.</p> <p>The list is published in notices boards within the vicinity of the company and at OPIC's notice boards. These documents are also introduced to smallholders during field days.</p>	Complied
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>There were no request for such information for the last reporting period.</p>	Complied
1.1.4	<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>- Critical (Major) compliance -</p>	<p>Communication and Consultation Procedure (v3 dated 04/07/2020) is in place. The procedure documented the process to ensure free and effective communication between NBPOL and all stakeholders whom include both the internal (NBPOL employees and dependents) and external stakeholders. The procedures clearly defined the responsible department that handles the communications.</p> <p>The procedure also documented the process to address grievances raised against NBPOL's operations.</p> <p>The procedure is constantly made aware to both internal and external stakeholders through internal awareness trainings, annual external stakeholders workshops, smallholders blocks field day and community notice boards.</p> <p>Interviewing workers and external stakeholders could confirm that communication with NBPOL is effective. There is no major communication breakdown.</p> <p><b>Independent Estate:</b></p> <p>The Communication &amp; Consultation Procedure dated 22/06/2019 for Repamira Estate was reviewed and available. Discussion with workers and OPIC confirms that the communication is well established by the estate management.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p>	<p>The current list of stakeholders was updated in June 2021. The stakeholders list includes local government / authorities; NGOs operating in PNG; local</p>	Complied

	- Minor compliance -	communities; business partners; schools and smallholders supplying to NBPOL.	
<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts by the milling Company. The policy is extended to smallholders through extension services provided by the Company and Government. Smallholders are expected to apply the policy in their own dealings with others.</p> <p><b>Smallholder Requirement:</b>          Organization that is managing the smallholders required to have a written policy committing to a code of ethical conduct and integrity in all operations and transactions</p> <p>- Minor compliance -</p>	<p>The overall commitment of Sime Darby Plantation (SDP) towards ethical conduct is published in the Group Sustainability &amp; Quality Policy Statement undersigned by Mr Mohamad Helmy Othman Basha the Group Managing Director dated 02/12/2019. The statement provided that Sime Darby Group is committed to promote good governance and transparency abiding the Groups Policies &amp; Authorities and Code of Business Conduct.</p> <p>The Code of Business Conduct is a guidance for Sime Darby Group to uphold the core values of Integrity, Respect &amp; Responsibility, Enterprise and Excellence to compass in steering towards doing business fairly, honestly and ethically. The COBC is applicable to all mill, estates and the Smallholder Department.</p> <p>The smallholders are made known to the Code of Business Conduct through the continuous Field days conducted for the smallholders.</p> <p>Concurrently, the company is still maintaining the NBPOL-WNB policies which include Business Ethics Policy dated 10/08/2021. Although there is a duplication of policies, both policies have not contradicts. But, since NBPOL-WNB has been taken over by Sime Darby Plantation for 3 years by the time of this audit, the changeover of the Parent Company group policies and procedure should be further improved and accelerated.</p> <p>The audit team noted that extra time was required to changeover the policies due to the current pandemic situation where there were travel restriction for representative from SDP head office to be onsite. Despite that, the audit team has not find any lacking in implemented the NBPOL-WNB policies. Policies were prepared in a form of booklet available in English and Tok Pisin which are disseminated to workers and relevant parties.</p> <p>The implementation of the business ethic of the company was further verified during stakeholder consultation and smallholders audits. It is confirmed that the company policies are explained during stakeholder workshops and field days.</p>	OFI

		<p>Workers are being briefed on the company policies and procedures on periodic basis..</p> <p>The company has also extended these policies implementation to contractors and the implementation is documented in Service Management Guidelines – Contractor Engagement Practices (NBPOL-EMP-MG-22 rev 2 dated August 2018.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>The implementation and monitoring of compliance of the ethical business practices includes:</p> <ol style="list-style-type: none"> <li>1. Internal audits by the sustainability team ensuring the mills and estates maintain the contractors’ contracts and contractor induction records.</li> <li>2. Periodic workers’ training and briefing on policies and procedures. Samples of training records were available during the audit for the auditors to verify.</li> <li>3. Implementation of training plans demonstrating commitment to provide continuous awareness to workers – sample include Kaipura Oil Mill 2021 training plan, Kumbango Oil Mill 2021 training plan.</li> <li>4. Establishment of Governance &amp; Audit Committee (under Sime Darby Plantation corporate governance) with primary objective ensuring an effective ethics program is implemented across the Group. The implementation of ethical business conducts are also scrutinized by financial auditors.</li> </ol>	Complied
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 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 legal requirements</p> <p><b>Smallholder Requirement:</b></p> <p>Smallholders are to comply with all applicable PNG or Solomon Islands legal requirements. Organization that is managing the smallholders requires to monitor compliance during extension activities. Block inspection reports to provide evidence of compliance.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL-WNB had maintained the Legal and Subscribed Register updated on 03/06/2021. The evaluation of the legal requirement applicable to the operations were conducted by Teup Goledu who is the company secretary. The Legal and Subscribed Register was prepared against the conditions within the PNG laws and regulation including the PNG Environmental Act 2000, PNG Environment (Water) Regulation 2002, Environmental Health Act, PNG Industrial Safety, Health and Welfare Act, Child Welfare Act 1961, Conservation Area Act 1978, Education Act 1983, Employment Regulation 1980, Forestry Act 1991, Industrial Relations Act 1962, Land Act 1996,</p>	Complied

		<p>Lands Dispute Settlement Act 1996, Land Groups Incorporation Act 2009, Land Registration Act 2009, Oil Palm Industry Corporation Act 1992, Superannuation Act 2000 and Workers' Compensation Act.</p> <p>The Legal and Subscribed Register has also included the evaluation of the company's legal compliance against the RSPO P&amp;C – PNG &amp; SI National Interpretation indicators.</p> <p>Samples of some licenses verified during this audit:</p> <ol style="list-style-type: none"> <li>1. Certificate of Registration as a Factor – Lolokoru Power House expiring on 31/12/2021</li> <li>2. Certificate of Registration as a Factor – Numondo Mill expiring on 31/12/2021</li> <li>3. Certificate of Registration as a Factor – Waraston Mill Maintenance workshop expiring on 31/12/2021</li> <li>4. Certificate of Registration as a Factor – Togulo Tyre Bay workshop expiring on 31/12/2021</li> <li>5. Certificate of Registration as a Factor – Dami Bunch Analysis Lab workshop expiring on 31/12/2021</li> <li>6. Certificate of Registration of a Boiler/Pressure Vessel – Horizontal Air Receiver at Wasisi Mini Estate expiring on 14/09/2021</li> <li>7. Certificate of Registration of a Boiler/Pressure Vessel – Horizontal Air Compressor at Haela Construction expiring on 14/09/2021</li> <li>8. Certificate of Registration of a Boiler/Pressure Vessel – Vertical Air Pressure Vessel at Mosa Mill expiring on 14/09/2021</li> </ol> <p>Other than obtaining appropriate licenses, the company has also submitted the Annual Environment Performance Report dated July 2021 as per the requirement under the Environmental Permits issued by the Conservation and Environment Protection Authority; and submitted the OSH Integrity Inspection Report 2021 to the Department of Labour &amp; Industrial Relations (Occupational Safety &amp; Health).</p> <p><b>Smallholders</b></p> <p>The sampled smallholders continue to comply with the applicable PNG legal requirements as verified during the interview session and site visit. The</p>	
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		<p>Smallholder Department conducts regular field days at the smallholders to inspect and ensure continuous compliance towards all legal requirements. Block Inspection and Field Days records were available for verification. The sampled smallholders also can show compliance towards the legality of the plots they use as Government Lease documents as well as Customary Land Use Agreements (CLUA) were available for verification.</p>	
<p>2.1.2</p>	<p>The milling Company has a documented system for ensuring legal compliance 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> <p><b>Smallholder Requirement:</b>          Organization that is managing the smallholders shall disseminate information on legal changes to smallholders.</p> <p>- Minor compliance -</p>	<p>The Legal and Subscribed Register updated on 03/06/2021 is in place to ensure the company maintain legal compliances. The register is periodically reviewed by the Company Secretary and the company have subscription to Pacific Islands Legal Information Institute website to track changes of the laws and regulation. The review the legal and other requirements changes are conducted following the Review of Legal and Other Requirements EP-02 rev 08 dated 05/05/2015 and the overall person in charge is the Sustainability Manager.</p> <p>Other that conducted review on the register, quarterly internal audits are also conducted to check against the sites legal compliances. Samples of internal / supplier audit reviewed:</p> <ol style="list-style-type: none"> <li>1. 2021 Q1 Internal Audit for Kapiura Oil Mill dated 18/03/2021.</li> <li>2. 2021 Q2 Internal Audit for Lolokoru Estate dated 23/06/2021.</li> <li>3. 2021 Q1 Internal Audit for Volupai Estate dated 21/01/2021.</li> <li>4. 2021 Q2 Internal Audit for Karausu Estate dated 19/05/2021.</li> <li>5. 2021 Q1 Internal Audit for Smallholder Affairs dated 27/04/2021</li> <li>6. GDSS Security Services dated 18/02/2021</li> <li>7. Contractor Operation of Pacific Development Co-operation dated 13/04/2021.</li> <li>8. 2020 Q2 Internal Audit for Bebere Estate dated 05/07/2020</li> <li>9. 2020 Q2 Internal Audit for Bilomi Estate dated 15/06/2020</li> <li>10. 2020 Q2 Internal Audit for Kumbango Oil Mill dated 24/04/2020</li> </ol> <p><b>Smallholders</b>          Information on legal compliances and changes on legal requirements are updated to the smallholders on a regular basis during the Field Days</p>	<p>Complied</p>

		<p>conducted. The compliances towards the legal requirements are also monitored during the Field Visit which also serves as a field Inspection.</p>	
<p>2.1.3</p>	<p>For Company land, legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>For Smallholder land, boundaries have been defined by a registered surveyor and portion numbers allocated by the Surveyor General OR boundaries of Customary Land have been defined by traditional means and agreed between neighbours with common boundaries and other interested parties; AND there is no significant dispute over tenure.</p> <p>Smallholder allotment boundaries may be identified by traditional means provided that boundary locations are agree by all neighbouring parties that share common boundaries.</p> <p><b>Guidance:</b> Significant disputes are those disputes currently before the Courts.</p> <p><b>Smallholders requirement:</b></p> <p>Smallholders, evidence of the "Right to use the land" will be demonstrated by compliance with the following:</p> <p>a) Land title or lease OR uncontested occupancy where</p> <ul style="list-style-type: none"> <li>• Boundaries have been defined by a registered surveyor and portion numbers allocated by the Surveyor General or boundaries have been defined by traditional means and agreed between neighbours with common boundaries and other interested parties;</li> <li>• There is no significant dispute over tenure;</li> <li>• Smallholder allotments, boundaries may be identified by traditional means provided that boundary locations are agreed by all neighbouring parties that share common boundaries.</li> </ul> <p>- Minor compliance -</p>	<p>The land matters of the company is managed by NBPOL-WNB Lands &amp; Mini Estate Departments. The company is operating on state lease lands and sub-lease lands. The lease documents includes – maps; lease agreements (for both with state and customary land owner); FPIC documentation (for sub-lease from customary land owners) and land titles.</p> <p>Sample of lease agreement verified during this audit:</p> <ol style="list-style-type: none"> <li>1. State Lease agreement for Portion 178 at Talasea with 5,380acres land size commencing on 01/12/1966</li> <li>2. State Lease agreement for Portion 744 at Talasea with 2,629ha land size commencing on 01/03/1938</li> <li>3. Sub-Lease agreement for Portion 2120 with Morokea Land Group Incorporated with 782.5ha land size commencing on 01/08/2018</li> <li>4. Sub-Lease agreement for Portion 2562C with Rikau Land Group Incorporated with 1,240ha land size commencing on 16/02/2005</li> <li>5. Sub-Lease agreement for Portion 2563C with Gule Land Group Incorporated with 1,240ha land size commencing on 16/02/2005</li> <li>6. Sub-Lease agreement for Portion 1226C with Morao Land Group Incorporated with 1,240ha land size commencing on 01/05/1999 (expiring on 30/04/2019). The agreement has not been renewed due to some internal issues within the Land Group. However a Holding-Over agreement was issued by the Land Group to NBPOL-WNB for 3 months expiring on 23 August 2021 with further 9 months extension of the Holding-Over agreement.</li> </ol> <p>The sub-lease agreements details the rent to be paid to the Incorporated Land Groups (ILGs). This include basic land rent and royalty. The time of payment and manner of payment are details in the agreement.</p> <p>During site visit, the demarcation of the lands are done using traditional method by referencing to a stone or an object. So far there are no major disputes while NBPOL-WNB had maintain copy of land titles that has coordinates on it and maintained GIS maps information.</p>	<p>Complied</p>



		<p><b>Smallholders</b></p> <p>Interview and Field Inspection conducted by the assessment team verified that all smallholders currently have land titles belonging to them or their next of kin who have deceased. The smallholders with the assistance of OPIC are in the process of transferring the name to the smallholder for those with land titles under deceased names. Besides that, those without land titles have the Customary Land Use Agreement (CLUA) which enables them to use the plots provided to them by their clans. There were a number of land users also currently occupying government reserve lands where the smallholders with the assistance of OPIC are obtaining the approval to use the land from the Land Board.</p> <p>As for the smallholders, various methods were sighted to be used as boundary demarcations for the respective plots. The lands that are from the Government Lease are mainly demarcated with boundary stones. The boundary stones were visible and maintained by the smallholders and verified during the assessment. As for those lands under the CLUA agreement, they are generally demarcated by planting fruit trees to clearly indicate the boundary of the respective smallholders' plots.</p> <p>Based on the interview conducted on the sampled smallholders, disputes are generally between the smallholders and their family members on the rights to use the lands. Boundary disputes are were also notified to be existence especially for those without the clear boundary stones. NBPOL and OPIC have are aware of these disputes and are progressively assisting to solve them. It was noted that based on the samples, there were no significant disputes over tenure among the smallholders.</p> <p>Other than the individual smallholders, there any community planting and Independent Estates (or sometimes refer as out-growers). Community plantings are groups of families within a clan who gather all the clan land and plant oil palm. Each family owns a plot of land divided under the clan agreement. Hence, the community planting are usually treated as per the individual smallholders. However, land usage agreement has been established between the clan and the project custodian. Samples of land rights audited:</p>	
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		<ol style="list-style-type: none"> <li>1. Mapakakea Community Planting hold the land usage rights of Kevemuki Clan.</li> <li>2. Polapola Gama Community Planting hold the land usage rights of Kurkuru Clan. For this project, the rights are given by the clan leaders to the clan member which the clan member joins Polopola Gama Community Planting.</li> </ol> <p>There are several Independent Estates (or sometimes refer as out-growers). These growers are either leasing land from the clan or PNG Lands Department. Sampled land rights audited:</p> <ol style="list-style-type: none"> <li>1. Repamira Estates holds clan land usage leasing agreements with Rerengi Incorporated Land Group, Akuleng Clan, Aviklam Clan, Malum Clan and Avail Clan.</li> <li>2. CIS Lakiemata Estate holds state lease for Portion 1992 Milich Megigi, Fourmil Talasea, West New Britain Province.</li> </ol>	
<b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements			
2.2.1	<p>A list of contracted parties is maintained. Contracted parties include parties with whom a formal documented contract is in place and Smallholders where the contract is implied through the Smallholder offering fruit for sale by placing it at the pick-up point and the Company accepting the Smallholders offer by collecting it. The price to be paid and other conditions of the transaction are communicated by the Company. Each Smallholder pick-up is a separate transaction. Guidance: The Company docket issued when small-holder fruit is collected is evidence of the contract for that transaction.</p> <p>- Minor compliance -</p>	<p>Each mill and estate maintained their own list of suppliers' contracts. Contracts that are reviewed during this audits includes but not limited to:</p> <ol style="list-style-type: none"> <li>1. Contract agreement between Kumbango Oil Mill and ABACA Tradings Limited (Contract number 2021-01 dated 15/05/2021) for Palm Kernel Expeller and boiler ash removal from Kumbango Oil Mill to Dump area and transporting fibre from Mosa Oil Mill to Kumbango Oil Mill</li> <li>2. Contract agreement between Kumbango Oil Mill and LIMBS Construction (Contract number 2020-01 dated 21/05/2020) for Lawn mowing service at Kumbango Oil Mill / Kumbango Kernel Mill site including office, pond area, executive and main compound area.</li> <li>3. Contract agreement between Kapiura Oil Mill and HEYG International Development &amp; Contractors (dated 19/02/2021) for Cartage services of boiler ash and excess fibre from Kapiura Oil Mill.</li> <li>4. Contract agreement between Numundo Oil Mill and KT Komba Contractor (dated 15/06/2021) for student transportation to schools.</li> <li>5. Contract agreement between Numundo Oil Mill and Mr Dickson Kondo (dated 28/08/2019) for leasing of Trade Store.</li> </ol>	Complied

		<p>6. Contract agreement between Bilomi/Loata Estate and Kyapo Pundu Trans dated (28/01/2021) for FFB and loose fruits Cartage service.</p> <p>7. Contract agreement between Karausu Estate and Ambu Naiya Investment Ltd (dated 01/09/2020) for replanting and chipping services.</p> <p>8. Contract agreement between Silovuti Plantations and Melo-X85 Transport Services (dated 06/05/2019 renewed on 22/06/2021) for FFB and loose fruit cartage services.</p> <p><b>Smallholder</b></p> <p>The FFB collection dockets copies are available and maintained at the Smallholder Affairs office. The Smallholders Department with the assistance of OPIC regularly explain the FFB pricing to smallholders during the continues Field Days conducted. The FFB Price are also available in the Grower Booklet (Growa Buklet) and pricing are displayed at the OPIC Office. The pricing are publicly available for all smallholders to view. The Smallholders Harvesting Notice (Toksave Approved Data) was also available and displayed at public areas at smallholders' locations. Photographic evidence was available for evidence. Interview with the sampled smallholders indicated that they are aware of the FFB prices and have been explained on the pricing of FFB.</p>	
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by all parties to the contract.</p> <p><b>Guidance:</b> Companies may have standard conditions of supply for Smallholders which include this requirement.</p> <p>- Minor compliance -</p>	<p>Some of the contracts sample reviewed during the audit are as per 2.2.1 above. The clause of Compliance with Laws and guidelines is within the contract terms and conditions.</p> <p>The engagement of smallholders and independent estates growers are contracted using the Smallholder Declaration form mechanism whereby the smallholders had agree to follow the rules and requirements stated within the RSPO.</p> <p><i>It has to be noted that, the independent estates growers could be community land planting. Community planting is where a tribe uses the clan land to plant oil palm. Within the community planting land, there are plots of land that are subdivided depending on the number for families within the tribe/clan. As such community planting is considerable individual smallholders because the payment of the FFB goes direct to the person</i></p>	OFI

		<p><i>holding the Papa/Mama Card (a card system introduced by NBPOL for making payments).</i></p> <p>The delivering of FFBs by third party contractors could be improved in the aspect of not overloading and drivers carries proper driving documents.</p>	
2.2.3	<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><b>Guidance:</b> Companies may have standard conditions of supply for Smallholders which include this requirement.</p> <p>- Minor compliance -</p>	<p>There are several mechanism NBPOL-WNB has implemented the contractual terms of disallowing child, forced and trafficked labour.</p> <p>As per 2.2.1 the samples of contracts were reviewed. Within the contracts, the terms of either the contractor is required to follow the company policies and procedure or explicitly stated in the contract that “under no circumstances to employ persons below the age of 18, forced or trafficked labour”.</p> <p>Additional to the terms within the contract, the contractors were being inducted on the Contractor’s Social &amp; Environmental Responsibilities. The induction is part of the contractual required procedure. In the induction format, the contractor shall review and accept the clauses of induction form before commence of any work. Within the form, it is stated that No Child, forced or trafficked labour.</p> <p>The induction forms of the samples stated in 2.2.1 are available and reviewed during this audit.</p> <p>On 10/06/2020, the General Manager of NBPOL-WNB had again issued a memo to all third parties delivering services to NBPOL-WNB to remind the contractors to follow the conditions which includes “Persons under the age of 18, forced and trafficked workers are banned from WNB operations. Under no circumstance children is engaged in operations related to WNB”.</p>	Complied
<b>Criterion 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>• Company plantations, this will be Division or Sub-division, for Smallholder fruit, this will be Smallholder name, Division or Sub-division.</li> <li>• Proof of the ownership status or the right/claim to the land by the grower/smallholder.</li> </ul>	<p>NBPOL-WNB only process FFBs produced by its own estates and smallholders (including out-growers) that are registered or certified under the RSPO certification.</p> <p>The NBPOL-WNB Smallholders Affairs Office and the Sustainability team had maintained the list of smallholders and out-growers. The ownership of the smallholders are demonstrated either through Clan Land Use Agreement (that was developed as Village Oil Palm program) or state lease</p>	Complied

	<ul style="list-style-type: none"> <li>Milling Companies in PNG and the Solomon Islands may only source fruit from their own plantations and directly from Independent Smallholders in geographic proximity that are participants in the Unit of Certification of the applicable smallholder group.</li> </ul> <p>- Critical (Major) compliance -</p>	<p>(that was developed as Land Settlement Scheme (LSS)). It is noted that are some of the Land titles for the LSS may be missed placed by bank during the mortgage and the titles are in transmission to change name (usually from deceased parents to their children). However due to the challenges within PNG, the replacement of the Land Titles has taken much longer time. The Lands &amp; Mini Estate Department of NBPOL-WNB had taken initiative to help the LSS owners to get replacement of the titles.</p> <p>Despite the land titles may not be available or in transmission of change, the land legality and ownership can be demonstrated through no significant dispute over tenure. This has been confirmed through smallholders audits interview.</p> <p>In any situation where land dispute are significant NBPOL-WNB will suspend receiving FFBS. Currently, Karapi Mini Estate has been suspend for receiving FFBS. The dispute is between the member of the clan.</p> <p>The smallholders are within the proximity of the 5 mills.</p>	
2.3.2	No fruit is to be indirectly sourced through third party traders.	<p>During interview with smallholders and out-growers it was confirmed that the FFBS are collected by NBPOL-WNB directly. It is not going through any third party traders.</p> <p>Through the review of the mass balance sheet, it can be confirmed that there are no FFBS that are sourced through third party traders.</p>	Complied
<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b>			
<b>Criterion 3.1:</b> There is an implemented management plan 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 by the Milling Company that includes the projected contribution of fruit supplied by Smallholders that are within the Unit of Certification.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL WNB has established a Management Business Plan from 2021 to 2024 and reviewed periodically on the progress and annually at the budget time. Among the information available in the Management Business Plan is:</p> <ul style="list-style-type: none"> <li>Plantation Mature Ha</li> <li>Plantation FFB MT</li> <li>OCP FFB MT</li> <li>Total FFB MT</li> <li>CPO production MT</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>• PK production MT</li> <li>• OER (%)</li> <li>• KER (%)</li> <li>• Target plan</li> </ul> <p>The annual budget has the information about the financial expenditure allocated to all the estates and mills operations. The General Manager is in-charge for any expansion, new techniques and information to improve practices.</p>	
3.1.2	<p>The Milling Companies develop an annual replanting programme for Company plantations projected for a minimum of five years with yearly review.</p> <p><b>Smallholder requirements:</b>          Organization that is managing the smallholders develop replanting program for smallholders.</p> <p>- Minor compliance -</p>	<p>NBPOL WNB has established its replanting program with a projection of 9 years (until 2030) for all its supplying estates. The programme is annually reviewed during annual management review. The details of replanting programme for all the estates were documented in the company's Excel spreadsheet entitled "WNB 2021 Crop Mill Prod Budget FINAL".</p> <p>The replanting plan for Repamira Estate is available and planned up to year 2032. Repamira is an out-grower estate managed independently.</p> <p>The smallholder replanting program are documented in the WNB 2021 Crop Mill Prod Budget FINAL. The management of replanting program is by the NBPOL-WNB Smallholder Affairs Office. However the replanting decision falls on the smallholders themselves.</p>	Complied
3.1.3	<p>The Milling Company holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p>	<p>NBPOL WNG has last held its Management Review meeting on 14/07/2021 for RSPO P&amp;C and RSPO SCC. The Management Representative from Sustainability and Quality Department is Laszlo Mathe and the Environment Officer Xavier Brennan. The review conducted 12 months after the previous review and cover the period of 01/01/2019 to 31/12/2019. Based on the minutes of meeting, among the agenda discussed were:</p> <ol style="list-style-type: none"> <li>1. Summary</li> <li>2. General</li> <li>3. Results of internal audit</li> <li>4. Compliance with legal requirements</li> <li>5. Environmental incidents and communication(s) from external interested parties, including complaints</li> </ol>	Complied

		<ol style="list-style-type: none"> <li>6. Environmental performance of NBPOL</li> <li>7. Domestic water quality</li> <li>8. Smallholders</li> <li>9. Mosa central laboratory</li> <li>10. Continuous improvement plan</li> <li>11. Status of corrective and preventive actions</li> <li>12. Follow-up actions from previous management review</li> <li>13. Changing circumstances, including developments in legal and other requirements related to its environmental aspects</li> <li>14. Recommendation for improvement/resource needs</li> <li>15. Decisions and actions related to possible changes to environmental policy, objectives, targets and other elements of the EMS</li> <li>16. Resources needs</li> <li>17. Any other business</li> </ol>	
<p><b>Criterion 3.2:</b> 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.          - Critical (Major) compliance -</p>	<p>NBPOL WNB has centrally documented its Continuous Improvement Plan 2014-25 which covers both the environment and social aspects.          The latest review of the CIP was in July 2021 that covers the following topics:</p> <ul style="list-style-type: none"> <li>• Pesticides</li> <li>• Environment</li> <li>• Waste Reduction</li> <li>• Pollution, Emissions and Non-Renewable Energy</li> <li>• Social Impacts</li> <li>• Occupational Health and Safety</li> <li>• Legal Compliance and Transparency</li> <li>• General (Forward planning and other issues)</li> </ul>	<p>Complied</p>

		<p>Each of the topic includes improvement action, reference to the RSPO P&amp;C 2018 indicators, expected outcome, timeframe, responsibility and status of progress.</p> <p>The estates visited has established riparian buffer zone for rivers and creek flow through the estate and along the estate boundaries. passing through, flow the estate and flowing adjacent with the Sighted the river buffer zone as follows:</p> <ol style="list-style-type: none"> <li>1. Riparian buffer zone for Kapuluk River flows along the Ove Estate boundary.</li> <li>2. Riparian buffer zone for Garuru/Luvi River flow through Moroa Estate.</li> <li>3. Riparian buffer zone for Kulia River which flow along the Navarai Estate boundary.</li> <li>4. Riparian buffer zone for a creek flow through the Bebere Estate.</li> </ol> <p>The vegetation along the buffer zone was let growth naturally and well established. The estate has erected signboard prohibited activity such as cutting down trees, open burning and building shelters in the areas. No evidence of chemical application sighted at the buffer zone area.</p> <p>The estates monitored the usage of fuel on monthly basis. reviewed the diesel consumption FY 2020 as follows:</p> <table border="1" data-bbox="1084 970 1832 1316"> <thead> <tr> <th>Estates</th> <th>Diesel consumption (L)</th> </tr> </thead> <tbody> <tr> <td>WNB-Bilomi Estate</td> <td>40,500</td> </tr> <tr> <td>WNB-Navarai Estate</td> <td>90,000</td> </tr> <tr> <td>WNB-Morua Mini Estate</td> <td>40,000</td> </tr> <tr> <td>WNB-Valupai/Natupi Mini Estate</td> <td>150,150</td> </tr> <tr> <td>WNB-Lokokoru Mini Estate</td> <td>104,950</td> </tr> <tr> <td>WNB-Ove Estate</td> <td>594,300</td> </tr> </tbody> </table> <p>The estates continuously conduct briefing and training to enhance employee awareness to switch of lights, air conditioners when not in use to reduce the use of diesel in compounds and offices.</p>	Estates	Diesel consumption (L)	WNB-Bilomi Estate	40,500	WNB-Navarai Estate	90,000	WNB-Morua Mini Estate	40,000	WNB-Valupai/Natupi Mini Estate	150,150	WNB-Lokokoru Mini Estate	104,950	WNB-Ove Estate	594,300	
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		<p>For social impacts, there were about 19 CIPs (5.1 - 5.19) have been established. Verified some of the plans as the following:</p> <ol style="list-style-type: none"> <li>1. Overcrowding – ratio of employee per hectare and mechanization for further innovation systems to produce further efficiencies. Status – Workers Rationalisation Plan in place and reported on monthly basis</li> <li>2. Improved water quality within the compounds – proved portable water at all plantation. Status – Continue effort to improve water quality in the compounds identified by the 2020 management review as having poor water quality.</li> <li>3. Access to food gardens – Provide 300m<sup>2</sup> of suitable garden area per housing unit (as per Regulations Handbook) for compounds in all new replanting areas near compounds. Status – Gardening Areas allocated at replant.</li> </ol> <p>Each of the topics include improvement action, reference (refers to RSPO P&amp;C 2018 indicators), expected outcome, timeframe responsibility and status. Completed activities with the date completed stated</p> <p><b>Independent Estate</b></p> <p>The Continuous Improvement Plan (CIP) 2021-2023 for Repamira Estates operations are available. The CIP is are set to be aligned with the social and environmental management plan.</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.</p> <p>- Minor Compliance -</p>	<p>The RSPO metrics template was submitted to the audit team and the data provided has been verified against site documentation. The sampled data verified does not show any discrepancy. The submission is done together with the submission of the RSPO P&amp;C Public Summary for PalmTrace licensing.</p>	Complied
<b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p><b>Smallholder requirements:</b></p> <p>Organization that is managing the smallholders provides relevant SOP of smallholding operations to smallholders.</p>	<p>NBPOL WNB has established Standard Operating Procedure as guidance for the palm oil mill daily operations. The SOP was documented in Standard Operating Procedures Register_2020. The SOP was categorized as follows:</p> <ul style="list-style-type: none"> <li>• Milling – General (covering all the mills)</li> <li>• Engineering – General</li> </ul>	Complied

	<p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> <li>• Milling – Workshops</li> <li>• Transport</li> <li>• Heavy Equipment Workshop</li> <li>• Clinic</li> <li>• Plantations – General</li> <li>• Agronomy</li> <li>• Tractors</li> <li>• Sustainability</li> <li>• Smallholder Affairs</li> <li>• Management Guidelines</li> <li>• Environment Management Plans</li> <li>• Lands &amp; Mini Estate Department</li> </ul> <p>Latest additional to the SOP was for SOP COVID - 19 Prep. Refer SOP no. Sust-06, issue no. 1 dated 08/03/2021.</p> <p>Safety and Health procedure has been established in Operational Safety Management Plan for Planation and Production Department. The SOP was categorized as follows:</p> <ul style="list-style-type: none"> <li>• Section 1: Occupational Health and Safety Policy</li> <li>• Section 2: OH&amp;S Committee Member Procedure</li> <li>• Section 3: OHS Responsibility and Communication</li> <li>• Section 4: Risk Assessments</li> <li>• Section 5: Accident and Emergency Response</li> <li>• Section 6: Lost Time Injury Reporting and Recording</li> <li>• Section 7. Initial Reporting Requirements for Incidents (INR)</li> <li>• Section 8: Fatality and Permanent Disability Reporting and Recording</li> <li>• Section 9: Major Incident Flow Chart</li> <li>• Section 10: Workers Compensation Claims</li> <li>• Section 11: Health and Safety Procedures - Plantations / Production</li> <li>• Section 12: Health and Safety Procedures- General</li> </ul>	
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		<p>Among the estate’s SOPs reviewed and verified are:</p> <ul style="list-style-type: none"> <li>• MG 01A – New Development, Issue 6; dated 01/05/2016</li> <li>• MG 01B – Replant, Issue 6; 01/05/2016</li> <li>• MG 02 – Nursery, Issue 6; 01/05/2016</li> <li>• MG 03 – Pesticides, Issue 8; 20/04/2017</li> <li>• MG 04 – Upkeep, Issue 7; 23/10/2018</li> <li>• MG 05 – Harvesting, Issue 8; 24/10/2018</li> <li>• Agro 001 – Leaf Sampling &amp; Processing, Issue 1, 01/01/2008</li> <li>• Agro 002 – Soil Sampling in NBPOL Plantation, Issue 1, 01/01/2013</li> <li>• Agro 003 – Leaf Sampling &amp; Processing Flow Chart, Issue 1, 25/08/2011</li> <li>• Agro 004 – Fertiliser Sampling, Issue 9, 11/07/2015</li> </ul> <p><b>Smallholders</b></p> <p>Standard Operating Procedures were available by NBPOL and OPIC (Oil Palm Industry Corporation). The Smallholder Department have provided SOPs for better managing of the smallholder’s plots. Among the Smallholders available and verified during the assessment were as below.</p> <p>Standard Operating Procedures – Smallholders List</p> <ul style="list-style-type: none"> <li>• Auditing</li> <li>• Change of Name</li> <li>• Tractor Work</li> <li>• Tall Palm Harvesting near Power Lines</li> <li>• Covid-19 Lockdown</li> <li>• Geographic Information System Management (GIS)</li> <li>• Planting</li> <li>• Fertilizer Delivery</li> <li>• Grievance Procedures</li> <li>• Contract Awards</li> <li>• Chemical Handling</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Traffic Control in Mill Area</li> <li>• Discrepancy &amp; Grievance – Transport Operations.</li> </ul> <p><b>Independent Estate:</b></p> <p>The standard operation procedure for Upkeep Practice was developed and followed. The SOP includes manual weeding; fertilizer application; Pest and Disease Management; Pruning and Chemical spraying. The procedures includes work instructions and the tools / PPEs required for every task.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p><b>Smallholder requirements:</b></p> <p>Organization that is managing the smallholders maintains production records and field day attendance records as evidence of improved performance.</p> <p>- Minor Compliance -</p>	<p>NBPOL WNB has established mechanism to monitor the implementation of their procedure by Mill advisor/ Plantation Advisor Visit, Structured Oil Recovery Assessment (SORA), Structure Crop Recovery Assessment and, Performance Monitoring Visit and Agronomist Visit, Environmental, Health and Safety Visit and Internal Audit. The visit focusing on Yield Improvement, Crop Recovery, Replanting and Immature Palms Maintenance and Mature Upkeep, Environmental, Health and Safety on all aspect of operations in the mill and estates.</p> <p>The implementation of procedures are guided by various procedures such as the Performance Monitoring Procedure, Procedure for Contractor Monitoring, Internal Audits and Workplace Inspections. Some samples of the internal audits records are as per indicator 2.1.2.</p> <p><b>Smallholder</b></p> <p>NBPOL Smallholder Departments maintain all FFB received from the smallholders in their database. The FFB production records were available for verification.</p> <p>Field Days are conducted regularly by NBPOL Smallholder Departments together with OPIC personals at the smallholder’s plots. The Field Days are conducted as platform to provide trainings, monitor legal compliance, and inspect field conditions and compliance to the RSPO requirements. Trainings that are provided for the smallholders include BMPs, HCVs management, RTE Species, Chemical and Fertiliser Applications, Buffer Zones, etc. Records of Field Day Inspections were available for dates 14/03/2020, 16/06/2020, 03/03/2020 and 10/03/2020.</p>	Complied

3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Records of monitoring including any action taken are maintained and available. Among the records verified are:</p> <ul style="list-style-type: none"> <li>• E-SHEQ001 Incident Form, ver. 2, rev. 05/2014</li> <li>• EHS Monthly Inspection Checklist – Engineering Specific for Central Engineering Store dated 19/04/2021 and 03/07/2021</li> <li>• Estate Structured Crop Recovery Assessment Report, Lolokoru Estate, dated 29/07/2021</li> <li>• Estate Structured Crop Recovery Assessment Report, Bilomi Estate, dated 29/07/2021</li> <li>• Estate Structured Crop Recovery Assessment Report, Volupai Estate, dated 29/07/2021</li> <li>• Estate Structured Crop Recovery Assessment Report, Bebere Estate, dated 29/07/2021</li> <li>• Estate Structure Crop Recovery Assessment report, Ove Estate, dated 25 – 27/01/2021 dated 04/02/2021.</li> <li>• Estate Structure Crop Recovery Assessment report, Navarai Estate, dated 15 – 16/06/2021 dated 22/07/2021</li> <li>• ESH Monthly Inspection Checklist-Engineering Specific for Mosa Oil Mill, dated 19/04/2021 and 09/07/2021</li> <li>• ESH Monthly Inspection Checklist-Engineering Specific for Kumbango Oil &amp; Kernel Mills dated 29/03/2021, 30/04/2021 and 09/07/2021</li> <li>• ESH Monthly Inspection Checklist-Engineering Specific for Numundo Oil Mill, dated 12/02/2021, 20/04/2021 and 30/06/2021</li> <li>• ESH Monthly Inspection Checklist-Engineering Specific for Waraston Oil Mill, dated 18/03/2021 and 30/06/2021</li> <li>• ESH Monthly Inspection Checklist-Engineering Specific for Kapiura Oil Mill, dated 10/03/2021 and 28/06/2021</li> <li>• OH&amp;S Monthly Inspection Checklist for Ove Estate dated 16/05/2021, 28/06/2021, and 27/07/2021</li> <li>• OH&amp;S Monthly Inspection Checklist for Moroa Estate dated 25/02/2021, 16/03/2021, 20/04/2021, and 26/05/2021</li> </ul>	Non-compliance
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		<ul style="list-style-type: none"> <li>• OH&amp;S Monthly Inspection Checklist for Bebere Estate dated 07 and 08/04/2021, 23/06/2021, 28/07/2021</li> <li>• Plantation Advisory (PA) Report No. WNB/NBPOL/2 – 2020 for visit to Moroa Estate dated 02/03/2020. The visit was postponed in 2021 due to Covid-19 Pandemic travelling restriction which caused the PA from Malaysia unable to proceed.</li> <li>• Internal Audit QIP for Kapiura Oil Mill dated 18/03/2021</li> <li>• Internal Audit QIP for Kumbango Mill dated 23/03/2021</li> <li>• Internal Audit QIP for Mosa Oil Mill dated 13/04/2021</li> <li>• Internal Audit QIP for Numundo Oil Mill dated 19/05/2021</li> </ul> <p>Deviation of latest inspection results (PF29) against actual physical condition of house were observed at the following mills and estates:</p> <ul style="list-style-type: none"> <li>• Mosa Oil Mill - DLQ house (24A, 6B &amp; 19A)</li> <li>• Kumbango Oil Mill - DLQ house (17, 13 &amp; 25)</li> <li>• Kapiura Oil Mill - DLQ house (3, 14 &amp; 29)</li> <li>• Lolokuru Estate - QLQ house (6, 17 &amp; 26)</li> <li>• Bilomi Estate - DLQ house (2,12 &amp; 20)</li> </ul> <p>Based on site verification at operating unit's housing compound, deviation of inspection results against actual physical condition of house were observed. Interview with the house occupants have confirmed that most of the problems were reported to their immediate superior/supervisor however still pending for rectification. Request for house repair by the occupants were not made available for verification. Thus a minor non-compliance was raised.</p>	
<p><b>Criterion 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. Guidance: SEIA will be undertaken where:</p>	<p><b>EIA</b> The environmental aspect and impact have been identified and documented in the Environmental Aspects Register. The assessment has covered all operations within NBPOL's estates, mills and smallholders. Among the information available in the register is:</p>	<p>Complied</p>

<p>a) It is required by law; or</p> <p>b) The certified operation meets any of these thresholds:</p> <ol style="list-style-type: none"> <li>1. Land conversion exceeding 500 hectares;</li> <li>2. Additional water withdrawal exceeding 500,000 cubic meters per year for irrigation or processing; or</li> <li>3. Additional industrial wastewater discharge exceeding 10,000 cubic meters per year.</li> </ol> <p>The SEIA may be comprised of separate documents being a Social Impact Assessment and an Environmental Impact Assessment provided there is collaboration in the production of the documents to ensure coordination.</p> <p>- Critical (Major) compliance -</p>	<p>Activities – e.g. milling and plantation operations</p> <ul style="list-style-type: none"> <li>• Environmental aspects – e.g. generation of pollutants and wastes</li> <li>• Potential Environmental Impacts – air &amp; water pollution, soil contamination, global warming</li> <li>• Risk level</li> <li>• Control measures</li> </ul> <p><b>SIA</b></p> <p>2018 Social Dialogue Report NBPOL WNB was conducted between December 2018 and February 2019 for whole group. This considered as review of initial SIA which was carried out in 2008. The study focused on the employees and dependents through interview with questionnaire. Data analysis was completed in February 2019. The indicators that focused are as such:</p> <ol style="list-style-type: none"> <li>1. General living condition in compounds.</li> <li>2. Land</li> <li>3. Working hours</li> <li>4. Female gender, pregnancy &amp; income, breastfeeding, domestic violence</li> <li>5. PPE, service provided by Security &amp; Construction Department and Clinics</li> <li>6. Substance abuse, dangerous driving</li> <li>7. Water accessibility</li> <li>8. Toilets and cookhouses</li> <li>9. Transport for students</li> <li>10. Awareness</li> <li>11. Pay issues</li> <li>12. Other important issues</li> </ol> <p>Recommendations of the dialogue are summarized in the report. Some of the recommendations are such as below:</p>	
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		<ol style="list-style-type: none"> <li>1. Plantation Management to conduct awareness and issue warning to all employees that still maintain their dependents who are 18years and above.</li> <li>2. Plantations to work closely with Sustainability for allocation of garden areas during replanting schedules.</li> <li>3. NBPOL Women Empowering Women Group to improve dialogue and collaboration with plantation sites on its awareness, training programs so all employees are aware of its activities.</li> </ol> <p>Social Impacts Assessment (SIA) – New construction and felling project for Mosa Mill was carried out together with the social awareness session on 29/6/2021 and 1/7/2021 through a participatory methodology involving the affected stakeholders. Based on the assessment, the project will impact following but not limited to;</p> <ol style="list-style-type: none"> <li>1. Mosa main compound residents and dependents</li> <li>2. Bebere two compound residents and dependents</li> <li>3. Mosa market vendors</li> <li>4. NBPOL employees, dependents and general public using Mosa market bus stop</li> <li>5. School students</li> <li>6. Smallholders at Tamba LSS accessing main road to travel back and forth to do business in town.</li> <li>7. Mosa Village, when accessing main road to use Mosa Market or the ATM and bus stop.</li> </ol> <p>Negative impacts have been identified from the project as such:</p> <table border="1" data-bbox="1084 1161 1917 1369"> <thead> <tr> <th>Item/issue</th> <th>Impact</th> <th>Rating</th> </tr> </thead> <tbody> <tr> <td>Social/Security</td> <td>Increase of social issues due to project activities.</td> <td>2</td> </tr> <tr> <td>Traffic and transport</td> <td>Disturbance to normal traffic flow for road users and pedestrians</td> <td>3</td> </tr> </tbody> </table>	Item/issue	Impact	Rating	Social/Security	Increase of social issues due to project activities.	2	Traffic and transport	Disturbance to normal traffic flow for road users and pedestrians	3	
Item/issue	Impact	Rating										
Social/Security	Increase of social issues due to project activities.	2										
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		Human Rights	Unequal distribution of benefits from the project activities due to gender, wantok system and bribery.	2	
		Local communities	Local communities upset with company for no consultation prior to new development	2	
		Positive/beneficial impacts identified: <ul style="list-style-type: none"> <li>• Job opportunities available to dependents above 18 years.</li> <li>• Mosa market vendors make more money from sales due to demand for more garden food. Additional income for families</li> <li>• Chances of meeting new people and building network</li> </ul>			
3.4.2	<p>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. The SEIA shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes shall be made to current practices. In any case, the complete SEIA shall be updated at least every ten years to evaluate the cumulative effect of incremental changes. There shall be evidence that the review includes the participation of affected stakeholders.</p> <p><b>Smallholder requirements:</b></p> <p>Improvements suggested at the pre-planting inspection should be noted on the inspection form.</p> <p>- Minor Compliance -</p>	<p>For the Environmental Aspect Registry, the latest review was conducted in July 2021 by the Sustainability Department. The significant impact activities was documented in the Beneficial Impact Register. Since the environmental aspect registry is an assessment on the aspect and impact due to the oil palm operations, it is not necessary to involved stakeholders. The control measures for all the significant aspects were incorporated in the register, whereas the management plans to minimise the impacts were incorporated in the Continuous Improvement Plan.</p> <p>Base on the assessment conducted, a management plan was established and documented in the Continual Improvement Plan 2014 - 2025. The environmental management plan focusing on:</p> <ol style="list-style-type: none"> <li>1. Minimising the usage of certain pesticides</li> <li>2. Reducing negatives and enhancing positives environmental impacts</li> <li>3. Waste reduction</li> <li>4. Pollutions, emission and non-renewable energy</li> </ol> <p>Estates and mills have developed Social Management Plan to aim at improving social conditions for employees and dependents within all plantations and mills in the WNB group. The plan is based on social indicators highlighted through the socialization of the community engagement programs with NBPOL Sustainability Department.</p>			OFI

		<p>The main measurable indicators in plantations are:</p> <ol style="list-style-type: none"> <li>1. Safe and harmonious communities</li> <li>2. Promoting healthy lifestyle</li> <li>3. Education and literacy programs</li> <li>4. Spiritual wellbeing</li> <li>5. Embark on power point installation to all housing including DLQs, SLQs, and QJQs.</li> </ol> <p>The main measurable indicators in mills are:</p> <ol style="list-style-type: none"> <li>1. Working hours</li> <li>2. Superannuation benefits</li> <li>3. Provision of PPE</li> <li>4. Pregnancy</li> <li>5. Living conditions</li> <li>6. Sustainable livelihoods</li> <li>7. Service provision</li> </ol> <p>For existing operation in the mills and estates, Social Management Plan 2019 - 2021 were verified which valid for 2 years. For example at Bebere Estate, Social Management Plan, version 5 dated May 2021 was verified. Similar projects or initiatives such as vegetation farm project and chicken poultry farm were sighted. This project is to provide food security and nutrition improvements for workers.</p> <p>However, it was noted that some of site-specific issues has yet to include in the social management plan for improvement. Issues such as expensive pricing at trade store and water shortage/rationing issues to be incorporated in the SMP and ensure that planned action, timeline of completion being met and monitored effectively – OFI</p> <p>For Mosa Mill new construction and felling project, related control measures/plan have been identified to mitigate the impacts.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Item/issue</th> <th style="width: 25%;">Impact</th> <th style="width: 25%;">Control Measures/plan</th> <th style="width: 25%;">Responsible Department</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Item/issue	Impact	Control Measures/plan	Responsible Department					
Item/issue	Impact	Control Measures/plan	Responsible Department								

		Social/Security	Increase of social issues due to project activities.	Report unacceptable disturbances and anti-social behaviors to security Parents to reinforce discipline at home.	Mosa Security/ Parents		
		Traffic and transport	Disturbance to normal traffic flow for road users and pedestrians	Traffic management plan to identify potential risk associated to project area and implement control E.g. traffic signage installed in designated sites. Construct footpath for pedestrians to use. Print colored map and posted on notice board for public viewing.	Earthworks & Road Maintenance Projects		
		Human Rights	Unequal distribution of benefits from the project activities due to gender, wantok system, bribery etc.	Follow Gender and Human Rights policies etc when allocating benefits.	HR		
		Local communities	Local communities upset with company for no consultation prior to new development	Communicate grievance policy	SQM		

		<p>The management plan will be reviewed annually, and internal audit will be carried out on quarterly basis to check the progress of implementation.</p> <p><b>Smallholders</b></p> <p>The Smallholder Department conduct regular Field Days at the smallholder plots where improvements are suggested for better management of the plots as well as improved compliance towards legal and RSPO requirements. Noteworthy improvements initiated by the smallholders are also recognised by the Smallholder Departments. Among the improvements that have been noticed are better management of waste by implementation of landfills within the plots to dispose domestic waste and well as well-established buffer zones along creeks and rivers to avoid pollution and soil erosion.</p>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p><b>Smallholder requirements:</b></p> <p>Management improvements suggested by organization managing the smallholders during routine block inspections shall be implemented as practicable.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL WNB has incorporated its Environment Management Plan in NBPOL WNB Continuous Improvement Plan 2014-25. It was last reviewed in July 2021. Where identification of impacts that requires changes in current practices, to mitigate negative effects, a timetable for change is developed and implemented. The management plan is annually reviewed, and the progress of implementation is monitored through internal audit which is carried out on quarterly. Based on on-site verification, the progress was found to be on track.</p> <p>Reviewed the sample implementation of the management plan established as follows:</p> <p><u>Ove Estate</u></p> <p>Sighted the riparian buffer zone for Kapuluk River flows along the estate boundary. The vegetation along the buffer zone was well established. No evidence of chemical application at the buffer zone area.</p> <p><u>Moroa Estate</u></p> <p>Sighted the riparian buffer zone for Garuru/Luvi River. The vegetation along the buffer zone was let growth naturally and well established. No evidence of chemical application at the buffer zone area.</p> <p><u>Navarai Estate</u></p> <p>Sighted the riparian buffer zone for Kulia River which flow along the estates boundary. The vegetation along the buffer zone was let growth naturally</p>	Complied

		<p>and well established. The estate has erected signboard prohibited activity such as cutting down trees, open burning and building shelters in the areas. No evidence of chemical application at the buffer zone area.</p> <p>While the Social Management Plan has been developed to improve social conditions for employees and dependents within all mills and estates in the WNB group. Document dated 15<sup>th</sup> May 2019 is referred to. The management plan entitled, Social Management Plan for Mills in West New Britain Province 2019–2021 has 7 main objectives with measurable indicators for each of the mills to implement as such:</p> <ol style="list-style-type: none"> <li>1. Working Hours</li> <li>2. Superannuation benefits</li> <li>3. Provision of PPE</li> <li>4. Pregnancy</li> <li>5. Living Conditions</li> <li>6. Sustainable livelihoods</li> <li>7. Service provision</li> </ol> <p>Total of 18 measurable indicators have been identified. Among identified objective and measurable indicators checked:</p> <table border="1" data-bbox="1084 951 1917 1437"> <thead> <tr> <th>Objective</th> <th>Status</th> <th>Time frame</th> <th>Responsible Department</th> </tr> </thead> <tbody> <tr> <td>Mills to check and ensure all labour requirements per the NBPOL regulations and PNG Employment act is implemented</td> <td>In progress. Reviewing Hours of work and OT interpretation in conjunction with HR and F&amp;A department</td> <td>2019 – 2021</td> <td>Mill Managers</td> </tr> <tr> <td>Mills to consider employees accessibility to gardens by engaging with Plantations and Sustainability</td> <td>Work in progress Plantation allocated plots. Awaiting confirmation for first 30 plus employees especially those in QLQ for starter</td> <td>2019 – 2021</td> <td>Mill Managers</td> </tr> </tbody> </table>	Objective	Status	Time frame	Responsible Department	Mills to check and ensure all labour requirements per the NBPOL regulations and PNG Employment act is implemented	In progress. Reviewing Hours of work and OT interpretation in conjunction with HR and F&A department	2019 – 2021	Mill Managers	Mills to consider employees accessibility to gardens by engaging with Plantations and Sustainability	Work in progress Plantation allocated plots. Awaiting confirmation for first 30 plus employees especially those in QLQ for starter	2019 – 2021	Mill Managers	
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		<p>Mills to come up with an engagement plan with Construction to repair employees</p>	<p>WIP. System of PF29 records carried out and filed quarterly. Minor repairs being carried out by Mill staff. Work is mostly limited due to budget limitations</p>	<p>2019 – 2021</p>	<p>Mill Managers</p>
		<p>Likewise the Social Management Plan for Estates has 4 main objective as outlined in the Plantation Social Management Plans for WNB which covers:</p> <ol style="list-style-type: none"> <li>1. Safe and harmonious communities</li> <li>2. Promoting healthy lifestyle</li> <li>3. Education and literacy programs</li> <li>4. Spiritual well-being</li> </ol> <p>The plantation social management plans are reviewed every 3 years. The implementation of the management plans are committed by the company with demonstration of KPI and Results orientated including cost investment. The management plans for the sample estates are available and the review of the individual estate plans are up to date.</p> <p>Social Improvement Register (SIR) identifies the planned actions that NBPOL WNB (mills and plantations) will take in order to mitigate its negative impacts and promote the positives ones where this is deemed necessary. Social Improvement Register (SIR) identifies the planned actions that NBPOL WNB will take in order to mitigate its negative impacts and promote the positives ones where this is deemed necessary. Each planned action will be monitored on an ongoing basis by the Sustainability Department and reported against at bi-annual management meetings with the General Manager and Heads of Departments. Some significant issues which were verified with the WNBOP union president and spoke person and observation at housing area have been acknowledged and included in the SIR updated July 2021 for further monitoring. Among identified impacts and planned actions sighted:</p>			
		Impact	Planned action	Status	

		<p>Overcrowding</p>	<p>Conducted survey for DLQ houses to identify large family members that are sharing toilet and bathing facilities to prevent spread of diseases like TB, skin infections etc.</p>	<p>Survey yet to conduct. Findings to be presented to management for decision.</p>	
		<p>Housing maintenance issues</p>	<p>Review current system set up to do maintenance for staff houses in plantation and mill compounds. It is taking longer than 2 weeks to do repairs</p>	<p>Bilum Index/survey is still in progress for 2021</p>	
		<p>Domestic violence and sexual harassment.</p>	<p>Review reporting structure and actions taken to address domestic and sexual assessment cases. Especially incest. In some cases, parents and children share the same room with no partitions in DLQ houses. Couples do not have privacy. The arrangement encourages incest between the father and daughter which is a catalyst for domestic arguments and violence</p>	<p>Bilum Index/survey is still in progress for 2021</p>	
		<p><b>Smallholders</b> The smallholder Department conduct regular Filed Days at the smallholder's plot and provide continuous improvement suggestions for social and environmental betterment. This was noticed and acknowledged by the smallholders during the visit to the smallholder's plots. Among the improvements that have been noticed are better management of waste by implementation of landfills within the plots to dispose domestic waste, implementation of toilet pits and well as well-established buffer zones along creeks and rivers to avoid pollution and soil erosion. Awareness trainings were also provided by the Smallholder Departments that have made the management of smallholder plots more environmental friendly such as the awareness to not conduct open burning and to protect the RTE species.</p> <p><b>Independent Estates</b></p>			

		Repamira Estate management independently estate has developed the social management plan covering objectives to improve labour living condition; employee benefits; promoting health and safety; improve sanitation; promote gender equality; promoting safe community; maintaining Christian principles and improve education and literacy. The management plan includes target date and status of implementation. The plan was last reviewed on 05/01/2021.	
<b>Criterion 3.5:</b> A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives. - Minor Compliance -	NBPOL has developed SOP for Recruitment & Selection approved by 27/07/2020. The objective is to ensure every recruitment activity is strategically aligned with the mission and values of company. The method of recruitment of general labour and semi- skilled are from hearing of vacancies through word of mouth and putting up notice on notice board. Interview by a Manager is required for semi-skilled labourer to ensure the applicant is suitable for the position. All applicants are required to undergo mandatory medical examination with pass before being employed. The operating units will identify the needs of recruitment and submit  The Employment Requisition Form to Human Resource and General Manager for approval. They will screen the applicants based on job specifications and through interview. Internal promotion, relocation of duties will be considered if there is any vacancy. Human Resource Officer has explained the whole process of recruitment, selection, hiring and promotion. Besides, a General Policies & Regulations Handbook was released on May 2010 where retirement, promotion and termination of services is clearly stated in the SOP.  <b>Independent Estate:</b> The Employment Procedure for Repamira Estate is available. Terms of employment and method of recruitment is clearly stated in the procedure.	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	WNB30 @ non-executive staff recruitment form, employment interview assessment form, pre-employment medical report, employee induction form was sighted for new recruited employees. On top of the said documents, as required by the law of PNG, salary @ wages via form S3 declaration must be submitted to PNG Internal Revenue Commission and	Complied



		<p>application for membership: Palm SUPA was also verified. The latest recruitment records at mills and estates for 2021 available for verification. A personal file filled with the above documents was kept as personal employment records. The method of recruitment of general labour and semi- skilled are from hearing of vacancies through word of mouth and putting up notice on notice board.</p>	
<p><b>Criterion 3.6:</b> An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p><b>Smallholder requirements:</b></p> <p>Organization managing the smallholders to provide advice and training on identification and control of risks through extension activities.</p> <p>- Critical (Major) compliance -</p>	<p>The assessment cover all main operations and support operations in such as follows but not limited:</p> <ul style="list-style-type: none"> <li>• Estates: Harvesting, weeding, manuring, office operation, security, pest and disease and other support operation.</li> <li>• Mill: security, office, store, weighbridge, fruit handling and threshing.</li> </ul> <p>The assessment covers working type, job step, hazard, effect, existing control, type, probability.</p> <p>As stated in the SOP, all risk assessments are to be reviewed annually, or as prompted by, a major incident i.e. Class 1, Class 2 or Class 3 incident or when there is a change with process or procedure and yearly review. The reviewed was conducted centrally by OHS Officer – SQM Department and the Operating units.</p> <p>Reviewed the latest risk assessment as follows:</p> <ol style="list-style-type: none"> <li>1. WNB Central Risk Register reviewed dated 30/01/2021</li> <li>2. OH&amp;S Risk Register for Plantations reviewed for Kapiura dated 16/02/2021, 02/07/2021, and 03/07/2021</li> <li>3. Workplace Risk Assessment (WRA) for EFB at the Hopper at Mosa Mill dated 22/06/2021</li> <li>4. Workplace Risk Assessment (WRA) for Crop Theft Prevention and Monitoring at Moroa Estate dated 30/06/2021</li> <li>5. Workplace Risk Assessment (WRA) for Safe route for cartage of mill fibre to Kapiura Nursery Beds for nursery use dated 07/06/2021</li> <li>6. Workplace Risk Assessment (WRA) for Harvesting of Tall Palms Near Power Lines dated 25/03/2021</li> </ol>	<p>Complied</p>

		<p>7. Workplace Risk Assessment (WRA) for Poisoning of Palms dated 25/03/2021</p> <p>8. Workplace Risk Assessment (WRA) for Spraying Activity FY 2021 dated June 2021</p> <p>Workplace Risk Assessment (WRA) for Harvesting Operation FY 2021 dated June 2021</p> <p>All the sampled estates have satisfactorily implemented their occupational safety mitigation plans and procedures as spelt out in the Operational Safety Management Plan. Among the mitigation measures implemented based on site visits were:</p> <ul style="list-style-type: none"> <li>• Usage of PPE such as gumboots for harvesters; coverall, rubber glove, spray cap, apron &amp; gumboots for sprayer</li> <li>• Safe operating procedures trainings to create awareness and competency e.g. possession of green card for trained sprayers</li> <li>• Availability of clean water for sprayers and emergency shower at chemical mixing facility in case of accidental spillage onto the chemical handlers</li> <li>• Availability of speed limit signboards and road humps</li> </ul> <p><b>Smallholders</b></p> <p>Smallholder Department with the assistance of OPIC conduct regular Field Days as well as OSH Inspection at the smallholder’s blocks. OSH Inspections include aspects related to compound health &amp; hygiene, pesticide chemicals &amp; hazardous chemicals, PPE, Amenities, First Aid, Fire Control, housekeeping and OSH improvements. OSH Inspection Records were available for verification for the smallholders.</p> <p>The Smallholder Department also maintains monthly medical statistics that is obtained from the smallholders.</p> <p>Regular OH&amp;S Committee Meeting are conducted for Smallholder Affairs to discuss on health and safety issues in relation to the smallholders. Sampled the OH&amp;S – Smallholder Affairs meeting minutes dated 01/06/2021, 31/03/2021 and 29/0/2021.</p>	
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		<p>During the interview with the sampled smallholders, they have acknowledged that the Smallholder Department with the help of OPIC conduct regular OSH related trainings especially on the importance of PPE usage while carrying out work in their respective plots.</p> <p><b>Independent Estate</b></p> <p>A simplified Health &amp; Safety management plan for Repamira estate is available. The plan was dated June 2021.</p>											
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL WNB has established Operational Safety Management Plan issue no. 7 dated May 2019 for Production and Plantation. The effectiveness of the H&amp;S plan is monitored through various methods, for examples as follows:</p> <ul style="list-style-type: none"> <li>• ESH Monthly Inspection Checklist as mentioned in Indicator 3.3.3</li> <li>• Internal Audit QIP Summary</li> <li>• OH&amp;S Monthly Inspection Checklist</li> </ul> <p>Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> <li>1. Safety Officer conducted EHS Monthly Inspection Checklist. The findings were discussed in the OH&amp;S monthly meeting. Reviewed the minutes meeting for OH&amp;S committee meeting for all operating units sampled.</li> <li>2. The operating units monitor the status of the compensation claim and recorded in the Workers Compensation Claims Status Report Forms. Reviewed the records of claim as follows:</li> </ol> <table border="1" data-bbox="1086 1029 1854 1281"> <thead> <tr> <th>Payment voucher raised</th> <th>Cheque no#</th> </tr> </thead> <tbody> <tr> <td>20/05/2021</td> <td>2781xx, 2780xx, 2781xx, 2781xx, 2780xx</td> </tr> <tr> <td>08/07/2021</td> <td>2785xx, 2785xx, 2785xx, 2785xx, 2785xx</td> </tr> <tr> <td>08/07/2021</td> <td>2785xx, 2785xx, 2785xx</td> </tr> <tr> <td>15/07/2021</td> <td>2786xx, 2786xx, 286xx, 2786xx</td> </tr> </tbody> </table> <ol style="list-style-type: none"> <li>3. The estates conducted medical check-up for all the chemical handlers once every 6 months. The fit chemical handlers will be issued with Green-Card. Reviewed the latest medical check-up and green card for all estates sampled.</li> </ol>	Payment voucher raised	Cheque no#	20/05/2021	2781xx, 2780xx, 2781xx, 2781xx, 2780xx	08/07/2021	2785xx, 2785xx, 2785xx, 2785xx, 2785xx	08/07/2021	2785xx, 2785xx, 2785xx	15/07/2021	2786xx, 2786xx, 286xx, 2786xx	Complied
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		<p>4. The operating units conducted the Emergency Response Drill Operation once every 6 months and documented in the Emergency Response Drill Operation - Performance Evaluation form, EF-EP05-03. Reviewed the training records as follows:</p> <ul style="list-style-type: none"> <li>a. Emergency Response Drill Operation for Mosa Palm Oil Mill dated 15/01/2021. With 3 minutes evacuation times.</li> <li>b. Emergency Response Drill Operation for Numondo Palm Oil Mill dated 17/02/2021. With 4 minutes evacuation times.</li> <li>c. Emergency Response Drill Operation for Kapiura Palm Oil Mill dated 17/03/2021. With 5 minutes evacuation times.</li> <li>d. Emergency Response Drill Operation for Lolokoru Palm Oil Mill dated 20/06/2021. With 3 minutes evacuation times.</li> <li>e. Emergency Response Drill Operation for Ove Estate dated 15/04/2021.</li> <li>f. Emergency Response Drill Operation for Navarai Estate dated 17/07/2021. With 30 minutes evacuation times.</li> </ul>	
<p><b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to those who will be affected by the programme, 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><b>Smallholder requirements:</b></p> <p>Organization managing the smallholders to provide advice and ongoing support to Smallholders through field days and visits to Smallholder blocks.</p> <p>- Major Compliance -</p>	<p>NBPOL WNB has established central training plan and documented in Training Calendar 2021. The training focusing on General Staff Generic Training, Supervisory, Sustainability, Human Resource, Research &amp; Development, Workshop, Oil Palm Mills, Construction, Asset Protection, Oil Palm Field Training, and Management Training. The training plan includes the training themes, hours allocated, target group and month programmed.</p> <p>The operating units has also established site specific training plan. The training was more focusing on awareness of safety and health, environmental and operation in the operating units.</p> <p><b>Smallholders</b></p> <p>The NBPOL-WNB Smallholder Affairs Department with the assistance of OPIC provide advice and continuous support to all smallholders within the certification unit through regularly conducted Field Days at the smallholders blocks as well as meetings conducted at the Smallholder’s Department and OPIC office. Programmes for Field Days have been halted due to the</p>	<p>Complied</p>

		<p>ongoing Covid 19 Pandemic, nevertheless the smallholder departments have made efforts to engage with the smallholders as much as possible. Smallholders Affairs Department – Stakeholders/Outgrowers Training Program (Jan 2021 – Dec 2021) was available for verification.</p> <p><b>Independent Estate:</b></p> <p>The NBPOL-WNB Smallholder Affairs Department assisted Repamira Estate to develop and provide training to the workers. The training plan for 2021 is available. Training plan for 2021 includes Best Management Practices for Upkeep Practices; Company Policies; First Aid Respond; Pest &amp; Disease; Emergency Response Drill; Fertilizer Application and Haversting Practices.</p>																																														
<p>3.7.2</p>	<p>Records of training are maintained, where appropriate on an individual basis. Appropriate records include records of training or evidence of competency for trade qualifications, boiler operation and other safety related activities such as chemical handling</p> <p><b>Smallholder requirements:</b></p> <p>Smallholder training records are maintained.</p> <p>- Minor Compliance -</p>	<p>The records of training were maintained by the Sustainability Department and the operating units. Reviewed the sampled records of training as follow:</p> <table border="1" data-bbox="1086 719 1957 1417"> <thead> <tr> <th>Topic</th> <th>Group Location / Department</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Sustainability Training (module 2 &amp; 3)</td> <td>Kulu Dagi / Silo / Healla Group</td> <td>16/01/2021</td> </tr> <tr> <td>COVID 19 &amp; Curfew Awareness</td> <td>SQM</td> <td>18/01/2020</td> </tr> <tr> <td>Sustainability Training (module 2 &amp; 3) and Risk Assessment</td> <td>Superintendents, Operators, Supervisors, Safety Reps</td> <td>30/01/2021</td> </tr> <tr> <td>Workplace Risk Assessment</td> <td>Healla Workshop/Roadworks</td> <td>10/02/2021</td> </tr> <tr> <td>Workplace Risk Assessment</td> <td>Seed Production Unit</td> <td>18/02/2021</td> </tr> <tr> <td>Social Awareness</td> <td>Valupai / Lotogum</td> <td>13/02/2021</td> </tr> <tr> <td>SAN / RSPO Filing</td> <td>Kapiura Group</td> <td>13/03/2021</td> </tr> <tr> <td>GMP training</td> <td>Production &amp; SQM</td> <td>23-24/03/2021</td> </tr> <tr> <td>BCFW – Family &amp; Sexual Violence Training</td> <td>Plantation Group, Research, HR, SQM</td> <td>26/03/2021</td> </tr> <tr> <td>Social Awareness - KOM</td> <td>Mill Compound</td> <td>18/04/2021</td> </tr> <tr> <td>COVID Awareness</td> <td>SQM</td> <td>08/04/2021</td> </tr> <tr> <td>New Employee Induction</td> <td>SQM</td> <td>29/04/2021</td> </tr> <tr> <td>First Aid Training</td> <td>WNB Operation</td> <td>11/06/2021</td> </tr> <tr> <td>Boiler Training</td> <td>Mills, Contraction</td> <td>20/07/2021</td> </tr> </tbody> </table>	Topic	Group Location / Department	Date	Sustainability Training (module 2 & 3)	Kulu Dagi / Silo / Healla Group	16/01/2021	COVID 19 & Curfew Awareness	SQM	18/01/2020	Sustainability Training (module 2 & 3) and Risk Assessment	Superintendents, Operators, Supervisors, Safety Reps	30/01/2021	Workplace Risk Assessment	Healla Workshop/Roadworks	10/02/2021	Workplace Risk Assessment	Seed Production Unit	18/02/2021	Social Awareness	Valupai / Lotogum	13/02/2021	SAN / RSPO Filing	Kapiura Group	13/03/2021	GMP training	Production & SQM	23-24/03/2021	BCFW – Family & Sexual Violence Training	Plantation Group, Research, HR, SQM	26/03/2021	Social Awareness - KOM	Mill Compound	18/04/2021	COVID Awareness	SQM	08/04/2021	New Employee Induction	SQM	29/04/2021	First Aid Training	WNB Operation	11/06/2021	Boiler Training	Mills, Contraction	20/07/2021	<p>Complied</p>
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<p>After training were conducted, the operating units will conduct training assessment to evaluate the effectiveness of training conducted. The results will be used for training plan for next year.</p> <p>For newly joined workers, they were required to attend the on-job training during the probation period. During this period, the workers were attached with experienced workers to learn about the assign works. At the end of the probation period, the supervisor will evaluate the workers and recorded in the Probation Assessment Period. Reviewed the records for workers ID MOM 9315, MOM 9312 and MOM 0314.</p> <p><b>Smallholders</b></p> <p>Smallholders Department have maintained the records of training provided to the smallholders and available for verification as below:</p>																	
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<p>3.7.3</p>	<p>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.</p> <p>- Minor Compliance -</p>	<p>NBPOL-WNB provides annual RSPO Supply Chain refresher training to staff and employee whom are relevant to the task. The training are mainly provided to mill operations and sustainability team.</p> <p>Some of the training records reviewed in this audit:</p> <ol style="list-style-type: none"> <li>1. RSPO Supply Chain Refresher &amp; RSPO SCC 2020 for Sustainability team conducted on 29/05/2020</li> <li>2. RSPO Supply Chain Refresher &amp; RSPO SCC 2020 for Kapiura Oil Mill team conducted on 06/06/2020</li> <li>3. RSPO Supply Chain Refresher for Kapiura Oil Mill team conducted on 17/05/2021</li> <li>4. RSPO Supply Chain Refresher &amp; RSPO SCC 2020 for Kumbango Oil Mill team conducted on 29/05/2020</li> <li>5. RSPO Supply Chain Refresher &amp; RSPO SCC 2020 for Mosa Oil Mill team conducted on 26/05/2020</li> <li>6. RSPO Supply Chain Refresher for Waraston Oil Mill team conducted on 18/05/2021</li> <li>7. Refresher and QA on RSPO PalmTrace conducted on 06/07/2021</li> </ol>	<p>Complied</p>								
<p><b>Criterion 3.8:</b> Supply chain requirement for mills          (note: all supply chain requirements are considered as <b>Critical (C)</b>. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>											

3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/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 Mass Balance Module is applicable.</p>	<p>This certification is a multi-mills certification. The FFB received are from certified source either from the owned estates or smallholders that are associated with the mills.</p> <p>The NBPOL Supply Chain Management Guidelines rev 13 dated July 2021 has correctly identify the supply chain module Identity Preserved.</p>	Complied
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. 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>	Not applicable	Complied
3.8.3	<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. 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 mills maintain mill daily production reports which monitors the production of CPO and PK. The production reports provide details such as OER, KER, quantity produced and total stock. With such historical data and budget from the estates, trending can be plotted to estimate the future CPO and PK tonnage.</p> <p>As per section 7-11 of the report, it volumes are reported.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The estimated tonnage of CPO and PK is available in the public summary report.</p> <p>NBPOL-WNB is a subsidiary of Sime Darby Plantation. Hence the RSPO member ID carried by NBPOL-WNB is 1-0008-04-000-00. This certification is a multi-mill certification. There is total of 5 mills included in the certification. Each mill holds a PalmTrace account.</p> <p>Below are the Mills' PalmTrace member ID:</p>	Complied



		<ol style="list-style-type: none"> <li>1. Kapiura Oil Mill with PalmTrace member ID RSPO_PO1000007539</li> <li>2. Waraston Oil Mill with PalmTrace member ID RSPO_PO1000007522</li> <li>3. Numundo Oil Mill with PalmTrace member ID RSPO_PO1000007478</li> <li>4. Mosa Oil Mill with PalmTrace member ID RSPO_PO1000000002</li> <li>5. Kumbango Oil Mill with PalmTrace member ID RSPO_PO1000007582</li> </ol>	
3.8.5	<p><b>Documented procedures</b></p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> <li>a. Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c. Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</li> <li>d. The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</li> </ol>	<p>The guiding procedure to implement and maintain the supply chain established by NBPOL-WNB is the NBPOL Supply Chain Management Guideline (MG 26 SCC) rev. 13 dated July 2021. The procedures includes</p> <ol style="list-style-type: none"> <li>1. Roles &amp; responsibilities</li> <li>2. Purchasing and Good In</li> <li>3. Outsourcing Activities</li> <li>4. Sales and Goods Out</li> <li>5. Volume Records</li> <li>6. Processing</li> <li>7. Training/Awareness</li> <li>8. Claims</li> <li>9. Non-conforming Products and/or documents</li> <li>10. Internal Audit (including internal audit checklist)</li> <li>11. Communication Process of Suspended / Terminated Certificate</li> <li>12. Supply Chain Management Review</li> <li>13. Retention time of SCC documentation</li> <li>14. Rules on market communications and claims</li> <li>15. Complaints</li> </ol>	Complied
3.8.6	<p><b>Internal Audit</b></p> <ol style="list-style-type: none"> <li>i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ol style="list-style-type: none"> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> </ol> </li> </ol>	<p>The Internal audit checklist includes all the requirements of indicator 3.8.1 till 3.8.17 of the PNG and Solomon Islands National Interpretation of the RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018.</p> <p>As per the MG-26 SCC rev. 13 dated July 2021, the internal audit is required to be conducted annually. The principles of issuance non-conformities</p>	Complied

	<p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii. 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 mill shall maintain the internal audit records and reports.</p>	<p>follows the NBPOL-WNB Internal Audit Standard Operating Procedure (SOP) - SUST-01-Internal Auditing rev.4 dated June 2020. The SOP described the process of internal audit and how to address the non-conformance found.</p> <p>Internal Audit records are maintained at all sites involved. Samples of internal audit records audited in this audit:</p> <ol style="list-style-type: none"> <li>1. RSPO SCC Internal Audit – Numundo Oil Mill conducted on 05/06/2020. No non-conformance was raised.</li> <li>2. RSPO SCC Internal Audit – Numundo Oil Mill conducted on 19/05/2021. 1 non-conformance was raised.</li> <li>3. RSPO SCC Internal Audit – Mosa Oil Mill conducted on 26/05/2020. No non-conformance was raised.</li> <li>4. RSPO SCC Internal Audit – Mosa Oil Mill conducted on 05/06/2021. No non-conformance was raised.</li> <li>5. RSPO SCC Internal Audit – Kapiura Oil Mill conducted on 06/06/2020. No non-conformance was raised.</li> <li>6. RSPO SCC Internal Audit – Kapiura Oil Mill conducted on 17/05/2021. 1 non-conformance was raised.</li> <li>7. RSPO SCC Internal Audit – Kumbango Oil Mill conducted on 28/05/2020. No non-conformance was raised.</li> <li>8. RSPO SCC Internal Audit – Kumbango Oil Mill conducted on 20/05/2021. 2 non-conformities was raised.</li> <li>9. RSPO SCC Internal Audit – Waraston Oil Mill conducted on 13/06/2020. No non-conformance was raised.</li> </ol> <p>As there is no operations at Waraston Oil Mill, internal audit was not conducted for year 2021.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>As this is an Identity Preserved certification, the mills only receive and process certified FFBs from its own supply bases and smallholder associated to the mills. However, due to the smallholders that may sometimes be suspended from supplying to the mills, the FFBs will not be allowed into the mill. These FFBs will be isolated until further decision by the management.</p>	<p>Complied</p>

	<p>iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The MG-26 SCC rev. 13 dated July 2021 had described that the site shall inform the CB immediately if there is a projected over production of certified tonnage.</p>	
3.8.8	<p><b>Sales and Goods Out</b></p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> <li>a. The name and address of the buyer;</li> <li>b. The name and address of the seller;</li> <li>c. The loading or shipment / delivery date;</li> <li>d. The date on which the documents were issued;</li> <li>e. RSPO certificate number;</li> <li>f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g. The quantity of the products delivered;</li> <li>h. Any related transport documentation;</li> <li>i. A unique identification number.</li> </ol>	<p>The Crude Palm Oil (CPO) and Palm Kernel) processed by the mills will be transferred to Kumbango Oil Refinery (KOR) and Kumbango Kernel Mill (KKM). Both these facilities belongs to NBPOL-WNB and are located at the same vicinity of Kumbango Oil Mill.</p> <p>Other than Kumbango Oil Mill, the CPO and PK from other mills are transfer by tankers or KCP trucks to the KOR or KKM. The records of transfers are recorded using the weighbridge ticket. Samples of CPO and PK dispatched were reviewed. The ticket includes information such as,</p> <ol style="list-style-type: none"> <li>1. Name of the mill</li> <li>2. RSPO certificate number with identification of Identity Preserved</li> <li>3. Type of product and quantity</li> <li>4. Date of dispatch</li> <li>5. Ticket number as the unique identification</li> </ol> <p>Since the operation of the KOR and KKM is under the management of Kumbango Oil Mill, the audit team deems that the minimal information stated above are sufficient as there is minimal risk that the information received is incorrect.</p>	Complied
3.8.9	<p><b>Outsourcing Activities</b></p> <ol style="list-style-type: none"> <li>i. The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> <li>ii. The mill shall ensure the following:</li> </ol>	<p>There is no outsourcing of mill activities. NBPOL-WNB handles all the mill process.</p> <p>The storage facilities are not related to this certification as it is handled and managed KOR and KKM and both these facilities maintained their own RSPO Supply Chain Certification.</p>	Complied

	<ul style="list-style-type: none"> <li>a. The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b. The mill 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 mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d. The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</li> </ul>		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	There is no outsourcing of mill activities. NBPOL-WNB handles all the mill process.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The sites had understood regarding this requirement. Furthermore, as it is not expected to have any outsourced activities, this risk is minimal. Additional to this, NBPOL-WNB was cooperative to provide BSI the pre-audit information as requested before the audit commence.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> <li>i. The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</li> <li>ii. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> </ul>	<p>Each mill have Daily and Monthly Production Summary Report. The summary reports the Crops received, Production data (milling hours, ton/hour, oil production, oil extraction, kernel production, kernel extraction rate, CPO stocks and dispatch, PK stocks and dispatch, Oil quality, Kernel quality, process data, oil loses, and kernel loses. The production summary reports demonstrate the balance of received FFBs and deliveries of CPO and PK.</p> <p>The CPO and PK quantities available in the mill are recorded using the Storage Tank Records excel sheets and Kernels Stock &amp; Despatch record excel sheets.</p>	Complied

	<ul style="list-style-type: none"> <li>iii. For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>iv. For Mass Balance Module, the mill:               <ul style="list-style-type: none"> <li>a. 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.</li> <li>b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</li> <li>c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</li> </ul> </li> </ul>	<p>During the audit, the auditors has no issue to receive the requested information.</p> <p>As per the MG-26 SCC rev. 13 dated July 2021, the minimum retention time for all documentation is 3 years and generally all documents have been stored for 5 years.</p>	
<p>3.8.13</p>	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The yearly oil extraction rate and palm kernel extraction rate estimate are determined through mill throughput capacity, past historical performance of the mill and age profile of the oil palms. The company 3 years Management Business Plan has reported the Key Operational Drivers which include the target OER and KER up to year 2024. The average OER for 2022-2024 is 23.05% while KER is 6.18%. These Extraction rates were derived from actual production output that were measured daily/monthly by the mills and recorded in the daily production report.</p> <p>During this audit samples of monthly mill production reports were reviewed to confirm the estimation and monitoring of the OER and KER through the reporting period.</p> <ol style="list-style-type: none"> <li>1. Kapiura Oil Mill Monthly Summary for May 2021 shows year to date OER is 23.30% and KER of 5.63%</li> <li>2. Kumbango Oil Mill Monthly Summary for January 2021 shows year to date OER is 22.87% and KER of 5.71%</li> <li>3. Mosa Oil Mill Monthly Summary for June 2021 shows year to date OER is 22.96% and KER of 6.24%</li> </ol>	<p>Complied</p>

		4. Numundo Oil Mill Monthly Summary for June 2020 shows year to date OER is 19.62% and KER of 6.02%	
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Daily Mill Production Report (DMRP) shows that extraction rates are updated daily to get the most close CPO and PK estimation.	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Mosa Mill, Kumbango Mill, Waraston Mill, Kapiura Mill and Numundo Mill does not receive any FFB from uncertified supply base, therefore all CPO and PK produced are 100% certified.</p> <p>However, due to the smallholders that may sometimes be suspended from supplying to the mills, the FFBs will not be allowed into the mill. These FFBs will be isolated until further decision by the management.</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii. Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>The monthly stock records of the PK and CPO volumes transfer to the refinery or crusher plant was reviewed. The records shows that the closing stock at the refinery or crusher are well balanced and the products are not kept more than 3 months. The final products will be shipped out by the refinery or crusher latest by 2<sup>nd</sup> month after receiving from the mills. While the shipping announcement for the mill will then be conducted. The records of the PalmTrace transaction was verified and the announcements are accordingly.</p> <p>The product shipped out by NNPOL-WNB are mainly RSPO certified material. There are no selling under different schemes. NBPOL-WNB understand the removal of RSPO certified volumes and these can be seen in the last license transactions records.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>NBPOL has through its website <a href="https://www.nbpol.com.pg/?page_id=277">https://www.nbpol.com.pg/?page_id=277</a> inform stakeholders about their RSPO Certification. There is no trademark logo used in the website. While the description of the certification did not lead consumers to believe that being an RSPO member means eligible to sell RSPO certified oil palm products. There is no communication regarding NBPOL's RSPO membership.</p> <p>The only claims made was the business to business claims where by the RSPO certificate number and the products was correctly stated in the CPO and PK deliveries.</p>	Complied

<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	<p>NBPOL has through its website <a href="https://www.nbpol.com.pg/?page_id=277">https://www.nbpol.com.pg/?page_id=277</a> inform stakeholders about their RSPO Certification. There is no trademark logo used in the website. While the description of the certification did not lead consumers to believe that being an RSPO member means eligible to sell RSPO certified oil palm products. There is no communication regarding NBPOL's RSPO membership.</p> <p>Document template, assessment reports, production records, policies and site observation were verified and there were no corporate communication made by NBPOL other than in the website.</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>a. Display its RSPO membership status</li> <li>b. Display the RSPO web address (www.rspo.org)</li> <li>c. State that the member supports the work of the RSPO</li> <li>d. State the member's history with regard to the RSPO.</li> <li>e. Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <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>NBPOL has through its website <a href="https://www.nbpol.com.pg/?page_id=277">https://www.nbpol.com.pg/?page_id=277</a> inform stakeholders about their RSPO Certification. There is no trademark logo used in the website. While the description of the certification did not lead consumers to believe that being an RSPO member means eligible to sell RSPO certified oil palm products. There is no communication regarding NBPOL's RSPO membership.</p> <p>Document template, assessment reports, production records, policies and site observation were verified and there were no corporate communication made by NBPOL other than in the website.</p>	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	<p>NBPOL has through its website <a href="https://www.nbpol.com.pg/?page_id=277">https://www.nbpol.com.pg/?page_id=277</a> inform stakeholders about their RSPO Certification. There is no trademark logo used in the website. While the description of the certification did not lead consumers to believe that being an RSPO member means eligible to sell RSPO certified oil palm products. There is no communication regarding NBPOL's RSPO membership.</p> <p>Document template, assessment reports, production records, policies and site observation were verified and there were no corporate communication made by NBPOL other than in the website.</p>	Complied

4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	NBPOL has through its website <a href="https://www.nbpol.com.pg/?page_id=277">https://www.nbpol.com.pg/?page_id=277</a> inform stakeholders about their RSPO Certification. There is no trademark logo used in the website. While the description of the certification did not lead consumers to believe that being an RSPO member means eligible to sell RSPO certified oil palm products. There is no communication regarding NBPOL's RSPO membership.  Document template, assessment reports, production records, policies and site observation were verified and there were no corporate communication made by NBPOL other than in the website.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Business website, document template, assessment reports, production records, policies and site observation were verified to confirm the RSPO Corporate logo was not in used.	Complied
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	All certified CPO and PK are transferred to Kumbango Oil Refinery and Kumbango Kernel Mill respectively and these facilities belongs to NBPOL-WNB located at the same vicinity of Kumbango Oil Mill. The transfer documents, mainly the weighbridge ticket demonstrate the product are transfer as RSPO certified material and the communication is through identity of the RSPO certificate number. There are no other communication.	Complied
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.	All certified CPO and PK are transferred to Kumbango Oil Refinery and Kumbango Kernel Mill respectively and these facilities belongs to NBPOL-WNB located at the same vicinity of Kumbango Oil Mill. The transfer documents, mainly the weighbridge ticket demonstrate the product are transfer as RSPO certified material and the communication is through identity of the RSPO certificate number. There are no other communication.	Complied
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	This certification is mill certification. Hence the requirement is not applicable.	Not Applicable



	<p>products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
<b>Business to consumer communication</b>			
6.1	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.	There were no business to consumer communication made by NBPOL.	Complied
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	There were no business to consumer communication made by NBPOL.	Complied
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	There were no business to consumer communication made by NBPOL.	Complied
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	There were no business to consumer communication made by NBPOL.	Complied
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	There were no business to consumer communication made by NBPOL.	Complied
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	There were no business to consumer communication made by NBPOL.	Complied
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	There were no business to consumer communication made by NBPOL.	Complied
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer	There were no business to consumer communication made by NBPOL.	Complied

	<p>communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules 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>.</p>		
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>All CPO and PK produced by the mills are sources from its own supply bases. There are no uncertified source that goes into the mills supply chain. Any non-conforming smallholders will not have their FFBS delivered to the mills. Hence the oil palm content transfer to Kumbango Oil Refinery or Kumbango Kernel mill will be 100% IP certified.</p>	Complied
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>All CPO and PK produced by the mills are sources from its own supply bases. There are no uncertified source that goes into the mills supply chain. Any non-conforming smallholders will not have their FFBS delivered to the mills. Hence the oil palm content transfer to Kumbango Oil Refinery or Kumbango Kernel mill will be 100% IP certified.</p>	Complied
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of</p>	<p>All CPO and PK produced by the mills are sources from its own supply bases. There are no uncertified source that goes into the mills supply chain. Any non-conforming smallholders will not have their FFBS delivered to the mills. Hence the oil palm content transfer to Kumbango Oil Refinery or Kumbango Kernel mill will be 100% IP certified.</p>	Complied

	non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.		
<b>Labelling and trademark (IP)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>a. RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul>	No labelling and trademark were used when delivering the CPO and PK.	Complied
<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> </ul>	No messaging was used when delivering the CPO and PK.	Complied

	<ul style="list-style-type: none"> <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>		
<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
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>- Critical (Major) compliance -</p>	<p>NBPOL has developed Human Rights Policy that signed by the General Manager of WNB. The management uphold their commitment to respect, support and uphold fundamental human rights as expressed in the Universal Declaration for Human Rights and its two covenants. Their commitment extends to any human being affected by the operations including employees, suppliers, smallholders and people in communities surrounding the operations. There are three core areas that they focus on as below:</p> <ul style="list-style-type: none"> <li>Free, Prior and Informed Consent</li> <li>Right to Health</li> <li>Rights for Workers</li> </ul> <p>The same Human Rights Policy was also adopted by Repamira Estate to uphold the same commitments.</p> <p>For the group level, Sime Darby Plantation Berhad has developed the Policy on the Protection of Human Rights Defenders (HRDs) effective on 25/03/2020. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). They promote the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more</p>	Complied

		information. <a href="#">Policy on the Protection of HRDs FINAL.pdf (simeidarbyplantation.com)</a> Sustainability Manager, Mr. Laszlo has conducted the briefing on the HRD Policy to all the Head of Department on 22/06/2020. The policy awareness was then cascaded down during Social Awareness Programme for the group (Mosa, Kuludagi, Haella, Malilimi, Kapiura, Talasea and Silovuti) which has been scheduled throughout the year of 2021. For Mosa group, latest session was carried out on 8/4/21 (Dami Office) and 16/7/21 (Kombanga Oil Mill).	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. - Minor compliance -	NBPOL prohibits any form of harassment in their operation as per the policies above. Interviewed with the workers confirmed that no workplace violence or harassment done by the management. No mercenaries and paramilitaries in the mills and plantations.	Complied
<b>Criterion 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			
4.2.1	<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 whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	The main upholding commitment of NBPOL-WNB towards resolving complaints and protecting complainant is through the established Whistleblower Policy. The Policy is made available in Tok Pisin. The strong commitment of NBPOL-WNB defined the whistle-blower is not a complaint but rather as a witness.  The policy stated that any relevant stakeholders to the company whom includes workers holds the rights to raise any complaints if found the company or the employees of the company has violated the company policies. This is with especially referring to the Human Rights Policy where NBPOL-WNB uphold the United Nation Universal Declaration of Human Rights and the 2 covenants including protecting of any defendant of human rights.  The Management of NBPOL-WNB has ensured that the complainant will be protected and not be at risk of losing job or suffering any form of retribution.  The Whistleblower Policy has maintained strict confidentiality. In case a worker feels uncomfortable to raise the matter to the line manager, the worker can directly raise it to the Locally Designated Officer (LDO) who consist of the General manager, Company Secretary and Lands Officer.	Complied

		<p>Further choice is given to the complainant that if they are unsatisfied, they have the rights to bring the matter outside of the company by contacting Transparency International, external auditors, trade union, Local Member of Parliament, citizen advise bureau, professional bodies or regulatory organization, voluntary organization and the police.</p>					
<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>New Britain Palm Oil Limited (NBPOL) has developed Communication &amp; Consultation Procedure, version 3 dated 04/07/2020 where the objectives of the procedure are to:</p> <ol style="list-style-type: none"> <li>1. Ensure free and effective communication between all of NBPOL stakeholders (including employees) and external stakeholders.</li> <li>2. Address and take corrective action on grievances raised against NBPOL's operations in a timely and adequate manner.</li> </ol> <p>The procedure has clearly outlined the department to be responsible to respond to each types of communications. For example: Sustainability Department will be responded to any NGO's &amp; government bodies for discussions on environment, social and new development projects issue. All the communications raised could be either in writing, phone call, emails or verbal discussion. Details of the grievance or communication will be recorded in grievance registers and community request books at respective sites.</p> <p>The timeline to deal and respond to the grievances and requests as below:</p> <ul style="list-style-type: none"> <li>• Internal grievances – within 10 days of reporting and response. Any grievances pending further investigation to be communicated to the person not exceeding 90 days.</li> <li>• External grievances – within 30 days by receiving Department. Any further investigation shall not exceed 90 days.</li> </ul> <p>The procedure has been briefed to the internal stakeholders such as employees and dependents that aside in the compound during social awareness programme. Summary of briefing carried out as per the following:</p> <table border="1" data-bbox="1084 1342 1928 1437"> <thead> <tr> <th data-bbox="1084 1342 1505 1390">Estate/Mill</th> <th data-bbox="1505 1342 1928 1390">Date of briefing/training</th> </tr> </thead> <tbody> <tr> <td data-bbox="1084 1390 1505 1437">Mosa Mill</td> <td data-bbox="1505 1390 1928 1437">06/07/2021</td> </tr> </tbody> </table>	Estate/Mill	Date of briefing/training	Mosa Mill	06/07/2021	<p>Complied</p>
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Mosa Mill	06/07/2021						

		<table border="1"> <tr> <td>Kumbango Mill</td> <td>18/04/2021</td> </tr> <tr> <td>Numundo Mill</td> <td>15/07/2021</td> </tr> <tr> <td>Kapuiria Mill</td> <td>04/03/2021</td> </tr> <tr> <td>Bebere Estate</td> <td>06/07/2021</td> </tr> </table>	Kumbango Mill	18/04/2021	Numundo Mill	15/07/2021	Kapuiria Mill	04/03/2021	Bebere Estate	06/07/2021	
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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>- Minor compliance -</p>	<p>The company maintained several grievance trackers. This includes:</p> <ol style="list-style-type: none"> <li>1. Mills and estates grievance booklet. The grievances that are directly involving the sites and that could be resolve within the sites' capacity, it will not be escalated to Sustainability Team or Central Grievance register (Electronic Grievance).</li> <li>2. Sustainability Team Safety, Health, Environment &amp; Quality register. These grievances are received from the mill and estates that are related to Health &amp; Safety, Environment and Quality that requires attention of the Sustainability Team.</li> <li>3. NBPOL-WNB group Electronic Grievance register. This register records complaints received other than item 1 and 2 above.</li> <li>4. Land dispute grievance register that is managed by NBPOL-WNB Lands &amp; Mini Estate Department</li> <li>5. Special Grievance register including related to gender and sexual harassment that goes directly to the Human Resource department.</li> <li>6. Whistle-blower register that goes directly to the LDO as stated in indicator 4.2.1 above.</li> </ol>	OFI								

		<p>Despite of several registers, records of resolutions are maintained. The auditors recognized that due to the cultural behaviour and locality conditions, not all grievance can be solved following the timeline as stated in the procedure. However, the auditor are able to confirm that the company has kept the parties informed of the progress especially when the resolution requires more time.</p> <p>While, the grievances records are being maintained well, the grievance registers/mechanism could be further improve to incorporate a centralized / standardized grievances monitoring so that all grievances are monitored and addressed effectively.</p> <p><b>Independent Estate:</b></p> <p>The grievance records for Repamira Estate is available. Actions taken are agreed by person who raised the issues.</p>	
4.2.4	<p>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 observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>As stated in the Whistleblower Policy, further choice is given to the complainant that if they are unsatisfied, they have the rights to bring the matter outside of the company by contacting Transparency International, external auditors, trade union, Local Member of Parliament, citizen advise bureau, professional bodies or regulatory organization, voluntary organization and the police.</p>	Complied
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p><b>Smallholder requirements:</b></p> <p>Smallholder should participate in Field days and other extension activities delivered by organization managing the smallholders. All records shall be maintained.</p> <p>- Minor compliance -</p>	<p>The contributions to community development plans are incorporated in the Action Plan for 2021 significant issues raised in External Stakeholder Workshops. Some of the contributions identified includes:</p> <ol style="list-style-type: none"> <li>1. Enhance safer communities.</li> <li>2. Improve cash-crop production such as cocoa and coconut.</li> <li>3. Donating of equipment to Police, Health and other sectors.</li> <li>4. Revive NBPOL Book donation program to schools.</li> <li>5. Program to improve food security</li> </ol> <p>Other that the above programs, NBPOL-WNB has previous introduce financial uplift program for smallholders. This program elevates the overall family financial management of the smallholders by introducing "Papa Card"</p>	Complied



		<p>and "Mama Card" system where certain portion of the income from the FFB sales are given to the Mama who is the female of the family who usual take cares about the household needs of the family. This program not only elevates the financial management but also reduces the on-going domestic violent.</p> <p><b>Smallholders:</b></p> <p>Field Days are conducted regularly by NBPOL Smallholder Departments together with OPIC personals at the smallholder's plots. The Field Days are conducted as platform to provide trainings, monitor legal compliance, and inspect field conditions and compliance to the RSPO requirements. Trainings that are provided for the smallholders include but not limited to BMPs, HCVs management, RTE Species, Chemical and Fertiliser Applications, Buffer Zones, company polices and changes of the company operations. Records of Field Day Inspections were available.</p>	
<b>Criterion 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	<p><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 where such documents have been issued by the appropriate Government agency. For Customary land where such documents are not available, evidence of ownership will be demonstrated as follows:</p> <p>- Critical (Major) compliance -</p>	<p>The company is operating on state lease lands and sub-lease lands. Sub-lease lands are usually the leasing of land from the clan. The NBPOL-WNB Management Guidelines MG-21 Lands &amp; Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 includes FPIC process in the flow chart.</p> <p>The lease documents includes – maps; lease agreements (for both with state and customary land owner); FPIC documentation (for sub-lease from customary land owners) and land titles.</p> <p>Please refer to indicator 2.1.3 for samples of land usage audited during this audit.</p> <p>Based on the sub-lease agreements, the intention of the land use is clearly stated to by planted with oil palm. Hence with agreement of the clan leaders on the sub-leasing agreement, consent is given to the company to cultivate the land. The sub-lease agreement includes the royalty and leasing fee to be paid to the clan.</p>	Complied

	<p>4.4.1(a) For PNG, there are no written laws on customary land, but decisions are guided by customs of the landowning group or clan and documented in a CLUA (Customary Land Use Agreement) which is valid for one planting cycle only. Decisions on land use and distribution are normally done conventionally at the level of the clan and may vary from clan to clan. Individuals only have exclusive rights to use and occupy land based on verbal and mutual agreement, whilst undisputed outright ownership status of customary land is vested in the clan. Traditionally, clans decide on occupancy and user rights. One has to be a member of a land-owning group through custom in order to have access to land.</p>	<p>Land sub-lease agreements on customary land through Incorporated Land Group (ILG) arrangement are available. Please refer to indicator 2.1.3 for details of the sub-leasing agreement.</p> <p>The incorporation of the land groups are usually initiated by the clan groups. The purpose of the incorporation is mainly to charge out the customary land so that a Special Agricultural Business Lease agreement under the Land Act 1996 between the ILGs and the PNG Lands Department can be formalized to enable the ILGs to legalize the leasing of their lands.</p> <p>As per indicator 2.1.3, the agreements that are maintained by NBPOL-WNB that includes the Special Agricultural Business Lease agreement between the ILG and PNG Lands Department.</p> <p>While for the independent estates sampled for this audit, there is no customary sub-leasing. All lands are direct leasing with the PNG Lands Department.</p>	
	<p>4.4.1(b) For Solomon Islands, Customary Land may be recorded in accordance with the Customary Lands Record Act 1994 (as amended). This act provides for the Recording officer appointed by the National Records to determine the Customary Owners, the survey the land with maps to be held at the Central and other Land Record offices. Other mechanisms to manage Customary Land may be applied.</p> <p>Companies must be able to demonstrate that where they have leased customary land, they have negotiated with the recognised owners of the land or their authorised representatives and have observed full FPIC requirements in those negotiations with all required details being appropriately documented.</p>	<p>Not applicable as the certification is not in Solomon Islands.</p>	
<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>As stated in 4.4.1, the company is operating on state lease lands and sub-lease lands. These Sub-lease lands are leasing of land from the clans through Incorporated Land Groups.</p> <p>As per the Land Act 1996, the incorporation of land groups requires consent from the landowners. The management of consent of the clan is through the clan leaders representative and clan leaders are to be executive of the group. If the consent is not available the Secretary of the Department of</p>	<p>Complied</p>

		Provincial Affairs will not process the Certificate of Alienability and without this certification, the Special Agriculture and Business Lease will not be granted. Hence through the incorporation of ILGs, the landowners have given their consent to leaser to develop the land. While this arrangement has always be recognized as a "joint venture" agreement between NBPOL-WNB and the ILGs.	
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 - Minor compliance -	The customary land development are controlled by the clan leaders and the clan communities. As stated in indicator 4.4.2, consent of the clan shall be available prior a sub-leasing can commence. As sub-leasing of lands are clan affairs, clan members (or families) within the clan are involved in deciding the use of land. Since the development of oil palm in PNG, clans are making the initiatives to engage with NBPOL-WNB for land development.	Complied
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 - Minor compliance -	Since the development of oil palm in PNG, clans are making the initiatives to engage with NBPOL-WNB for land development. NBPOL-WNB does not trigger any form of development. Since the land are not going to be developed until the sub-lease agreement is finalized, the ILGs still have the rights to withhold the consents if the terms are not agreeable.	Complied
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. - Minor compliance -	The sub-leasing is regulated under Section 54 of Land Registration Act. Land sub-lease agreements on customary land through Incorporated Land Group (ILG) arrangement are available. Please refer to indicator 2.1.3 for details of the sub-leasing agreement. In the sub-lease agreement, it states the number of years of lease and the economic benefits to the ILGs. The sharing of the economic benefits will be under the jurisdiction of the Clan leaders.	Complied
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). - Critical (Major) compliance -	Maps are attached with the sampled land lease and sublease approved by PNG Department of Land Office. The scale of the maps are of either 1:15,000 or 1:25,000 or 1:38,000 are available. The customary land map or land settlement scheme maps are on files for each smallholder.	Complied

4.4.4	<p>All relevant information is available in appropriate forms and the English language, including assessments of impacts, proposed benefit sharing, and legal arrangements. Explanatory documentation may be provided in Tok Pisin in PNG or Solomon Pijin in the Solomon Islands and verbal presentation may be made in those languages.</p> <p>- Minor compliance -</p>	<p>The information incorporation of land groups are detailed in the Management Guidelines MG-21 Lands &amp; Mini Estates Guidelines rev.3, dated June 2014.</p> <p>The information of propose benefits and legal arrangements are available in the Sub-lease agreement as detailed in indicator 2.1.3. The agreements are in English and it is a government regulated agreement as the customary land rights are heavily protected by the PNG Department of Lands &amp; Physical Planning. The Land Act protects customary land and as such it would be unlawful for a big project development to take place on customary land without formalizing the land administration process through the relevant government authorities.</p>	Complied
4.4.5	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>The sub-lease agreements are government regulated agreement. As per the sub-lease agreement audited (please refer to indicator 2.1.3), the definition of Landlord (meaning the ILGs) includes in the case of natural person the executors, administrators and assigns of the Landlord and in the case of a company its successors and permitted assigns and where the context permits includes any person authorised by the Landlord to act on its behalf.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is reviewed in consultation with affected parties midway through the term of the agreement however regular communication between the parties is encouraged through the duration of the agreement.</p> <p>- Minor compliance -</p>	<p>As per the sub-lease agreement audited (please refer to indicator 2.1.3), the agreed terms especially regarding the economic will be reviewed fifteen (15) years from the date of the sub-lease agreement.</p> <p>Other than such review, the ILGs are identified as external stakeholders of the company where by the ILGs are invited to involve in the annual external stakeholder workshop. Records of the external stakeholder workshop for year 2019-2021 shows the attendance of ILGs.</p>	Complied
<p><b>Criterion 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.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting development identified during this audit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands &amp; Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated</p>	Complied

		by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.	
4.5.2	<p><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> <p>- Critical (Major) compliance -</p>	There is no new planting development identified during this audit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.	Complied
4.5.3	<p>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 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.</p> <p>- Minor compliance -</p>	There is no new planting development identified during this audit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.	Complied
4.5.4	<p>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.</p> <p>- Minor compliance -</p>	There is no new planting development identified during this audit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. As identified in the Management Guidelines, environmental and social impact shall be considered.	Complied
4.5.5	<p>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.</p> <p>- Minor compliance -</p>	There is no new planting development identified during this audit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed.	Complied

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 - Minor compliance -	There is no new planting development identified during this audit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.	Complied
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. - Minor compliance -	There is no new land acquisition identified during this audit. As per discussion with the management, there is no intention acquire new land other than maintaining the current state lease lands.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation unless a full FPIC process has been undertaken with recognised community representatives and their right to use the land is verified in accordance with 4.4.1. - Critical (Major) compliance -	There is no new land acquisition identified during this audit. As per discussion with the management, there is no intention acquire new land other than maintaining the current state lease lands. If there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.	Complied
<b>Criterion 4.6:</b> 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. - Critical (Major) compliance -	The PNG Land Act protects customary land and as such it would be unlawful for big land development to take place on customary land without formalizing the land administration process through the relevant government authorities. Customary land in PNG is heavily regulated through strong tribal customs.  In any circumstance that if NBPOL-WNB would like to possess tenure to a land, under the Land Tenure Conversion Act, all people with any customary interests on the subject land must be in agreement. Under the Act prior to	Complied

		<p>successful tenure conversion, the applicant must first adequately compensate all persons with customary interest on the subject land. The compensation can be monetary (money terms) or according to custom, but must be made before the application can be approved. Any application under this Act must be accompanied by an approved and registered plan of survey.</p> <p>Based on the above, NBPOL-WNB is required to follow the Land Act to ensure all compensation are dealt and such PNG regulation is consistent with the RSPO P&amp;C. The above are identified in Management Guidelines MG-21 Lands &amp; Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014.</p>	
4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair 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. Distribution of monies within families is determined by the families.</p> <p>Guidance: Where possible, Companies shall set up banking arrangements with the ILGs to provide for monies to be paid directly into members' bank accounts at the agreed percentages to avoid the possibility of theft or diversion of funds.</p> <p>- Critical (Major) compliance -</p>	<p>The PNG Land Act protects customary land and as such it would be unlawful for big land development to take place on customary land without formalizing the land administration process through the relevant government authorities. Customary land in PNG is heavily regulated through strong tribal customs.</p> <p>In any circumstance that if NBPOL-WNB would like to possess tenure to a land, under the Land Tenure Conversion Act, all people with any customary interests on the subject land must be in agreement. Under the Act prior to successful tenure conversion, the applicant must first adequately compensate all persons with customary interest on the subject land. The compensation can be monetary (money terms) or according to custom, but must be made before the application can be approved. Any application under this Act must be accompanied by an approved and registered plan of survey.</p> <p>Based on the above, NBPOL-WNB is required to follow the Land Act to ensure all compensation are dealt and such PNG regulation is consistent with the RSPO P&amp;C. The above are identified in Management Guidelines MG-21 Lands &amp; Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings in accordance with National law.</p>	<p>The PNG customs varies from province and region to another. In some parts of PNG the descendants of a particular tribal group or clan inherit land through patrilineal descent (male lineage) while others follow a matrilineal</p>	Complied

	- Minor compliance -	descent (female lineage). Hence the equal opportunities are provided in accordance to the PNG custom practices.	
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 provided that the right to privacy and confidentiality is respected. - Minor compliance -	There is no compensation for loss of legal, customary or user rights identified during this audit. In case of any such compensation it will be dealt according to the Land Act.  While if there is any land dispute due to the current operations, it is dealt following the Communication & Consultation Procedure ver. 3 dated 04/07/2020. Depending on the dispute, it will be manage either by the NBPOL-WNB Smallholder Affairs Office or Lands & Mini Estates Department.	Complied
<b>Criterion 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.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	The PNG Land Act protects customary land and as such it would be unlawful for big land development to take place on customary land without formalizing the land administration process through the relevant government authorities. Customary land in PNG is heavily regulated through strong tribal customs.  In any circumstance that if NBPOL-WNB would like to possess tenure to a land, under the Land Tenure Conversion Act, all people with any customary interests on the subject land must be in agreement. Under the Act prior to successful tenure conversion, the applicant must first adequately compensate all persons with customary interest on the subject land. The compensation can be monetary (money terms) or according to custom, but must be made before the application can be approved. Any application under this Act must be accompanied by an approved and registered plan of survey.  Based on the above, NBPOL-WNB is required to follow the Land Act to ensure all compensation are dealt and such PNG regulation is consistent with the RSPO P&C. The above are identified in Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014.	Complied



4.7.2	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>The PNG Land Act protects customary land and as such it would be unlawful for big land development to take place on customary land without formalizing the land administration process through the relevant government authorities. Customary land in PNG is heavily regulated through strong tribal customs.</p> <p>In any circumstance that if NBPOL-WNB would like to possess tenure to a land, under the Land Tenure Conversion Act, all people with any customary interests on the subject land must be in agreement. Under the Act prior to successful tenure conversion, the applicant must first adequately compensate all persons with customary interest on the subject land. The compensation can be monetary (money terms) or according to custom, but must be made before the application can be approved. Any application under this Act must be accompanied by an approved and registered plan of survey.</p> <p>Based on the above, NBPOL-WNB is required to follow the Land Act to ensure all compensation are dealt and such PNG regulation is consistent with the RSPO P&amp;C. The above are identified in Management Guidelines MG-21 Lands &amp; Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>There is no expansion identified in this audit. Despite there is not such expansion that may cause loss of access and rights, NBPOL-WNB has set priority to employed local workers. Evidence on not only local workers are hired but equal opportunity of promotion was audited.</p> <p>Local business opportunity such as grass cutting and non-operational upkeep maintenance are awarded to local communities.</p>	Complied
<p><b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
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,</p>	<p><i>Per say</i> NBPOL-WNB does no “acquire” any land. All lands developed by NBPOL-WNB are either State lease lands or Sub-lease Lands with ILGs. As NBPOL-WNB operation has been long developed since 1960s, many of the FPIC are no more available. However it was able to be demonstrated that</p>	Complied

	<p>and that any compensation was accepted following a documented process of FPIC.</p> <p><b>Guidance:</b> In some circumstances where FPIC was conducted many years ago, documented evidence of the process may not be available. In these cases, evidence of continuing agreement of all parties shall be regarded as evidence of resolution.</p> <p>- Minor compliance -</p>	<p>continual agreement of the surrounding communities and no significant land dispute between NBPOL-WNB and landowners.</p> <p>In case on any land conflict at the present management units, it will be managed following the Communication &amp; Consultation Procedure ver. 3 dated 04/07/2020. Depending on the dispute, it will be managed either by the NBPOL-WNB Smallholder Affairs Office or Lands &amp; Mini Estates Department.</p>	
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 unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>There were no new land conflicts recorded. Records on resolution of previous land conflict are maintained. The resolution includes independent land market evaluation by the Provincial Valuer.</p> <p>Documented records of the clan negotiation, participatory mapping, scratched maps and final accepted of the compensation is available.</p>	Complied
4.8.3	<p>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 rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>Please refer to indicator 4.4.2, 4.4.3 and 4.4.4 for details regarding the management of land development within NBPOL-WNB. There is no such land acquisition.</p>	Complied
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>Documented records of the clan negotiation, participatory mapping, scratched maps and final accepted of the compensation is available.</p> <p>Sample records on land conflict dispute on Portion 2093 and 2094 of Megigi, Talasea. The conflict was recorded since 10/09/2018. There were several communication in between the conflict was recorded until it is being resolved. This includes survey by independent valuator, While the final agreement of the clan on the amount to be compensated was dated 24/07/2020.</p>	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			

5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>The prices are made available to smallholder via notices displayed in public areas at smallholders' locations and the OPIC office. The prices are provided to OPIC by the mills.</p> <p>To enhance the knowledge of the smallholders, NBPOL had developed the Growa Buklet (Grower Booklet) that includes the pricing mechanisms. The booklet has been distributed to all smallholders and explained during the Field Days conducted.</p> <p>Interview with the sampled smallholders indicated that the current and previous prices of FFB are made available by the related departments.</p>	Complied									
5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The Smallholders Department with the assistance of OPIC regularly explain the FFB pricing to smallholders during the continues Field Days conducted. The FFB Price are also displayed at the OPIC Office and is publicly available for all smallholders to view. The Smallholders Harvesting Notice (Toksava Approved Data) was also available and displayed at public areas at smallholders' locations. Photographic evidence was available for evidence. Interview with the sampled smallholders indicated that they are aware of the FFB prices and have been explained on the pricing of FFB.</p>	Complied									
5.1.3	<p><b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. Premium pricing, when achieved for RSPO certified sustainable palm oil is also shared with Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The pricing of FFB is determined by The Department of Agriculture &amp; Livestock, Port Moresby, National Capital District. The FFB Price Calculation is provided by the Department to Economic Advisor on a monthly basis. The monthly price calculation was available for verification which clearly indicates the formula to calculate the FFB Price payable to the smallholders which takes into account variable such as US\$ Price for CPO CIF Rotterdam, US\$ Price for PKO Rotterdam, CPO Extraction Rate, Exchange rate US\$ to Kina, Freight Cost US\$, FFB Transport Cost (Kina) and Mill Gate Price. Reductions are included for Levy's for OPRA, Sexava and OPIC and the final price Is paid for the smallholders. Verified the FFB Price Calculations as below.</p> <table border="1" data-bbox="1086 1262 1924 1407"> <thead> <tr> <th>Month</th> <th>Document Date</th> <th>FFB Price</th> </tr> </thead> <tbody> <tr> <td>March 2021</td> <td>08/03/2021</td> <td>473.15 Kina</td> </tr> <tr> <td>April 2021</td> <td>07/04/2021</td> <td>494.94 Kina</td> </tr> </tbody> </table>	Month	Document Date	FFB Price	March 2021	08/03/2021	473.15 Kina	April 2021	07/04/2021	494.94 Kina	Complied
Month	Document Date	FFB Price										
March 2021	08/03/2021	473.15 Kina										
April 2021	07/04/2021	494.94 Kina										

		May 2021	06/05/2021	505.49 Kina	
		June 2021	03/06/2021	550.58 Kina	
		July 2021	08/07/2021	451.59 Kina	
5.1.4	<p><b>(C)</b> Evidence is available that all parties within the Unit of Certification, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the basis on which their fruit is sold to the Companies. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. To assist this, Companies include financial literacy information in their extension activities.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL Smallholder Department have included the OPIC and all smallholders within the certification regardless of gender in decision making in regard to the smallholders. Pricing of FFB are discussed with the presence of OPIC to the smallholders during Field Days. Repayments for Fertiliser, tools and seedlings are done through credit and deducted when the smallholders send their FFB to the mill. This was done by the smallholders providing a written consent that they are purchasing the items on a credit basis and provide the mill with the authority to deduct they FFB payment. Samples of consent forms were available for verification.</p>			Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p><b>Smallholder requirements:</b></p> <p>Smallholders must be able to verbally explain that they understand and observe their obligations and the obligations of the Company to whom they are selling their fruit.</p> <p>- Minor compliance -</p>	<p>There is no contractual agreement between NBPOL and smallholders. NBPOL is obliged to process all smallholders FFBS in accordance to the International Development Association for agricultural development Act 1970.</p> <p>For other businesses, sample of contract agreement for FFB transportation and engineering works were sighted. The contracts are entered fairly including pricing mechanism of the services.</p> <p>Contracts are entered following the Sime Darby ethical business guidelines.</p>			Complied
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p><b>Guidance:</b> Weight of FFB may be determined by weighing at the point of pick-up or by calculation of average bunch weight when weighed at the verified mill weighbridge. The organization managing the smallholders should determine the data used for payment and communicated to all smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Payments are made on a timely manner every fortnightly and payment is deposited directly to the bank account or by cheque. Dockets of the smallholders were sighted to confirm the weight of the FFB sold to NBPOL. Despite there is weighing at the receiving mills, the payment will be based on the weigh at the collection. Samples of payment receipts were available for verification during the assessment.</p>			Complied

<p>5.1.7</p>	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). Other weighing equipment used may be calibrated using weights that are verified on the weighbridges. Records are maintained to provide an audit trail.</p> <p>- Minor compliance -</p>	<p>Weighbridges used for weighing the FFBs received from all the smallholders are regularly calibrated to ensure its precision for accurate payments and production monitoring. The records of weighbridge calibration were available and verified as below.</p> <p><u>Kapiura Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. Date: 03/11/2020; Certificate Number: ICCC 1797; Scale: Avery Weigh – Tronix; Model: E1110; Capacity: 45 tonnes; Serial Number: 141650295; Inspection Body: Independent Consumer Competition Commission.</li> </ol> <p><u>Kumbango Oil Mill</u></p> <ol style="list-style-type: none"> <li>2. Date: 03/11/2020; Certificate Number: ICCC 1798; Scale: Accuweigh; Model: IT3000M-AC; Capacity: 60 tonnes; Serial Number: 1410513; Inspection Body: Independent Consumer &amp; Competition Commission.</li> <li>3. Date: 03/11/2020; Certificate Number: ICCC 1907; Scale: Accuweigh; Model: IT3000M-AC; Capacity: 60 tonnes; Serial Number: 1601281; Inspection Body: Independent Consumer &amp; Competition Commission.</li> </ol> <p><u>Mosa Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. Date: 03/11/2020; Certificate Number: ICCC 1799; Scale: Avery Weigh – Tronix; Model: E1110; Capacity: 60 tonnes; Serial Number: 83950226; Inspection Body: Independent Consumer &amp; Competition Commission.</li> </ol> <p><u>Numondo Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. Date: 03/11/2020; Certificate Number: ICCC 1800; Scale: Accuweigh; Model: IT3000M-AC; Capacity: 60 tonnes; Serial Number: 1601284; Inspection Body: Independent Consumer &amp; Competition Commission.</li> </ol> <p><u>Waraston Oil Mill</u></p>	<p>Complied</p>
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		1. Date: 03/11/2020; Certificate Number: ICC 1853; Scale: Accuweigh; Model: IT3000M-AC; Capacity: 60 tonnes; Serial Number: 1601283; Inspection Body: Independent Consumer & Competition Commission.	
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. - Minor compliance -	Supports to smallholders can be shown through the field visit cum inspection report where advice and evaluation especially in good agriculture practices were available. Apart from that various trainings covering the subjects of occupational safety, environment and field upkeep techniques were also given. Records of trainings were well maintained for verification.	Complied
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. - Critical (Major) compliance -	New Britain Palm Oil Limited (NBPOL) has developed Communication & Consultation Procedure, version 2 dated 30/06/2018 where the objectives of the procedure are to: 1. Ensure free and effective communication between all of NBPOL stakeholders (including employees) and external stakeholders. 2. Address and take corrective action on grievances raised against NBPOL's operations in a timely and adequate manner.  The procedure states that the smallholders are to raise their grievances to OPIC where they are to detail out the grievances on the Incident/Accident/Grievance Form provided by OPIC. OPIC then escalates the form to NBPOL Smallholder's Department. The Smallholder Department maintain a registry to monitor all grievances raised by the smallholders. Grievance Committee Meetings are conducted every fortnight to discuss on all the grievances raised buy the smallholders. The issues are then addressed by NBPOL accordingly. Samples of Incident/Accident/Grievance Form, Grievance Registry (Dec 2020, Jan 2021 and Feb 2021) and Grievance Committee Meetings Minutes (dated 15/08/2021) were available for verification during the assessment.  Awareness to Oil Palm Industry Cooperation (OPIC) regarding collecting of grievance from smallholders could be improved to ensure all grievances related to NBPOL are effectively addressed.	OFI

**Criterion 5.2:** The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.

5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, 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> <p>- Minor compliance -</p>	<p>Supports to smallholders can be shown through the field visit cum inspection report where advice and evaluation especially in good agriculture practices were available. Apart from that various trainings covering the subjects of occupational safety, environment and field upkeep techniques were also given. Records of trainings were well maintained for verification. Trainings related to Boilwater Awareness, implementation of toilet pits and rubbish pits were noticed to improve the livelihoods of the smallholders in terms of safety and hygiene.</p>	Complied
5.2.2	<p>The Company and Government Extension Service provide extension services to support the development and implementation of livelihood improvement programmes, including capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard).</p> <p><b>PROCEDURAL NOTE:</b>  The RSPO is currently developing a separate standard for Independent Smallholders to be referred to as the "RSPO Independent Smallholder Standard". A National Interpretation for PNG&amp;SI will be developed after the standard is ratified.</p> <p>- Minor compliance -</p>	<p>Supports to smallholders can be shown through the field visit cum inspection report where advice and evaluation especially in good agriculture practices were available. Apart from that various trainings covering the subjects of occupational safety, environment and field upkeep techniques were also given. Records of trainings were well maintained for verification as well.</p>	Complied
5.2.3	<p>Where applicable, the Company and Government Extension Service provide extension services to Smallholders to enhance their understanding of the legal requirements for FFB production to maintain RSPO certification.</p> <p>- Minor compliance -</p>	<p>Understanding on legal requirements were given by the company mainly through trainings and field visit cum inspection.</p>	Complied
5.2.4	<p><b>(C)</b> Evidence exists that pesticide handling training is available from the Company and/or Government Extension Service for Smallholders within the Unit of Certification. This may be verified by interview with the Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The Smallholder Department with the assistance of OPIC conduct regular refreshers on Chemical Handling for the smallholders. All smallholders that are to use chemicals or pesticides are required to undergone special designated trainings by OPIC which will in return provide them with a Certificate which allows them to use chemicals in their plots. The certificate also enables them to purchase chemicals from NBPOL. Records of refresher trainings conducted by NBPOL and OPIC were available for verification as below.</p>	Complied

		<p>– Chemical – Smallholder Refresher Training (06/07/2021)</p> <p>Interviews conducted on the sampled smallholders indicated that they rarely use chemicals for weed control and resort to manual brushing as advised by the Smallholders Department. A number of smallholders occasionally do use chemical application and it was verified that they have the relevant certificate and trainings provided by OPIC and NBPOL. They are well aware on the hazards that are associated with chemical application, the required PPEs and the restrictions of chemical application along buffer zones.</p>	
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>The progress and performance of smallholders were reported through field inspection reports and the reports are accessible by public.</p>	Complied
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1: Any form of discrimination is prohibited.</b>			
6.1.1	<p><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> <p>- Critical (Major) compliance -</p>	<p>NBPOL has developed Employee Rights &amp; Equal Employment Opportunities Policy dated 25/07/2016 where NBPOL is committed to eliminate any unlawful or unfair discrimination on the grounds of race, colour, gender, religion, disability, age, ethic/national origins, marital status, religious or ethical beliefs, etc. The company will use positive discrimination to encourage an ethnically diverse workforce across the company to protect against social inequality. Other than the policy mentioned, the company also established Human Rights Policy to highlight the equal opportunities and discrimination based on any grounds in recruitment, dismissal or promotion is strictly prohibited.</p> <p>For group level, Sime Darby Plantation has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national</p>	Complied



		origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded from <a href="https://www.simedarbyplantation.com/sustainability/human-rights-charter">https://www.simedarbyplantation.com/sustainability/human-rights-charter</a> .	
6.1.2	<p><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.</p> <p>- Critical (Major) compliance -</p>	Interviewed with the workers comprises of different gender and nationalities as well as the parolees confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers and offered job based on capability. The worker can request for job transfer if they found they unfit for the job assigned to them.	Complied
6.1.3	<p>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> <p>- Minor compliance -</p>	NBPOL has developed Employee Rights & Equal Employment Opportunities Policy dated 25/07/2016 where NBPOL is committed to eliminate any unlawful or unfair discrimination on the grounds of race, colour, gender, religion, disability, age, ethnic/national origins, marital status, religious or ethical beliefs, etc. The company will use positive discrimination to encourage an ethnically diverse workforce across the company to protect against social inequality. Other than the policy mentioned, the company also established Human Rights Policy to highlight the equal opportunities and discrimination based on any grounds in recruitment, dismissal or promotion is strictly prohibited.	Complied
6.1.4	<p>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.</p> <p>- Minor compliance -</p>	Interviewed with the female employees at WNB mills and plantations confirmed that pregnancy testing is not conducted in discriminatory measure and only with the consent from workers. No pregnancy test included in the pre-employment medical check-up. They still will be able to offer for work if they are pregnant.	Complied
6.1.5	<p><b>(C)</b> A Social Issues Committee (SOC) is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	NBPOL has established a guidance on Social Issues Committee – “Strengthening and Implementing Gender Equity and Social Inclusion in the workplace” dated May 2020. NBPOL is committed to create a fair and equitable environment that is free from discrimination ensuring active participation, accessibility and social inclusion of women, people living with	Complied

		<p>disabilities, people living with HIV and AIDS and other marginalized groups in all aspects of NBPOL’s operations. Social Issues Committee is established to develop, implement and monitor the effectiveness of the SOP developed. The function of the committee is to raise awareness, identify and address issues of concern for women, identify opportunities and improvement for women and to ensure that Gender Smart Audits are carried out and recommendations are acted upon.</p> <p>Social Issues Committee Meeting was last conducted on 05/06/2021 which chaired by SQM Officer. Meeting agendas are discussed as below:</p> <ol style="list-style-type: none"> <li>1. Social Awareness Schedule</li> <li>2. Presentation Materials</li> <li>3. New Mother’s Needs Assessment</li> <li>4. Human Rights Policies</li> <li>5. Maternity Leave &amp; Breastfeeding time</li> <li>6. Social Issues Data</li> </ol> <p>Meeting minutes was sighted and resolutions of the issue concerned were highlighted during the meeting. Social Awareness Tentative Schedule 2021 was developed to plan the awareness training topics for respective operating sites. The topics covered are health &amp; hygiene, law and order/ security, company policies, sustainability topics, HR awareness and Women Empowering Women (WEW) awareness.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.            - Minor compliance -</p>	<p>Reviewed the payslips for both gender, male and female workers found that they are paying the minimum basic rate, K3.13/ hour (2020) and K3.29/hr (2021). The rate will be adjusted to higher depends on the job scope and the position. There is no discrimination of pay based on gender.</p>	Complied
<p><b>Criterion 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)..</p>			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in the English language and verbally explained to them in language they understand.</p>	<p>Reviewed the WNB30, Non-Executive Staff Recruitment Form as the employment contract for the workers. The WNB30 is in English and the Grade/ Level of the worker will clearly be stated in the form. Besides, NBPOL has implemented General Policies &amp; Regulations. Handbook</p>	Complied

	- Critical (Major) compliance -	released on May 2010 where summary of employment conditions was clearly stated in the handbook.	
6.2.2	<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>Family members who work must be employed to ensure that they have access to those benefits. Notwithstanding that, young children may assist their parents on Smallholder blocks provided it does not interfere with their schooling, their physical and emotional development and they are under the direct supervision of their parents.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL has implemented General Policies &amp; Regulations Handbook released on May 2010 where summary of employment conditions was clearly stated in the handbook such as hours of work, overtime, annual leave, sick days, housing, electricity, water, promotion, loans and advances, probation notice and maternity leave. Reviewed payslips where all types of work done and the deduction made by the company have stated in the payslips.</p> <p>Latest pay rates effective from Jan to Dec 2021 is publicly available on all notice boards in mills and estates. Piece rated workers for example harvester gang will be based on latest published rate. NBPOL WNB FY2021 - Harvesting Rate has defined specific rates for cutter, wheeler and loose fruit collector and based on years of planting (YOP). WNB, HOP, MBE AND POL: NON-EXECUTIVE PAY RATES FOR JAN - DEC 2021 is being referred for hourly and fortnightly pay based on NBPOL grades and level.</p> <p>NBPOL WNB continue to use the approval of wage scale issued by the Department of Labour for Partial payment of the National Minimum Wage as cash of K3.13 (2020) and K3.29/hr (2021) for 88 hour's week and no-cash benefits of K1.30/hr. The total wage h is higher than the National Minimum Wage for Agricultural sector of K3.50/hr that include benefits</p>	Complied
6.2.3	<p><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.</p> <p>- Critical (Major) compliance -</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 were verified. Reviewed on the payslips in 3 different production trends (low, average and peak) found that regular working hours (11 days work x 8 hours = 88 hours work weeks/fortnightly) was not exceeded. Overtime only been carried out by the workers based on process/production demand and with the approval by the management. No involuntary overtime work observed. Other legal labour requirements such as sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice is clearly mentioned in the General Policies &amp; Regulations Handbook dated May 2010 and evidently in compliance.</p> <p><u>Mosa Mill</u></p>	Complied

		<p>Total of 15 worker’s payslips checked from out of 157 numbers of workers consist of full time, casual workers /short term contract workers for the month of September 2020 (low), December 2020 (average/normal) and June 2021 (high). Pay rates (based on grade with basic wages start from K3.13 excluding benefits), call out allowance (overtime) ordinary day (1.5 x day rate), Sunday work (roster rest day = 2 x rate of the period worked), gazetted Public Holiday (2 x rate of the period worked) and lawful deduction were made clear in the payslip. No workers have exceeded 88 hours work week based on the sample taken.</p> <p><u>Kumbango Mill</u></p> <p>Total of 13 worker’s payslips checked from out of 120 numbers of workers consist of full time, casual workers /short term contract workers for the month of September 2020 (low), December 2020 (average/normal) and June 2021 (high). Pay rates (based on grade with basic wages start from K3.13 excluding benefits), call out allowance (overtime) ordinary day (1.5 x day rate), Sunday work (roster rest day = 2 x rate of the period worked), gazetted Public Holiday (2 x rate of the period worked) and lawful deduction were made clear in the payslip. No workers have exceeded 88 hours work week based on the sample taken.</p> <p><u>Numundo Mill</u></p> <p>Total of 14 worker’s payslips checked from out of 146 numbers of workers consist of full time, casual workers /short term contract workers for the month of August 2020 (low), December 2020 (average/normal) and April 2021 (high). Pay rates (based on grade with basic wages start from K3.13 excluding benefits), call out allowance (overtime) ordinary day (1.5 x day rate), Sunday work (roster rest day = 2 x rate of the period worked), gazetted Public Holiday (2 x rate of the period worked) and lawful deduction were made clear in the payslip. No workers have exceeded 88 hours work week based on the sample taken.</p> <p><u>Waraston Mill</u></p> <p>Total of 12 worker’s payslips checked from out of 107 numbers of workers consist of full time, casual workers /short term contract workers for the month of August 2020 (low), December 2020 (average/normal) and April 2021 (high). Pay rates (based on grade with basic wages start from K3.13</p>	
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		<p>excluding benefits), call out allowance (overtime) ordinary day (1.5 x day rate), Sunday work (roster rest day = 2 x rate of the period worked), gazetted Public Holiday (2 x rate of the period worked) and lawful deduction were made clear in the payslip. No workers have exceeded 88 hours work week based on the sample taken.</p> <p><u>Kapuiria Mill</u></p> <p>Total of 16 worker’s payslips checked from out of 171 numbers of workers consist of full time, casual workers /short term contract workers for the month of August 2020 (low), December 2020 (average/normal) and April 2021 (high). Pay rates (based on grade with basic wages start from K3.13 excluding benefits), call out allowance (overtime) ordinary day (1.5 x day rate), Sunday work (roster rest day = 2 x rate of the period worked), gazetted Public Holiday (2 x rate of the period worked) and lawful deduction were made clear in the payslip. No workers have exceeded 88 hours work week based on the sample taken.</p> <p><u>Lolokuru Estate</u></p> <p>Total of 17 worker’s payslips checked from out of 434 numbers of workers consist of full time, casual workers /short term contract workers for the month of August 2020 (low), December 2020 (average/normal) and April 2021 (high). Pay rates (based on grade with basic wages start from K3.13 excluding benefits), call out allowance (overtime) ordinary day (1.5 x day rate), Sunday work (roster rest day = 2 x rate of the period worked), gazetted Public Holiday (2 x rate of the period worked) and lawful deduction were made clear in the payslip. No workers have exceeded 88 hours work week based on the sample taken.</p> <p><u>Bilomi Estate</u></p> <p>Total of 18 worker’s payslips checked from out of 483 numbers of workers consist of full time, casual workers /short term contract workers for the month of August 2020 (low), December 2020 (average/normal) and April 2021 (high). Pay rates (based on grade with basic wages start from K3.13 excluding benefits), call out allowance (overtime) ordinary day (1.5 x day rate), Sunday work (roster rest day = 2 x rate of the period worked), gazetted Public Holiday (2 x rate of the period worked) and lawful deduction</p>	
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		<p>were made clear in the payslip. No workers have exceeded 88 hours work week based on the sample taken.</p> <p><u>Volupai Estate</u></p> <p>Total of 13 worker’s payslips checked from out of 239 numbers of workers consist of full time, casual workers /short term contract workers for the month of August 2020 (low), December 2020 (average/normal) and April 2021 (high). Pay rates (based on grade with basic wages start from K3.13 excluding benefits), call out allowance (overtime) ordinary day (1.5 x day rate), Sunday work (roster rest day = 2 x rate of the period worked), gazetted Public Holiday (2 x rate of the period worked) and lawful deduction were made clear in the payslip. No workers have exceeded 88 hours work week based on the sample taken.</p> <p><u>Bebere Estate</u></p> <p>Total of 14 worker’s payslips checked from out of 309 numbers of workers consist of full time, casual workers /short term contract workers for the month of September2020 (low), December 2020 (average/normal) and June 2021 (high). Pay rates (based on grade with basic wages start from K3.13 excluding benefits), call out allowance (overtime) ordinary day (1.5 x day rate), Sunday work (roster rest day = 2 x rate of the period worked), gazetted Public Holiday (2 x rate of the period worked) and lawful deduction were made clear in the payslip. No workers have exceeded 88 hours work week based on the sample taken.</p>									
<p>6.2.4</p>	<p><b>(C)</b> The Company 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 (5years) is allowed to upgrade the infrastructure. Smallholders may live in houses of traditional materials or other accommodation of their choosing.</p> <p>- Critical (Major) compliance -</p>	<p>The workers live in the housing complex of the mill and estate are provided with free housing facilities and water supply, subsidized of electric supply and medical support. 3 categories house provided to workers according to grade as per below:</p> <table border="1" data-bbox="1086 1189 1926 1385"> <thead> <tr> <th>House Type</th> <th>Entitled to Occupy</th> </tr> </thead> <tbody> <tr> <td>IA &amp; IB</td> <td>Grades 5 - 7</td> </tr> <tr> <td>JG</td> <td>Grades 3 &amp; 4</td> </tr> <tr> <td>DLQ</td> <td>Grades 1 &amp; 2</td> </tr> </tbody> </table>	House Type	Entitled to Occupy	IA & IB	Grades 5 - 7	JG	Grades 3 & 4	DLQ	Grades 1 & 2	<p>Complied</p>
House Type	Entitled to Occupy										
IA & IB	Grades 5 - 7										
JG	Grades 3 & 4										
DLQ	Grades 1 & 2										

		<p>Under the Employment Act 1978 of Independent State of Papua New Guinea, PART VIII. – HOUSING, sub section 124. HOUSING, ETC., TO BE MAINTAINED IN CLEAN CONDITION.</p> <p><i>(1) All buildings, premises and surrounding areas where an employee or accompanying dependants are housed or employed shall be maintained in a clean and sanitary condition.</i></p> <p><i>(2) An employee may be required by an employer to perform such duties as may reasonably be necessary to maintain buildings, premises and surrounding areas referred to in Subsection (1) in a clean and sanitary condition.</i></p> <p>To comply with the said requirement, NBPOL has established a maintenance programme on regular housing inspection. The inspection was conducted on quarterly basis using the Housing Repair and Maintenance Checklist, PF29. House conditions and other any issues contradict with guideline will recorded and for further action.</p>	
6.2.5	<p>The unit of certification being the mill and Company operated plantations makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Interviewed with the workers confirmed that they are easily access to adequate, sufficient and affordable foods where the mill and estates have been provided with canteen and can easily access if they need to but supplies. Management has also provided transport if the workers intent to buy any food supply. Sighted in the social management plan, there several projects and plan initiated by the management such as chicken poultry project in Lolokoru Estate, allocation of 300m<sup>2</sup> of suitable garden area per housing unit (as per Regulations Handbook) for compounds in all new replanting areas near compounds as to encourage workers to plant some vegetable for consumption.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b> Where a GLWC living wage standard (benchmark), or one that fulfills the basic requirements of the RSPO-endorsed living wage methodology, has been established in the</p>	<p>NBPOL (WNBOP) has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. The in-kind benefits are such as housing (including maintenance costs &amp; tax levies for a house), ambulance cost, water cost, electricity cost, electricity cost – generator and school bus transport. Based on 2020 calculation, considering total population in WNBOP with the minimum wages of K3.13/hour (with exemption given by the authority), benchmark calculation of prevailing</p>	Complied

	<p>country or region of operation, the same should be used as benchmarks.</p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks<sup>1</sup>. These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage.</p> <p>Once the benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may to choose to implement the living wage payment in specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>	<p>wages and in kind benefit, total benefit per employee or equivalent with K284.34 per 88 hours work week/fortnight.</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>All the core works are performed by permanent and full-time employees in mills and plantations. At palm oil mill, temporary or short-term contract</p>	Complied



	- Minor compliance -	offered to non-core type of work such as general worker and miscellaneous labour.	
<b>Criterion 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.			
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>- Critical (Major) compliance -</p>	NBPOL has developed Employee Rights & Equal Employment Opportunities Policy dated 25/07/2016 where they respect the right of all personnel to form and join trade unions of their choice and to bargain collectively. Other than the policy mentioned, the company also outlined the rights of employees to join and form organization of their own choosing in the Human Rights Policy dated 19/06/2014. Sime Darby Plantation has developed Human Rights Charter where they respect Freedom of Association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, they will provide alternative means of employee engagement and grievance redressal.	Complied
6.3.2	<p>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.</p> <p>- Minor compliance -</p>	Minutes of meetings between NBPOL with WNBOP union available for verification. The WNBOP union committee are freely elected every 4 years cycle. Verified latest meeting minutes for 2021 dated 27/5/2021, 16/7/2021 and 26/4/2021. Among highlighted issues were related to housing and working conditions for workers. On top of that safety and health issues were also being discussed related to PPE at high risk area. Output from the meetings have been reviewed by management as the inputs for the development of company-wide social and continuous management plan for 2021. Status of the management plan being updated under Social Improvement Register (SIR) dated July 2021.	Complied
6.3.3	<p>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.</p> <p>- Minor compliance -</p>	Interviewed with WNBOP union president and spoke person confirmed that the election of the representatives was elected freely by the workers without any interference of management. Union election will be done every 4 years and the latest election was last carried out in February 2021.	Complied
<b>Criterion 6.4:</b> Children are not employed or exploited.			

6.4.1	<p>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.</p> <p>- Minor compliance -</p>	<p>NBPOL has established Human Rights Policy where no children below 16 working paid or unpaid on their premises. They will seek to ensure that schooling opportunities are available to children in the areas where they operate. Sime Darby Plantation has developed Human Rights Charter 2020 to recognize that they protect the wellbeing of children by safeguarding them from any form of maltreatment or exploitation. They will not employ anyone under the age of 18 years.</p> <p>Please refer to indicator 2.2.3 providing audit details on suppliers complying to this policy.</p> <p>Consultation with stakeholders and field observation during the onsite audit has not identified any use of child labour.</p>	Complied
6.4.2	<p><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 which must be carried out by clinic or supervisory staff to be applied where other documentary evidence of date of birth is not available.</p> <p>- Critical (Major) compliance -</p>	<p>The screening process follows the NBPOL-WNB Standard Operating Procedure for Minimum Age Specification. Steps of verification of the age are conducted with 2 criteria verification. Legal documentations such as birth certificate and national identification card must be provided unless not available due to the condition/ culture of the country. Alternatives procedure may be relied upon to provide assurance that minors are not employed such as:</p> <ol style="list-style-type: none"> <li>1. School certificates</li> <li>2. Letter from parents confirming the date of birth</li> <li>3. Letter from village court/ District Court Magistrate, or local church pastor</li> <li>4. Previous employment records</li> <li>5. Statutory declaration signed by Commissioner of Oaths</li> <li>6. Assurance during interview that the candidate has strong recollection of key events that aligns with their claimed age.</li> </ol> <p>The age or date of birth of each workers are registered in the company database and it can be shown in the workers list.</p> <p>During this audit, the sample sites workers master lists were reviewed. Referring to the date of birth, there is no worker with the age on below 18 years old.</p>	Complied

6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. Normally the minimum age for employment by the Company is 18 year however in certain circumstances such as school work experience, persons as young as 16 years may be employed. These persons are classified as Young Persons.</p> <p>- Critical (Major) compliance -</p>	<p>As per the NBPOL-WNB policy and Sime Darby Group Policy no young person should be employed. Please refer to indicator 6.4.1 detailing the content of the policy and 6.4.2 on how the age of the workers are being audited and verified.</p>	Complied
6.4.4	<p>The Company demonstrates communication about its “no child labour” policy and the negative effects of child labour through notices at workers’ housing compounds and Smallholder field days. It promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The no child labour policy of NBPOL-WNB are communicate through several channels including but not limited to:</p> <ol style="list-style-type: none"> <li>1. Through suppliers contract and supplier Induction program. The suppliers are required to understand the NBPOL-WNB policy and subsequently apply the same when conducting business activities in NBPOL-WNB. Please refer to indicator 2.2.1 and 2.2.3 for more details on the contracts audited.</li> <li>2. Through providing the Policy Booklet to all workers while the booklet is available in Tok Pisin.</li> <li>3. Continuous awareness program with workers through periodic training and briefing regarding company policies.</li> <li>4. Continuous awareness during field days with smallholders and independent estates regarding no child labour. The smallholder Grower Booklet (Growa Buklet) provided to the smallholders displays information regarding Child Labour is against international and PNG labour laws.</li> <li>5. External stakeholder workshop conducted annually will reemphasize the company’s policies include Human Rights Policy.</li> <li>6. The NBPOL-WNB policies are also published in notice board of OPIC.</li> </ol>	Complied
<b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p><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.</p> <p><b>Smallholder requirements:</b></p>	<p>NBPOL has developed Gender Rights Policy dated 25/07/2016 to address any occurrences on gender inequality, domestic violence, sexual assaults and sexual harassment on NBPOL premises. Besides, Sexual Harassment Policy and Human Rights Policy was established to show commitment of NBPOL to maintain work environment that demands respect for the dignity</p>	Complied

	<p>Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Critical (Major) compliance -</p>	<p>of everyone. NBPOL will not tolerate, condone or allow sexual harassment, whether engaged in by fellow employees, supervisors, managers, clients or other non-employees who conduct business with this company.</p> <p>The reporting process as below:</p> <p>1st level of reporting is to your Manager, HOD, Human Resources or WEW local contact in writing detailing the events / reasons for feeling harassed. All reported cases will be investigated. Any employee who is found guilty of sexual harassment will be dealt with under the Discipline Policy and Procedure.</p> <p><b>Smallholders</b></p> <p>Smallholders are briefed on the company’s policies on sexual and other forms of harassments during the regular Field Days and Meetings conducted at the Smallholder Departments. Pre-audit Meetings are also conducted by the department to identify any cases or occurrence of harassments among the smallholders. Records of Meetings and Awareness Trainings on Sexual Harassments were available for verification as sampled below.</p> <ul style="list-style-type: none"> <li>• RSPO Pre-Audit and Sexual Harassment Meeting (Growers – Gavana) – 06/07/2021</li> <li>• RSPO Pre-Audits and Sexual Harassment Meeting (Growers – Galeowale) – 07/07/2021</li> </ul> <p>Interviews with the sampled smallholders indicated that they are regularly trained and made aware of the company’s policies on sexual and other forms of harassments. They are aware of the grievance procedures that are to be adhered to if there are any cases of harassments within the smallholders.</p>	
<p>6.5.2</p>	<p><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.</p> <p><b>Smallholder requirements:</b></p> <p>Smallholders must be able to verbally explain that they understand and observe this requirement.</p>	<p>Gender Rights Policy was established to eliminate discrimination against women in the field of employment to ensure, on a basis of equality of men and women, the same right, in particularly the right to protection of health and safety in working conditions, including the safeguarding of the function of reproduction.</p>	<p>Complied</p>

	<p>- Critical (Major) compliance -</p>	<p>The policies and awareness on sexual harassment, domestic violence, reproductive rights and gender rights have been communicated to the workers as per the following sessions:</p> <table border="1" data-bbox="1084 395 1617 842"> <thead> <tr> <th>Operating unit</th> <th>Date of briefing</th> </tr> </thead> <tbody> <tr> <td>Mosa Mill</td> <td>12/06/2021</td> </tr> <tr> <td>Kombango Mill</td> <td>18/04/2021</td> </tr> <tr> <td>Numundo Mill</td> <td>15/07/2021</td> </tr> <tr> <td>Kapuiria Mill</td> <td>10/07/2021</td> </tr> <tr> <td>Lolokoru Estate</td> <td></td> </tr> <tr> <td>Bilomi Estate</td> <td></td> </tr> <tr> <td>Volupai Estate</td> <td></td> </tr> <tr> <td>Bebere Estate</td> <td>06/07/2021</td> </tr> </tbody> </table> <p>Interview with the gender committee has confirmed on the understanding on women’s rights and complaint process if there are such issues related to workplace harassment and domestic violence occurred. There are sexual harassment and domestic violence issues report for the last review period. Resolution process evidences (meeting minute, SHEQ and security incident reports, written statements, chronology of the incident) was verified. Result of resolution process was then conveyed to the complainants officially. The process was handled transparently by the respective estate and HR/security team.</p> <p><b>Smallholders</b></p> <p>Smallholders are briefed on the company’s policies on gender and reproductive rights during the regular Field Days and Meetings conducted at the Smallholder Departments.</p> <p>Interviews with the sampled smallholders indicated that they are regularly trained and made aware of the company’s policies on gender and reproductive rights. They are aware of the grievance procedures that are</p>	Operating unit	Date of briefing	Mosa Mill	12/06/2021	Kombango Mill	18/04/2021	Numundo Mill	15/07/2021	Kapuiria Mill	10/07/2021	Lolokoru Estate		Bilomi Estate		Volupai Estate		Bebere Estate	06/07/2021	
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		to be adhered to if there are any cases of discrimination within the smallholders.	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and a procedure has been determined that identifies actions are taken to address the needs of them and their babies.</p> <p>- Minor compliance -</p>	<p>A detail new mother’s need assessment was conducted in year 2020. The assessment was participated by 138 new mothers where on 14 are employed by NBPOL-WNB. The methodology of collecting the needs are through face to face questionnaires with new mothers living within NBPOL-WNB plantations and compounds by trained clinical staffs.</p> <p>The main feedback from the consultations are feeding of baby will be difficult and baby-sitting challenges when the new mother is working. The results of the consultation has transform to actions plans where extra feeding time and ensuring the new mothers are working closer to home.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The Special Grievance handling that includes grievances related to gender and sexual harassment that goes directly to the Human Resource department.</p> <p>A welfare officer was employed by NBPOL-WNB to specially handles and resolve matters related to sexuality and domestic issues. Records of complaints are kept confidential and the rights of anonymity are respected. Due to this, the case will not be reported in this audit report. However the auditors has reviewed 2 sample cases reported on 20/01/2021 and 22/02/2021.</p> <p>Addition to this mechanism, the Whistleblower Policy is another channel that complainant can directly contact the General Manager and Company Secretary to raise their complaint anonymously.</p>	Complied
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All work is voluntary and following are prohibited:</p> <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> </ul>	<p><u>Retention of identity documents or passports</u></p> <p>A copy of identity documents retained for employment purpose and kept under individual files. No foreign or guest workers in NBPOL.</p> <p><u>Payment of recruitment fees</u></p>	Complied

<ul style="list-style-type: none"> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>Note: where a Company has advanced money to an employee as a loan, this is to be regarded as a debt to the Company by the employee and a documented arrangement for repayment is to be established that is acceptable to both parties.</p> <p><b>Smallholder requirements:</b></p> <p>Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Critical (Major) compliance -</p>	<p>No recruitment fees paid for employment. The method of recruitment of general labour and semi- skilled are from hearing of vacancies through word of mouth and putting up notice on notice board.</p> <p><u>Contract substitution</u></p> <p>No contract substitution observed. Clear job designation and scope of work written in the contract. No foreign or guest workers in NBPOL.</p> <p><u>Involuntary overtime</u></p> <p>Overtime is voluntary and must be approved in advance by the appropriate Manager. Exceptionally, this rule will be waived in an emergency where it is impracticable to obtain prior managerial approval</p> <p><u>Lack of freedom of workers to resign, penalty for termination of employment and debt bondage</u></p> <p>Based on General Policies and Guidelines handbook 2010, employees are subject to give notice to terminate the contract. Notice periods for all Non-Executive staff are as follow:</p> <p>Grade 1-7: &lt; 3 months service (1 day)</p> <p style="padding-left: 40px;">&lt; than 1 year (1 week)</p> <p style="padding-left: 40px;">&lt; less than 5 years (2 weeks)</p> <p style="padding-left: 40px;">&gt; 5 years of service (1 month)</p> <p>Debt bondage recorded in the payslip for food rations and sighted deduction consent has been confirmed with the workers during interview.</p> <p><u>Withholding of wages</u></p> <p>There are mandated deductions as required by the law of Papua New Guinea. Deductions such income tax and PSF @ Palm Supa Fund (AON), WNBGW (union fees) were paid on timely manner.</p>	
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6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed for seasonal or activity related periods of high demand, these are regarded as “casual” workers. A specific labour policy and procedures for casual workers are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has implemented a Sime Darby’s Human Rights Charter revised 2020 and can be easily access via <a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a> where they committed as below:</p> <ol style="list-style-type: none"> <li>1. Providing equal opportunity</li> <li>2. Respecting freedom of association</li> <li>3. Eradicating any form of exploitation</li> <li>4. Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs</li> <li>5. Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution.</li> </ol> <p>There was no foreign labours or migrant workers employed in NBPOL WNB.</p>	Complied
<p><b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;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> <p>- Critical (Major) compliance -</p>	<p>As stated in the Operational Safety Management Plan for Planation and Production Department under Section under section 3: OHS Responsibility and Communication, the Site Operational Managers (Palm Oil Mills, Plantations and Group Managers) were the responsible to for the safety performance of the operating units and drive improvements and awareness. The operating units’ management has established OH &amp; S Committee. The committee holds meeting on monthly basis. Reviewed the OH &amp;S minutes meeting for the month of January – June 2021. Among the agenda discussed in the meeting:</p> <ol style="list-style-type: none"> <li>1. Review of near miss</li> <li>2. Review of incidents including first aid, medical and lost time cases</li> <li>3. Overview of safety inspection, risk assessment and safety permits</li> <li>4. Review of PPE</li> <li>5. Employee health status</li> <li>6. Compound health and hygiene</li> </ol>	Complied



		<ol style="list-style-type: none"> <li>7. Chemical handling and storage</li> <li>8. Emergency drills</li> <li>9. New employee induction</li> <li>10. Review of internal/external audits</li> <li>11. Internal inspections</li> <li>12. OH&amp;S training</li> </ol> <p>The group management has also established OH &amp; S committee and conducted meeting at least Bi-Monthly. Reviewed the group minutes meeting dated for Plantation Mosa Group no. 06/2021 dated 01/07/2021 and Group Of Plantations – WNB no. 04/2021 dated 26/05/2021.</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the 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> <p>- Minor compliance -</p>	<p>Accident and procedure has been established in Operational Safety Management Plan for Planation and Production Department under Section under section 5: Accident and Emergency Response and Appendix 8: Emergency Response Plan (ERP).</p> <p>Noted during the interview with the workers, the understanding on the emergency response plan during working at the mill/estates and housing area is satisfactory. The mill, estates facilities and housing area were equip with firefighting equipment such as fire extinguisher and fire hydrant.</p> <p>The operating units continuously conducted training on the ERP to enhance the workers awareness. The emergency drill conducted every 6 months. The reports were recorded in EF-EP05-03 forms. Reviewed training records as follows:</p> <ol style="list-style-type: none"> <li>1. Emergency Response Drill Operation for Mosa Oil Mill dated 15/01/2021. With 3 minutes evacuation times.</li> <li>2. Emergency Response Drill Operation for Numondo Oil Mill dated 17/02/2021. With 4 minutes evacuation times.</li> <li>3. Emergency Response Drill Operation for Kapiura Oil Mill dated 17/03/2021. With 5 minutes evacuation times.</li> <li>4. Emergency Response Drill Operation for Lolokoru Oil Mill dated 20/06/2021. With 3 minutes evacuation times.</li> <li>5. Emergency Response Drill Operation for Ove Estate dated 15/04/2021.</li> </ol>	Complied

		<p>6. Emergency Response Drill Operation for Navarai Estate dated 17/07/2021. With 30 minutes evacuation times.</p> <p>Competent first aider present at the mill and estate. Reviewed the first aider certificate with serial no. as follows:</p> <ol style="list-style-type: none"> <li>1. PNGRCS CPR 117</li> <li>2. PNGRCS CPR 128</li> <li>3. PNGRCS CPR 058</li> <li>4. PNGRCS CPR 127</li> <li>5. PNGRCS CPR 163</li> <li>6. PNGRCS CFA 256</li> <li>7. PNGRCS CFA 234</li> <li>8. PNGRCS CFA 262</li> <li>9. PNGRCS CFA 247</li> <li>10. PNGRCS CFA 259</li> <li>11. PNGRCS CFA 279</li> <li>12. PNGRCS CPR 102</li> <li>13. PNGRCS CPR 067</li> </ol> <p>For the mill, the first aid kit were placed at designated strategic station. The maps for the first aid kit were displayed at the notice board. For the estates, the first aid kit were put in the Bumbags and hold by the Bossboi/Supervisor. Noted during the interview with the workers, the awareness on who hold the first aid was satisfactory.</p> <p>The operating units conducted first aid kit monitoring on monthly basis by the Hospital Assistant and during the EHS Inspection. Reviewed the monitoring records for the month of May, June and July 2021.</p> <p>Noted during site visit, the items in the first aid kit were adequate and no consumable medicine were placed in the first aid kit and the knowledge of the first aider were satisfactory. Any in jury or usage if the first aid were recorded in Register of Injury form.</p> <p>All accident records were recorded in the Injury Assessment Report (IAR) and submitted to the Sustainability Department for records compilation.</p>	
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		Attached with the IAR were the document related to the accident such as accident investigation, medical certificate and training attended. Reviewed the IAR report no. 03306, 03297, 04,324,04327, 05299, 05483, 05542, 05538, 08104, 08774, 08789, 10236, 10240, 12775, 13773,	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE) as specified in Company procedures, 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>- Critical (Major) compliance -</p>	<p>NBPOL WNB has established Standard Operating Procedure for Personal Protective Equipment documented in the Operational Safety Management Plan for Planation and Production Department under Section 12.5: PPE and Appendix 7: PPE Guidelines.</p> <p>The operating units provided appropriate PPE to the employee free of charge base on the job type. Noted during interview with the workers noted that the understanding on the importance of PPE was satisfactory.</p> <p>Reviewed the PPE issuance records as follows:</p> <p><u>Mosa Mill</u></p> <p>The workers request the PPE from the Main Store and was recorded in the PPE Issuance Logbook. The records includes receiver name, work section, PPE type, and receiver signature and replacement date. Reviewed the records dated 08 - 13/07/2021 for workshop operators, process operators and laboratory operators.</p> <p><u>Kumbango Mill</u></p> <p>The PPE issue to the workers from the store was recorded in the PPE Issue Records Form. In the forms records the employee name, position/role, date of old items return, date of new items issue, item issue (type of PPE) and recover signature. The form was recorded each workers. Reviewed the PPE issue for workshop mechanical fitters, carpenters, electrical fitters, press station operators and boiler operators.</p> <p><u>Numundo Mill</u></p> <p>The PPE issue to the workers from the store was recorded in the PPE Issue Records Form. In the forms records the employee name, position/role, date of old items return, date of new items issue, item issue (type of PPE) and recover signature. The form was recorded each workers. Reviewed the PPE issue for laboratory operators and boiler operators.</p> <p><u>Waraston Mill</u></p>	Complied

		<p>The workers request the PPE from the Main Store and was recorded in the PPE Issuance Logbook. The records includes the date issued, receiver name, PPE description, quantity, work section and receiver signature. Reviewed the records for boiler operators and laboratory operators.</p> <p>For the estates, the workers were supplied with PPE base on the jobs requirement as per Appendix 7: PPE Guidelines and Work Risk Assessment conducted. Noted during site visit, the sprayers were provided with overall, gumboots, apron, rubber gloves, and spray caps. The chemical mixer were provided with overall, gumboots, apron, nitrile gloves, face shield and respirator. Reviewed the records of PPE issues for sprayer, chemical mixers, harvester, wheelers and loose fruit pickers FY 2021.</p>																									
6.7.4	<p>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> <p>- Minor compliance -</p>	<p>All the workers were protected under Worker’s Compensation Acts 1978. The operating units as employer made contribution to the compensations fund in quarterly basis. Reviewed the payment document made to the Office of Workers’ Compensation dated 08/03/2021 with cheque no. 011199 and 011128.</p> <p>The workers were also covered by Life Insurance (Death Benefits) on optional basis which the workers made contributions on monthly basis.</p> <p>The operating units monitor the status of the compensation claim and recorded in the Workers Compensation Claims Status Report Forms. The operating units maintain the records since 2011.</p>	Complied																								
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>All the operating units reported all accident occur to the Sustainability Quality Management Department for compilation. The Lost Time Accident Records was recorded in the NBPOL WNB LTI Register. reviewed the records FY 2020 and to date June 2021 as follows:</p> <table border="1" data-bbox="1086 1165 1892 1412"> <thead> <tr> <th rowspan="2">Months</th> <th colspan="2">2020</th> <th colspan="2">To date June 2021</th> </tr> <tr> <th>LTA (Days)</th> <th>Cases</th> <th>LTA (Days)</th> <th>Cases</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>26</td> <td>13</td> <td>39</td> <td>18</td> </tr> <tr> <td>February</td> <td>72</td> <td>40</td> <td>66</td> <td>23</td> </tr> <tr> <td>March</td> <td>65</td> <td>36</td> <td>39</td> <td>21</td> </tr> </tbody> </table>	Months	2020		To date June 2021		LTA (Days)	Cases	LTA (Days)	Cases	January	26	13	39	18	February	72	40	66	23	March	65	36	39	21	Complied
Months	2020			To date June 2021																							
	LTA (Days)	Cases	LTA (Days)	Cases																							
January	26	13	39	18																							
February	72	40	66	23																							
March	65	36	39	21																							

	April	32	18	43	26
	May	117	37	100	39
	June	50	31	98	43
	July	58	32	-	-
	August	106	42	-	-
	September	42	22	-	-
	October	86	31	-	-
	November	54	24	-	-
	December	61	20	-	-
	Total	769	346	385	170

**Principle 7: Protect, conserve and enhance ecosystems and the environment**

**Criterion 7.1:** Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p><b>Smallholder requirements:</b>          Organization managing the smallholders to manage IPM program for smallholders.          - Critical (Major) compliance -</p>	<p>Integrated Pest Management Plan was implemented as per Papua New Guinea Oil Palm Research Association (PNGOPRA) Inc. IPM plan revised by PNG OPRA Head of Entomology on dated 01/06/2020. The IPM strategies were:</p> <ol style="list-style-type: none"> <li>1. Understanding of economic threshold</li> <li>2. Understanding of pest and beneficial organism biology</li> <li>3. Routine monitoring of pest and beneficial</li> <li>4. Biological control</li> <li>5. Physical control</li> <li>6. Cultural control</li> <li>7. Precise and target application of pesticides</li> </ol> <p>The IPM was conducted when there is sign/evidence of pest attack in the plantations. Reviewed the sample implementation of the management plan as follows:</p>	Complied
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		<ol style="list-style-type: none"> <li>1. Reviewed Pest Infestation Recommendation (PestRec) report submitted to PNGOPRA dated 15/06/2021.</li> <li>2. Reviewed Pest Infestation Recommendation (PestRec) report for Navarai Estate submitted to PNGOPRA dated 20/04/2021.</li> <li>3. Reviewed the sexave daily worksheet treatment records for Navarai Estate dated 05/06/2021 and 08/06/2021.</li> </ol> <p>The sampled have effectively implemented their IPM programme as outlined in the procedure. Among the evidence of implementation sighted during the site visits are:</p> <ul style="list-style-type: none"> <li>• Planting of beneficial plants such as <i>Antigonon leptopus</i>, <i>Turnera ulmifolia</i>, and <i>Cassia cobanensis</i>. Apart from that, since <i>Euphorbia heterophylla</i> grows naturally in PNG, the estates keep the plants as one of the beneficial plants.</li> <li>• Overspray of herbicides is not a practice in WNB. It was sighted that soft vegetation was maintained in the field and herbicides application is limited to circle and strip only.</li> </ul> <p><b>Smallholders</b></p> <p>NBPOL is using the Smallholder Guide to Growing Successful and Profitable Oil Palm which was produced by OPIC as IPM plan for its associate smallholders. Among others, the contents include placement of pruned fronds and manually control of Ganoderma.</p>	
7.1.2	<p>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. Any imported species must first be approved in PNG by National Agriculture Quarantine and Inspection Authority (NAQIA) and in the Solomon Islands by Biosecurity Solomon Islands (BSI).</p> <p>- Minor compliance -</p>	<p>As per Papua New Guinea Oil Palm Research Association (PNGOPRA) Inc. IPM plan, any invasive species listed under the Global Invasive Species Database or CABI. Org lists are prohibited and must not to be imported into the countries under any circumstances.</p> <p>The estates continuously maintained the beneficial plant in the estate such as <i>Tunera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i> and <i>Euphorbia heterophylla</i> that become habitat for natural predator for the insects.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p>	<p>No evidence and records of fire usage for pest control at all estate visited.</p> <p>Addressed in the Sime Darby Planation Group Responsible Agriculture Charter under clause 3.2.5 stated as follows:</p>	Complied

	<p>- Minor compliance -</p>	<ul style="list-style-type: none"> <li>Zero use of fire for land preparation and establish effective monitoring and prevention as well as proactive firefighting measures within a reasonable radius beyond our operational boundaries.</li> </ul> <p>There was no use of fire for pest control by the sampled estates. Moreover, there has been no pest outbreak at WNB for the past several years, hence the unavailability of pesticides stock at all the sampled estates.</p>																																																									
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																																																											
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>- Critical (Major) compliance -</p>	<p>Justification of all pesticides used is documented in Plantation Management Guidelines: Pesticide Practices. Refer document no. NBPOL – EI - MG 03, revision no. 8 dated 20/04/2017 under section 5; Complete Spray Program and 6: Weed Identification and Treatment.</p>	Complied																																																								
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><b>Smallholder requirements:</b>          Organization managing the smallholders to maintain records of herbicide issue to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides used at all the sampled estates are maintained and available for verification. The records are updated monthly and separated based on the type of pesticides used. Among the information available in the records is location of application, sprayed Ha, applied volume and application rate. The records are accumulated to be viewed on a to date figure for the year. The records were updated on monthly basis.</p> <p>Reviewed the sampled records of pesticides usage per ha at estate visited as follows:</p> <table border="1" data-bbox="1084 986 1921 1428"> <thead> <tr> <th></th> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> <th>May</th> <th>Jun</th> </tr> </thead> <tbody> <tr> <td>Ally 20 DF</td> <td>0.02</td> <td>0.02</td> <td>0.02</td> <td>0.02</td> <td>1.90</td> <td>0.02</td> </tr> <tr> <td>Amine 24 D</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.07</td> </tr> <tr> <td>Asulox</td> <td>0.47</td> <td>0.00</td> <td>0.91</td> <td>0.00</td> <td>0.00</td> <td>0.46</td> </tr> <tr> <td>Basta</td> <td>1.80</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Canyon 20WG</td> <td>0.02</td> <td>0.02</td> <td>5.97</td> <td>0.03</td> <td>0.04</td> <td>0.03</td> </tr> <tr> <td>Glyphosate</td> <td>0.46</td> <td>0.35</td> <td>0.40</td> <td>0.50</td> <td>0.44</td> <td>0.52</td> </tr> <tr> <td>Starane</td> <td>0.03</td> <td>0.05</td> <td>0.02</td> <td>0.09</td> <td>0.05</td> <td>0.03</td> </tr> </tbody> </table>		Jan	Feb	Mar	Apr	May	Jun	Ally 20 DF	0.02	0.02	0.02	0.02	1.90	0.02	Amine 24 D	0.00	0.00	0.00	0.00	0.00	0.07	Asulox	0.47	0.00	0.91	0.00	0.00	0.46	Basta	1.80	0.00	0.00	0.00	0.00	0.00	Canyon 20WG	0.02	0.02	5.97	0.03	0.04	0.03	Glyphosate	0.46	0.35	0.40	0.50	0.44	0.52	Starane	0.03	0.05	0.02	0.09	0.05	0.03	Complied
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		<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Supermo 41</td> <td>0.26</td> <td>0.36</td> <td>0.29</td> <td>0.43</td> <td>0.41</td> <td>0.44</td> </tr> </table> <p><b>Smallholders</b>  Records of pesticides used by the smallholders under NBPOL are maintained and available for verification. The records are updated on a monthly basis based on issuance to the smallholders. The records are accumulated to be viewed on a to date figure for the year. Records were sampled for the Month of June 2021.</p>	Supermo 41	0.26	0.36	0.29	0.43	0.41	0.44	
Supermo 41	0.26	0.36	0.29	0.43	0.41	0.44				
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><b>Smallholder requirements:</b>  Organization managing the smallholders to manage IPM for smallholders.  - Critical (Major) compliance -</p>	<p>The plan to minimise the use of pesticides is guided by the Pesticide Practices (NBPOL-EI-MG 030). All the sampled estates have been using the glyphosate-based herbicides and Class I herbicides such as paraquat, is no longer in use. The use glyphosate is mixed with wet and stick substance to have more effective weeding results.</p> <p>The pesticides used was based on the New Guinea Oil Palm Research Association (PNGOPRA) Inc. IPM plan. Pest Recommendation (PestRec) need to be submitted to the PNGOPRA.</p> <p><b>Smallholders</b>  NBPOL is using the Smallholder Guide to Growing Successful and Profitable Oil Palm which was produced by OPIC as IPM plan for its associate smallholders. Among others, the contents manually control of Ganoderma as an alternative method to using chemicals. It was also noticed that majority of the smallholders avoid using chemicals by conducting manual brushing to eradicate the weeds in their plots.</p>	Complied							
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>No evidence of prophylactic use of pesticides in the estates visited as per Agro Chemical Classification and SAN Standard Requirements register.</p>	Complied							
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>Addressed in the Sime Darby Planation Group Responsible Agriculture Charter under clause 3.4 Promote responsible consumption and production stated as follows:</p> <p>We strive to ensure that activities within our operations do not harm the ecosystem and minimise pollution, hazards and the production of waste. We commit to:</p>	Complied							



	<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><b>Smallholder requirements:</b></p> <p>Smallholders not using pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat. Smallholders to follow the policies of the organization managing the smallholders</p> <p>- Minor compliance -</p>	<p>3.4.2 Eradicating the use of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by Stockholm or Rotterdam Conventions. We also ensure that paraquat is not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>As per Agro Chemical Classification and SAN Standard Requirements register, only Class II, III and IV were used in the estates.</p> <p>In NBPOL WNB, there is no use of pesticides that categorized as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat. Visit to the chemical stores and records reviewed of the sampled sites confirm of no sure usage.</p> <p><b>Smallholders</b></p> <p>Interview with the sampled smallholders indicated that they avoid using chemicals as they prefer to conduct manual brushing to eradicate the weeds in their blocks. Those that do use chemical application obtain the chemicals from NBPOL which provide them with Class 3 and Class 4 chemicals for weeding purposes.</p>	
7.2.6	<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 Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p><b>Smallholder requirements:</b></p> <p>Smallholders using and/or storing pesticides must demonstrate knowledge of the correct handling, storage, application and disposal requirements.</p> <p>- Critical (Major) compliance -</p>	<p>At the sampled estates, the employees who involve in chemical handling were adequately trained regarding the usage safety and health issue and proper way for chemical application. Training records as follows were verified:</p> <p>Lolokoru</p> <ul style="list-style-type: none"> <li>Estate Hazard and risk, pesticide routes entry, conducting risk assessment (25/05/2021)</li> </ul> <p>Bilomi Estate:</p> <ul style="list-style-type: none"> <li>2<sup>nd</sup> Quarter 2021-Sprayers Training (24/06/2021)-</li> </ul> <p>Volupai Estate</p> <ul style="list-style-type: none"> <li>Wearing of PPE (01/08/2021), How to contain spillage (20/07/2021), Classification of chemicals (02/07/2021), MSDS-MG03 (20/06/2021)</li> </ul> <p>Ove Estate</p>	Complied

		<ul style="list-style-type: none"> <li>• Chemical mixing ratio training dated 04/08/2021</li> <li>• Safety during chemical mixing and chemical mixing training dated 14/07/2021</li> <li>• Pesticides practices, recycling containers, chemical mixing and containers labelling training dated 05/08/2021</li> </ul> <p>Morua Estate</p> <ul style="list-style-type: none"> <li>• Safety when spraying training dated 22/06/2021</li> </ul> <p>Navarai Estate</p> <ul style="list-style-type: none"> <li>• Chemical handling and storage training dated 27/07/2021</li> <li>• Safe spraying during windy season dated 17/07/2021</li> <li>• Target area for spraying training dated 23/06/2021</li> </ul> <p>Bebere Estate</p> <ul style="list-style-type: none"> <li>• Pesticides routes of entries training dated 08/06/2021</li> </ul> <p><b>Smallholders</b></p> <p>Smallholders that wish to use chemicals on their plots are to obtain a certificate from OPIC that enables them to purchase chemicals and apply them at their plots. In order to obtain the certificate, they have to undergo certain trainings (A Smallholder Management Training Guideline – Pesticide Practise) and competencies assessment by OPIC personals. During the site visit to the sampled smallholders, the certificate was available for those smallholders that use chemicals in their plots. Relevant chemical handling training records were maintained and available for verification at the smallholder department. Training records were sampled dated 06/07/2021.</p>	
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p><b>Smallholder requirements:</b>          The requirements fully applicable to smallholders.          - Critical (Major) compliance -</p>	<p>Standard Operating Procedure for pesticides storage were documented in Plantation Management Guidelines: Pesticide Practices. Refer document no. NBPOL – EI - MG 03, revision no. 8 dated 20/04/2017. All pesticides were stored in designated storage area under lock and key. the pesticides were issued base on request.</p> <p>During the visit to the chemical stores at the sampled estates via the facilitator it was noticed that all pesticides and chemicals were stored in designated stores labelled as Chemical Stores and was under lock and key.</p>	Complied

		<p>No unauthorised persons could enter the vicinity of the chemical store. Only those wearing appropriate PPE's as stated in the chart displayed at the entrance of stores were allowed into the chemical stores. Inside the chemical stores it was sighted that all chemicals were arranged and labelled on the shelves. A bin card was available for each pesticides and chemicals to monitor the incoming and outgoing of the chemicals. Remaining solutions that were brought back after being issued were also stored in the stores in a separate area. The walling of the stores was equipped with wire mesh windows to ensure good ventilation. Apart from that, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p> <p><b>Smallholders</b></p> <p>Interview with the smallholders indicated that majority of them do not use chemicals or pesticides for field operations and resort to manual brushing of the weeds. A number of smallholders occasionally do use chemicals to eradicate weeds. The chemicals are obtained from NBPOL-WNB. The chemicals are temporarily stored at chemicals sheds in the smallholder's plots. The sheds were noticed to be locked with proper ventilation. Chemical container was properly stacked and they original labels were maintained.</p>	
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. Empty pesticide containers may be used for pre-mixing spray solution before transport to the plantation for use by sprayers. In this case they must have visual identification such as painted lines around them.</p> <p><b>Smallholder requirements:</b></p> <p>The requirements fully applicable to smallholders.</p> <p>- Minor compliance -</p>	<p>Empty pesticides containers were reused for chemical premixing operation. For containers which are broken or not used for chemical premixing were stored in designated storage area before disposed and buried in the hydrocarbon waste landfill.</p> <p>20 litres empty chemicals containers are normally reused to contain pre-mixed herbicides. Smaller size and worn out empty containers were triple rinsed and punctured or shredded before disposing them at the designated landfill. Those containers that are used to contain pre-mixed herbicides were painted with red lines around them as an indication.</p> <p><b>Smallholders</b></p> <p>There is no prophylactic use of pesticides in among the smallholders.</p>	Complied
7.2.9	<p><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</p>	<p>There was no aerial spraying conducted at in NBPOL WNB and all smallholders' plots.</p>	Complied

	<p>information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p><b>Smallholder requirements:</b>  The requirements fully applicable to smallholders.  - Critical (Major) compliance -</p>																	
7.2.10	<p><b>(C)</b> Specific bi-annual medical surveillance for pesticide operators handling organophosphate insecticides, and documented action to treat related health conditions, is demonstrated.</p> <p><b>Smallholder requirements:</b>  The requirements fully applicable to smallholders.  - Critical (Major) compliance -</p>	<p>The sampled estates have not used any organophosphate insecticides for a long time since no pest outbreak reported. Nonetheless, the medical surveillance for sprayers and herbicide operators were conducted once in every six months at the company's clinics. It is one of the prerequisites to determine whether a spraying operator is fit for the job. After passing the medical test, a "Pesticide Fitness Card" (a.k.a Green Card) will be issued to certify that the operator is fit. The Pesticide Fitness has the information about name of the operator, date of medical test and due date of medical test. In such way, the management can easily monitor to ensure the frequency of medical test is not missed. Based on verification of Pesticide Fitness Cards of the sampled estates, it was found that all the cards were still valid at the point of this visit. The test reports were also well maintained by the estates for verification. Among the parameters tested were skin, pulse, blood pressure, vision, hearing, cardiovascular, respiratory system, gastro-intestinal system, nervous system, haemoglobin, and urinalysis.</p> <p>The fit chemical handlers will be issued with Pesticides fitness card. Reviewed the latest medical check-up and Pesticides fitness card as follows:</p> <table border="1" data-bbox="1086 1059 1924 1307"> <thead> <tr> <th></th> <th>Latest medical check-up</th> <th>Next medical check-up</th> </tr> </thead> <tbody> <tr> <td>Ove Estate</td> <td>07/06/2021</td> <td>12/2021</td> </tr> <tr> <td>Moroa Estate</td> <td>09/08/2021</td> <td>02/2022</td> </tr> <tr> <td>Navarai Estate</td> <td>10/05/2021</td> <td>11/20221</td> </tr> <tr> <td>Bebere Estate</td> <td>18/05/2021</td> <td>11/2021</td> </tr> </tbody> </table> <p><b>Smallholders</b>  Interview with the smallholders indicated that those that apply chemicals are subject to undergone medical examination. Records were available for</p>		Latest medical check-up	Next medical check-up	Ove Estate	07/06/2021	12/2021	Moroa Estate	09/08/2021	02/2022	Navarai Estate	10/05/2021	11/20221	Bebere Estate	18/05/2021	11/2021	Complied
	Latest medical check-up	Next medical check-up																
Ove Estate	07/06/2021	12/2021																
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Navarai Estate	10/05/2021	11/20221																
Bebere Estate	18/05/2021	11/2021																

		those smallholders that have undergone medical examination for the month of December 2020. The smallholders were informed on the results of the examination.	
7.2.11	<p><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.</p> <p><b>Smallholder requirements:</b>  The requirements fully applicable to smallholders.  - Critical (Major) compliance -</p>	<p>As stated in the Plantation Management Guidelines: Pesticide Practices. Refer document no. NBPOL – EI - MG 03, revision no. 8 dated 20/04/2017 under clause 2.2.0: Safe Systems of Work as follows:</p> <p>If pregnancy is confirmed, the manager will be informed and advised to remove the worker from pesticide duties from that time until six months after delivery.</p> <p>Based on verification of employment records and interview of the spraying operators at the sampled estates, there was no persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions was assigned to undertake any work with pesticides.</p> <p><b>Smallholders</b></p> <p>Interview with the sampled female smallholders indicated that they were aware they are not to work with pesticides if they were pregnant or breast feeding. The smallholders also ensure that children below the age of 18 do not handle chemicals. smallholders that have undergone Medical Surveillance and obtained negative results have been advised not to conduct pesticides related works.</p>	Complied
<b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p><b>Smallholder requirements:</b>  Smallholders must demonstrate planned waste management and disposal by disposing of waste products in a designated waste pit.  - Minor compliance -</p>	<p>The waste management plan is documented in Environmental Instruction Waste Management Plan (EI-02), rev 11, dated 01/07/2021 to provide the methods and strategies of wastes disposal. NBPOL WNB has categorised its types of waste according to their physical state i.e. solid, liquid, and gaseous.</p> <p>NBPOL WNB has identified waste generated from the operation and categorised as follows:</p> <ol style="list-style-type: none"> <li>1. Gaseous Wastes</li> <li>2. Solid Wastes <ol style="list-style-type: none"> <li>a. Household Waste</li> </ol> </li> </ol>	Non-compliance

		<ul style="list-style-type: none"> <li>b. Industrial Activities</li> <li>c. Agricultural Waste</li> <li>d. Palm Oil Processing</li> <li>e. Cattle Farming</li> <li>f. Workshop/Garage Wastes</li> <li>g. Medical Wastes</li> <li>h. Others Including: Carpentry/Joinery, Construction, Office Complexes</li> </ul> <p>3. Liquid wastes</p> <ul style="list-style-type: none"> <li>a. Household</li> <li>b. Industrial activities</li> <li>c. Agricultural Activity</li> <li>d. Production and Processing of Palm Oil Product</li> <li>e. Cattle Farming</li> <li>f. Workshop/Garage Wastes</li> </ul> <p>Generally, the management of wastes at the sampled estates were implemented according to plan. Among the evidence of implementation are:</p> <ul style="list-style-type: none"> <li>• Scrap iron was sold to recycle waste contractor</li> <li>• Used lubricants were incinerated at the mills' boilers</li> <li>• Empty pesticide containers were reused for containing pre-mixed chemical for herbicides spraying</li> <li>• Household wastes and industrial wastes were disposed at designated landfill areas which are away from residential area and surface water</li> <li>• Fertiliser bags used for loose fruits collection</li> <li>• EFB used for organic fertiliser in the field</li> </ul> <p><u>Ove Estate</u></p> <p>The domestic waste and hydrocarbon waste were disposed in designated landfill and hydrocarbon pit. Noted during site visit, the area was located far from natural waterways and housing area. The rubbish were covered</p>	
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		<p>with a layer of soil after each filled into the landfill to prevent the odour from the waste.</p> <p><u>Moroa Estate</u></p> <p>The estate maintain the inventory of waste generated. Reviewed the records for FY 2021 as follows:</p> <ol style="list-style-type: none"> <li>1. Refuse segregation       <ol style="list-style-type: none"> <li>a. Organic: 68.60 tons</li> <li>b. Inorganic: 36.00 tons</li> </ol> </li> <li>2. Industrial waste       <ol style="list-style-type: none"> <li>a. Workshop: 20 kg</li> <li>b. Others: 10 kg</li> </ol> </li> <li>3. Gen-set hydrocarbon       <ol style="list-style-type: none"> <li>a. Waste fuel: 60 L</li> <li>b. Others: 2 kg</li> </ol> </li> </ol> <p>The industrial waste and hydrocarbon waste were disposed at Bilomi Estate hydrocarbon pit.</p> <p><u>Navarai Estate</u></p> <p>The domestic was were collected once a week and disposed at the designated landfill located in field NV 100. Reviewed the collection records for the month of June and July 2021.</p> <p><u>Bebere Estate</u></p> <p>The estate maintains the records of Pesticides Waste Disposal. reviewed the records as at July 2021 as follows:</p> <ol style="list-style-type: none"> <li>1. Containers/Knapsack: 107</li> <li>2. Boxes: 16</li> <li>3. Coverall/Rags: 17</li> <li>4. Plastics/Packet: 27</li> </ol> <p>However, some wastes were inadequately addressed in the waste management plan. WNB has been granted with an Environment Permit [ref.: EP-L2 (411), dated 27/04/2017] by the PNG Conservation and</p>	
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		<p>Environment Protection Authority (CEPA). Based on the permit, the company is required to comply with the applicable requirements under the Environmental Code of Practice for Papua New Guinea Oil Palm Processing Industry, DEC, 2013. Among the requirements are:</p> <ul style="list-style-type: none"> <li>• Rainfall on piled EFB within the mill area should be collected and diverted into the effluent treatment system (Clause 4.3.7).</li> <li>• Wastes contaminated with hydrocarbons such as oil filters, from which as much oil as possible has been drained, must be disposed in a designated hydrocarbon waste location that is impermeable so that there is no possibility of groundwater contamination. If there are circumstances where the location is permeable or may be susceptible to surface to groundwater transfer, every effort must be made to ensure that there is no liquid exchange by installing and impermeable lining (Clause 4.3.11.2).</li> </ul> <p>Nonetheless, the above requirements were inadequately addressed in the management plan. In addition to that, based on the site visits, the following lapses were observed:</p> <ul style="list-style-type: none"> <li>• Leachate or potential leachate from EFB pile at MOM, NOM, WOM and KAPOM was not channelled into the effluent treatment system. It was discharged into the environment through storm drain instead.</li> <li>• At the designated hydrocarbon wastes pits located at landfill areas, it was observed that no impermeable lining installed.</li> </ul> <p>Thus, a non-conformity was raised.</p> <p><b>Smallholders</b></p> <p>Smallholder Department together with OPIC have conducted regular Field Day and trainings for all the smallholders. Among the trainings provided includes Waste management and Rubbish Pit Management. Visit to the smallholder’s sites indicated that they have well maintained rubbish pits that have been well barricaded. Separate Chemical Pit was also available for disposal of used chemical containers.</p>	
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7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. Medical waste must be disposed of in purpose- built incinerators.</p> <p>Guidance: With minimal opportunity for recycling in PNG and Solomon Islands, waste disposal is by landfill. Segregation of waste shall be into Hydrocarbon contaminated waste, putrescible waste and hard waste and compostable waste. Company procedures must state how these waste streams are managed.</p> <p><b>Smallholder requirements:</b></p> <p>The requirements fully applicable to smallholders.</p> <p>- Minor compliance -</p>	<p>Waste material was disposed in accordance to the Wastes Management Plan mentioned in Indicator 7.3.1. Among the records of disposal maintained by the sampled estates and verified are as follows:</p> <ul style="list-style-type: none"> <li>• Hydrocarbon Wastes Disposal Records</li> <li>• Pesticide Wastes Disposal Records</li> <li>• Bio-medical wastes disposal records</li> </ul> <p>Domestic wastes were disposed at landfill. Based on site visit, the landfill area was observed to be well maintained by the certification unit. Clinical wastes were disposed through incineration. The incineration facilities used are either the locally installed incinerators located nearby the company's clinic or boilers at the mills, depending to the types of clinical wastes. The clinic maintain the records of inventory and disposal. Reviewed the records for the month of May, June and July 2021.</p> <p><b>Smallholders</b></p> <p>Smallholder Department together with OPIC have conducted regular Field Day and trainings for all the smallholders. Among the trainings provided includes Waste management and Rubbish Pit Management. Visit to the smallholder's sites indicated that they have well maintained rubbish pits that have been well barricaded. Separate Chemical Pit was also available for disposal of used chemical containers.</p>	Complied
7.3.3	<p>Open fire is not used for waste disposal by the Unit of Certification.</p> <p><b>Smallholder requirements:</b></p> <p>Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Minor compliance -</p>	<p><b>Estates and Mills</b></p> <p>There is a strict no burn policy on all NBPOL land at all stages of development and there was no use of open fire in wastes disposal observed at the certification unit.</p> <p>No evidence use of fire for waste disposal in estates visited. Domestic was were throw into designated dustbin and collected once a week and disposed into designated landfill.</p> <p><b>Smallholders</b></p> <p>There was no use of open fire in wastes disposal observed at the sampled smallholders' plots.</p>	Complied

**Criterion 7.4:** Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.

7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p><b>Smallholder requirements:</b></p> <p>Smallholders to implement good agriculture practices as communicated through extension services delivered by organization that is managing the smallholders.</p> <p>- Minor compliance -</p>	<p>NBPOL has established its Plantation Management Guidelines to be adhered for good agriculture practices. In managing the soil fertility to optimise yield and minimise environmental impacts, it is covered under various chapters in the guidelines i.e.:</p> <ul style="list-style-type: none"> <li>• Agro 001 Leaf Sampling and Processing, issue 1, dated 01/01/2008</li> <li>• Agro 002 Soil sampling in NBPOL plantations, issue 1, dated 01/01/2013</li> <li>• Agro 003 Leaf Sampling and Processing Flow Chart, issue 1, dated 25/08/2011</li> <li>• Agro 004 Fertiliser Sampling, issue 9, dated 11/07/2015</li> <li>• MG 04 Upkeep, issue 7, dated 23/10/2018</li> <li>• MG 16 Composting, issue 4, dated 01/06/2014</li> </ul> <p>The SOP has been implemented. The leaf sampling was conducted on annually basis and the results were used for fertiliser recommendation by agronomist.</p> <p>The fertiliser were applied based on type and dosage recommended by the agronomist.</p> <p><b>Smallholder</b></p> <p>The Smallholder Department together with OPIC regularly educates the smallholders to implement good agricultural practises in line with the SOPs that have been cascaded to the smallholders. This is a continuous process done via Field Days and Field inspections. During the visit to the smallholder plots, various GAP has been noticed to be implemented by the smallholders such as buffer zone establishments, frond stackings, harvesting standards, etc.</p>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. Tissue testing is conducted annually to determine fertiliser requirements for the following year. Soil testing is carried out at replant.</p> <p>Guidance: Smallholders are provided with access to test results applicable to the Company Management Unit closes to their block.</p> <p><b>Smallholder requirements:</b></p>	<p>Periodic tissue and soil sampling is carried out annually guided by the following procedures:</p> <ol style="list-style-type: none"> <li>1. Agro 001 Leaf Sampling and Processing, issue 1, dated 01/01/2008</li> <li>2. Agro 002 Soil sampling in NBPOL plantations, issue 1, dated 01/01/2013</li> <li>3. Agro 003 Leaf Sampling and Processing Flow Chart, issue 1, dated 25/08/2011</li> </ol> <p>The last leaf sampling analysis at the sampled estates were carried out in mid-2020 by an accredited third-party laboratory. Based on the report,</p>	Complied

	<p>Organization that is managing the smallholders to take tissue samples from representative Smallholders annually.</p> <p>- Minor compliance -</p>	<p>among the nutrient contents analysed were Nitrogen, Phosphorus, Potassium, Sulphur, Calcium, Magnesium, Sodium, Iron, Manganese, Zinc, Copper, Boron, and Chloride. The data was then used as a basis for recommendation of fertiliser application in 2021.</p> <p>Soil sampling for all the sampled estates was last conducted in September 2018 by an accredited third-party laboratory. Analysis reports were well maintained for verification. The soil sampling is done once in every five years.</p> <p><u>Ove Estate</u></p> <p>Latest leaf sampling was conducted on 29/11/2019. Refer test lab certificate no. 2284413 dated 19/12/2019 for sample name OV 0100 – OV 2400.</p> <p>Latest soil analysis was conducted on 23/10/2018. Refer test lab certificate no. 2068436 dated 26/10/2018 for sample name OV0400 0-15, OV1300 0-15, OV0700 0-15, OV0900 0-15, OV1700 0-15 and OV2100 0-15</p> <p><u>Moroa Estate</u></p> <p>Latest leaf sampling was conducted on 30/12/2019. Refer test lab certificate no. 2299260 dated 15/01/2020 for sample name MR0100, MR0200, MR03A0, MR03B0 and MR04A0.</p> <p>Latest soil analysis was conducted on 25/09/2018. Refer test lab certificate no. 2053857 dated 17/10/2018 for sample name MR0100, and MR 0800.</p> <p><u>Navarai Estate</u></p> <p>Latest leaf sampling was conducted on 29/11/2019. Refer test lab certificate no. 2284413 dated 19/12/2019 for sample name NV 0100 – NV 0700.</p> <p>Latest soil analysis was conducted on 25/09/2018. Refer test lab certificate no. 2053857 dated 17/10/2018 for sample name NV 0100, NV 0400 and NV 0500.</p> <p><u>Bebere Estate</u></p> <p>Latest leaf sampling was conducted on 14/06/2019. Refer test lab certificate no. 2193271 dated 26/06/2019 for sample name BB05A0, BB05B0, BB05C0, BB06A0, BB06B0, BB06C0, BB07A0, BB0800</p>	
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7.4.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The nutrient recycling strategy of NBPOL is documented and the latest version is dated 15/12/2020. Among the recyclable nutrient identified are EFB, Palm residues (e.g. palm fronds) after planting were left in the biomass row to decompose, fibre and treated POME as compost material, Geotube solids, dried pond solids, and boiler ash. Due to the distance from the mills, not all the estates are applying EFB mulching in the field. EFB application records were well maintained by the estates which are applying the EFB mulching. Based on verification of the records for Bebere and Bilomi estates, among the information available in the records was tonnage of EFB and area of application.</p> <p>Reviewed the sample EFB application at Bebere Estate recorded at 34,071.66 ton.</p>	Complied
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p><b>Smallholder requirements:</b></p>	<p>The estates maintained the record of the fertiliser application in the fields in order to monitor and ensure the application is carried out as recommended by the PNG OPRA. Among the information available in the records was field number, date of application and type &amp; quantity of</p>	Complied

<p>Organization that is managing the smallholders to maintain records of fertiliser distribution. - Minor compliance -</p>	<p>fertilisers. Based on the agronomist recommendations, the average dosage of fertiliser for the visited estates. The dosage depends on the type of fertilizer. The types of fertiliser were mostly of straight fertilisers.</p> <p>The fertiliser were applied based on type and dosage recommended by the agronomist. The estate maintain the fertiliser application records as follows:</p> <p>Ove Estate</p> <table border="1" data-bbox="1084 539 1872 655"> <tr> <td>Month application: May 2021 Type: MOP Rate/palm: 0.03 kg/palm</td> <td>Month application: May 2021 Type: Urea Rate/palm: 0.73 kg/palm</td> </tr> </table> <p>Morao Estate</p> <table border="1" data-bbox="1084 703 1872 820"> <tr> <td>Month application: May 2021 Type: MOP Rate/palm: 0.11 kg/palm</td> <td>Month application: May 2021 Type: Urea Rate/palm: 0.29 kg/palm</td> </tr> </table> <p>Navarai Estate</p> <table border="1" data-bbox="1084 868 1872 984"> <tr> <td>Month application: May 2021 Type: MOP Rate/palm: 0.10kg/palm</td> <td>Month application: May 2021 Type: Urea Rate/palm: 2.00 kg/palm</td> </tr> </table> <p>Bebere Estate</p> <table border="1" data-bbox="1084 1032 1872 1149"> <tr> <td>Month application: May 2021 Type: MOP Rate/palm: 0.42 kg/palm</td> <td>Month application: May 2021 Type: Urea Rate/palm: 1.49 kg/palm</td> </tr> </table> <p><b>Smallholders</b></p> <p>The SH Manager maintained records of fertiliser distribution of all the smallholders and were available for verification. Fertilisers are provided to the smallholders on a credit basis and deducted from the FFB payment.</p>	Month application: May 2021 Type: MOP Rate/palm: 0.03 kg/palm	Month application: May 2021 Type: Urea Rate/palm: 0.73 kg/palm	Month application: May 2021 Type: MOP Rate/palm: 0.11 kg/palm	Month application: May 2021 Type: Urea Rate/palm: 0.29 kg/palm	Month application: May 2021 Type: MOP Rate/palm: 0.10kg/palm	Month application: May 2021 Type: Urea Rate/palm: 2.00 kg/palm	Month application: May 2021 Type: MOP Rate/palm: 0.42 kg/palm	Month application: May 2021 Type: Urea Rate/palm: 1.49 kg/palm		
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<p><b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.</p>											

7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Each estate of NBPOL WNB has its individual map, Soil Map and Slope Map in appropriate scales. Based on the maps, there are no marginal or fragile soils identified at the sampled estates. The main soil present at the sampled estates were of Vitrandepts, Dystropepts, Troporthents types to name a few.</p> <p>Reviewed the soil maps as follows:</p> <table border="1" data-bbox="1084 507 1924 790"> <thead> <tr> <th>Estate</th> <th>Soil Series</th> </tr> </thead> <tbody> <tr> <td>Ove Estate</td> <td>Fluvaquents Series, Hydraquents Series</td> </tr> <tr> <td>Moroa Estate</td> <td>Sosoba Series, Gavuvu Series, Mamota Series</td> </tr> <tr> <td>Navarai Estate</td> <td>Vitrandepts Series</td> </tr> <tr> <td>Bebere Estate</td> <td>Mal Series, Nahavio Series, Nahavio Shallow Series, Lameki Series</td> </tr> </tbody> </table>	Estate	Soil Series	Ove Estate	Fluvaquents Series, Hydraquents Series	Moroa Estate	Sosoba Series, Gavuvu Series, Mamota Series	Navarai Estate	Vitrandepts Series	Bebere Estate	Mal Series, Nahavio Series, Nahavio Shallow Series, Lameki Series	Complied
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Navarai Estate	Vitrandepts Series												
Bebere Estate	Mal Series, Nahavio Series, Nahavio Shallow Series, Lameki Series												
7.5.2	<p>There is no extensive replanting of oil palm on steep terrain.</p> <p><b>Smallholder requirements:</b></p> <p>Smallholders do not plant on unsuitable slopes. Organization managing the smallholders to advise on slope suitability after consideration of gradient, soil type, harvesting safety and other relevant issue.</p> <p>- Minor compliance -</p>	<p>WNB has established its slope map for all the estates. Based on the maps, generally the sampled estates have flat to undulating terrain. Based on map verification and site visit, there was no extensive replanting of oil palm on steep terrain. Latest replanting program was for Moroa Estate scheduled in 2023</p> <p><b>Smallholders</b></p> <p>Visit to the smallholder’s plots indicated that the oil palms have not been planted on unsuitable slopes. Generally, the land occupied with oil plans are flat and undulating and suitable for oil palm cultivation.</p>	Complied										
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>There was no new planting at the sampled estates.</p>	Complied										
<p><b>Criterion 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.</p>													
7.6.1	<p><b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile</p>	<p>There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB’s GIS &amp; Mapping Unit.</p>	Complied										

	soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -		
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. - Minor compliance -	The sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB's GIS & Mapping Unit. Addressed in the Sime Darby Planation Group Responsible Agriculture Charter under clause 3.2 Commitment towards no deforestation and new development on peat stated as follows: 3.2.2 No new development of 'potential high carbon stock area' forest as defined by the 'HCS Approach'. 3.2.3 No new development of peat areas, regardless of depth or location. Existing planted areas shall be managed according to best practices and rehabilitated if the area reaches natural gravity drainability limit <sup>7</sup> measured using recognised method. No fragile soil categorized in the estates visited as per soil map issued by GIS & Mapping Unit. There is no new planting at the sampled estates.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB's GIS & Mapping Unit. Soil series and topography map available for estate visited as per slope map issued by GIS & Mapping Unit.	Complied

Estate	Slope
Ove Estate	0° - 15°
Morooa Estate	0° - 25°
Navarai Estate	0° - >25°
Bebere Estate	0° - 15°

**Criterion 7.7:** No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.

7.7.1	<p><b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>No planting on peat in the estate as no peat identified in the estates sampled as per Soil Map established and sample report reviewed as follows:</p> <ol style="list-style-type: none"> <li>1. Soil Resources of Moroa Mini Estate, Report No TS/AG-11 dated June 2005</li> <li>2. Soil Resources of Navarai Plantation, Report No TS/AG-15a dated July 2005</li> <li>3. Soil Resources of Kaurausu Plantation, Report No TS/AG-10 dated June 2005</li> <li>4. Soil Resources of Bilomi Plantation, Report No TS/AG-08 dated May 2005</li> </ol>	Complied
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>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).</p> <p>- Minor compliance -</p>	<p>No planting on peat in the estate as no peat identified in the estates sampled as per Soil Map established and sample report reviewed as per 7.7.1.</p>	Complied
7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>No planting on peat in the estate as no peat identified in the estates sampled as per Soil Map established and sample report reviewed as per 7.7.1.</p>	Complied
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>No planting on peat in the estate as no peat identified in the estates sampled as per Soil Map established and sample report reviewed as per 7.7.1.</p>	Complied
7.7.5	<p><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</p>	<p>No planting on peat in the estate as no peat identified in the estates sampled as per Soil Map established and sample report reviewed as per 7.7.1.</p>	Complied



	<p>out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>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></p> <p>PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues]</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p><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> <p>- Critical (Major) compliance -</p>	<p>No planting on peat in the estate as no peat identified in the estates sampled as per Soil Map established and sample report reviewed as per 7.7.1.</p>	<p>Complied</p>
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>- Critical (Major) compliance -</p>	<p>No planting on peat in the estate as no peat identified in the estates sampled as per Soil Map established and sample report reviewed as per 7.7.1.</p>	<p>Complied</p>
<p><b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.</p>			

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>7.8.1b Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>The water management plan is addressed by WNB through Water and Natural Resource Management Plan (EI-03) rev 8 dated 13/06/2021. The main objective of the plan is to meet the professional standards for developing and managing the availability of water resources available across the company's operations and to assist with the regulatory compliance. Generally, the management plans established to prevent pollution of water sources and to supply clean water to workers are:</p> <ul style="list-style-type: none"> <li>• Well management of mills ETP to meet the regulated parameter of effluent discharge</li> <li>• Ensuring runoff from mill operations such as EFB leachate, hydrocarbons and boiler ash are handled correctly</li> <li>• Establishment and restoration of riparian zone according to the Environmental Permit</li> <li>• No clearing at &gt;25°slope and establishment of cover crop at replanting fields</li> <li>• Ensuring the volume extraction of water from the resources is within the permitted limit</li> <li>• Well maintained water treatment plants to ensure safe potable water to labour quarters</li> </ul> <p>Past of the water management plan includes monitoring of the drinking water quality provided to the workers on monthly basis. Among the parameter analyse were turbidity, total solids, total coliform and E.Coli.</p> <p>Reviewed sample water quality analysis for the month of July 2021 for sampled estates.</p> <p><u>Ove Estate</u></p> <p>Reviewed the domestic analysis for sample no. 1792/21 and 1793/21 as per report no. 282/21 dated 06/07/2021. The results for 1792/21 was not conform to the Drinking Water Quality Standards.</p> <p><u>Moroa Estate</u></p> <p>Reviewed the domestic analysis for sample no. 1978/21 as per report no. 310/21 dated 26/07/2021. The results conform to the Drinking Water Quality Standards.</p>	Complied
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		<p><u>Navarai Estate</u>  Reviewed the domestic analysis for sample no. 1855/21 and 1856/21 as per report no. 310/21 dated 13/07/2021. The results for 1855/21 was not conform to the Drinking Water Quality Standards.</p> <p><u>Bebere Estate</u>  Reviewed the domestic analysis for sample no. 1906/21 as per report no. 296/21 dated 19/07/2021. . The results was not conform to the Drinking Water Quality Standards.</p> <p>The operating units and Sustainability Dept. conducted investigation and issued CPAR form for all analysis results which not conform to the Drinking Water Quality Standards. Base on the analysis results, it was found that slightly higher contains of total coliform and E.Coli.</p> <p>The operating units has conducted briefing to create awareness to the workers on importance of boiling the water before drinking. Reviewed the briefing records dated 14/06/2021, 15/06/20201, 16/06/2021</p>	
7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p><b>Smallholder requirements:</b>  Smallholders must protect water courses and wetlands by not polluting with rubbish or other waste.  - Critical (Major) compliance -</p>	<p>Establishment and maintenance of riparian zones are also outlined in the Water and Natural Resource Management Plan (EI-03) with main objective to protect the area that has conservation value for maintaining balances between oil palm development and ecological integrity. Based on site visit at the sampled estates, generally the riparian zones were well maintained. There was sufficient signage to restrict agrochemical application and trespassing being planted at the zones. The zones were also clearly demarcated for identification. Some of the location sited:</p> <ul style="list-style-type: none"> <li>• The riparian buffer zone for Kapuluk River flows along the estate boundary. The vegetation along the buffer zone was well established. No evidence of chemical application at the buffer zone area</li> <li>• The riparian buffer zone for Garuru/Luvi River. The vegetation along the buffer zone was let growth naturally and well established. No evidence of chemical application at the buffer zone area.</li> <li>• The riparian buffer zone for a creek flow through the estates. The vegetation along the buffer zone was let growth naturally and well established. No evidence of chemical application at the buffer zone</li> </ul>	Complied

		<p>Interview with workers especially those who apply herbicides showed that the understanding about the importance of riparian zone among them is good.</p> <p><b>Smallholder</b></p> <p>Visit to the smallholder and the Independent Estate blocks confirmed that the water course and wetlands are continued to be protected. Discussion with the blocks owners and Independent Estates confirmed their understanding on the importance to protect waterways. It was sighted at some Independent Estates / community planting estate, awareness signage are erected.</p>																					
7.8.3	<p>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> <p>- Minor compliance -</p>	<p>The maximum permissible limit for BOD set by WNB before it is discharged to waterways is 90mg/l. Effluent sampling is conducted on a weekly basis. Results sampled demonstrated that the overall BOD results are generally meeting the discharge limits. Occasionally, when the limit was exceeded, the mills took initiative to investigate the cause and took the appropriate corrective actions. The investigation report and corrective action taken are documented in E-SHEQ001 Incident Form, ver. 2, rev. 05/2014.</p>	Complied																				
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Water consumption at all mills are monitored by using flowmeter. Based on the records, the consumptions are as follows:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th rowspan="2">Mill</th> <th colspan="2">m<sup>3</sup>/mt FFB processed</th> </tr> <tr> <th>2020</th> <th>2021 (as at June)</th> </tr> </thead> <tbody> <tr> <td>Mosa</td> <td style="text-align: center;">1.00</td> <td style="text-align: center;">0.80</td> </tr> <tr> <td>Kumbango</td> <td style="text-align: center;">0.94</td> <td style="text-align: center;">1.78</td> </tr> <tr> <td>Numundo</td> <td style="text-align: center;">1.24</td> <td style="text-align: center;">1.33</td> </tr> <tr> <td>Waraston</td> <td style="text-align: center;">Not in operation</td> <td style="text-align: center;">Not in operation</td> </tr> <tr> <td>Kapiura</td> <td style="text-align: center;">1.63</td> <td style="text-align: center;">1.50</td> </tr> </tbody> </table>	Mill	m <sup>3</sup> /mt FFB processed		2020	2021 (as at June)	Mosa	1.00	0.80	Kumbango	0.94	1.78	Numundo	1.24	1.33	Waraston	Not in operation	Not in operation	Kapiura	1.63	1.50	Complied
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**Criterion 7.9:** Efficiency of fossil fuel use and the use of renewable energy is optimised

7.9.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported.</p> <p>- Minor compliance -</p>	<p>The biogas plant operated at Mosa and Kumbango mill continue to provide renewable energy to nearby housing and office areas. The amount of energy supplied was recorded on monthly basis. Such information was also reported in the RSPO GHG calculator.</p> <p>For any fossil fuel consumed, it is being monitored. The mills continue to utilise their fibre and shell as biofuel for their boilers.</p> <p>Reviewed the diesel consumption FY 2020 as follows:</p> <table border="1" data-bbox="1084 547 1805 979"> <thead> <tr> <th>Estates/Mill</th> <th>Diesel consumption (L)</th> </tr> </thead> <tbody> <tr> <td>WNB-Bilomi Estate</td> <td>40,500</td> </tr> <tr> <td>WNB-Navarai Estate</td> <td>90,000</td> </tr> <tr> <td>WNB-Moroa Mini Estate</td> <td>40,000</td> </tr> <tr> <td>WNB-Valupai/Natupi Mini Estate</td> <td>150,150</td> </tr> <tr> <td>WNB-Lolokoru Mini Estate</td> <td>104,950</td> </tr> <tr> <td>WNB-Ove Estate</td> <td>594,300</td> </tr> <tr> <td>WNB-Mosa Mill</td> <td>320,000</td> </tr> <tr> <td>WNB-Kapiura Mill</td> <td>960,000</td> </tr> <tr> <td>WNB-Numundo Mill</td> <td>600,000</td> </tr> <tr> <td>WNB-Waraston Mill</td> <td>348,000</td> </tr> </tbody> </table> <p>The estates continuously conduct briefing and training to enhance employee awareness to switch of lights, air conditioners etc. when not in use to reduce the use of diesel in compounds and offices.</p>	Estates/Mill	Diesel consumption (L)	WNB-Bilomi Estate	40,500	WNB-Navarai Estate	90,000	WNB-Moroa Mini Estate	40,000	WNB-Valupai/Natupi Mini Estate	150,150	WNB-Lolokoru Mini Estate	104,950	WNB-Ove Estate	594,300	WNB-Mosa Mill	320,000	WNB-Kapiura Mill	960,000	WNB-Numundo Mill	600,000	WNB-Waraston Mill	348,000	Complied
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<p><b>Criterion 7.10:</b> 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><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>The GHG emissions are identified and the Palm GHG calculator was used to determine the potential emissions.</p> <p>The biogas plant operated at Mosa and Kumbango mill continue to capture the methane emission reducing GHG emission while provide renewable energy to nearby housing and office areas to further reduce fossil consumption to generate electricity.</p>	Complied																						

		As methane emission is one of the biggest emitter in palm oil mill, further reduction was introduced by using Geotube to capture solids from the effluent treatment ponds. The capturing of the solids reducing the decaying factor in the pond and hence reduces the methane generation.											
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 minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	There is no new development after 2014. Hence the carbon stock requirement is not applicable for this audit.	Not Applicable										
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The Identification of Potential Source of GHG Emission and GHG Reduction Plan is used to identify the waste products and sources of pollution is in place and is being reviewed accordingly. Among the Potential Source of GHG Emission identified such as Palm Oil Mill Effluent (POME), Diesel Usage, Electricity Usage, Chemical Usage and Generator Set.</p> <p>All pollutants are identified through environmental aspect register and plans to reduce or minimise are compiled in the Continuous Improvement Plan 2014-2025. Among the examples of improvement plans are as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Improvement actions</th> <th style="text-align: center;">Expected outcome</th> </tr> </thead> <tbody> <tr> <td>Pond Management to 7.8.3 reduce BOD below &lt; 90ppm at exit of last pond</td> <td>Reduction of BOD, TS and TDS at discharge and EIP to the limit set out in the EP</td> </tr> <tr> <td>BOD of &lt; 90ppm at exit of 2019-2024 last pond</td> <td>All Mills to be provided with De-oiling Tank to trap oil from getting into ETP.</td> </tr> <tr> <td>BOD of &lt; 20 at exit of effluent treatment system at Waraston</td> <td>Dewatering press system</td> </tr> <tr> <td>Reduction of leachates from EFB</td> <td>Construct pit to collect the leaches produced at EFB yard</td> </tr> </tbody> </table>	Improvement actions	Expected outcome	Pond Management to 7.8.3 reduce BOD below < 90ppm at exit of last pond	Reduction of BOD, TS and TDS at discharge and EIP to the limit set out in the EP	BOD of < 90ppm at exit of 2019-2024 last pond	All Mills to be provided with De-oiling Tank to trap oil from getting into ETP.	BOD of < 20 at exit of effluent treatment system at Waraston	Dewatering press system	Reduction of leachates from EFB	Construct pit to collect the leaches produced at EFB yard	Complied
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		<p>Implementation of riparian buffer zones across all estates</p> <p>No spraying and no fertilizer application buffer zone (10 metres and 50 metres) around waterways where riparian buffer zones have not yet been established</p> <p>Establishment of a larger scale buffer zone nursery with a variety of endemic tree species</p> <p>High solid level in mill ponds</p>	<p>Enhanced landscape for biodiversity and erosion control</p> <p>Eliminate the risk of fertiliser and chemical run-off into the waterways</p> <p>Buffer zone nurseries to be established with WMAs and communities identified</p> <p>Sufficient retention time for biochemical reaction</p>	
<b>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</b>				
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>The was no new planting at all the sampled estates.</p> <p>For replanting operation, the management is guided by Plantation Management Guidelines, Replant Practices [NBPOL – EI - MG 01B, rev. 7, dated 05/2016]. Based on the procedure, felled palms should be neatly stacked into straight lines. The procedure is in line with the Sime Darby Planation Group Responsible Agriculture Charter under clause 3.2.5 stated – “Zero use of fire for land preparation and establish effective monitoring and prevention as well as proactive firefighting measures within a reasonable radius beyond our operational boundaries”.</p> <p>Further confirmation based on site visit at the replanting area field no. MU 16D at Bebere Estate, there was no evidence of open burning observed.</p> <p><b>Smallholders</b></p> <p>Based on site visit at the smallholder’s plots, there were no evidence that land for replanting was prepared by burning. Interview with the sampled smallholders further justified the fact that they are aware that they are prohibited from using fire during the replanting process.</p>		Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.	Regarding fire prevention WNB is driven by NBPOL Environmental Policy 2017, ver. 3. The commitment to zero burning for land preparation is stated		Complied

	- Minor compliance -	<p>in the policy. WNB has also established the Agriculture Fire Fighting Procedure, [SUST-05, issue 1, dated 01/07/2020] as a reference in firefighting.</p> <p>The SOP was displayed at the notice board and communicated to all the workers during training and morning briefing. Noted during interview, the understanding of the workers on fire prevention plan was satisfactory.</p>	
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The sampled estates have organised meetings with the adjacent stakeholders which were mainly villages and smallholders with regards to fire prevention and control measure as a mean of engagement. Attendance records dated 16/02/2021 (Lolokoru), 07/07/2021 (Bilomi), 12/06/2021 (Volupai) and 13/07/2021 (Bebere) were made available for verification.</p> <p><b>Smallholders</b></p> <p>Smallholder Department together with OPIC have conducted regular Field Day and trainings for all the smallholders. During these field days the smallholders have been briefed on fire prevention and control measures. Interview with the sampled smallholders indicate that they are aware of the fire prevention and control measures.</p>	Complied
<p><b>Criterion 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></p> <p>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.</p> <p>The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems.</p> <p>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).</p> <p>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>The Roka Mini Estate development was after November 2005. The New Planting Procedure notification was published in the RSPO website on 04/11/2013 (<a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-roka-mini-estate">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-roka-mini-estate</a> ).</p>	Complied



	<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>- Critical (Major) compliance -</p>	<p>Other available HCV assessment includes:</p> <ol style="list-style-type: none"> <li>1. Conservation and Management Guidelines for Conservation for biological diversity within New Britain Palm Oil Limited Operation covering Bilomi / Kaurausu Area dated 07/12/2007</li> <li>2. High Conservation Value Forest Assessment 2<sup>nd</sup> Stage North of Avenue 10 Soluvuti Oil Palm Project dated 14/12/2012.</li> </ol> <p>Additionally, NBPOL has established the NBPOL WNB established Habitat Management Plan, Landscape Overview, Version 2, 17/11/2016 was a guidance for HCV management covering Government Protected areas and Industry protected area.</p> <p>There are no new planting identified during this audit.</p>	
<p>7.12.2</p>	<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>7.12.2b 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><b>PROCEDURAL NOTE:</b> For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p> <p>- Critical (Major) compliance -</p>	<p>The Roka Mini Estate development was after November 2005. The New Planting Procedure notification was published in the RSPO website on 04/11/2013 (<a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-roka-mini-estate">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-roka-mini-estate</a> ).</p> <p>Other available HCV assessment includes:</p> <ol style="list-style-type: none"> <li>1. Conservation and Management Guidelines for Conservation for biological diversity within New Britain Palm Oil Limited Operation covering Bilomi / Kaurausu Area dated 07/12/2007</li> <li>2. High Conservation Value Forest Assessment 2<sup>nd</sup> Stage North of Avenue 10 Soluvuti Oil Palm Project dated 14/12/2012.</li> </ol> <p>Additionally, NBPOL has established the NBPOL WNB established Habitat Management Plan, Landscape Overview, Version 2, 17/11/2016 was a guidance for HCV management covering Government Protected areas and Industry protected area.</p> <p>There are no new planting identified during this audit.</p> <p><b>Independent Estate:</b> The HCV identification for Repamira Estate was conducted by NBPOL-WNB as an extension service. There are no in particular any HCV area within Repamira Estate except the buffer zones.</p>	<p>Complied</p>

7.12.3	<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><b>PROCEDURAL NOTE:</b></p> <p>There shall be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development shall 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&amp;C requirements apply, including FPIC and HCV requirements.</p> <p>- Critical (Major) compliance -</p>	Other than the new planting at Roku Mini Estate, there is no new planting after 15/11/2018. Hence the HFCL within HFCC is not applicable for this audit.	Non-compliance
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peat land and other conservation areas within Company managed land 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) that may result from the actions of the Unit of Certification.</p> <p>- Critical (Major) compliance -</p>	<p>The Habitat Management Plan, Landscape Overview, Version 2, 17/11/2016 has been established as a guidance for HCV management covering Government Protected areas and Industry protected area. The specific area HMP is established to further manage the location. The HMP for Silovuti Groups issue 3 dated June 2020 has established the plan to protect and conserve conservation area.</p> <p>HCV inspection reports and forest integrity assessments were made available for verification to confirm the proper implementation of the management plan.</p> <p>There was no area identified as HCV at Lolokoru, Bilomi/Loata, Volupai/Lotomgam &amp; Natupi/Goruru, Ove Estate, Kaurausu / Moroa Estate, Navarai Estate and, Bebere Estate.</p>	Complied
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land 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.</p> <p>- Minor compliance -</p>	There is no new planting after 15/11/2018 within the certification unit.	Complied

<p>7.12.6</p>	<p>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.</p> <p><b>Smallholder requirements:</b></p> <p>Organization managing the smallholders to educate and support Smallholders through field days and visits to Smallholder blocks as part of their routine extension activities.</p> <p>- Minor compliance -</p>	<p>The RTE species status is included in the Habitat Management plan of each area (e.g. Silovuti area). The forest integrity assessment and periodic HCV inspection served the purpose to ensure that there is no encroachment and violation on RTE protection.</p> <p>NBPOL has also established the Flora and Fauna Species ver. 2 dated March 2019 to further identified the potentials RTE.</p> <p>The estates management continue to promote awareness on HCV/RTE to the workers during morning briefing and training. Sighted at several strategic places in the estates visited such as office compound, muster ground, housing area and HCV area, signage on prohibition of capture, harm, collect or kill RTE species are erected. Trainings have been provided as a programme to educate the workforce about the status of RTE species. Examples of training records verified are as follows:</p> <table border="1" data-bbox="1084 742 1924 991"> <thead> <tr> <th>Estates</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Lolokoru</td> <td>20/06/2021</td> </tr> <tr> <td>Bilomi</td> <td>16/04/2021</td> </tr> <tr> <td>Volupai</td> <td>10/07/2021</td> </tr> <tr> <td>Bebere</td> <td>22/06/2021</td> </tr> </tbody> </table> <p>The estate continue to enhance the workers awareness on the RTE species through training as sighted in the training records as follows:</p> <ol style="list-style-type: none"> <li>1. Environment, buffer zone and RTE species training dated 22/06/2021 at Bebere Estate</li> <li>2. Buffer zone and RTE species training dated 13/03/2021 at Bebere Estate</li> <li>3. Environment policy, buffer zone and RTE species training dated 16/07/2021 at Navarai Estate</li> </ol> <p><b>Independent Estate:</b></p> <p>RTE awareness training was provided by NBPOL-WNB. The latest training records observed dated 02/07/2021. Other than training, awareness through pictorial is published on the notice board.</p>	Estates	Date	Lolokoru	20/06/2021	Bilomi	16/04/2021	Volupai	10/07/2021	Bebere	22/06/2021	<p>Complied</p>
Estates	Date												
Lolokoru	20/06/2021												
Bilomi	16/04/2021												
Volupai	10/07/2021												
Bebere	22/06/2021												

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>- Minor compliance -</p>	<p>There no new planting after 15/11/2018 identified that does not have a prior HCV assessment.</p> <p>However, for the current operations, the RTE species status is included in the Habitat Management plan of each area (e.g. Silovuti area). The forest integrity assessment and periodic HCV inspection served the purpose to ensure that there is no encroachment and violation on RTE protection.</p> <p>NBPOL has also established the Flora and Fauna Species ver. 2 dated March 2019 to further identified the potentials RTE.</p>	Complied
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>- Critical (Major) compliance -</p>	<p>There no new planting after 15/11/2018 identified that does not have a prior HCV assessment.</p> <p>However, for the current operations, the RTE species status is included in the Habitat Management plan of each area (e.g. Silovuti area). The forest integrity assessment and periodic HCV inspection served the purpose to ensure that there is no encroachment and violation on RTE protection.</p> <p>NBPOL has also established the Flora and Fauna Species ver. 2 dated March 2019 to further identified the potentials RTE.</p>	Complied

## Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2020 for Numundo Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. 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 2020 for Numundo Oil Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	2.67
PKO	0.00

Extraction	%
OER	20.20
KER	6.14

Production	t/yr
FFB Process	365,263.00
CPO Produced	73,773.00
PKO Produced	22,413.00

Land Use	Ha
OP Planted Area	58,821.91
OP Planted on peat	950.59
Conservation (forested)	6,210.70
Conservation (non-forested)	0.00
<b>Total</b>	<b>65,983.20</b>

### Summary of Field Emission and Sink

	Own Crop		Group		3 <sup>rd</sup> Party*		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	325,675.24	1.00	0.00	0.00	3,546.87	0.00	329,222.11	10.48
CO <sub>2</sub> Emission from fertilizer	11,895.20	0.04	0.00	0.00	71.45	0.00	11,966.65	0.38
NO <sub>2</sub> Emission	21,401.21	0.06	0.00	0.00	92.67	0.00	21,493.88	0.34
Fuel Consumption	7,098.40	0.02	0.00	0.00	470.27	0.01	7,568.68	0.24
Peat Oxidation	51,062.31	0.16	0.00	0.00	0.00	0.00	51,062.31	1.63
<b>Sink</b>								
Crop Sequestration	-182,905.31	-0.56	0.00	0.00	25,246.33	0.00	-208,151.64	-0.56
Conservation Sequestration	-41,433.25	-0.13	0.00	0.00	0.00	0.00	-41,433.25	-0.13
<b>Total</b>	<b>192,793.79</b>	<b>0.59</b>	<b>0.00</b>	<b>0.00</b>	<b>-21,065.07</b>	<b>0.00</b>	<b>171,728.72</b>	<b>0.59</b>

\*Note: 3<sup>rd</sup> party crops are smallholders crops

**Summary of Mill Emission and Credit**

	tCO <sub>2e</sub>	tCO <sub>2e</sub> /tFFB
<b>Emission</b>		
POME	83,693.87	0.23
Fuel Consumption	1,839.24	0.01
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>85,533.11</b>	<b>0.23</b>

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

Emissions	tCO <sub>2e</sub>
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

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

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

The GHG emissions that were produced in 2020 for Kaipura Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. 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 2020 for Kapiura Oil Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct	Extraction	%
CPO	0.58	OER	22.92
PKO	0.00	KER	5.91

Production	t/yr	Land Use	Ha
FFB Process	282,279.00	OP Planted Area	41,695.40
CPO Produced	64,697.00	OP Planted on peat	0.00
PKO Produced	16,669.00	Conservation (forested)	3,152.60
		Conservation (non-forested)	0.00
		<b>Total</b>	<b>44,848.00</b>

**Summary of Field Emission and Sink**

	Own Crop		Group		3 <sup>rd</sup> Party*		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	116,064.17	0.53	0.00	0.00	5,718.37	0.00	121,782.54	0.53
CO <sub>2</sub> Emission from fertilizer	7,493.31	0.03	0.00	0.00	115.20	0.00	7,608.51	0.03
NO <sub>2</sub> Emission	9,063.87	0.04	0.00	0.00	149.40	0.00	9,213.27	0.04
Fuel Consumption	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-90,494.28	-0.41	0.00	0.00	40,702.94	0.00	-131,197.22	-0.41
Conservation Sequestration	-22,813.97	-0.01	0.00	0.00	0.00	0.00	-22,813.97	-0.01
<b>Total</b>	<b>19,313.11</b>	<b>0.09</b>	<b>0.00</b>	<b>0.00</b>	<b>-34,719.97</b>	<b>0.00</b>	<b>-15,406.86</b>	<b>0.09</b>

*\*Note: 3<sup>rd</sup> party crops are smallholders crops*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	59,416.17	0.22
Fuel Consumption	2,909.40	0.01
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>62,325.57</b>	<b>0.22</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

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

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



The GHG emissions that were produced in 2020 for Mosa Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. 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 2020 for Mosa Oil Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct	Extraction	%
CPO	-1.16	OER	21.11
PKO	0.00	KER	5.58

Production	t/yr	Land Use	Ha
FFB Process	285,769.00	OP Planted Area	58,541.51
CPO Produced	60,317.00	OP Planted on peat	950.59
PKO Produced	15,957.00	Conservation (forested)	5,732.70
		Conservation (non-forested)	0.00
		<b>Total</b>	<b>65,224.80</b>

### Summary of Field Emission and Sink

	Own Crop		Group		3 <sup>rd</sup> Party*		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	45,073.80	0.52	38.76	0.69	18,522.03	0.09	63,634.59	1.30
CO <sub>2</sub> Emission from fertilizer	2,579.78	0.03	1.89	0.03	373.12	0.00	2,954.79	0.06
NO <sub>2</sub> Emission	2,924.78	0.03	2.13	0.04	483.93	0.00	3,410.83	0.07
Fuel Consumption	2,027.79	0.02	1.26	0.02	2,455.80	0.01	4,484.86	0.05
Peat Oxidation	102.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-33,609.50	-0.39	-36.74	-0.66	-131,838.42	-0.66	-165,484.66	-1.71
Conservation Sequestration	-4,007.60	-0.05	-6.15	-0.11	0.00	0.00	-4,013.75	-0.16
<b>Total</b>	<b>15,091.68</b>	<b>0.17</b>	<b>1.15</b>	<b>0.02</b>	<b>-110,003.54</b>	<b>-0.56</b>	<b>-94,910.71</b>	<b>-0.37</b>

\*Note: 3<sup>rd</sup> party crops are smallholders crops

**Summary of Mill Emission and Credit**

	tCO <sub>2e</sub>	tCO <sub>2e</sub> /tFFB
<b>Emission</b>		
POME	5,698.08	0.02
Fuel Consumption	989.04	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>6,687.12</b>	<b>0.02</b>

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

<b>Emissions</b>	<b>tCO<sub>2e</sub></b>
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

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

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

The GHG emissions that were produced in 2020 for Kumbango Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. 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 2020 for Kumbango Oil Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	-0.24
PKO	0.00

Extraction	%
OER	21.12
KER	6.31

Production	t/yr
FFB Process	259,928.00
CPO Produced	54,893.00
PKO Produced	16,412.00

Land Use	Ha
OP Planted Area	58,539.91
OP Planted on peat	950.59
Conservation (forested)	5,618.70
Conservation (non-forested)	0.00
<b>Total</b>	<b>65,109.20</b>

### Summary of Field Emission and Sink

	Own Crop		Group		3 <sup>rd</sup> Party*		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	86,500.74	0.55	0.00	0.00	9,589.11	0.00	96,089.85	0.55
CO <sub>2</sub> Emission from fertilizer	4,736.31	0.03	0.00	0.00	193.17	0.00	4,929.48	0.03
NO <sub>2</sub> Emission	5,408.86	0.03	0.00	0.00	250.54	0.00	5,659.39	0.03
Fuel Consumption	3,911.75	0.02	0.00	0.00	1,271.40	0.00	5,183.15	0.02
Peat Oxidation	737.77	0.00	0.00	0.00	0.00	0.00	737.77	0.00
<b>Sink</b>								
Crop Sequestration	-63,176.05	-0.40	0.00	0.00	-68,254.56	0.00	-131,430.61	-0.40
Conservation Sequestration	-8,095.65	-0.05	0.00	0.00	0.00	0.00	-8,095.65	-0.05
<b>Total</b>	<b>30,023.72</b>	<b>0.19</b>	<b>0.00</b>	<b>0.00</b>	<b>-56,950.34</b>	<b>0.00</b>	<b>-26,926.62</b>	<b>0.19</b>

\*Note: 3<sup>rd</sup> party crops are smallholders crops

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	8,090.37	0.03
Fuel Consumption	1,584.59	0.01
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>9,674.95</b>	<b>0.02</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

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

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

The GHG emissions that were produced in 2020 for Waraston Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. 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.

As there is no production Warastom Oil Mill, the Net GHG emitted in 2020 for Warastom Oil Mill and supply base are zero as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.00
PKO	0.00

Extraction	%
OER	0.00
KER	0.00

Production	t/yr
FFB Process	0.00
CPO Produced	0.00
PKO Produced	0.00

Land Use	Ha
OP Planted Area	0.00
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
<b>Total</b>	<b>0.00</b>

### Summary of Field Emission and Sink

	Own Crop		Group		3 <sup>rd</sup> Party*		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO <sub>2</sub> Emission from fertilizer	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO <sub>2</sub> Emission	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fuel Consumption	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

\*Note: 3<sup>rd</sup> party crops are smallholders crops

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	0.00	0.00
Fuel Consumption	0.00	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	0.00	0.00

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

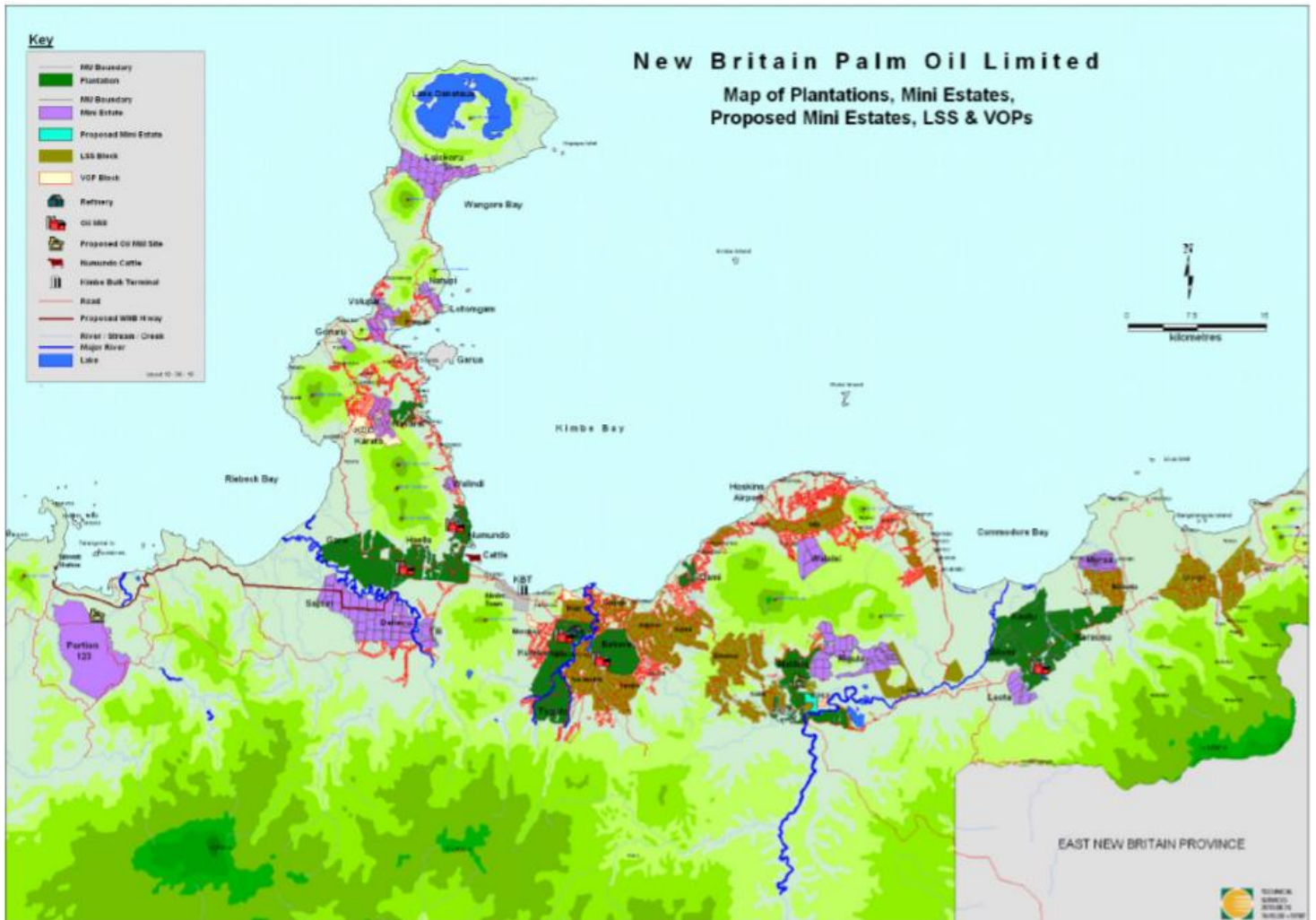
Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	0.00

\*This mill has no kernel crusher operation.

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

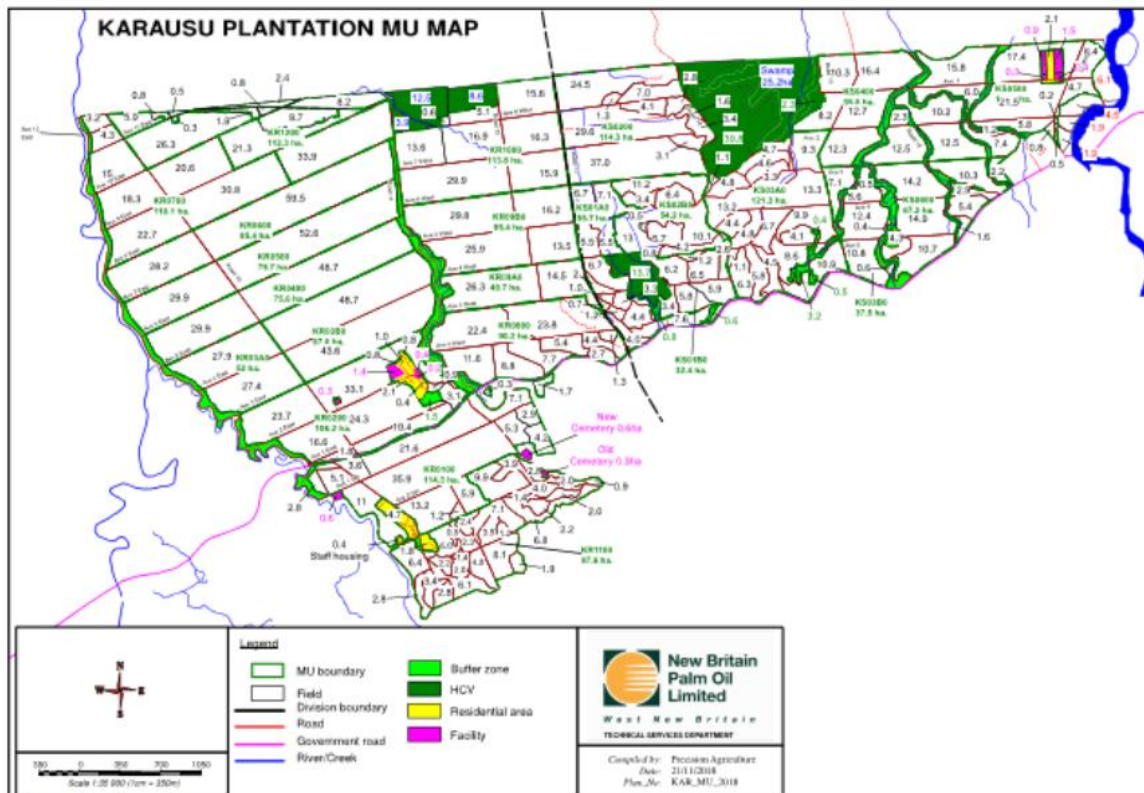
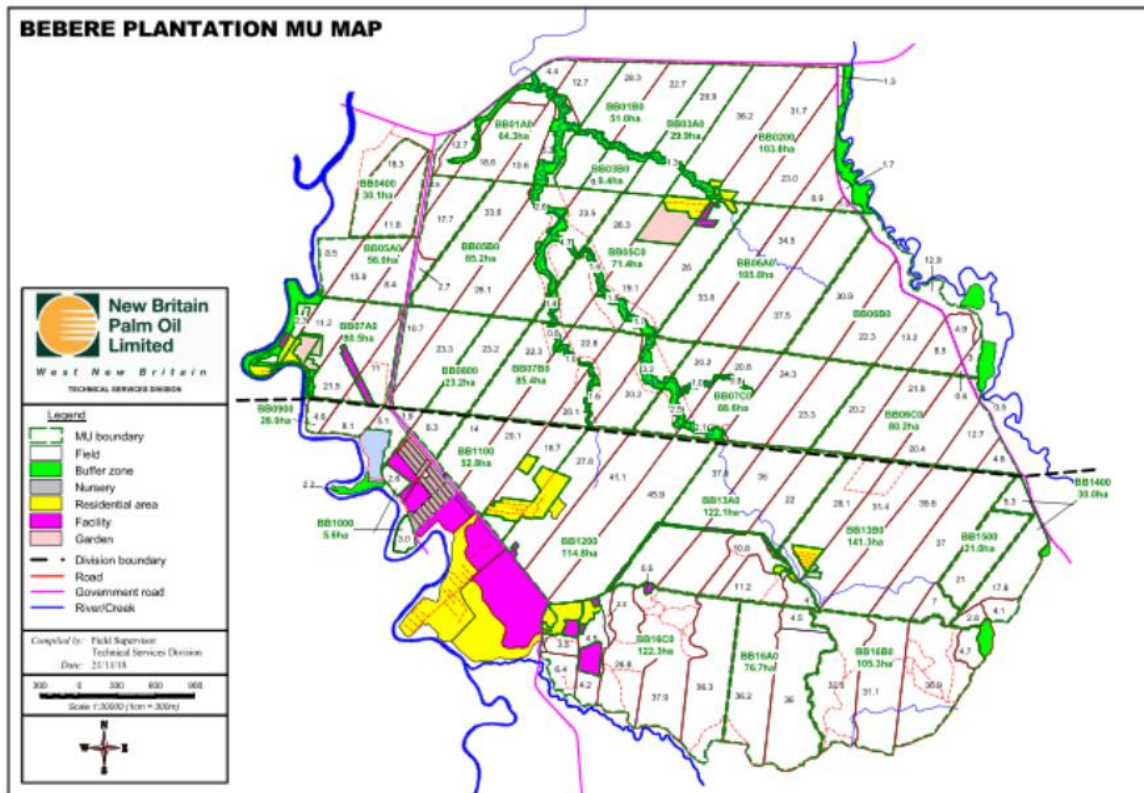
<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

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

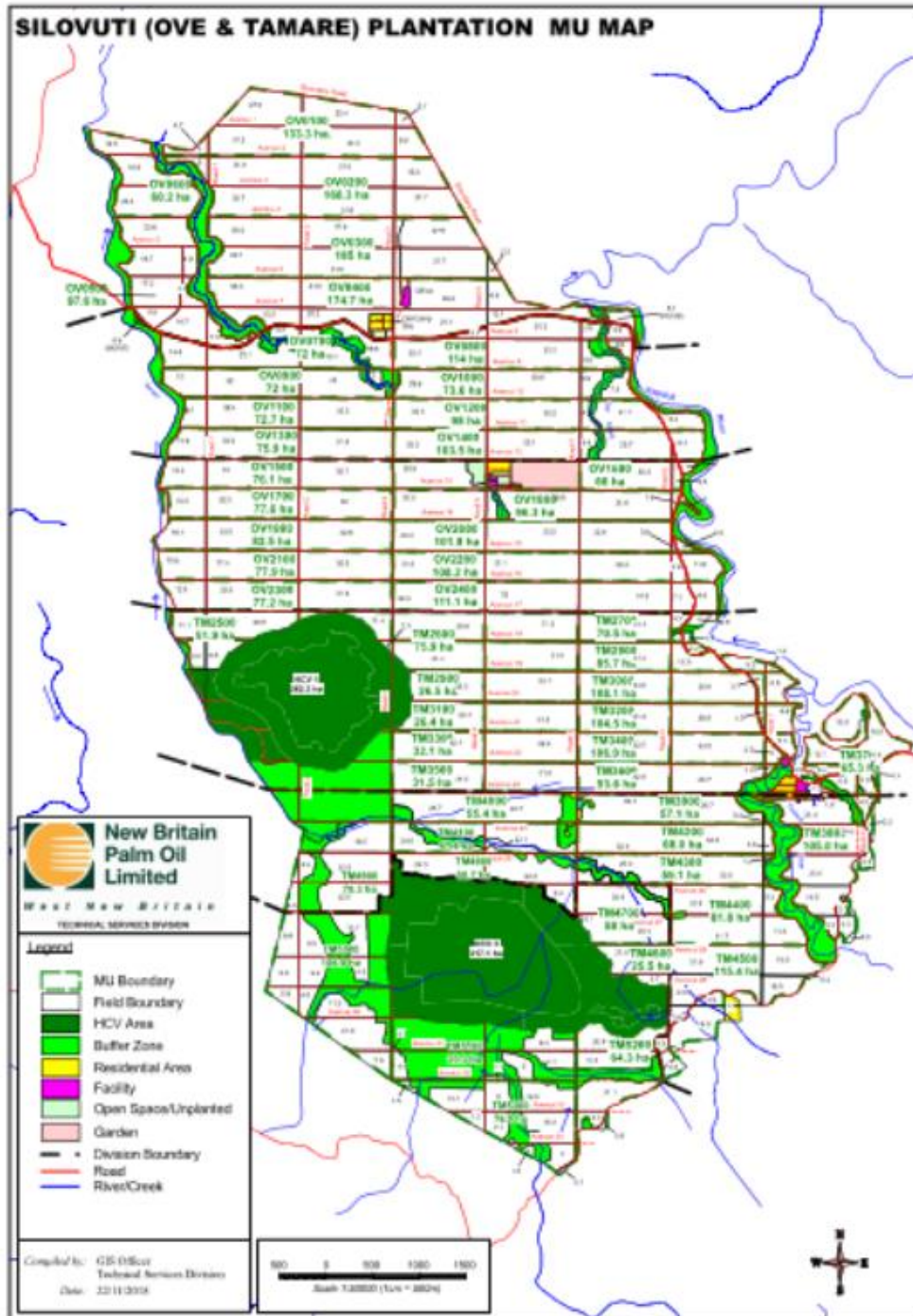


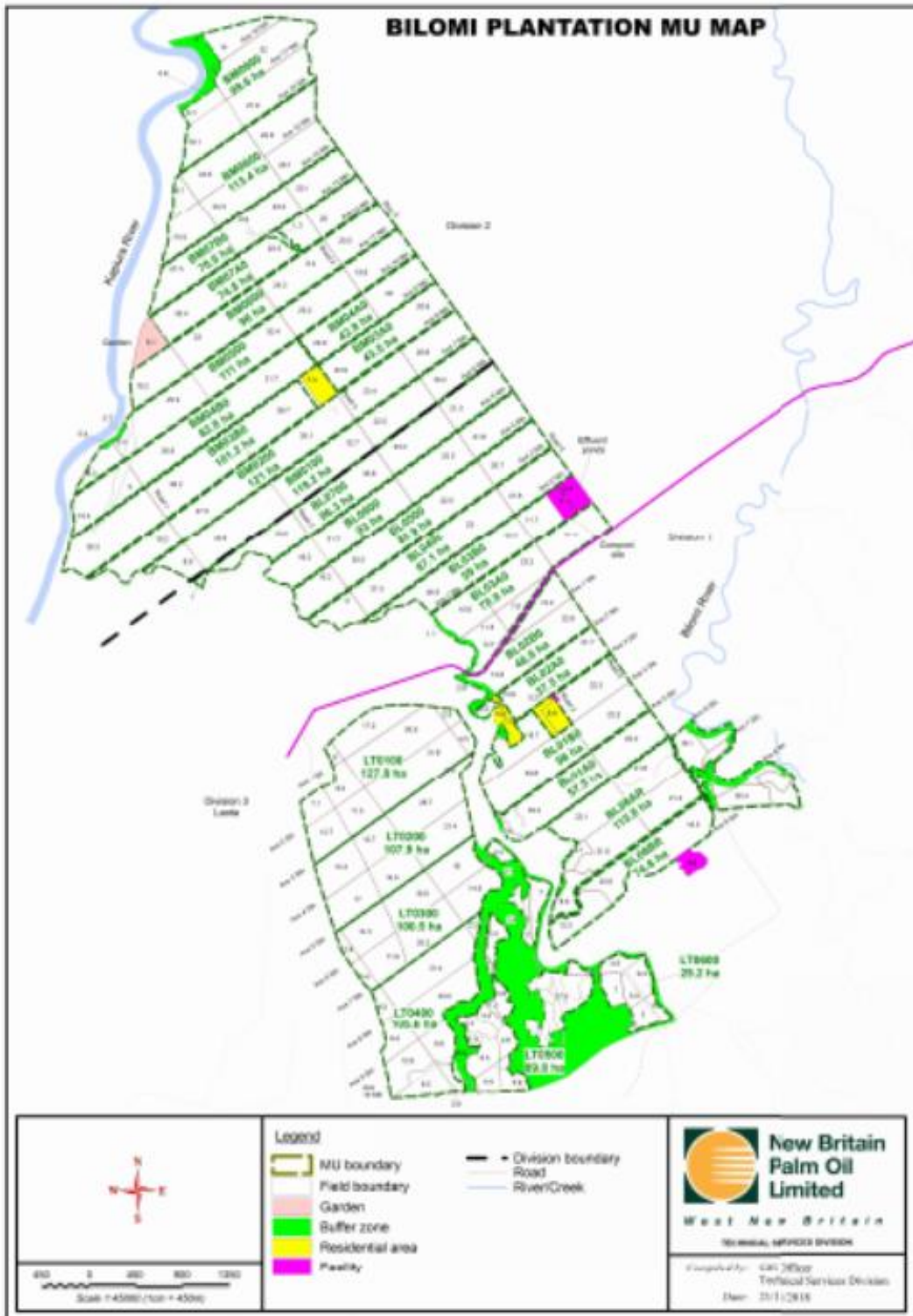
**Appendix D: Estate Field Map**

Due to audit site is relatively large, maps within this report are estates that are sampled during this audit.

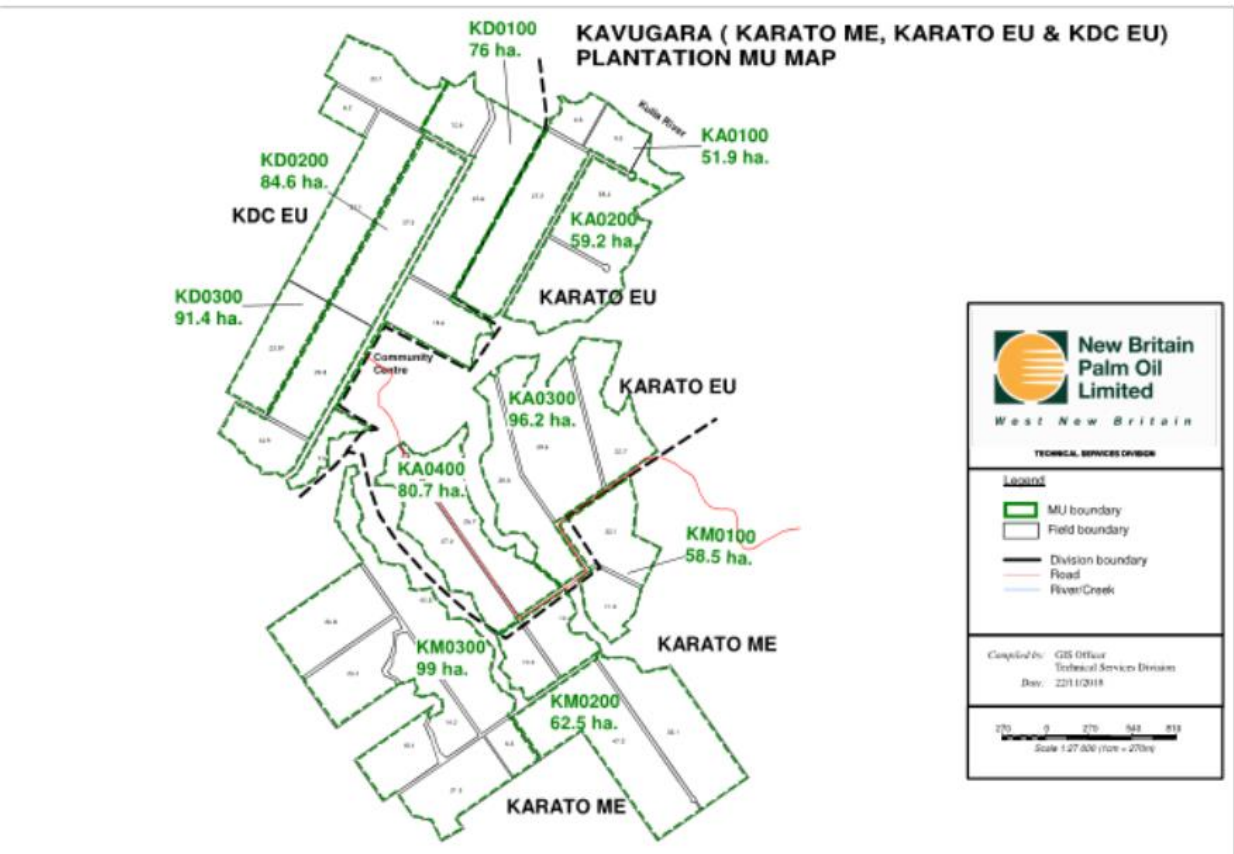
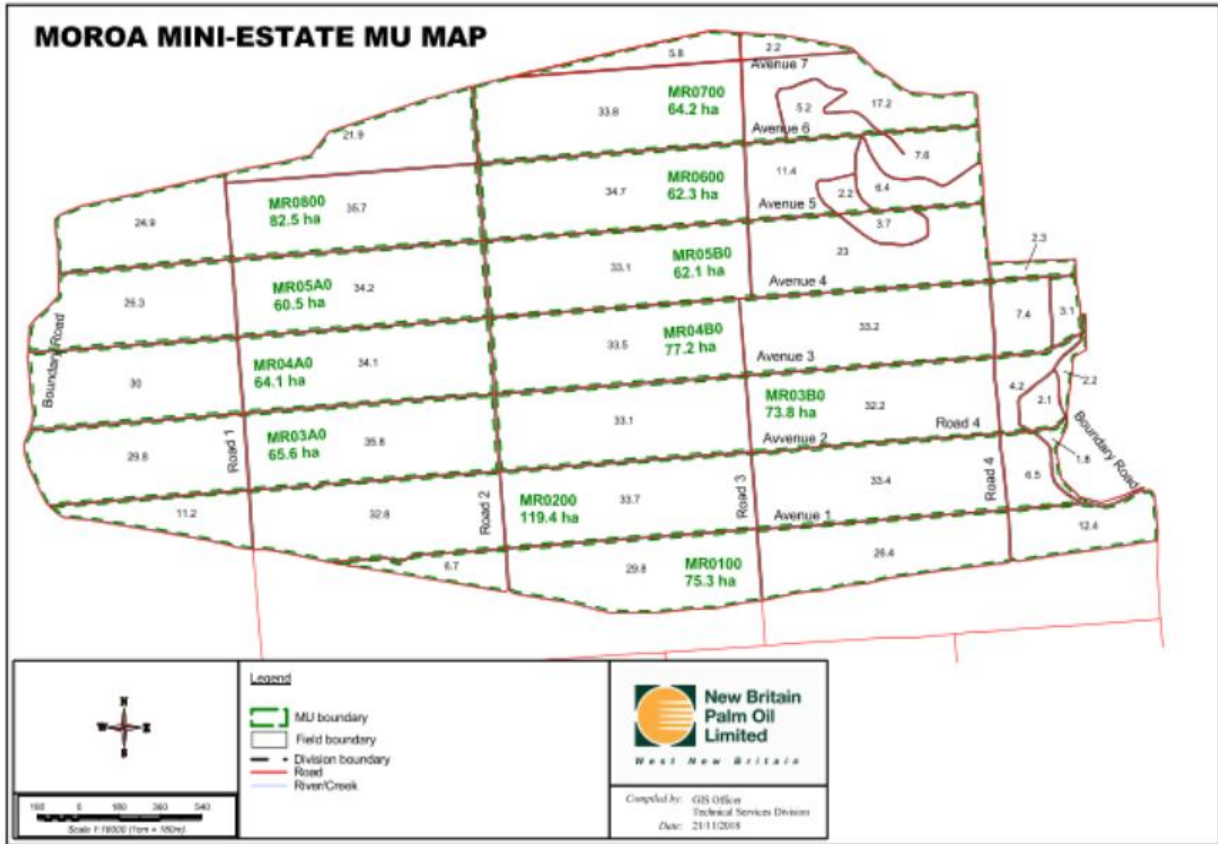


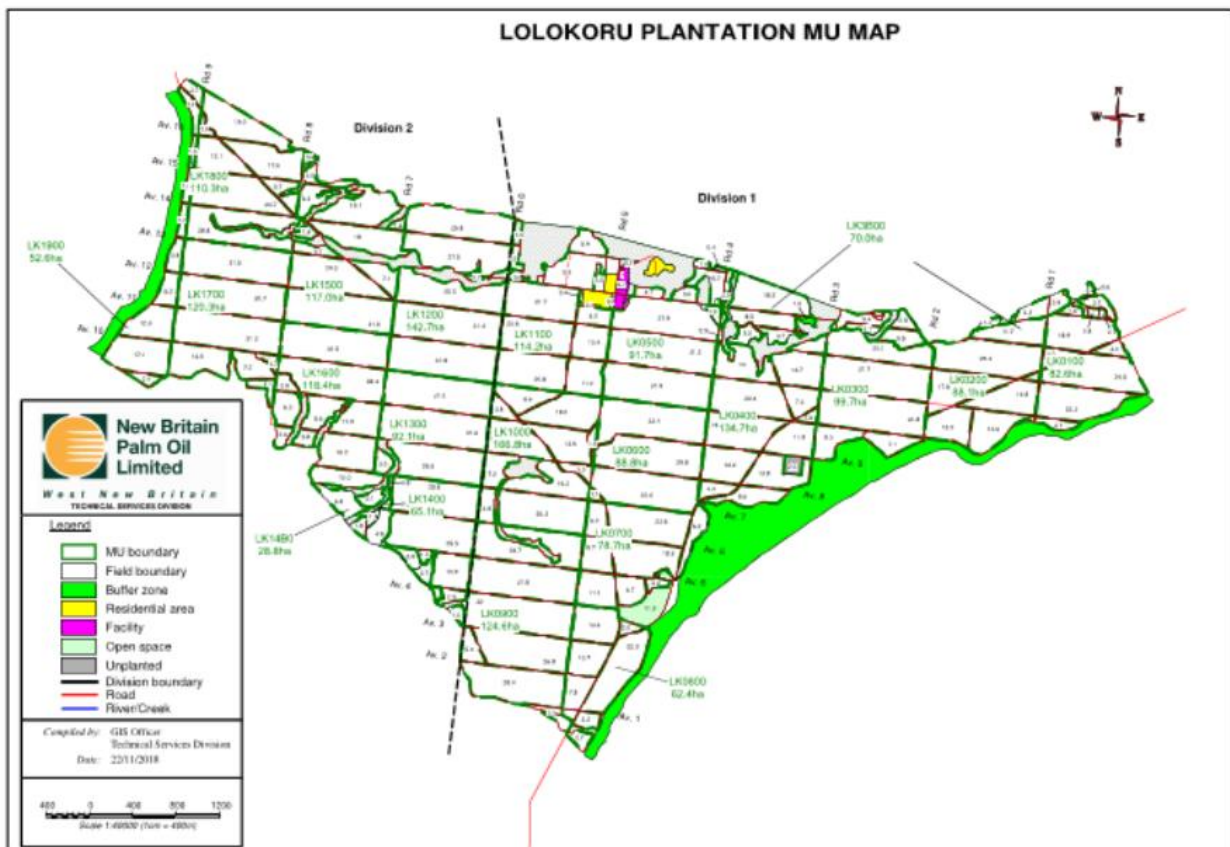
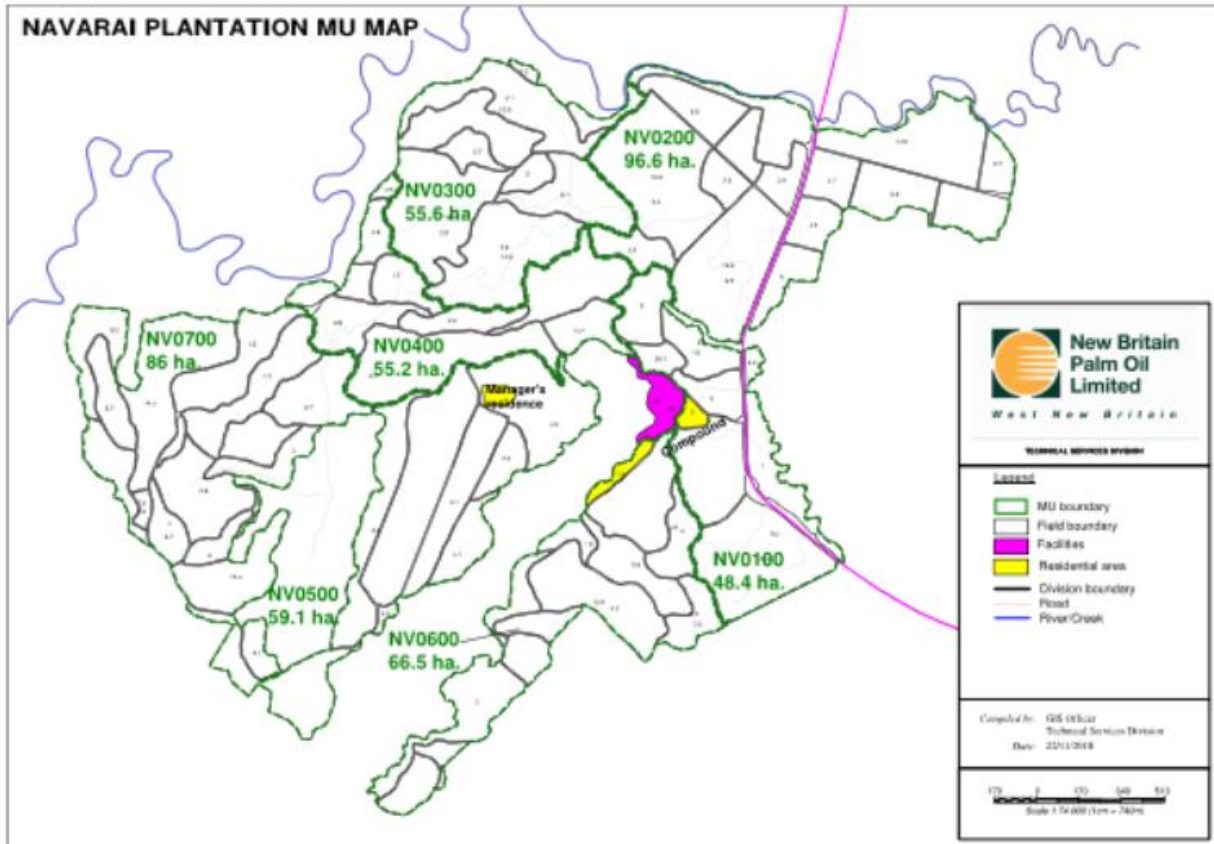


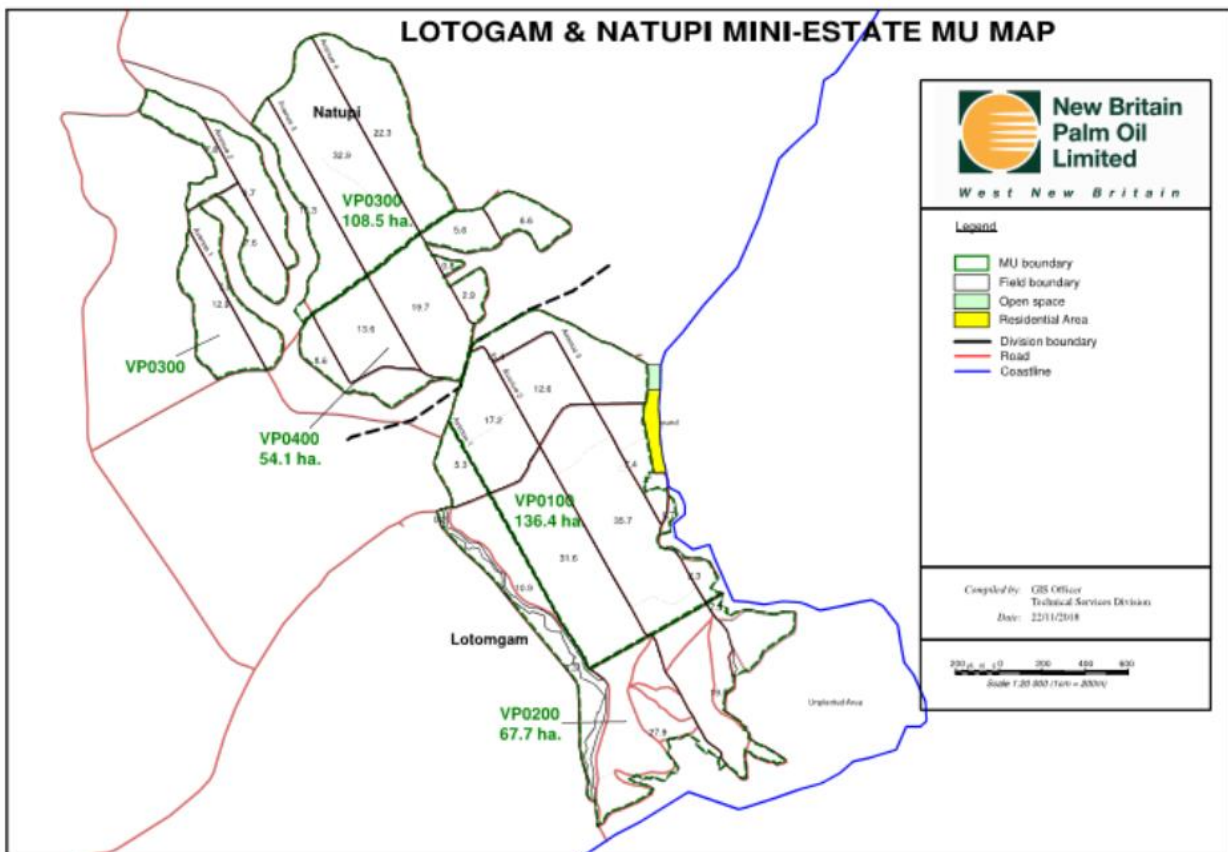
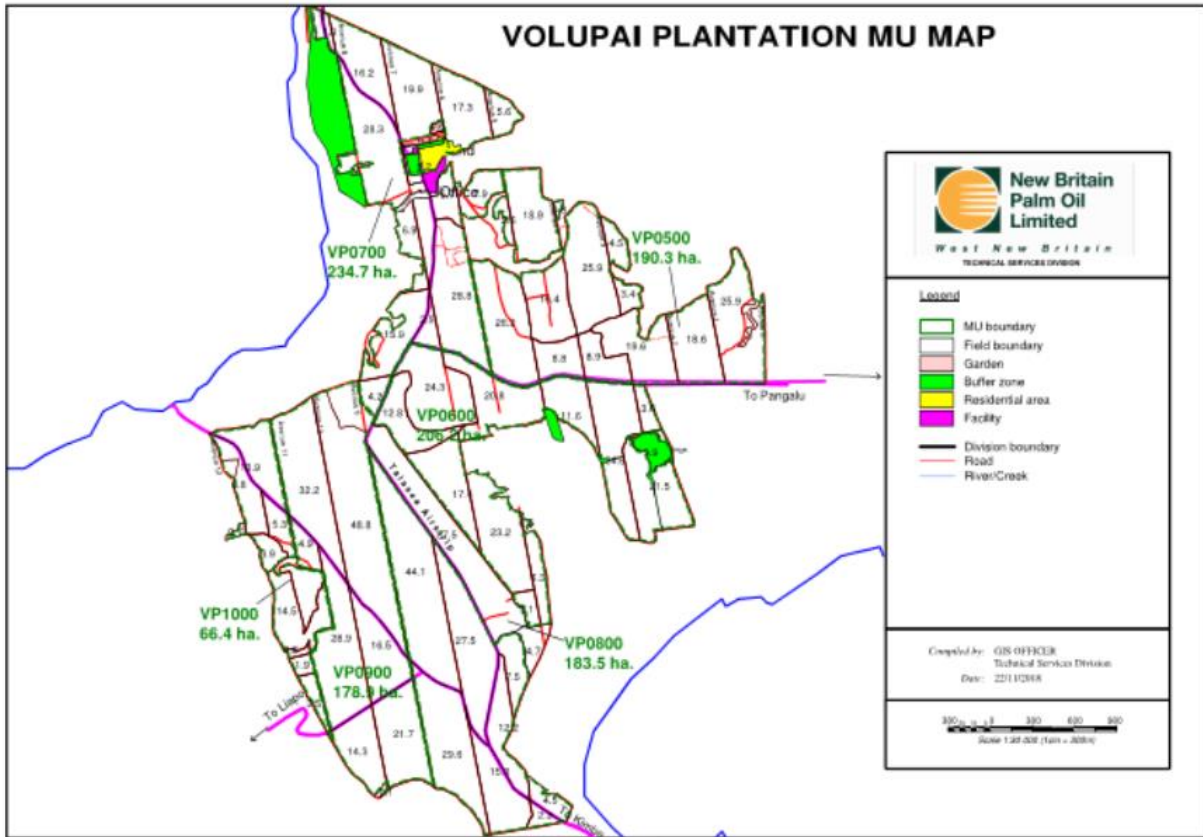












### Appendix E: List of Smallholder Registered

As this assessment is not independent smallholder audit, the list below is only to provide the sampled smallholders during this audit.

Grower Type	Block Number	Name	Total Hectares	Location
LSS	1.0371	Lui. A. Masti	5.66	Kapore
LSS	1.0353	Abunam Iebenidi	5.78	Kapore
LSS	1.0282	Narako Maigi	5.98	Kapore
LSS	1.0345	J.T.Tokakau	5.80	Kapore
LSS	1.0258	Peter Simogun	7.03	Kapore
LSS	1.0286	Anton Tabunu	5.91	Kapore
LSS	1.0360	James Nicholas	4.09	Kapore
LSS	1.0379	Essiko Potoi	4.25	Kapore
LSS	3.0973	Mutiz Kanok	5.76	Sarakolok
LSS	3.0857	Joseph Wenem	5.87	Sarakolok
LSS	3.0970	Gesring Gabing	5.91	Sarakolok
LSS	3.0838	Tomaia Mutasuwas	5.70	Sarakolok
LSS	3.0822	David Luan	5.77	Sarakolok
LSS	3.0879	Thomas Wagana	5.20	Sarakolok
LSS	3.0797	Yanga Milingi	5.72	Sarakolok
LSS	3.0814	Michael Bainigil	5.97	Sarakolok
LSS	3.0874	Vincent Manifo	6.00	Sarakolok
LSS	3.0909	John Toninit	5.67	Sarakolok
LSS	3.0853	Philip Bun	6.00	Sarakolok
LSS	3.0908	Sebastian Tarai	7.28	Sarakolok
LSS	3.0905	Francis Wolio	5.63	Sarakolok
LSS	242-0472	Kokora Siu	5	Silanga
LSS	242-0314	Dominic Lova	6	Silanga
LSS	242-0527	Edmun Luvi	2	Silanga
LSS	242-0350	Ome Inobubu	4	Silanga
LSS	242-0537	Kennedy Vaisau	2	Silanga
LSS	242-0521	Bonney Kasate	4	Silanga
LSS	242-0582	Ben Inobubu	2	Silanga
LSS	242-0408	P.Kapatarusa	3	Silanga
LSS	242-0457	Edward Moatewa	2	Silanga
LSS	242-0427	W. Katui	5	Silanga
LSS	242-0458	Lutesa Kowalalana	5	Silanga

LSS	242-0452	Michael Bosi	3	Silanga
LSS	242-0596	Peter Kapele	2	Silanga
LSS	242-0283	John Koros	4	Silanga
LSS	242-0393	P. Goru	4	Silanga
LSS	242-0415	W. Lusango	2	Silanga
LSS	242-0326	Joackim Saroa	2	Silanga
LSS	242-0803	Judith Maneke	2	Silanga
LSS	242-0329	Kereesay Goilo	2	Silanga
LSS	005-1623	Demanu Suanis	7	Galai
LSS	005-2129	Thomas Warku	4	Galai
LSS	005-0074	Paul Obien	7	Galai
LSS	005-1511	T. Kabia	6	Galai
LSS	005-1536	Veronica Riet, Peter, Patrick & Clement Kanau	5	Galai
LSS	005-0024	W. Tabinauylim	6	Galai
LSS	005-2102	Manjeri Kili	7	Galai
LSS	005-1590	Steven Wakis	8	Galai
LSS	005-0015	Jeneth Ananias	8	Galai
LSS	005-1614	Hillary Sirinjui	6	Galai
LSS	005-2019	Peter Takura	10	Galai
LSS	005-1489	Vincent Yawi	6	Galai
LSS	005-1498	M. Yambasa	8	Galai
LSS	005-1593	Vitus Noah	6	Galai
LSS	005-1573	Didi Loniga	10	Galai
LSS	005-1523	J. Alipet	4	Galai
VOP	14.0101	John Mabubu	0.72	Mai
VOP	14.0163	Stanis Batson	3.37	Mai
VOP	14.0038	Bio To	1.96	Mai
VOP	49.0037	Geraldin Baeba	1.83	Dilima
VOP	49.0035	Pori Kautu	2.34	Dilima
VOP	49.0043	Sophia Bola	1.98	Dilima
VOP	49.0009	Michael Hate	2.06	Dilima
VOP	49.0040	Robert Varivo	1.83	Dilima
VOP	49.0001	Robert Matige	2.63	Dilima
VOP	49.0038	Hate Kaumu	2.08	Dilima
VOP	49.0024	Thomana Buna	1.63	Dilima



VOP	49.0025	Veloa Veregi	2.09	Dilima
VOP	49.0066	Ben Buku	0.69	Dilima
VOP	16.0159	Kevin Vitolo	1.94	Morokea
VOP	16.0352	Ben Kolamanu	2.00	Morokea
VOP	16.0206	Keso Suma	1.98	Morokea
VOP	16.0092	Paulina Mai	3.71	Morokea
VOP	16.0061	Vincent Piangin	4.76	Morokea
VOP	16.0373	Wapi Leslie	2.04	Morokea
VOP	16.0264	Puruki Apu	1.99	Morokea
VOP	42.0076	Steven Bai	1.58	Gavaiva
VOP	42.0010	Darius Vatoa	1.87	Gavaiva
VOP	42.0007	Paul Tiaen	1.83	Gavaiva
VOP	42.0040	Willy Labu	1.44	Gavaiva
VOP	42.0077	Robert Sira	1.50	Gavaiva
VOP	42.0013	Joe Raralo	1.94	Gavaiva
VOP	42.0095	Able Vololua	1.93	Gavaiva
VOP	42.0044	Max Kaipu	1.75	Gavaiva
VOP	42.0059	Lawrence Luba	1.56	Gavaiva
VOP	42.0015	Martin Peau	1.97	Gavaiva
VOP	42.0037	Alphones Golu	1.91	Gavaiva
VOP	32.0080	Roland Ragi	1.70	Valoko
VOP	32.0076	Willaim Ossie	1.96	Valoko
VOP	32.0077	Anna Kadoka	1.76	Valoko
VOP	32.0078	Mark Tule	1.89	Valoko
VOP	32.0074	Peter Kaibo	1.92	Valoko
VOP	32.0075	Michael Samo	1.16	Valoko
VOP	32.0076	Patrick Mota	2.03	Valoko
VOP	32.0077	Francis Gavuri	1.58	Valoko
VOP	29.0078	Gabby Kose	1.93	Galewale
VOP	29.0126	Alois Rova	2.00	Galewale
VOP	29.0131	Justin Bai	1.67	Galewale
VOP	29.0094	Alvin Isu	1.87	Galewale
VOP	29.0139	Felix Mou	1.28	Galewale
VOP	29.0140	Carlistius Mari	2.72	Galewale
VOP	29.0045	Damien Gelu	1.89	Galewale
VOP	29.0030	Watson Kaipu	2.15	Galewale

VOP	250-0064	Peter Kalake	2.96	Ubai
VOP	250-0142	Daniel Yawi	1.98	Ubai
VOP	250-0019	Leo Vuvou	6.32	Ubai
VOP	250-0145	John Kaole	1.98	Ubai
VOP	250-0025	Paul Kaliki	3.96	Ubai
VOP	250-0143	Peter Lusi	3.01	Ubai
VOP	250-0007	Paul Mape	4.64	Ubai
VOP	250-0172	Alois Kabara	2.02	Ubai
VOP	250-0192	Vincent Abia	1.98	Ubai
VOP	250-0157	Mathew Komeme	2.09	Ubai
VOP	250-0132	Junior Pius	1.95	Ubai
VOP / Community Planting	020-0235	Nick Penias	2.00	Polopola Gama
	020-0234	Diana Thompson	2.00	Polopola Gama
	020-0236	Judah Rakulo	4.00	Polopola Gama

## Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
CLUA	Customary Land Use Agreement / Clan Land Use Agreement
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
GIS	Geographic Information System
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
ILG	Incorporated Land Group
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
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
LSS	Land Settlement Scheme
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
NBPOL	New Britain Palm Oil Limited
OER	Oil Extraction Rate
OPIC	Oil Palm Industry Corporation
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
QIP	Quarterly Internal Process
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SDP	Sime Darby Plantation
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
VOP	Village Oil Palm
WNB	West New Britain