

**RSPO PRINCIPLE AND CRITERIA –  
3<sup>rd</sup> ANNUAL SURVEILLANCE ASSESSMENT (ASA1\_3)  
Public Summary Report**

<b>Keresia Plantations Sdn Bhd</b>
Head Office: Level 6, Tun Jugah Tower 18, Jalan Tunku Abdul Rahman 93100 Kuching Sarawak, Malaysia
Certification Unit: <b>Keresia Palm Oil Mill and supply base</b> Lot 1, Block 17, Lavang Land District 97000 Bintulu Sarawak, Malaysia

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0077-09-000-00	<b>Membership Approval Date</b>	02/06/2009
<b>Parent Company Name</b>	Keresia Plantations Sdn Bhd. / Keresia Mill Sdn Bhd.		
<b>Address</b>	Head office : Level 6, Tun Jugah tower, 18, Jalan Tunku Abdul Rahman 93100 Kuching, Sarawak, Malaysia Certification Unit : Postal address : PO Box 2607 97008 Bintulu, Sarawak, Malaysia Location address : Lot 1, Block 17, Lavang Land District 97000 Bintulu, Sarawak, Malaysia		
<b>Subsidiary</b>	Not applicable		
<b>Address</b>	Not applicable		
<b>Contact Name</b>	Mr Abdul Aziz Bin Zainal Abidin (Deputy General Manager)		
<b>Website</b>	<a href="http://www.keresia.com.my">www.keresia.com.my</a>	<b>E-mail</b>	aziz@keresia.com.my
<b>Telephone</b>	012-8855870	<b>Facsimile</b>	-

2. Certification Information			
<b>Certificate Number</b>	RSPO 559278	<b>Date of First Certification</b>	21/10/2010
		<b>Certificate Start Date</b>	20/10/2015
		<b>Certificate Expiry Date</b>	20/10/2020
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production from Keresia Palm Oil Mill and Supply Base (Jiba Estate, Sujan Estate)		
<b>Applicable Standards</b>	RSPO P&C MYNI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert- DE104-11421401	ISCC	ISCC Gut Cert	03/12/2018
MSPO 644920 (Keresia Palm Oil Mill)	MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	10/11/2020
MSPO 644923 (Sujan Estate)	MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Palm Oil		10/11/2020

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	Plantations and Organized Smallholders		
MSPO 644925 (Jiba Estate)	MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Palm Oil Plantations and Organized Smallholders		10/11/2020

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Keresa Palm Oil Mill	Lot 1, Block 17, Lavang Land District 97000 Bintulu, Sarawak, Malaysia	03° 09' 49.6" N	113° 35' 59.1" E
Sujan Estate	Lot 1, Block 17, Lavang Land District 97000 Bintulu, Sarawak, Malaysia	03° 10' 34.3" N	113° 36' 09.0" E
Jiba Estate	Lot 1, Block 17, Lavang Land District 97000 Bintulu, Sarawak, Malaysia	03° 09' 18.0" N	113° 33' 46.0" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sujan Estate	3,078.08	0	464.62	3,542.70	86.89
Jiba Estate	2,268.82	0	211.48	2,480.30	91.47
KSGS*	-	-	-	-	-
Total (ha)	5,346.90	0	676.10	6,023.00	88.77

\* KSGS has no longer registered any certified area and FFB volume effective from 1/11/2017. Hence total certified area has been reduced.

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Sujan Estate	0	0	3,078.08	0	0	3,078.08	-
Jiba Estate	0	0	2,268.82	0	0	2,268.82	-
Total (ha)	0	0	5,346.90	0	0	5,346.90	-

\* KSGS has no longer registered any certified area and FFB volume effective from 1/11/2017. Hence total certified area has been reduced.

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<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated (Oct 17 – Sep 18)</b>	<b>Actual (Oct 17 – Jul 18)</b>	<b>Forecast (Oct 18 – Sep 19)</b>
Sujan Estate	75,600.00 mt	55,614.15 mt	68,000.00 mt
Jiba Estate	48,000.00 mt	37,223.08 mt	49,000.00 mt
KSGS*	1,800.00 mt	0.00 mt	0.00 mt
<b>Total</b>	<b>125,400.00 mt</b>	<b>92,837.23 mt</b>	<b>117,000.00 mt</b>

\* KSGS has no longer registered any certified area and FFB volume effective from 1/11/2017. Hence total certified volume has been reduced.

<b>8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated (Oct 17 - Sep 18)</b>	<b>Actual (Oct 17 - July 18)</b>	<b>Forecast (Oct 18 – Sep 19)</b>
<b>N/A</b>	<b>N/A</b>	N/A	<b>N/A</b>
<b>Total</b>	<b>N/A</b>	N/A	<b>N/A</b>

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>			
<b>Independent FFB Supplier</b>	<b>Tonnage / year</b>		
	<b>Estimated (Oct 17 - Sep 18)</b>	<b>Actual (Oct 17 - Jul 18)</b>	<b>Forecast (Oct 18 – Sep 19)</b>
<b>Smallholders &amp; Outgrowers</b>	124,400.00 mt	106,047.26 mt	135,000.00 mt
<b>Total</b>	<b>124,400.00 mt</b>	<b>106,047.26 mt</b>	<b>135,000.00 mt</b>

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10. Certified Tonnage			
Mill Capacity: 45 MT/hr	Estimated* (Oct 18 – Sep 18)	Actual (Oct 17 - Jul 18)	Forecast (Oct 18 – Sep 19)
	FFB	FFB	FFB
	125,400.00 mt	92,837.23 mt	117,000.00 mt
SCC Model: MB	CPO (OER: 19.00 %)	CPO (OER: 20.13 %)	CPO (OER: 21.00 %)
	23,826.00 mt	18,688.13 mt	24,570.00 mt
	PK (KER: 4.00 %)	PK (KER:4.36 %)	PK (KER: 5.50%)
	5,016.00 mt	4,047.70 mt	6,435.00 mt

\* Extension volume: FFB = 1,254.00 mt; CPO= 238.26 mt; PK = 50.16 mt

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	17,370.26	-	-	0	17,370.26

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	3,642.37	-	-	0	3,642.37

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSP0	n/a	-
IS-CSPKO	n/a	-
IS-CSPKE	n/a	-

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
 (ASI Accreditation Number: RSPO-ACC-067)  
 Unit 3, Level 10, Tower A  
 The Vertical Business Suites, Bangsar South  
 No. 8, Jalan Kerinchi  
 59200 Kuala Lumpur  
 Tel +603 2242 4211 Fax +603 2242 4218  
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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (RSPO-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Singapore, Jakarta, Bangkok and Australia which involve in RSPO Certification Program.

## 2.1 Assessment Methodology, Programme, Site Visits

The on-site surveillance assessment was conducted from 7-10/08/2018. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates (Sujan Estate & Jiba Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

- The estates sample were determined based on formula  $N = 0.8\sqrt{y}$  where  $y$  is the number of estates (*Note: This is applicable until 30<sup>th</sup> June 2018*).
- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (0.8\sqrt{y}) \times (z)$  where  $y$  is the number of estates and where  $z$  is the multiplier defined by risk assessment (*Note: This is applicable starting from 1<sup>st</sup> July 2018*).
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where  $y$  is total number of independent group member and where  $z$  is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix H.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.



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

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Keresa Palm Oil Mill	√	√	√	√	√
Sujan Estate	√	√	√	√	√
Jiba Estate	√	√	√	√	√

**Tentative Date of Next Visit:** August 6, 2019 – August 8, 2019

**Total No. of Mandays:** 10 mandays

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b>	<b>Qualification</b>
Hafriazhar Mohd Mokhtar	Lead auditor	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO

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		P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.
Valence Shem (VS)	Team member	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and 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&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English.
Mahzan Munap (MM)	Team member	He holds a MBA from Ohio University and B Sc. in Petroleum Engineering from University of Missouri, USA. Collected over 370 days of auditing experience in OHSAS 18001 and MS 1722 OHSMS (72 days for palm oil milling and 8 days for oil palm plantation). CIMAH competent person with Malaysia Department of Occupational Safety and Health (DOSH) since 1997. An Occupational Safety and Health Trainer at INSTEP PETRONAS. Successfully completed RSPO Lead Assessor Course in 2008 and IRCA accredited Lead Assessor training for ISO 9001 and RABQSA/IRCA EMS Lead Assessor Course for ISO 14001 in 2008. During this assessment, he covered Mill & Estate Best Practices, Legal, OSH, Workers Consultation & etc.

**Accompanying Persons:**

No.	Name	Role
	N/A	

**2.3 Assessment Plan**

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

PRELIMINARY AGENDA					
Date	Time	Subjects	Hafri	Valence	Mahzan
Monday 6/8/2018	1730 - 1935	Audit team travel to Bintulu via MH 2746 Check in hotel at Bintulu	√	√	√
Tuesday 7/8/2018  <b>Keresia Palm Oil Mill</b>	0630	Audit team travel to Keresia Plantation from Bintulu	√	√	√
	0830 - 0900	Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).</li> <li>Verification on previous audit findings</li> </ul>	√	√	√
	0900 - 1200	<b>Keresia Palm Oil Mill</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	√
	1200 – 1300	Lunch	√	√	√
	1300 - 1600	<b>Keresia Palm Oil Mill</b> Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	1600 - 1630	Interim Closing briefing.	√	√	√
	Wednesday 8/8/2018  <b>Jiba Estate</b>	0830 - 1200	<b>Jiba Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√
0900 - 1200		<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
1200 - 1300		Lunch	√	√	√
1300 – 1600		<b>Jiba Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
1600 - 1630		Interim Closing Briefing	√	√	√
Thursday 9/8/2018  <b>Sujan Estate</b>	0830 - 1200	<b>Sujan Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√

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PRELIMINARY AGENDA					
Date	Time	Subjects	Hafri	Valence	Mahzan
	1200 - 1300	Lunch	√	√	√
	1300 - 1600	<b>Sujan Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). Verify previous nonconformities.	√	√	√
	1600 - 1630	Interim closing briefing	√	√	√
Friday 10/8/2018	0830 - 1200	RSPO Supply Chain for mill, weighbridge and storage area	√	√	-
	1200 - 1400	Lunch & Friday Prayer	√	√	√
	1400 - 1430	Closing meeting	√	√	√
	1430	Audit team travel back to Bintulu	√	√	√
	2010 - 2215	Audit team travel back to KL via MH 2747 flight	√	√	√

### Section 3: Assessment Findings

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

- Keresa Plantation Sdn Bhd Time Bound Plan
- RSPO Supply Chain Certification Checklist June 2017
- RSPO P&C MY-NIWG 2014 Checklist

#### 3.2 Progress against Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
<b>Summary of the Time Bound Plan</b>		
Does the plan include all subsidiaries, estates and mills?	Yes	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	No	No
Is the time bound plan challenging? <ul style="list-style-type: none"> <li>• Age of plantations.</li> <li>• Location.</li> <li>• POM development</li> <li>• Infrastructure.</li> <li>• Compliance with applicable law.</li> </ul>	The time bound plan is challenging enough.	Yes
Have there been any changes since the last audit? Are they justified?	As of this year, no changes as per submitted to ACOP, wrong figure submitted was corrected. For 2018 onwards, no more KSGS in their RSPO audit site	Yes
If there have been changes, what circumstances have occurred?	Not applicable	Not applicable
Have there been any stakeholder comments?	No	No
Have there been any newly acquired subsidiaries?	No	No
If yes, have the newly acquisitions certified within a three-year timeframe?	Not applicable	Not applicable
Have there been any isolated lapses in implementation of the plan?	Not applicable	Not applicable
<b>Un-Certified Units or Holdings</b>		

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Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes. Internal audits are done by Group's internal audit team @ Total Quality Management (TQM) team.	Yes
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> <li>Primary forest.</li> <li>Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	Sg Kubud Estate – leased land belongs to community. As per HCV assessment report, HCV cleared. Liability issue has been passed by RSPO.	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	New plantings at Sg Kubud Estate completed NPP.	Yes
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.	No land conflicts for Keresa Plantations	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No land conflicts for Keresa Plantation	Yes
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No non-compliances as of today for for Keresa Plantation	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes. Internal audits are done by Group's internal audit team @ TQM.	Yes

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

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	Not applicable	Not applicable

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**3.4 Details of findings**

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

During the Certification Assessment there were five (5) Major and three (3) Minor nonconformities raised. The Keresa Palm Oil Mill Certification Unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1668121-201808-M1	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 6.5.3 Major
<b>Date Issued</b>	10/08/2018	<b>Due Date</b>	7/11/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	7/11/2018
<b>Statement of Nonconformity</b>	CAP for the closure of previous Minor NC was insufficient where the quarterly monitoring of drinking water by estate & mill does not include the problematic parameter (Total Coliform) and annual inspection by Pegawai Kesihatan Bahagian Bintulu has yet to be conducted. (Minor escalated to Major)		
<b>Requirement Reference</b>	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.		
<b>Objective Evidence</b>	<ul style="list-style-type: none"> <li>Sighted the letter by Pejabat Kesihatan Bahagian Bintulu; Ref. # PKBB/KMAM/600-2(166); Dated 30/8/2017 on the requirement of correct chlorine dosage for drinking water treatment process in the estate plant (Keperluan Dalam Pengedaran Klorin Dengan Kadar Yang Betul Bagi Proses Rawatan Air Minum Di Loji Ladang). The attached document of Borang Pengumpulan Data Analisis Group 1 (In Situ Test); dated 22/8/2017 and Lampiran 1 (Attachment 1) Borang S1B (Air Terawat) Jabatan Kimia Malaysia Permintaan Analisis Bakteria; Kod Balai KKS75 dated 23/8/2017 shown bacteria (Total Coliform) was detected in sample S02 (Treatment plant – treated) and S05 (Stesen 2 Kantin).</li> <li>Latest external analysis for the drinking water sample was done by ESI Laboratory Sdn. Bhd.; Certificate of Analysis # KPSB/12-10/017; Lab # ELS/KPSB/04/017/17; Date sample received: 12/10/2017; Date sample reported: 16/10/2017. Analysis of Total Coliform Count (TCC), MPN/100mL was done for sample marking as following:               <ul style="list-style-type: none"> <li>D1 (before water tap entering crèche water tank); TCC result: &lt;1 MPN/100mL</li> <li>D2 (after water tank entering Robert’s house); TCC result: &gt;2419 MPN/100mL</li> <li>D3 (after water pipe entering Augustus’s house water tank); TCC result: 160 MPN/100mL</li> </ul> </li> <li>Jiba Estate Water Monitoring Record – parameter monitored Turbidity, pH, TDS &amp; TSS (no Total Coliform Content)</li> </ul>		
<b>Corrections</b>	<ol style="list-style-type: none"> <li>Review of the existing monitoring system and to include 'Total Coliform' into monitoring parameters.</li> <li>Engagement of Health Officer to conduct inspection.</li> </ol>		

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<b>Root Cause Analysis</b>	Although instruction were given by management, there were some houses reconnecting their rain gutter to the treated water tank since no monitoring conducted. Pegawai Kesehatan Bintulu is yet to be engaged by the Management as of the time of audit.
<b>Corrective Action</b>	1. Conducting Quartely Monitoring by Estate/Mill. The parameters monitored including 'Total Coliform' by sending sample of water for analysis to the independent laboratory. 2. Diconnecting of the rain gutter for each house to avoid mixing with treated water. 3. Half yearly monitoring by Pegawai Kesehatan Bintulu.
<b>Assessment Conclusion</b>	Corrective action plan (CAP) accepted. Verification of CAP taken was done off-site due to availability of evidence that can be sufficiently submitted electronically via email as following: <ul style="list-style-type: none"> <li>- Pegawai Kesehatan Bintulu visit request records</li> <li>- Housing water supply monitoring records</li> <li>- Independent lab analysis records; Certificate of Analysis # KPSB/10-10/032; Date: 16/10/2018</li> </ul> Evidence verified confirmed the CAP effective to address the issue. Hence, Major Nonconformity closed on 7/11/2018.

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1668121-201808-M2	<b>Clause &amp; Category (Major/Minor)</b>	Indicator SCCS 5.3.1 Major
<b>Date Issued</b>	10/08/2018	<b>Due Date</b>	7/11/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	7/11/2018
<b>Statement of Nonconformity</b>	The elements in the latest RSPO SCCS, ver. 2017 has yet to be included in the current written procedures.		
<b>Requirement Reference</b>	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>		
<b>Objective Evidence</b>	The elements in the latest RSPO SCCS, ver. 2017 has yet to be included in the following documents: i) Supply Chain Procedures for FFB, CSPO & CSPK (MB), dated October 2017, first edition ii) Mass Balance (CPO), dated January 2017, first edition iii) Mass Balance (PK), dated January 2017, first edition iv) Internal Audit Procedure, dated July 2015, rev 1 (25/8/2017) v) Management Review Procedure, dated September 2015, version 1.0		
<b>Corrections</b>	To review and update the exisiting procedures.		
<b>Root Cause Analysis</b>	As this is new element in RSPO SCCS, the lack of knowledge on Management lead to not/updating the new elements into written procedures.		
<b>Corrective Action</b>	To review the procedures every 3 years or whenever new elements implemented by RSPO.		



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<b>Assessment Conclusion</b>	<p>Corrective action plan (CAP) accepted. Verification of CAP taken was done off-site due to availability of evidence that can be sufficiently submitted electronically via email as following:</p> <ul style="list-style-type: none"> <li>- Keresia POM Supply Chain Procedure; Dated August 2018</li> </ul> <p>Evidence verified confirmed the CAP effective to address the issue. Hence, Major Nonconformity closed on 7/11/2018.</p>
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Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1668121-201808-M3	<b>Clause &amp; Category (Major/Minor)</b>	Indicator SCCS 5.3.2 Major
<b>Date Issued</b>	10/08/2018	<b>Due Date</b>	7/11/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	7/11/2018
<b>Statement of Nonconformity</b>	The internal audit for RSPO supply chain has yet to be conducted.		
<b>Requirement Reference</b>	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <ul style="list-style-type: none"> <li>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>ii) effectively implements and maintains the standard requirements within its organization</li> </ul>		
<b>Objective Evidence</b>	There is no evidence that the internal audit for RSPO supply chain has been conducted.		
<b>Corrections</b>	To conduct audit based on RSPO supply chain.		
<b>Root Cause Analysis</b>	RSPO internal audit has been conducted but the new elements of RSPO Supply Chain were not included due to lack of knowledge and guidelines.		
<b>Corrective Action</b>	To prepare proper audit guidelines/checklist for RSPO SCCS.		
<b>Assessment Conclusion</b>	<p>Corrective action plan (CAP) accepted. Verification of CAP taken was done off-site due to availability of evidence that can be sufficiently submitted electronically via email as following:</p> <ul style="list-style-type: none"> <li>- Notice &amp; records of Keresia POM RSPO Supply Chain Internal Audit dated 4-7/9/2018</li> </ul> <p>Evidence verified confirmed the CAP effective to address the issue. Hence, Major Nonconformity closed on 7/11/2018.</p>		

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1668121-201808-M4	<b>Clause &amp; Category (Major/Minor)</b>	Indicator SCCS 5.8.1 Major
<b>Date Issued</b>	10/08/2018	<b>Due Date</b>	7/11/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	7/11/2018

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<b>Statement of Nonconformity</b>	Training plan on RSPO Supply Chain Standards has yet to be established.
<b>Requirement Reference</b>	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.
<b>Objective Evidence</b>	There is no evidence that the training plan on RSPO Supply Chain Standards has been established.
<b>Corrections</b>	To draft and establish RSPO Supply Chain Standard Training Plan
<b>Root Cause Analysis</b>	The RSPO training has been drawn earlier but failed to include the RSPO supply chain standard as it is new elements.
<b>Corrective Action</b>	To plan RSPO Supply Chain training on yearly basis.
<b>Assessment Conclusion</b>	Corrective action plan (CAP) accepted. Verification of CAP taken was done off-site due to availability of evidence that can be sufficiently submitted electronically via email as following: - Keresas POM annual training schedule 2018/2019 - Notice & records of RSPO Supply Chain (FFB, CPO & PK) Training dated 21/9/2018 Evidence verified confirmed the CAP effective to address the issue. Hence, Major Nonconformity closed on 7/11/2018.

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1668121-201808-M5	<b>Clause &amp; Category (Major/Minor)</b>	Indicator SCCS 5.13.1 Major
<b>Date Issued</b>	10/08/2018	<b>Due Date</b>	7/11/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	7/11/2018
<b>Statement of Nonconformity</b>	Management reviews has yet to be conducted.		
<b>Requirement Reference</b>	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.		
<b>Objective Evidence</b>	There is no evidence that the annual management reviews has been conducted.		
<b>Corrections</b>	To conduct Management Review.		
<b>Root Cause Analysis</b>	The management review is yet to be conducted and scheduled to be held in September together with MSPO internal Audit.		
<b>Corrective Action</b>	To conduct management review immediately after internal audit.		
<b>Assessment Conclusion</b>	Corrective action plan (CAP) accepted. Verification of CAP taken was done off-site due to availability of evidence that can be sufficiently submitted electronically via email as following: - Minutes of meeting: Keresas Mill Supply Chain Management Review Meeting; Date: 24/9/2018 Evidence verified confirmed the CAP effective to address the issue. Hence, Major Nonconformity closed on 7/11/2018.		

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Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1668121-201808-N1	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 5.1.2 Minor
<b>Date Issued</b>	10/08/2018	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes/No)</b>	No	<b>Date of nonconformity closure</b>	N/A
<b>Statement of Nonconformity</b>	The mitigation measures in accordance to the established procedure has yet to be developed.		
<b>Requirement Reference</b>	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.		
<b>Objective Evidence</b>	The significant aspects register and their mitigation measure in accordance to the Procedure Manual [ref. no.: KPSB 1/2012; Doc. No.: Aspect Impact 1/2012] Identification of Environmental Aspects and Evaluation of Environmental Impacts has yet to be established.		
<b>Corrections</b>	To review and conduct comprehensive mitigation measures on Enviromental Aspects and Impacts.		
<b>Root Cause Analysis</b>	The management is in progress identifying and establishing mitigation measures in accordance to procedure manual.		
<b>Corrective Action</b>	To review the mitigation measure if any changes in the operation.		
<b>Assessment Conclusion</b>	CAP accepted. Effectiveness to be verified in next audit.		

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1668121-201808-N2	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 6.1.5 Minor
<b>Date Issued</b>	10/08/2018	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes/No)</b>	No	<b>Date of nonconformity closure</b>	N/A
<b>Statement of Nonconformity</b>	Relevant social impact with regards to smallholders was lacking of particular attention.		
<b>Requirement Reference</b>	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme).		
<b>Objective Evidence</b>	The list of SIA tabulated in table of Social Aspect, Positive Impact, Promoting Measures, Negative Impact and Control Measures has been established has been established as Social Impact Assessment Keresa Plantations & Mill; Assess date: 19-20 July 2018; Next Assess: Year 2019; Date Report: 25/7/2018.		
<b>Corrections</b>	To review and list out the social impacts with regards to smallholders (include KSGS Smallholders).		
<b>Root Cause Analysis</b>	The exisiting social impacts is not adequate. Need to identify further especially on smallholders.		

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<b>Corrective Action</b>	To review if any changes in operation or surroundings by stakeholders.
<b>Assessment Conclusion</b>	CAP accepted. Effectiveness to be verified in next audit.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1668121-201808-N3	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 2.1.3 Minor
<b>Date Issued</b>	10/08/2018	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes/No)</b>	No	<b>Date of nonconformity closure</b>	N/A
<b>Statement of Nonconformity</b>	The clauses of the acts below were not adequately addressed.		
<b>Requirement Reference</b>	A mechanism for ensuring compliance shall be implemented.		
<b>Objective Evidence</b>	Lapses of the following Acts / Regulations / Rules were sighted in the legal register. 1) Electrical Ordinance Electricity Rules 1999 a) No Electrical Chargeman at the Mill b) Frequency of mill visit by Electrical Visiting Engineer was once every three months instead of monthly visit. 2) Act 139 Factories and Machinery (Person In Charge) Regulations 1970 a) No First Grade Engine Driver in charge of the boiler.		
<b>Corrections</b>	1) Proposed to sent Electrical Chargeman to schedule training. 2) To propose available Electrical Visiting Engineer to do monthly visit.		
<b>Root Cause Analysis</b>	The information of certain legal requirement were not properly disseminated.		
<b>Corrective Action</b>	Sustainability department to regulate proper info dissemination related to legal		
<b>Assessment Conclusion</b>	CAP accepted. Effectiveness to be verified in next audit.		

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	1668121-201808-I1 <b>Indicator 4.1.2</b> Details : Improvement needed for the implementation of the following: a) Three monthly Inspection of Workers' Housing was performed by Medical Assistant and Clinical Assistant instead of Weekly inspection b) No Visiting Medical Officer since December 2011

<b>Positive Findings</b>	
<b>PF #</b>	<b>Description</b>
<b>PF 1</b>	Good positive feedback received from internal and external stakeholders

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

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1534040-201709-M1	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 4.7.2 Major
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	06/10/2017
<b>Statement of Nonconformity</b>	HIRARC was not adequately identified on the new activity involved in the mill/estate.		
<b>Requirement Reference</b>	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers		
<b>Objective Evidence</b>	The activities at Keresa POM and Sujan/Jiba Estate were not adequately identified in HIRARC register: 1. Construction of new/modification of sterilizer 2. Gasifier plant 3. Quarry activity 4. Evacuation of FFB using buffaloes		
<b>Corrective Action</b>	<p>Root cause:            There are no consistently monitoring risk assessment of new activities at Keresa POM &amp; Sujan/Jiba Estate.</p> <p>Correction:            To conduct the HIRARC for activities below at Keresa POM and Sujan/Jiba Estate :            1. Construction of new/modification of sterilizer (POM)            2. Gasifier plant (POM)            3. Quarry activity (Sujan)            4. Evacuation of FFB using buffaloes (Jiba)</p> <p>Corrective Action:            Monitoring the new job/activities at the estate/mill and conduct the risk assessment for the activities.</p> <p>Verification during Major Close Out:            1. Construction of new/modification of sterilizer (POM) was reviewed on 19/10/2017            2. Gasifier plant (POM) was reviewed on 16/10/2017            3. Quarry activity (Sujan) was reviewed on 17/10/2017            4. Evacuation of FFB using buffaloes (Jiba) was reviewed on 17/10/2017</p>		
<b>Assessment Conclusion</b>	<p>The corrective action taken was verified effectively implemented with no recurrence of issues during the on-site assessment visit.</p> <p>Hence, the nonconformity remained closed.</p>		

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1534040-201709-M2	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 2.1.1 Major

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<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	06/10/2017
<b>Statement of Nonconformity</b>	It was found partially failure in compliance with Sarawak Labour Ordinance.		
<b>Requirement Reference</b>	Evidence of compliance with relevant legal requirements shall be available. Labour Ordinance (Sarawak CAP. 76		
<b>Objective Evidence</b>	<p>i) It was seen the employees ID: 11206 have not been paid with the overtime for working more than 8 hours per day. Based on the schedule of work on July &amp; August 2017.</p> <p>ii) It was seen the company have a deduction of equipment from the workers and additional working hour for shift work (security guard) but with no approval from Labour department.</p> <p>iii) It was seen the Harvester was not being paid of 2 times of normal piece rated when working on off day/ public holiday for Employee: ID 11270</p>		
<b>Corrective Action</b>	<p>Root cause:</p> <ol style="list-style-type: none"> <li>1. There are no consistently monitoring of workers pay and wages</li> <li>2. There are no approval of deduction equipment and additional hour for shift working for security guard</li> <li>3. There are no consistently monitoring of workers pay and wages</li> </ol> <p>Correction:</p> <ol style="list-style-type: none"> <li>1. To pay back the employee ID : 11206 - overtime for working more than 8 hours perday as on the schedule of work in July &amp; August 2017</li> <li>2. To get the approval from Labour department for deduction of equipment from the workers and additional working hour for shift work ( security guard)</li> <li>3. To pay back the employee ID : 11270 , harvester which that was not being paid of 2 times of normal piece-rated when working on off day/public holiday.</li> </ol> <p>Corrective Action:</p> <p>Appoint a person in-charge to monitor the pay &amp; wages of workers and do the monitoring job monthly to ensure the pay in accordingly with Labour Ordinance (Sarawak CAP, 76)</p>		
<b>Assessment Conclusion</b>	<p>The corrective action taken was verified effectively implemented with no recurrence of issues during the on-site assessment visit.</p> <p>Hence, the nonconformity remained closed.</p>		

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1534040-201709-M3	<b>Clause &amp; Category (Major/Minor)</b>	SCCS E3
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	06/10/2017
<b>Statement of Nonconformity</b>	Implementation of supply chain procedure requirements not fully ensured		
<b>Requirement Reference</b>	<p>E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ol style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</li> <li>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable</li> </ol>		

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	requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard
<b>Objective Evidence</b>	<p>i) Description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations) for CPO sales ticket no.: 004674 dated: 25/9/2017 was wrongly written as CPO PQ and not included in rubber stamp.</p> <p>ii) Supply chain certificate number for PK sales ticket no.: 004692 dated: 29/9/2017 was wrongly written as SPO 559278.</p>
<b>Corrective Action</b>	<p>Root cause: Lack of training of weighbridge operators regarding the ISCC/RSPO type of product between PK and CPO</p> <p>Correction: 1. Amended CPO and PK despatch weighbridge ticket for CPO-MB and PK-MB 2. Supply chain training to weighbridge staff</p> <p>Corrective Action: Give annually training to weighbridge operator or staff for Weighbridge ticket as per RSPO certification requirement</p>
<b>Assessment Conclusion</b>	<p>The corrective action taken was verified effectively implemented with no recurrence of issues during the on-site assessment visit.</p> <p>Hence, the nonconformity remained closed.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1534040-201709-M4	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 5.1.1 Major
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	06/10/2017
<b>Statement of Nonconformity</b>	Documented environmental impact assessment for the installation of Gasifier Plant and Quarry activity was not available		
<b>Requirement Reference</b>	An environmental impact assessment (EIA) shall be documented.		
<b>Objective Evidence</b>	Keresa Mill/Sujan Estate: Environmental Significant Aspect (E 4.3.3 .1 Env. Aspect Register V2; dated May 2010) – amended Sep 2011 – latest reviewed on Sep 2014		
<b>Corrective Action</b>	<p>Root cause: There are no competent person to do the EAI assessment</p> <p>Correction: To do the assessment for the installation of gasifier Plant and Quarry activity.</p> <p>Corrective Action: To send a person for EAI training in future and to do the assessment for all activities at the worksite</p>		
<b>Assessment Conclusion</b>	<p>The corrective action taken was verified effectively implemented with no recurrence of issues during the on-site assessment visit.</p> <p>Hence, the nonconformity remained closed.</p>		

Summary of Total Number of Nonconformity			
Nonconformity			

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<b>NCR Ref #</b>	1534040-201709-M5	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 4.4.2 Major
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	06/10/2017
<b>Statement of Nonconformity</b>	Protection of buffer zones not fully demonstrated		
<b>Requirement Reference</b>	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.		
<b>Objective Evidence</b>	Sujan/Jiba Estate: Traces of grass been applied with herbicide was found within buffer zone at River Water Sampling Point W3 (Sungai Semerah)		
<b>Corrective Action</b>	<p>Root cause: There are no proper training of awareness to protect buffer zones with workers</p> <p>Correction: To do the awareness training for all sprayer and manurer about the protection of buffer zone.</p> <p>Corrective Action: To monitoring and inspection monthly at buffer zone area and continually awareness training with workers.</p>		
<b>Assessment Conclusion</b>	<p>The corrective action taken was verified effectively implemented with no recurrence of issues during the on-site assessment visit.</p> <p>Hence, the nonconformity remained closed.</p>		

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1534040-201709-N1	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 4.6.10 Minor
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	07/8/2018
<b>Statement of Nonconformity</b>	Proper disposal of waste material procedures were not fully demonstrated by workers.		
<b>Requirement Reference</b>	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).		
<b>Objective Evidence</b>	Jiba Estate: Used oil (SW 305) and empty container of engine oil from workers vehicle was kept within workers housing compound same row with the crèche without proper handling.		
<b>Corrective Action</b>	Conduct monthly inspection at housing area and periodically awareness training for workers/motorbike owners.		
<b>Assessment Conclusion</b>	<p>Evidence of CAP for the previous Minor NC was verified and found effective with no recurrence of issue found during this visit.</p> <p>Hence, the Minor Nonconformity has been closed on 7/8/2018.</p>		

<b>Summary of Total Number of Nonconformity</b>
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Nonconformity			
<b>NCR Ref #</b>	1534040-201709-N2	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 6.5.3 Minor
<b>Closed (Yes/No)</b>	No. Upgraded to Major NC	<b>Date of nonconformity closure</b>	N/A
<b>Statement of Nonconformity</b>	Water supplies were not according to national standards		
<b>Requirement Reference</b>	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.		
<b>Objective Evidence</b>	Sujan & Jiba Estate: Records of drinking water sample analysis done on 23/8/2017 (Borang S1B Air Terawat; Station code: KKS75 for sample taken at S05 (Clinic) Sujan Estate shown high Total Coliform recorded as TNTC (Too numerous to count); sample taken at S05 (Canteen) Jiba Estate also shown high Total Coliform and letter by Pegawai Kesehatan Bahagian Bintulu ref.: PKBB/KMAM/600-2(165).		
<b>Corrective Action</b>	Quarterly monitoring by estate & mill and annually inspection by Pegawai Kesehatan Bahagian Bintulu.		
<b>Assessment Conclusion</b>	CAP for the closure of previous Minor NC was insufficient where the quarterly monitoring of drinking water by estate & mill does not included the problematic parameter (Total Coliform) and annual inspection by Pegawai Kesehatan Bahagian Bintulu was yet to be conducted.  Hence, the Minor Nonconformity has been escalated to Major Nonconformity on 7/8/2018.		

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	CATEGORY (MAJOR/ MINOR)	ISSUED	STATUS & DATE (Closure)
1213818N1 – 6.10.3	Minor	25/7/2015	“Open” - upgraded to Major NC
1387081M1 – 4.7.1	Major	7/10/2016	Closed on 5/12/16
1387081M2 – 4.6.11	Major	7/10/2016	Closed on 5/12/16
1387081M3 – 4.6.2	Major	7/10/2016	Closed on 5/12/16
1387081M4 – 7.1.1	Major	7/10/2016	Closed on 5/12/16
1387081M5 – 7.3.1	Major	7/10/2016	Closed on 5/12/16
1387081M6 – 7.3.2	Major	7/10/2016	Closed on 5/12/16
1387081M7 – 7.7.1	Major	7/10/2016	Closed on 5/12/16
1387081M8 – 7.8.1	Major	7/10/2016	Closed on 5/12/16
1387081M9 – 7.2.1	Major	7/10/2016	Closed on 5/12/16
1387081M10 – 6.1.3	Major	7/10/2016	Closed on 5/12/16
1387081M11 – 6.9.2	Major	7/10/2016	Closed on 5/12/16
1387081M12 – 6.13.1	Major	7/10/2016	Closed on 5/12/16
1387081M13 – 6.5.1	Major	7/10/2016	Closed on 5/12/16

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1387081M14 – 6.5.2	Major	7/10/2016	Closed on 5/12/16
1387081M15 – 6.12.1	Major	7/10/2016	Closed on 5/12/16
1387081M16 – 4.1.1	Major	7/10/2016	Closed on 5/12/16
1387081M17 – 4.6.6	Major	7/10/2016	Closed on 5/12/16
1387081M18 – 5.3.2	Major	7/10/2016	Closed on 5/12/16
1387081N1 – 4.7.3	Minor	7/10/2016	Closed on 6/10/17
1387081N2 – 4.7.6	Minor	7/10/2016	Closed on 6/10/17
1387081N3 -2.1.2	Minor	7/10/2016	Closed on 6/10/17
1387081N4 – 7.1.2	Minor	7/10/2016	Closed on 5/12/16
1387081N5 – 7.3.3	Minor	7/10/2016	Closed on 5/12/16
1387081N6 – 7.3.4	Minor	7/10/2016	Closed on 5/12/16
1387081N7 – 7.3.5	Minor	7/10/2016	Closed on 5/12/16
1387081N8 – 7.4.1	Minor	7/10/2016	Closed on 5/12/16
1387081N9 – 7.4.2	Minor	7/10/2016	Closed on 5/12/16
1387081N10 – 7.7.2	Minor	7/10/2016	Closed on 5/12/16
1387081N11 – 7.8.2	Minor	7/10/2016	Closed on 5/12/16
1387081N12 – 7.2.2	Minor	7/10/2016	Closed on 5/12/16
1387081N13 – 1.3.1	Minor	7/10/2016	Closed on 6/10/17
1387081N14 – 4.4.1	Minor	7/10/2016	Closed on 6/10/17
1387081N15 – 4.8.2	Minor	7/10/2016	Closed on 6/10/17
1534040-201709-M1- 4.7.2	Major	6/10/2017	Closed on 6/11/17
1534040-201709-M2- 2.1.1	Major	6/10/2017	Closed on 6/11/17
1534040-201709-M3- SCCS E3.1	Major	6/10/2017	Closed on 6/11/17
1534040-201709-M4- 5.1.1	Major	6/10/2017	Closed on 6/11/17
1534040-201709-M5-4.4.2	Major	6/10/2017	Closed on 6/11/17
1534040-201709-N1-4.6.10	Minor	6/10/2017	Closed out on 7/8/18
1534040-201709-N2-6.5.3	Minor	6/10/2017	Upgraded as Major NC 7/8/18
1668121-201808-M1-6.5.3	Major	10/08/2018	Closed out on 7/11/18
1668121-201808-M2- 5.3.1 SCCS	Major	10/08/2018	Closed out on 7/11/18
1668121-201808-M3-5.3.2 SCCS	Major	10/08/2018	Closed out on 7/11/18
1668121-201808-M4-5.8.1 SCCS	Major	10/08/2018	Closed out on 7/11/18
1668121-201808-M5-5.13.1 SCCS	Major	10/08/2018	Closed out on 7/11/18
1668121-201808-N1-5.1.2	Minor	10/08/2018	“Open”
1668121-201808-N2-6.1.5	Minor	10/08/2018	“Open”
1668121-201808-N3-2.1.3	Minor	10/08/2018	“Open”

**3.5. Stakeholders Consultation**

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Keresia Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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



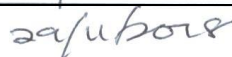
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Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff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

<b>List of Stakeholders Contacted</b>	
<b>Internal Stakeholders</b>  Gender Committee Mill Operators Field workers Workers representatives by nationalities (Indonesia and Bangladesh) Crèche ayah Staff Executives	<b>Union/Contractors/Local Communities</b>  Rumah Balrully Local smallholders Apex Uniparts Tiger Electricals Sujan Semerah Co. Triple Tree Alliance Tusy Enterprise
<b>Government Departments</b>  No complaint raised by Government Agency	<b>NGO</b>  CLC Volunteer (Teacher)

<b>IS #</b>	<b>Description</b>
<b>1</b>	<b>Issues:</b> Contractors & Suppliers – no issue in business dealings
	<b>Management Responses:</b> Positive feedback noted
	<b>Audit Team Findings:</b> No further issue
<b>2</b>	<b>Issues:</b> Local communities representatives – company always ready to assist local communities including FFB purchased from smallholders and involve in local communities event
	<b>Management Responses:</b> Relationship with local communities always maintained well
	<b>Audit Team Findings:</b> No further issue
<b>3</b>	<b>Issues:</b> CLC Teacher – good opportunity provided by company to foreign workers’ children to pursue studies
	<b>Management Responses:</b> Positive feedback noted
	<b>Audit Team Findings:</b> No further issue
<b>4</b>	<b>Issues:</b> Workers – no issue in salary payment and good facilities provided by company
	<b>Management Responses:</b> Positive feedback noted
	<b>Audit Team Findings:</b> No further issue

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<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Keresia Palm Oil Mill Certification Unit has complied with the RSPO P&amp;C Malaysia National Interpretation (MY-NI 2014) and the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Keresia Palm Oil Mill Certification Unit is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> <b>Mr. Hafriazhar Mohd Mokhtar</b>	<b>Name:</b> <b>Mr. Abdul Aziz B Zainal Abidin</b>
<b>Company Name:</b> <b>BSI Services Malaysia Sdn Bhd</b>	<b>Company Name:</b> <b>Keresia Plantation Sdn Bhd</b>
<b>Title:</b> <b>Lead auditor</b>	<b>Title:</b> <b>Assistant General Manager</b>
<b>Signature:</b> 	<b>Signature:</b> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<b>Date:</b> 15/11/2018	<b>Date:</b> 

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Commitment to Transparency</b>			
<b>Criterion 1.1:</b> Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Random interviews with the Mill and Estate employees had shown that the organization had provided adequate information as required by this criteria. Among those sighted include: <ul style="list-style-type: none"> <li>○ Land titles / user rights</li> <li>○ Safety and health plan</li> <li>○ Plans and impact assessments relating to environmental and social impacts</li> </ul>	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	The respective operating units visited maintained records of information request and response. The requests were attended promptly as sighted in the file Action Request.  Most of the requests were internal i.e. housing repair request by the workers raised during JCC Meeting.	Complied
<b>Criterion 1.2:</b> Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			
1.2.1	Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>• HCV documentation (Criteria 5.2 and 7.3);</li> <li>• Pollution prevention and reduction plans (Criterion 5.6);</li> <li>• Details of complaints and grievances (Criterion 6.3);</li> <li>• Negotiation procedures (Criterion 6.4);</li> <li>• Continual improvement plans (Criterion 8.1);</li> <li>• Public summary of certification assessment report;</li> <li>• Human Rights Policy (Criterion 6.13).</li> </ul> - Major compliance –	Documents related to Occupational health and safety plans, Environment Plans & Impact assessment and Pollution Prevention & reduction plans were sighted at the mill, Sujan Estate and Jiba Estate. The following sample documents were seen: <ol style="list-style-type: none"> <li>1. Land title:H16-10 (5.2) &amp; BP 9/12B- Keresa Plantations Sdn Bhd (Lease 99 years, 6,023 Ha).</li> <li>2. OSH Policy signed by Managing Director Graeme Iain Brown dated 17.10.2017 and OSH plans including monitoring of OSH performance.</li> <li>3. The environment impact and aspect assessment including pollution plans and reductions.</li> <li>4. The environment impact and aspect assessment including pollution plans and reductions.</li> <li>5. The mitigation plans and monitoring of the mitigations.</li> <li>6. Standard operating procedures.</li> <li>7. Human Right Policy, dated 30/11/2016 by Managing Director.</li> <li>8. Records of request</li> </ol>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
<b>Criteria 1.3:</b> Growers and millers commit to ethical conduct in all business operations and transactions.			
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	Memorandum; To: Workers: From: SGM; Date: 7/11/2017; Perkara: Kenyataan Dasar Kod & Kelakuan; Signed by Group Senior General Manager; Keresia Plantations Sdn. Bhd.	Complied
<b>Principle 2: Compliance with applicable laws and regulations</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			

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Criterion / Indicator	Assessment Findings	Compliance
2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance -	<p>A Legal Register noting requirements for Keresia POM and Keresia Plantations was sighted available and being monitored by the Operating Unit and evaluated by TQM department, dated 30.4.2018. It included monitoring of validity of licenses, permits and legal obligations to applicable Acts and its regulations. Those sampled include:</p> <p><b><u>Keresia POM</u></b></p> <ul style="list-style-type: none"> <li>i. MPOB license # 51055700400; <u>valid until</u>              (processing capacity 275,000MT/year) 31/3/19</li> <li>ii. Weighbridge licence B733540 valid until 12/11/18</li> <li>iii. <u>UPV and Certificate of fitness</u> <ul style="list-style-type: none"> <li>✓ Vertical sterilizer (1) SW PMT 1954 20/9/18</li> <li>✓ Vertical sterilizer (2) SW PMT 1955 01/6/19</li> <li>✓ Vertical sterilizer (3) SW PMT 1956 23/11/18</li> <li>✓ Vertical sterilizer (4) SW PMT 3665 27/12/19</li> <li>✓ Back Pressure Receiver SW PMT 1952 06/04/19</li> <li>✓ Boiler (1) SW PMD 469 11/06/19</li> <li>✓ Boiler (2) SW PMD 1131 07/04/19</li> </ul> </li> <li>iv. Fire Certificate, serial No. 305319, No. JBPM:SK/7/33/2015 12/12/18</li> <li>v. DOE License As.2-Pin.2/86 no. 003095 (validity period 01/07/2017 -30/06/2018) – no compliance scheduled for new license period received yet from the application to renew dated 1/3/2018 with receipt acknowledgement dated 2/3/2018 and internal memo between the mill manager and HQ on the renewal dated 13/2/2018 – sighted DOE’s “Notis Arahan di Bawah Seksyen 31, Akta Kualiti Alam Sekeliling Untuk Mematuhi Peraturan-peraturan Kualiti Alam Sekeliling (Udara Bersih) 2014 Bagi Kilan Kelapa Sawit”; Ref. # AS 91/110/611/077 Jilid 16 (28); Date: 28/5/2018 – received date 13/7/2018. Mill required to feedback latest by 31/8/2018.</li> <li>vi. DOE Compliance Schedule: JPKKS_Bintulu/2017/003095A; License # 003095 (validity period 01/07/2017 - 30/06/2018) for 60mt/hr and method of POME discharge is water course with BOD final discharge limit &lt;50mg/l.</li> <li>vii. Permit Barang Kawalan Berjadual; Serial # Q007439; Ref. # BTU.P.02/10(D); Kuantiti: 28,135ltr; Validity: 4/4/2017 – 3/4/2018. Surat Sokongan Perlesenan; Ref. # PPDN(BTU)/PGK/05/07/30(10); Date: 15/2/2018; Jabatan Bomba dan Penyelamat Malaysia; Ref. # JBPM/SK/ZBU:700-5/1/20 (51) JLD 4</li> <li>viii. Lessen Penggajian Pekerja Bukan Pemastautin di bawah Seksyen 119 Ordinan Buruh (Sarawak Bab 76)</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p><b>Jiba/Sujan Estate</b>  MPOB license #503656102000 under Keresa Plantations Sdn Bhd. License valid until 28/2/19.  ii) MPOB license (Nursery) #516060011000 under Keresa Plantations Sdn Bhd. License valid until 31/10/19.  iii) Diesel license (15,000 Ltr), BTU.P.33/2007(D), serial# Q007046 valid until 23/11/18.  iv) Storage of petroleum license # 30889 valid until 31/12/18 granted by Bintulu Development Authority (BDA).</p> <p>The following lapses, however, were observed and a Major NCR had been raised.</p> <p><u>Electrical Ordinance Electricity Rules 1999</u>  a. No Electrical Charginan at the Mill  b. Frequency of mill visit by Electrical Visiting Engineering from LAJ was once every three months instead of monthly visit.</p> <p><u>Act 139 Factories and Machinery (Person In Charge) Regulations 1970</u>  a. No First Grade Engine Driver in charge of the boiler.</p>	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	A Procedure for Legal Compliance (BMP2.2) dated 15 Mar 2010 has been established. All operating units visited have Legal & Other Requirements Register (LORR) covering all applicable regulatory requirements.	Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	<p>All Operating Units monitor the validity of their permits, licences and the need to comply to legal requirements.</p> <p>In conjunction with the TQM Sustainability Department they have reviewed and updated the LORR (Legal and Other Requirements Register) at both mill and estates on 30/4/2018.</p> <p>The list of license and its validity was sighted recorded on a board in the mill office. They are up to date.</p>	Minor nonconformance
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	The TQM Sustainability Department at Head Office is charged with tracking and identifying changes in the applicable laws. Methods used include website information and this change in information is subsequently communicated by them to the Operating Units.	Complied
<p><b>Criterion 2.2:</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>			
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	<p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land was made available during audit. The land titles were verified.</p> <p>Keresa Estate operation is on lease land. As reported during the last assessment, the estate was developed on State Lease Land, issued by Department of Land and Survey; Bintulu Division dated 28 December 1996 for 99 years (between 01 January 1981 and 01 January 2080) over an area of 6,023 ha in Lot No. 1 Block 17 Lavang Land District, Bintulu Sarawak.</p>	Complied



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Criterion / Indicator	Assessment Findings	Compliance
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	The estates demarcated their boundaries with other land owners using wooden pegs painted with red and white. Based on site visit at boundaries between estates and third parties, the boundary pegs were found to be well maintained. Among the pegs sampled were: <ul style="list-style-type: none"> <li>between Block 9701 of Jiba Estate and Rumah Lawai land - three pegs were verified i.e. #91, 825 and 823</li> <li>between Block S06K2 of Sujan Estate and Rumah Ballruly land - three pegs were verified i.e. #723, 722 and 721</li> </ul>	Complied
2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the certification unit and supply base at the time of audit. The land leased by Keresia and land ownership documents verified.	Complied
2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land leased by Keresia and land ownership documents verified.	Complied
2.2.5 For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land leased by Keresia and land ownership documents verified.	Complied
2.2.6 To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land leased by Keresia and land ownership documents verified.	Complied
<b>Criterion 2.3:</b> Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.		
2.3.1 Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	Maps of an appropriate scale showing the extent of legal rights sighted available as following: <ul style="list-style-type: none"> <li>- Jiba Estate consist of 6 divisions i.e. Belungai 1&amp;2, Semerah 1&amp;2 and Mapo 1&amp;2 with total area of 2480.30ha</li> <li>- Sujan Estate consist of divisions i.e. Labang 1&amp;2, Kemena 1&amp;2 and Stapang 1,2&amp;3 with total area of 3542.70ha</li> </ul> The maps indicated that there's no other legal users and occupiers within the titled land of the estate except outside estate boundary.	Complied

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2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	Based on the assessed documents of ownership and interviews with stakeholders among local communities from the longhouses, it is confirmed that the estate lands are legally owned by the company and no other users were identified within the land area. Hence, this indicator is not applicable.	Complied
2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	Based on the assessed documents of ownership and interviews with stakeholders among local communities from the longhouses, it is confirmed that the estate lands are legally owned by the company and no other users were identified within the land area. Hence, this indicator is not applicable.	Complied
2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	Based on the assessed documents of ownership and interviews with stakeholders among local communities from the longhouses, it is confirmed that the estate lands are legally owned by the company and no other users were identified within the land area. Hence, this indicator is not applicable.	Complied
<b>Principle 3: Commitment to long-term economic and financial viability</b>		
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.		

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Criterion / Indicator	Assessment Findings	Compliance																							
<p>3.1.1</p> <p>A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -</p>	<p>There is no business case for KSGS scheme smallholders since it was openly declared that Keresia Certification Unit discontinued to include them in this Annual Surveillance during the Opening Meeting.</p> <p>As a continuing practice, an annual business plan in the form of annual budget and the CSPO projection for 5 years (2018-2022) was prepared as guidance for future planning. The POM business plan consists of FFB yield, CPO, OER, and KER, costs of production, etc. CAPEX items included Installation of a new Shinko 1.8Mw Turbine (upgraded from 1.4Mw) for more power generation, on-going construction of Gasifier Plant and construction of a future BioGas plant.</p> <p>Also considered are items of (a) economic values at the mill such as focus on mill technical area (conveyors and kernel plant) and maintaining sufficient workers at estate level (b) environmental concerns such as Control of Pollution and significant impacts (at mill and estates), Environment and Biodiversity review, Waste management such as Reduction of waste volume at source, introduction of 3R (Reduce, Reuse, Recycle) Program and tight monitoring on use of pesticides while at the same time continue to expand the IPM program and (c) social components (Health and Safety at Workplace and Community program).</p>	<p>Complied</p>																							
<p>3.1.2</p> <p>An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -</p>	<p>The visited estates have prepared the replanting programme with minimum of 5 years projection. Below is the programme of the visited estates:</p> <table border="1" data-bbox="660 1227 1233 1473"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="2">Ha to be replanted</th> </tr> <tr> <th>Jiba</th> <th>Sujan</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>0</td> <td>0</td> </tr> <tr> <td>2019</td> <td>0</td> <td>0</td> </tr> <tr> <td>2020</td> <td>523.92</td> <td>0</td> </tr> <tr> <td>2021</td> <td>532.98</td> <td>0</td> </tr> <tr> <td>2022</td> <td>503.73</td> <td>72.23</td> </tr> <tr> <td>2023</td> <td>354.23</td> <td>307.90</td> </tr> </tbody> </table>	Year	Ha to be replanted		Jiba	Sujan	2018	0	0	2019	0	0	2020	523.92	0	2021	532.98	0	2022	503.73	72.23	2023	354.23	307.90	<p>Complied</p>
Year	Ha to be replanted																								
	Jiba	Sujan																							
2018	0	0																							
2019	0	0																							
2020	523.92	0																							
2021	532.98	0																							
2022	503.73	72.23																							
2023	354.23	307.90																							

**Principle 4: Use of appropriate best practices by growers and millers**

**Criterion 4.1:**

Operating procedures are appropriately documented, consistently implemented and monitored.

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Criterion / Indicator	Assessment Findings	Compliance
4.1.1 Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	<p>Keresas POM has established Standard Operating Procedures (SOPs) covering work processes as a guidance document to operate the mill. It covers work processes from weighbridge station, receipt and grading of FFB at ramp, cooking of FFB in sterilizer and its subsequent processes to extract crude palm oil (CPO) all the way to storage of CPO, then dispatch of CPO and Palm Kernel (PK). Other associated activities include SOP for operation of boiler, Water Treatment Plant, associated machineries and ancillary equipment and their maintenance, waste stream handling (effluent treatment plant, empty bunch yard, fiber and ash), etc.</p> <p>Likewise, Keresas estates have a separate SOP and the manual covers land preparation, planting material, upkeep, spraying, harvesting, manuring, transport etc. covering all the relevant operations.</p> <p>Inspection to the field and mill confirmed that the SOPs are implemented. Assistant Managers and staff monitor the implementation.</p>	Complied
4.1.2 A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	<p>Continuing existing practice, the External Mill Advisor and TQM department inspect and report on the mill operations on annual basis. The latest mill advisor visit was on June 2018. The on-site managers develop Action Plans from the Advisory Reports for improvement of the operations. Review of Advisory Reports, Action Plans and site inspections confirmed consistent records of implementation of SOPs. During mill visit it was noted that that operating parameters were consistently recorded by the operators.</p> <p>KM 6 Continual Improvement; KM 6-1 Mill Advisory Report. Visit Report – Keresas Palm Oil Mill by Mill Advisor dated on 25/6/2018. Previous report 8/1/2018.</p>	Complied
4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	<p>Records of monitoring by TQM were checked maintained. Internal audit by TQM was carried out in April 2017 (Keresas Mill: 17/4/17, Sujas Estate: 18/4/17, Jiba Estate: 19/4/17).</p> <p>Monitoring to Legal compliance were sampled, for example:</p> <ul style="list-style-type: none"> <li>• Keresas POM effluent discharge were sighted sampled and monitored on monthly basis. Their March, April and May 2018 Results of Analysis showed they were below permissible limit under EQA (Prescribed Premises) (Crude Palm Oil) Regulations 1977.</li> <li>• Two units of smoke density meter were calibrated at 3 monthly intervals. The last calibration being on 6.7.2018. During year of assessment, it was noted there was no emission exceeding allowable limits.</li> </ul>	Complied
4.1.4 The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	<p>Keresas POM maintains a daily record of all FFB received from third parties. Verification of the quantity of FFB received from third parties and the relevant transportation documents such as delivery order, weighbridge ticket and daily FFB received records showed that the figures were authentic.</p>	Complied
<p><b>Criterion 4.2:</b>            Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>		

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4.2.1 There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	Good agriculture practices which follows the Keresia Standard Operating and Procedures (version:2, dated 1/1/2009) to ensure soil fertility is managed to a level that ensures optimal and sustained yield. The manuring procedure is located in this set of SOP. The procedure gives the guideline on determining nutritional requirements, technics of applying fertilisers, type of fertilisers to be applied, timing to apply, dosage and placement.	Complied
4.2.2 Records of fertiliser inputs shall be maintained. - Minor compliance -	The types of fertilisers recommended by the agronomist were compound Hi-Kay bio, ERP/CIRP, Mag-Oxis and NPK Mix. The application of fertiliser in the field was recorded in "Manuring Application Monitoring Chit" and Fertilizer Application summary. Based on the Progress of Work (POW) report, as at 8/8/2018, Jiba Estate has completed about 69% of the annual programme.	Complied
4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	Evidence of periodic tissue and soil sampling to monitor the changes in nutrient status was available and presented in Agronomic Report by a third party's agronomist (CCF Agro Services). The 2017 report was available for verification which coverage included Jiba and Sujan Estates. The results of the analysis were then used by the agronomist for their recommendation of fertilisers applications programme in the following year. Soil analysis was last done in September 2015 by UPM Laboratory.	Complied
4.2.4 A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Keresia POM. The best practice of EFB application is described in the ARM. Records of EFB application were available for verification. Based on the records, it was noted that in 2018 Sujan Estate has applied 13,782.47 mt at 5 blocks while Jiba Estate has applied 8,529.72 mt at 3 blocks. The rate per hectare was around 44 mt/Ha.	Complied
<b>Criterion 4.3:</b> Practices minimise and control erosion and degradation of soils.		
4.3.1 Maps of any fragile soils shall be available. - Major compliance -	Soil series map available for both visited estates. There are no peat soil or soil categorised as problematic or fragile at all the visited estates. All the soil are of mineral types. Based on the soil map in the Preliminary EIA study dated September 1996, conducted by Chemsain Konsultant Sdn Bhd, among the major soils in Keresia Plantations Sdn Bhd. were: - Merit/Bekenu Association (51%) - Bekenu/Sarekei Association (14%) - Silantek/Nyalau Association (13%)	Complied
4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	The management strategy for planting on slopes is addressed in the Keresia Plantations SOP (Section 3.0 Development). Based on the SOP, terrace to be constructed at slopes exceeding 8° gradients. Cover crop shall also be planted to minimize erosion. The implementation of the procedure was evident during field visit.	Complied
4.3.3 A road maintenance programme shall be in place. - Minor compliance -	Road maintenance program for 2018 was available for all the visited estates. Among the activities for the road maintenance are road patching, road gravelling, grading & compacting and repair (culverts, roads and bridges). Based on the progress report, Jiba Estate has completed 41% of the annual road maintenance programme.	Complied

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4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	No peat soil at the visited estates.  Not applicable
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	No peat soil at the visited estates.  Not applicable
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	No fragile or problem soil at the visited estates.  Not applicable
<b>Criterion 4.4:</b> Practices maintain the quality and availability of surface and ground water.		
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	<p>Keresa Certification Unit has developed its Water Management Plan (WMP) dated 5/9/2017. It monitored water quality of outgoing waters to identify any adverse effect from the mill and estate activities. The plan takes into account the efficient use of resources, ensure amongst others that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent. The WMP also promote to meet water conservation requirements under Sarawak Water Resource Enactment 1998 and Interim National Water Standards for Malaysia</p> <p>Operators at Water Treatment Plant at Keresa POM and Jiba Estate were employed to man and chemical-dosed the raw water to ensure that the processed drinking water quality meet the National Water Quality Standard Malaysia (NWQSM). The processed water is also sampled and analyzed to counter check that it meets the same standard requirements by Kementerian Kesihatan Malaysia through its Pejabat Kesihatan Bahagian Bintulu.</p>
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	The visited estates have maintained their allocated riparian zones in accordance to their established guideline (Riparian/Buffer Zone management Guideline, dated Dec 2016). Based on site visit, it was noted that there was no trace of agrochemical application at the allocated riparian zones. The zones were also clearly demarcated using wooden pegs painted with red & white. Interview with the sprayers showed that the workers understand the restriction and the consequence of agrochemicals application in the riparian zones.

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4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	<p>The treatment of Keresia Palm Oil Mill Effluent (POME) were carried out as per SOP and DOE license requirements with regular monitoring at final discharge point and downstream of Sujan River.</p> <p>The results sighted from the Certificate of Analysis (COA) for the month of March, April and May 2018 showed that the mill discharge and Sujan River water were in compliance and has consistently met the requirement for BOD limit, &lt;20 mg/L as shown below. The water samples Analysis were conducted by ESI Laboratory Sdn. Bhd., Bintulu.</p> <table border="1"> <thead> <tr> <th rowspan="2">COA ref. #</th> <th colspan="2">Date</th> <th colspan="2">BOD, mg/L</th> </tr> <tr> <th>Sample received</th> <th>Mill</th> <th>Sq. Sujan</th> <th></th> </tr> </thead> <tbody> <tr> <td>KMSB/06-03/245</td> <td>6 March 2018</td> <td>13</td> <td>&lt;2</td> <td></td> </tr> <tr> <td>KMSB/06-04/246</td> <td>6 April 2018</td> <td>9.8</td> <td>&lt;2</td> <td></td> </tr> <tr> <td>KMSB/14-05/248</td> <td>14 May 2018</td> <td>11</td> <td>&lt;2</td> <td></td> </tr> </tbody> </table>	COA ref. #	Date		BOD, mg/L		Sample received	Mill	Sq. Sujan		KMSB/06-03/245	6 March 2018	13	<2		KMSB/06-04/246	6 April 2018	9.8	<2		KMSB/14-05/248	14 May 2018	11	<2		Complied
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4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	<p>Water consumption (KM 4-13) were monitored and measured individually for mill processing, boiler, firefighting and housing.</p> <p>Mill water consumption for the month of Jan – Aug 2017 = 0.71 m<sup>3</sup>/FFB processed.</p> <p>Average annual water consumption varies from 1.6 m<sup>3</sup> – 2.0 m<sup>3</sup> per tonne FFB processed with the average water usage of 1.97 m<sup>3</sup> per tonne FFB processed for the period from Jan to Oct 2016.</p>	Complied																								
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Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.																											
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	The visited estates have implemented the IPM in accordance to the Integrated Pest management guideline, dated 12/7/2017. Among the IPM implemented were maintaining soft vegetation in the field and planting of beneficial plants such as Tunera subulata. Based on census records, attack of pest and disease such as rat, leaf-eating pest, ganoderma and rhino beetles was at negligible level.	Complied																								
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>Among the trainings related to IPM organized by Keresia were:</p> <ul style="list-style-type: none"> <li>30/7/2018 – Termite control (attack symptoms observations &amp; treatment) – attended by 5 workers</li> <li>3/8/2018 – IPM training – attended by 2 staff from each estates – topics mainly on pest &amp; diseases control</li> </ul>	Complied																								
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Pesticides are used in ways that do not endanger health or the environment																											
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	<p>Justification of pesticides applied is available in Weeding procedure, SOP# 4.iv. It takes consideration to minimize effect on non-target species. Selected pesticides are specific to the target pest, weed and disease. The selection is also evaluated by the agronomist during his visit to the estate.</p> <p>Majority of the agrochemicals used are Class IV, some Class III. None from Class I and II were used and were verified that none was found kept in the Chemical Store.</p>	Complied																								

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<p>4.6.2</p> <p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided.</p> <p>- Major compliance -</p>	<p>Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained. Sample of agrochemicals records sighted are as follows:</p> <p><b>Sujan Estate</b></p> <table border="1" data-bbox="660 562 1291 1043"> <thead> <tr> <th colspan="7">Chemicals use</th> </tr> <tr> <th>Year</th> <th>Trade name</th> <th>Active ingredient</th> <th>a.i./ha</th> <th>LD<sub>50</sub></th> <th>Total area treated, ha</th> <th>Total used (liter)</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>Mamba</td> <td>Glyphosate</td> <td>0.75</td> <td>5000</td> <td>2468.97</td> <td>4516.4</td> </tr> <tr> <td></td> <td>Starmix</td> <td>Glyphosate</td> <td>0.22</td> <td>3000</td> <td>5177.21</td> <td>3520.5</td> </tr> <tr> <td></td> <td>Alion</td> <td>Indaziflame</td> <td>0.02275</td> <td>2000</td> <td>1274</td> <td>63.7</td> </tr> <tr> <td>2017</td> <td>Mamba</td> <td>Glyphosate</td> <td>0.75</td> <td>5000</td> <td>2150.04</td> <td>3933.0</td> </tr> <tr> <td></td> <td>Starmix</td> <td>Glyphosate</td> <td>0.22</td> <td>3000</td> <td>4405.32</td> <td>2995.62</td> </tr> <tr> <td></td> <td>Alion</td> <td>Indaziflame</td> <td>0.02275</td> <td>2000</td> <td>3075</td> <td>153.77</td> </tr> </tbody> </table> <p><b>Jiba Estate</b></p> <table border="1" data-bbox="660 1099 1291 1581"> <thead> <tr> <th colspan="7">Chemicals use</th> </tr> <tr> <th>Year</th> <th>Trade name</th> <th>Active ingredient</th> <th>a.i./ha</th> <th>LD<sub>50</sub></th> <th>Total area treated, ha</th> <th>Total used (liter)</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>Mamba</td> <td>Glyphosate</td> <td>0.75</td> <td>5000</td> <td>1933.71</td> <td>3537.28</td> </tr> <tr> <td></td> <td>Starmix</td> <td>Glyphosate</td> <td>0.2231</td> <td>3000</td> <td>4068.04</td> <td>2766.27</td> </tr> <tr> <td></td> <td>Alion</td> <td>Indaziflame</td> <td>0.02275</td> <td>2000</td> <td></td> <td></td> </tr> <tr> <td>2017</td> <td>Mamba</td> <td>Glyphosate</td> <td>0.75</td> <td>5000</td> <td>1636.72</td> <td>2994</td> </tr> <tr> <td></td> <td>Starmix</td> <td>Glyphosate</td> <td>0.2231</td> <td>3000</td> <td>5050.00</td> <td>3434</td> </tr> <tr> <td></td> <td>Alion</td> <td>Indaziflame</td> <td>0.02275</td> <td>2000</td> <td>2155.6</td> <td>107.78</td> </tr> </tbody> </table>	Chemicals use							Year	Trade name	Active ingredient	a.i./ha	LD <sub>50</sub>	Total area treated, ha	Total used (liter)	2016	Mamba	Glyphosate	0.75	5000	2468.97	4516.4		Starmix	Glyphosate	0.22	3000	5177.21	3520.5		Alion	Indaziflame	0.02275	2000	1274	63.7	2017	Mamba	Glyphosate	0.75	5000	2150.04	3933.0		Starmix	Glyphosate	0.22	3000	4405.32	2995.62		Alion	Indaziflame	0.02275	2000	3075	153.77	Chemicals use							Year	Trade name	Active ingredient	a.i./ha	LD <sub>50</sub>	Total area treated, ha	Total used (liter)	2016	Mamba	Glyphosate	0.75	5000	1933.71	3537.28		Starmix	Glyphosate	0.2231	3000	4068.04	2766.27		Alion	Indaziflame	0.02275	2000			2017	Mamba	Glyphosate	0.75	5000	1636.72	2994		Starmix	Glyphosate	0.2231	3000	5050.00	3434		Alion	Indaziflame	0.02275	2000	2155.6	107.78	<p>Complied</p>
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<p>4.6.3</p> <p>Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.</p> <p>- Major compliance -</p>	<p>Use of pesticide is minimized and part of the IPM programme. To reduce chemical use the planting of beneficial plants (<i>Cassia cobanensis</i>, <i>Tunera subulata</i>, <i>Tunera unifoliar</i>) were sighted along the main road at the estates.</p> <p>The Documented IPM procedure include:</p> <ol style="list-style-type: none"> <li>Identification of pest,</li> <li>Implementation monitoring</li> <li>Biology control</li> <li>Pesticides use</li> <li>Records keeping</li> <li>IPM Training</li> </ol>	<p>Complied</p>																																																																																																																



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4.6.4 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	Paraquat was eliminated. At the time of assessment there were no class 1a or 1b pesticides sighted in the chemical register and store. Alternatives such as Glyphosate were used with the elimination of Paraquat.	Complied
4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Pesticide handlers and operators were given training on the safe handling and application of the pesticides in accordance with products label and Safety Data Sheet. Suitable personal protective equipment and application equipment were provided to the operators. All precautions attached to the products were explained by Assistant Managers and Mandores to agrochemical handlers and it was found understood by them. This was noted during the interview with workers at the visit work units (field operation, workshop and chemical store).	Complied
4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During site visit it was found that the stocks of pesticides were stored in the Chemical Store appropriately where secondary containment trays were provided. The chemical store was securely locked, ventilated, PPE signage posted at entrance and complies with the requirements of the regulation.  The 20-liter used agrochemical containers were recycled for carrying premix agrochemical to field. Other plastic container sizes were properly disposed of (see Criterion 5.3)	Complied
4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	Pesticides had been applied using the Best Management Practices that minimize risk and impacts including the provision of PPE to Pesticides handlers. The pesticide operators were found to understand the use of the right nozzle, spray drift, spray quality and run-off as well as proper donning of PPE provided.  The quantity of agrochemicals required for various field conditions are documented and justified through agronomist advisory.	Complied
4.6.8 Pesticides shall be applied aeri ally only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	There was no aerial spraying method used at the visited estates.	Complied

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4.6.9	<p>Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8).</p> <p>- Minor compliance -</p>	<p>Employees handling pesticides (Storekeeper, Sprayers and Manurers) were given knowledge and skills required by the TQM to cover safe handling of chemicals in accordance with their product label, Safety Data Sheet, Standard Operating Procedures and demonstration practices. It is done in the interest of Best Management Practices that minimize risk and impacts to them.</p> <p>Interviews with the agrochemical handlers found that they were able to demonstrate safe handling of pesticides.</p>	Complied
4.6.10	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).</p> <p>- Minor compliance -</p>	<p>Proper disposal of waste materials, both scheduled waste and domestic waste are carried out as per the company procedures. The procedures are fully understood by workers and managers. Workers interview reveal that they are aware of the zero burning policy including domestic waste are not allowed to be burn.</p> <p>Disposal method of all identified waste was already identified, where the estate and mill office, workshop, field and linesite visited confirmed that the practice to reduce, reuse and recycle of materials has been implemented throughout the company.</p> <p>Management dispose waste material as per regulation for schedule waste and domestic waste to own-operated landfill.</p>	Complied
4.6.11	<p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.</p> <p>- Major compliance -</p>	<p>Medical surveillance was carried out once a year for sprayers. Medical examination programme established for 5 group of sprayer team was conducted by Medan Jaya Medical Clinic- HQ/08/DOC/00/206.</p> <p>Last medical check-up was conducted on 29/04/2016 by DOSH Registered doctor No.: HQ/08/DOC/00/666 for 30 workers. Total of 09 workers repeated the medical test on 11/11/2016. All 39 workers were found fit based on the medical results.</p>	Complied
4.6.12	<p>No work with pesticides shall be undertaken by pregnant or breast-feeding women.</p> <p>- Major compliance -</p>	<p>Interviews with Jiba Estate Nurse and Sujan Estate Medical Assistant and sighting of records confirmed that all female workers are being screened monthly to determine pregnancy and breast feeding status. Recent screening has not detected any pregnant or breast feeding women. The SOP is, if detected the respective estate management and the affected women will be notified. Management then will remove the affected pregnant or breast feeding women from the current pesticide job to a non-hazardous work job.</p> <p>Interviews of female workers confirmed knowledge of the policy of transfer to alternative duties if they wished to continue working when pregnancy was confirmed or breast-feeding.</p>	Complied
<p><b>Criterion 4.7:</b>            An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>			

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<p>4.7.1</p> <p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>Keresia Certification Unit has maintained an approved Health and Safety Policy dated 17.10.2017 signed by the Managing Director. It was sighted displayed prominently on notice boards. As stated in Keresia Plantations’ website to the public a copy of the Health and Safety Policy (and other six policies that help them realize their goals towards sustainability) can be made available upon request within 3 -5 working days.</p> <p>There also is an established Health and Safety Plan that is organized to meet the spirit of the OH&amp;S Policy. This policy is the roadmap that has been used to communicate to all employees, including new employees, suppliers and contractors, explaining to them on safety and health matters and Keresia’s commitment to health and safety. The OHS plan covers all activities at the mill and estates. They include documented information established for Hazard identification, risk assessment and determining control (HIRARC), the need to comply to all applicable legal requirements, establishment of OHS objectives, the implementation of operational controls, allocation of resources to execute OHS programs, OHS performance monitoring, evaluation of effectiveness of action taken and reporting, and the need to correct deviations to meet the OHS objectives and continual improvement.</p> <p>Program for OHS in-house training, audit, workplace inspection, OHS meeting and fire drill were plan throughout the year. The annual review of HIRARC register was conducted on 10.8.2017, Legal and other requirements register on 30.4.2018, Environmental Aspect and Impact Register on 3.4.2018 and the Emergency Preparedness and Response drill on 26.4.2018 (at mill) were sighted.</p> <p>Records of other OHS programs implemented have been sighted conducted since the Annual Surveillance Audit 2 are:</p> <ul style="list-style-type: none"> <li>• Chemical Health Risk Assessment (CHRA) renewal assessment was conducted on 13/7/2017 at Keresia POM by DOSH registered assessor, JKPP KIM127/453/6(33).</li> <li>• Annual Audiometric Test by Global Green OSH Services</li> <li>• Personnel Chemical Exposure Monitoring</li> <li>• Quarterly OHS Committee meeting and Workplace Inspection</li> <li>• Annual Internal audit and</li> <li>• On-going training courses for mill and estates employees.</li> </ul>	<p>Complied</p>

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<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.                      - Major compliance -</p>	<p>HIRARC is the methodology adopted by Keresu CU to assess its operational risks related to all OHS activities. Both mill and estates continued to use and maintain the HIRARC guideline. Its register was last reviewed on 10/8/2017. Risk assessment sampled were at Reception of FFB and grading by Graders, operation of vertical Sterilizer, Boiler and Combustion Engines, Oil clarification station, sampling of CPO, treated water at WTP and effluent discharge, CPO despatch bay, Kernal Silo, Harvesting, Manuring, Spraying and Workshop activities, etc.</p> <p>Precautions attached to products were found observed. Their related operational controls including use of SOP, posting of OHS warning signages, OHS related training and wearing of required PPE were addressed.</p> <p>The hazard identification, risk assessment and risk control records, as well as CHRA reports were verified during this assessment.</p>	<p>Complied</p>
<p>4.7.3</p> <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.                      - Minor compliance -</p>	<p>The training was conducted accordingly at mill and estates. Cross refer indicator 4.8.1</p> <p>Awareness and OHS training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding SDS (Safety Data Sheet), Safe Work Practices, the correct use of PPE and Emergency response.</p> <p>Suitable PPE has been provided to the workers based on the information in the SDS and CHRA assessor's recommendation.</p> <p>List of Personal Protective Equipment (PPE) provided by job – identifies the type of PPE for the respective activities are:.</p> <ol style="list-style-type: none"> <li>i. Boiler/Engine operator – safety helmet, semi leather hand glove, cotton gloves, safety shoes and ear muff.</li> <li>ii. Other Mill Operators - safety helmet, cotton gloves, safety shoes and ear plugs</li> <li>iii. WTP Operator –Nitrile rubber gloves, Organic Vapor dual cartridge respirator, apron, goggle.</li> <li>iv. Field workers (sprayer and manurer) – respirator, anti-mist goggles, nitrile rubber gloves, safety shoes and apron.</li> </ol> <p>During the site visit, it was noted that the PPE will be replaced by the workers when damaged or lost.</p> <p>The chemical stores visited at both Jiba and Sujan estates were found to be adequately organized, properly labelled, securely locked, ventilated and person in charge understands the OHS procedures. SDS were placed at the chemical stores and is available. The person in charge understands the information written in SDS. The Store Keepers interviewed understood actions to be taken should chemicals spills occur and the Safe Work Practice in disposing Scheduled Wastes items.</p>	<p>Complied</p>

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<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>The responsible persons are collectively the Deputy General Manager, Manager, Assistant Manager of the respective operating units and Keresha SHEO.</p> <p>At the Mill the Chairman of Safety, Health and Environmental Committee is the Mill Manager whereas at the estate it is the Assistant General Manager. Members consist of employer &amp; employee representatives with representations exceeding legal requirement. Records of regular meetings between the management and workers to discuss health and safety matters had been verified to be satisfactory. The meeting agenda discussed HSE Moment &amp; HSE Sharing, Business Unit Operation &amp; Activities, HSE Incidents Reporting and Lessons Learnt, Training, HSE Promotions/Incentives, Inspection and walkabout pre-audit, Committee Report and Any other business. Frequency of meeting were as follows:</p> <ol style="list-style-type: none"> <li>1. OHS meeting at Keresha POM were found conducted monthly as follows: 8/2/2018, 23/3/2018 and 27/4/2018.</li> <li>2. Same meeting agenda as that used by the mill was used during their quarterly OHS meeting at Sujana Estate and Jiba Estate.</li> </ol> <p>Attendees quorum at the meeting, frequency of meeting held, SHEO as Secretary of the Committee and circulation of meeting minutes conformed to legal regulations and thus have been complied by the responsible persons.</p>	<p>Complied</p>

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<p>4.7.5</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Keresas CU accident and emergency procedures have been established and communicated accordingly to all workers including contractors at mill and estates. They understood the instructions and demonstrated their response as follows:</p> <ol style="list-style-type: none"> <li>1. Fire drill was conducted on yearly basis, the latest being on 14.03.2018 for Keresas POM and estates. Generally, participation in the evacuation fire drill by Emergency Response Team members, all staff and workers were positive as noted in the attendance list. Manner of evacuation was orderly and timely reaching the designated assembly area within the set time.</li> <li>2. Use of Fire extinguisher training was conducted on 26.4.2018. Workers were given the opportunity to demonstrate their understanding on the use of the extinguisher to kill a "simulated fire" and found satisfactory.</li> <li>3. Their awareness on location of fire extinguishers at mill and line sites as well as contact numbers of key personnel (Mandores, respective Assistant Managers and office) were acceptable.</li> <li>4. First aid kits were available at worksites e.g. at Sterilizer station, Boiler Station, Chemical Store, Workshop, offices and with mandore in the field. Workers interviewed generally know the location of the first aid box. First aiders are competent and tested by auditor to be knowledgeable to respond in administering basic first aid.</li> <li>5. During this Annual Surveillance 3 Assessment no Lost Time Incident had been reported to occur at mill and estates. Review of the latest occurrence showed one Lost Time Accident was reported happened on 27.7.2017 at Keresas POM. Immediate notification of accident to management and the render of assistance to victim by fellow colleague were as per procedure.</li> <li>6. Records of accident were available, using internal reporting system. Form JKPP 6 was sent to DOSH promptly on 1/8/2017 (only LTA in 2017) following internal Investigation completed by SHE Officer.</li> </ol>	<p>Complied</p>
<p>4.7.6</p> <p>All workers shall be provided with medical care, and covered by accident insurance.</p> <p>- Minor compliance -</p>	<p>Tune Protection Malaysia Foreign Workers Compensation Scheme Policy Schedule Policy No 11-613-15-A00823</p> <p>Sight insured for 3 employees from 19-08-17 to 20-08-2019</p> <p>All workers are provided with medical care. Sighted records showed that Malaysian workers are covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial); while for foreign workers are covered by Foreign Workers Compensation Scheme Certificate of Insurance (underwriter Tune Protect) as per sample sighted:</p> <p>Underwriter: Tune Protect Malaysia            Coverage period: 19-8-2017 to 20-8-2018            Policy no.: 11-613-15-A00823</p>	<p>Complied</p>

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<p>4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics                      - Minor compliance -</p>	<p><b>Keresu Mill &amp; Estates</b>                      As at date of Audit, no LTA had been reported since last audit conducted in October 2017.</p> <p>However, records of past incidents was sighted as they were available. It uses internal reporting system. The occupational injuries record use Lost Time Accident (LTA) metrics.</p> <p>Although no LTA was reported it was discussed at the monthly Mill SHE Meeting since HSE and Incidents Statistics being an item on the standard SHE Committee Meeting agenda. Likewise, the LTA was tabled at the estate's Quarterly SHE meeting even though none had been reported to date</p>	<p>Complied</p>
<p><b>Criterion 4.8:</b>                      All staff, workers, smallholders and contract workers are appropriately trained.</p>		
<p>4.8.1 A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.                      - Major compliance -</p>	<p>A formal training program on all aspects of RSPO Principles and Criteria has been established and implemented. 34 Training Topics for various categories of operators, including all field and office staff, with regards to individual duties and training needs had been identified.</p> <p>Training program planned for year 2018 was consistently implemented although on some occasion actual vs planned training date differ. About 40% of training had been conducted upto July 2018.</p> <p>Evidence of adequate and appropriate training on safe working practices were provided to:</p> <ul style="list-style-type: none"> <li>- workers exposed to machinery and high noise levels,</li> <li>- workers working with hazardous chemicals,</li> <li>- harvesters</li> <li>- pesticides operators</li> <li>- Fertilizer Applicators</li> <li>- First Aiders</li> </ul> <p>New employees were given Awareness and Induction course that include exposure to RSPO.</p> <p>Refresher training are also conducted, among others, Application of pesticides by Pesticides Operators, First Aid, Harvesting and SOP.</p> <p>Following in-house training conducted, all training participants were assessed for competency to close the knowledge or skill gap by the Trainer as well as by the their Superior (Mandore or Assistant Manager).</p> <p>Training for Certificated Competent Persons required by law were also provided to employees such as Steam Engineer, Boilerman, CePSWaM (Certified environmental Professional for Scheduled Waste Management), CePPOME (Certified environmental Professional for the treatment of Palm Oil Mill Effluent), First Aiders, etc.</p>	<p>Complied</p>

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4.8.2 Records of training for each employee shall be maintained. - Minor compliance -	<p>Training records for employees were available and maintained at the mill and estates office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&amp;C requirement.</p> <p>Sample training checked:</p> <table border="0"> <thead> <tr> <th><u>Name of Course</u></th> <th><u>Dates conducted</u></th> </tr> </thead> <tbody> <tr> <td>Safety Data Sheet</td> <td>- 24.2.2018</td> </tr> <tr> <td>Grievance procedure</td> <td>- 3.3.2018</td> </tr> <tr> <td>Chemical handling</td> <td>- 27.2.2018</td> </tr> <tr> <td>Schedule waste handling</td> <td>- 4.4.2018</td> </tr> <tr> <td>Fire Extinguisher</td> <td>- 26.4.2018</td> </tr> <tr> <td>Fire drill</td> <td>- 14.3.2018</td> </tr> <tr> <td>Work in Confine Space</td> <td>- 1.8.2018</td> </tr> <tr> <td>SOP Training (Harvesters, } Pesticide Operators, Mill } Machinery Operators) }</td> <td>- various dates from February to May 2018</td> </tr> </tbody> </table>	<u>Name of Course</u>	<u>Dates conducted</u>	Safety Data Sheet	- 24.2.2018	Grievance procedure	- 3.3.2018	Chemical handling	- 27.2.2018	Schedule waste handling	- 4.4.2018	Fire Extinguisher	- 26.4.2018	Fire drill	- 14.3.2018	Work in Confine Space	- 1.8.2018	SOP Training (Harvesters, } Pesticide Operators, Mill } Machinery Operators) }	- various dates from February to May 2018	Complied
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<b>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</b>																				
<b>Criterion 5.1:</b>																				
Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.																				
5.1.1 An environmental impact assessment (EIA) shall be documented. - Major compliance -	<p>EIA was done in 1996 by Chemsain Konsultant Sdn Bhd. The report entitled "Preliminary Environmental Impact Assessment" [ref. #CK/EIA/085/96, dated Sep 1996] was available for verification.</p> <p>Apart from that, an assessment of environmental impacts was also conducted internally according to Procedure Manual Ref. No.: KPSB 1/2012; Doc. No.: Aspect Impact 1/2012. Identification of Environmental Aspects and Evaluation of Environmental Impacts. The results of evaluation were documented in "Environmental Aspect Impact Identification and Evaluation Form". The assessment had covered all of the estates activities which included harvesting &amp; evacuation and field upkeep. Among the environmental impact considered were depletion of natural resources, global warming, air pollution, water pollution, land contamination and community impacts.</p>	Complied																		
5.1.2 Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -	Based on the above procedure clause 6.9, any significant environmental impacts shall be prioritized and registered in the Significant Aspects and Impacts Registrar Form by SHO or TQM units. However, this was not evident. Thus, a non-conformity was assigned due to this lapse.	Minor nonconformance																		



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5.1.3 This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -	Based the EIA approval (by NREB, dated 14/8/1995 [ref.:(1)KPS/P/6-3/18]), the Environmental Management Report is required to be submitted to the Natural Resources & Environmental Board of Sarawak 3 times a year. Last 2 reports available for verification are dated Oct-Dec 2017 and Jan-Mar 2018. The Apr-Jun 2018 report was still pending for completion by the appointed consultant (ESI Sampling Sdn Bhd). Among the issues assessed in this activity were biodiversity conservation, river bank protection, control of soil erosion and sedimentation, protection of air quality, protection of water quality, control of noise pollution, control of solid wastes, social-economic aspects and public health and safety.	Complied
<b>Criterion 5.2:</b> The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.		
5.2.1 Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -	Environmental and Biodiversity Review was conducted by Wild Asia & Integrated Environmental Consultants Sdn. Bhd. in 2010. Report ref.: M672/10/E&BioD; review: V5; dated May 2010 was available for verification. Methods used were vegetation assessment through satellite image, discussion with the members of the local community and direct comparison against the surrounding forest and Temuda land (on assumption that this is similar to what had been presented on the Project Site). Based on the report there is no HCV in the areas apart from riparian zones along a few rivers crossing through the estate. The riparian areas have been identified and clearly demarcated.	Complied
5.2.2 Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	There was no rare, threatened or endangered species identified and reported at both of the visited estates. Nonetheless, signage to restrict hunting was put up at strategic places in the estates such as entrance gates and boundary with local community.	Complied
5.2.3 There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	Education to workforce generally given through briefing at the muster ground/induction and signage of animal hunting restriction. Interview with workers showed that they were aware of the restriction.	Complied

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5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the management plan.</li> </ul> - Minor compliance -	Management plan is not necessary since no HCV and RTE identified by the HCV assessor. Nonetheless, the management continue to monitor its riparian zones mainly in term of agrochemicals application.	Complied
5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	There was no HCV set-aside that needs any negotiation process with the local communities.	Complied
<b>Criterion 5.3:</b> Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		
5.3.1 All waste products and sources of pollution shall be identified and documented. - Major compliance -	Based on documented pollution prevention plan (KM 4-1 Waste Register RSPO/ISCC), among the waste products identified and documented were general wastes and scheduled waste. Sources of waste were from the mill, estates and housing area.  Common waste identified including domestic waste and scheduled waste. Other specific type of waste generated by the mill is organic (biomass) waste which is also a source of renewable energy consists of fibres, shells, empty fruit bunches, boiler ashes and decanter solids.  For estates, its reusable and recyclable wastes identified included empty fertilizer bags and triple rinsed empty chemical containers.  Other specific activities such as mill maintenance and estate vehicle workshop generate few categories of scheduled wastes such as spent oil, spent hydraulic oil, contaminated containers and contaminated filters & rags. Clinic operation generated clinical wastes.	Complied
5.3.2 All chemicals and their containers shall be disposed of responsibly. - Major compliance -	At Keres Mill, empty contaminated containers were stored and disposed as scheduled waste. For the estates, the empty chemical containers were returned to the supplier after undergone the triple rinsing procedure. Records of the empty chemical containers movement were well maintained.	Complied

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<p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>Documented pollution prevention plan (KM 4-1) emphasized on the pollution prevention plan. Based on the site visit, it showed the implementation of reducing, reusing and recycling of wastes was continued by the mill and estates. Domestic/general wastes were segregated at the collection point from offices and housing for recyclable wastes before disposed to the designated landfill. Landfill operation was guided by "Guidelines for Landfill Establishment for Domestic Wastes in Keresia Plantations &amp; Mill". Among the criteria:</p> <ul style="list-style-type: none"> <li>• at least 100m from nearest river</li> <li>• 400m from residential area</li> <li>• Methods: sandwich and trench</li> </ul> <p>For scheduled wastes, the handling was done according to the legal requirement where a scheduled wastes were at in each operating unit. Verification of consignment notes and inventory records showed that the scheduled wastes were disposed in accordance to the legal requirements. Clinical wastes from the clinic were disposed to Bintulu Specialist Hospital Sdn. Bhd. through the authorised clinical waste collection and disposal contractor appointed by the company.</p>	<p>Complied</p>
<p><b>Criterion 5.4:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		

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<p>5.4.1</p> <p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -</p>	<p>Mill utilization of fossil fuels (diesel for genset) was monitored and control through stores stocks and materials checking reported on monthly basis. Effective maintenance plan and productive operation plan for genset including regular servicing of gensets as well as efficient operation of FFB process to fully utilize the free source of fuel i.e. biomass (fiber and shell) were implemented.</p> <p>The quantity of biomass consumed was also monitored to achieve the expected percentage of fiber (60 – 70%) and shell (3%) quantities being consumed. The company has optimized the use of renewable energy.</p> <p>The mill production output records and the renewable energy used were monitored monthly. The Mill monitors and reports energy usage monthly to head office through monthly report.</p> <table border="1" data-bbox="660 909 1297 1473"> <thead> <tr> <th></th> <th>Year 2017</th> <th>Jan – Jul 2018</th> </tr> </thead> <tbody> <tr> <td>FFB processed (mt)</td> <td>229203.77</td> <td>121309.84</td> </tr> <tr> <td>Fiber</td> <td>31919.24</td> <td>16983.38</td> </tr> <tr> <td>Shell produce</td> <td>6239.02</td> <td>6067.72</td> </tr> <tr> <td>Shell Dispatched</td> <td>132.68</td> <td>1653.84</td> </tr> <tr> <td>Shell used as biomass - B</td> <td>5106.34</td> <td>4413.88</td> </tr> <tr> <td>Renewable energy used</td> <td>37025.58</td> <td>21397.26</td> </tr> <tr> <td>Renewable energy generated , kwh</td> <td>503,326.50</td> <td>321,829</td> </tr> <tr> <td>Renewable energy used / mt FFB</td> <td>0.162</td> <td>0.176</td> </tr> <tr> <td>Diesel used for genset, mt - C</td> <td>302,099.00</td> <td>106,103.00</td> </tr> <tr> <td>Diesel used / mt FFB processed</td> <td>1.32</td> <td>0.87</td> </tr> <tr> <td>Diesel Power generation, kwh</td> <td>10781.40</td> <td>3444.0</td> </tr> </tbody> </table> <p>There is considerable drop in diesel usage in 2018 to date compared 2017 with a corresponding increase in the use of renewable energy for the same period.</p>		Year 2017	Jan – Jul 2018	FFB processed (mt)	229203.77	121309.84	Fiber	31919.24	16983.38	Shell produce	6239.02	6067.72	Shell Dispatched	132.68	1653.84	Shell used as biomass - B	5106.34	4413.88	Renewable energy used	37025.58	21397.26	Renewable energy generated , kwh	503,326.50	321,829	Renewable energy used / mt FFB	0.162	0.176	Diesel used for genset, mt - C	302,099.00	106,103.00	Diesel used / mt FFB processed	1.32	0.87	Diesel Power generation, kwh	10781.40	3444.0	<p>Complied</p>
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<p><b>Criterion 5.5:</b> Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>																																						

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5.5.1 There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	Keresia Plantations has established and implemented Best Management Practice (KP 2) approach through its standard operations and procedures (KP2-4 SOPs –Field Policy Manual).  Under its conservation measures chapter entitled Environment Conservation (SOP # 7.iii; version 2 dated 1 Jan 2009), all mitigations measures for plantation activities including land preparation or replanting shall be in compliance with the approved Environment Impact Assessment (EIA) by Natural Resource and Environmental Board of Sarawak.  There was no trace of open burning observed during the site visit.	Complied
5.5.2 Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	At the point of assessment, there was no land preparation for replanting. There was also no trace of any open burning observed during the site visit.	Complied
<b>Criterion 5.6:</b> Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.		

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<p>5.6.1</p> <p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).                      - Major compliance -</p>	<p>The Environmental Aspect and Impact Register (last reviewed on 23.4.2018) identified operation of boiler as a source of air pollution. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring of dust particulate.</p> <p>Ambient Air quality monitoring and Air emission monitoring has been carried out as per required frequency stipulated in mill's compliance schedule. In addition, smoke density meters were calibrated consistently every 6 monthly.</p> <table border="1" data-bbox="660 707 1299 943"> <thead> <tr> <th></th> <th>Chimney No. 1</th> <th>Chimney No. 2</th> </tr> </thead> <tbody> <tr> <td>Smoke density meter last calibration date</td> <td>6.7.2018</td> <td>6.7.2018</td> </tr> <tr> <td>Latest Stack monitoring date</td> <td>31.7.2018</td> <td>31.7.2018</td> </tr> <tr> <td>Stack emission result, Ambient Air Total Suspended Particulate, g/Nm<sup>3</sup></td> <td>31.7.2018</td> <td>31.7.2018</td> </tr> </tbody> </table> <p>Results shown the stack emissions are within limit at 0.357 g/Nm<sup>3</sup> for Chimney No 1 and 0.359 g/Nm<sup>3</sup> for Chimney No 2.</p> <p>Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment (KM 4-1 Baseline Waste ID), identified source was boiler chimney. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring of dust particulate. Following sample verified:</p> <ul style="list-style-type: none"> <li>- Fourth Quarter Report for Relative Accuracy Audit (RAA) Test on Opacity Monitor Installed at Boiler # 1 and Boiler # 2; Assessment Date: 5/1/2018; Report ref. # KMSB/KPOM/2017/QR4; Report date: 15/1/2018</li> <li>- Fourth Quarter Report for Relative Accuracy Audit (RAA) Test on Opacity Monitor Installed at Boiler # 1 and Boiler # 2; Assessment Date: 25/4/2018; Report ref. # KKJSB/TPOM/2018/QR1; Report date: 30/4/2018</li> <li>- Maintenance Job Sheet # SOR18-JP006; Date: 6/7/2018; To perform Second Quarter Relative Accuracy Audit (Calibration) by Global Green Engineering &amp; Supply Sdn. Bhd. for the CEMS; Calibration Cert. # JP-8006A (Boiler #1) &amp; JP-8006B (Boiler #2)</li> </ul>		Chimney No. 1	Chimney No. 2	Smoke density meter last calibration date	6.7.2018	6.7.2018	Latest Stack monitoring date	31.7.2018	31.7.2018	Stack emission result, Ambient Air Total Suspended Particulate, g/Nm <sup>3</sup>	31.7.2018	31.7.2018	<p>Complied</p>
	Chimney No. 1	Chimney No. 2												
Smoke density meter last calibration date	6.7.2018	6.7.2018												
Latest Stack monitoring date	31.7.2018	31.7.2018												
Stack emission result, Ambient Air Total Suspended Particulate, g/Nm <sup>3</sup>	31.7.2018	31.7.2018												
<p>5.6.2</p> <p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.                      - Major compliance</p>	<p>Based on KM 4-1 Baseline Waste ID, main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH<sub>4</sub>) emission through POME treatment. The company are in process of obtaining proposals to construct methane capture facilities in POME treatment pond. Received one proposal from Konpro Consultant. Expected to complete the construction of the biogas plant by 2017.</p> <p>Other less significant GHG emissions identified including CO<sub>x</sub>, SO<sub>x</sub> and NO<sub>x</sub> from various sources including fossil fuel, chemical and fertilizer consumptions.</p>	<p>Complied</p>												

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<p>5.6.3</p> <p>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -</p>	<p>Verification of data in RSPO GHG calculator and sources of data which was mainly the store issuance records showed that the data was authentic.</p> <p><u>CEMS, Final Discharge – BOD 20ppm</u></p> <p>Tools and systems used to monitor significant pollutants includes the DOE Continuous Emission Monitoring System (CEMS) for air emissions, water quality at discharge points as per DOE regulations with monthly sampling analysis by external laboratory, ESI Laboratory and Scheduled Waste disposal as per the DOE requirements via E-Swis.</p> <p>Results of monitoring of smoke emissions, palm oil mill effluent discharge analysis and disposal of schedule wastes was found complied with the Environmental Quality Act 1974.</p> <p>Monitoring of the GHG quantity was previously done through its licensed GHG calculator, Neste Oil where annual quantification of all GHG sources was input into the calculator. Default values of emissions factor Calculation of the GHG emissions were derived from the RES-directive Annex V, table D as estimated by BioGrace project. These calculations were then checked against the calculations through ENZO. The GHG calculations were done separately between the mill and estates.</p> <p>The latest 2016 GHG was calculated through PalmGHG Ver. 3.01 calculator. The final figure shown total emissions was 1.79 tCO<sub>2</sub>e/mt products (CPO &amp; PK). Major source of emissions were from the estate field activities (80.95%) and mill (18.38%).</p>	<p>Complied</p>

**Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.**

**Criterion 6.1:**  
Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.1.1</p> <p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>- Major compliance -</p>	<p>The initial social impact assessment (SIA) was conducted by Wild Asia through a Technical Advisory Program conducted on 2-5 August 2011 in Keresia Plantations and Mill. A progress report entitled Keresia Plantations &amp; Mill - Satisfaction Survey Study 2011 Summary Notes; SAI ADV 2011 P0024 Keresia; Last updated 22/9/2011 was produced as part of the SIA.</p> <p>Records of the latest satisfaction survey conducted on 19-21 July 2018 indicated that at least 5 workers representative from each division of both estates were being surveyed of three categories which related to terms and conditions of work, social provision and safety &amp; health. The methodology of the assessment was by given questionnaire to the stakeholders.</p> <p>Subsequently, a table of Social Aspect, Positive Impact, Promoting Measures, Negative Impact and Control Measures has been established as Social Impact Assessment Keresia Plantations &amp; Mill; Assess date: 19-20 July 2018; Next Assess: Year 2019; Date Report: 25/7/2018.</p>	<p>Complied</p>
<p>6.1.2</p> <p>There shall be evidence that the assessment has been done with the participation of affected parties.</p> <p>- Major compliance -</p>	<p>There is evidence that the assessment has been done with the participation of affected parties based on the workers (internal stakeholder) satisfaction survey meeting conducted on 19-21 July 2018.</p>	<p>Complied</p>
<p>6.1.3</p> <p>Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.</p> <p>- Major compliance -</p>	<p>The plan for avoidance or mitigation of negative impacts and promotion of positive ones were established as Social Management Plan for Year 2018 prepared by Winnie Siman 15/3/2018. Plans included the followings:</p> <ul style="list-style-type: none"> <li>- Worker monthly dialogue</li> <li>- Joint consultative committee (JCC) meeting Mar, Jun &amp; Oct</li> <li>- Canteen inspection</li> <li>- Health screening</li> <li>- Health talk</li> <li>- Sport day</li> <li>- Activity for women</li> <li>- Activity for children</li> <li>- Meeting tuai-tuai rumah Apr, May &amp; Aug</li> <li>- CSR Apr, Aug &amp; Nov</li> <li>- Satisfaction survey Jul &amp; Nov 2018</li> <li>- Celebration day Jun &amp; Dec 2018</li> </ul>	<p>Complied</p>
<p>6.1.4</p> <p>The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties.</p> <p>- Minor compliance -</p>	<p>The plans were also reviewed with all stakeholders during the stakeholder meeting conducted with both internal and external stakeholders i.e. the JCC meeting latest conducted on June 2018, Tuai-tuai Rumah (Longhouse Chief) meeting conducted on August 2018 and satisfaction survey conducted on July 2018.</p>	<p>Complied</p>



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6.1.5 Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	The list of SIA tabulated in table of Social Aspect, Positive Impact, Promoting Measures, Negative Impact and Control Measures has been established as Social Impact Assessment Keresia Plantations & Mill; Assess date: 19-20 July 2018; Next Assess: Year 2019; Date Report: 25/7/2018. However, relevant social impact with regards to smallholders was lacking of particular attention.  Hence, a minor nonconformity has been raised.	Minor nonconformance
<b>Criterion 6.2:</b> There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.		
6.2.1 Consultation and communication procedures shall be documented. - Major compliance -	Consultation and communication procedures available in documented mechanism established through the use of Complaint Form with Flowchart of Complaint/Grievance communications. Direct communications also done through Workers Monthly Dialogue conducted with the workers' representative from all estate divisions of all 3 estates with the management and TQM department. Sighted latest dialogue conducted on 29/6/2018.	Complied
6.2.2 A management official responsible for these issues shall be nominated. - Minor compliance -	The manager and assistant managers at each operating units are responsible for respective units' communications. Additionally, on behalf of top management, Safety & Health Officer (for mill) and AGM of Keresia Group Plantation (for estates) have been nominated as communication officer to handle any social related issues.	Complied
6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	A list of stakeholders consist of internal, local community, vendors and authorities were recorded and being updated from time to time as necessary. Efforts to ensure understanding of relevant parties together with actions were maintained in documented records including the records of JCC meeting latest conducted on June 2018, Tuai-tuai Rumah (Longhouse Chief) meeting conducted on August 2018 and satisfaction survey conducted on July 2018.	Complied
<b>Criterion 6.3:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.		
6.3.1 The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	The system implemented via specific grievance mechanism established through the use of Complaint Form with Flowchart of Complaint/Grievance (Complaints & Grievance Procedure; ref. # SOC 3.2) available with specific person in-charge of each stage of the complaint flow to ensure effective, timely and appropriate resolution manner. Only appointed responsible person keep the records to ensure anonymity of complainants.	Complied
6.3.2 Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance -	Based on the sampled complaint form # 0401 dated 5/7/2018, the complaints has been taken action by the complaint recipient and resolution been recorded in documented form.	Complied

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<b>Criterion 6.4:</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.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	A procedure for identifying legal, customary or user rights complete with identifying people entitled to compensation was available in place i.e. Procedure for Identification of Customary Land Rights & Compensation; ref. # SOC 3.3.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	The procedure for calculating and distributing fair compensation was included in the Procedure for Identification of Customary Land Rights & Compensation; ref. # SOC 3.3.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	The procedure already specified the process of negotiation with the intention of fair outcome to all affected parties. As of the date of the on-site assessment visit, no any disputes that requires the implementation of process.	Complied
<b>Criterion 6.5:</b> Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			

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<p>6.5.1 Documentation of pay and conditions shall be available.                      - Major compliance -</p>	<p><b>Mill:</b>                      Documentation of pay and conditions verified available for the following sampled work agreements and pay slips:</p> <ul style="list-style-type: none"> <li>- George Bush AK Tuah; Nationality: Malaysia; Workers ID # E0761; Date joined: 2/1/2018; Station: Weighbridge</li> <li>- Cindy AK Geluma; Nationality: Malaysia; Workers ID # E0761; Date joined: 2/5/2018; Station: Baby Sitter</li> <li>- Jaswadi; Nationality: Indonesia; Workers ID # E0756; Date joined: 8/11/2018; Station: Loading Ramp</li> <li>- Junaidi; Nationality: Indonesia; Workers ID # E0741; Date joined: 27/7/2017; Station: Oil Room</li> <li>- Abdurrahman; Nationality: Indonesia; Workers ID # E0775; Date joined: 27/7/2018; Station: Oil Room</li> </ul> <p><b>Jiba Estate:</b>                      Documentation of pay and conditions verified available for the following sampled work agreements and pay slips:</p> <ul style="list-style-type: none"> <li>- Hendra Saputra; Nationality: Indonesia; Workers ID # 11206; Date joined: 7/3/2017; Station: Security</li> <li>- Santi; Nationality: Indonesia; Workers ID # 11877; Date joined: 2/7/2018; Station: Baby Sitter</li> <li>- Hasid; Nationality: Indonesia; Workers ID # 11413; Date joined: 23/7/2017; Station: Harvester</li> <li>- Ewalde Omenu; Nationality: Indonesia; Workers ID # 20113; Date joined: 1/9/2017; Station: Line sweeper</li> <li>- Arjun; Nationality: Indonesia; Workers ID # 10697; Date joined: 23/2/2017; Station: FFB Loader</li> </ul> <p><b>Sujan Estate:</b>                      Documentation of pay and conditions verified available for the following sampled work agreements and pay slips:</p> <ul style="list-style-type: none"> <li>- Kamisi Sanne; Nationality: Indonesia; Workers ID # 10653; Date joined: 17/12/2015; Station: Harvester</li> <li>- Erlina; Nationality: Indonesia; Workers ID # 11844; Date joined: 2/7/2018; Station: Baby Sitter</li> <li>- Martinus Nauf; Nationality: Indonesia; Workers ID # 10876; Date joined: 23/7/2017; Station: General</li> <li>- Rabaintan; Nationality: Indonesia; Workers ID # 10534; Date joined: 1/9/2017; Station: Manurer</li> <li>- Saripin; Nationality: Indonesia; Workers ID # 10793; Date joined: 23/2/2017; Station: Road Maintenance</li> </ul>	<p>Complied</p>
<p>6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.                      - Major compliance -</p>	<p>Contract agreements available for all sampled workers as above that detailing their payments and conditions as per Sabah Labour Ordinance and Malaysia National Minimum Wage Order 2016 as well as other relevant requirements obliged. Interview with workers confirmed that they understood the content and kept their own copy of the agreements.</p>	<p>Complied</p>

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<p>6.5.3</p> <p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>- Minor compliance –</p>	<p>Sighted the letter by Pejabat Kesihatan Bahagian Bintulu; Ref. # PKBB/KMAM/600-2(166); Dated 30/8/2017 on the requirement of correct chlorine dosage for drinking water treatment process in the estate plant (<i>Keperluan Dalam Penedosan Klorin Dengan Kadar Yang Betul Bagi Proses Rawatan Air Minum Di Loji Ladang</i>). The attached document of <i>Borang Pengumpulan Data Analisis Group 1</i> (In Situ Test); dated 22/8/2017 and <i>Lampiran 1</i> (Attachment 1) Borang S1B (Air Terawat) Jabatan Kimia Malaysia Permintaan Analisis Bakteria; Kod Balai KKS75 dated 23/8/2017 shown bacteria (Total Coliform) was detected in sample S02 (Treatment plant – treated) and S05 (Stesen 2 Kantin).</p> <p>Latest external analysis for the drinking water sample was done by ESI Laboratory Sdn. Bhd.; Certificate of Analysis # KPSB/12-10/017; Lab # ELS/KPSB/04/017/17; Date sample received: 12/10/2017; Date sample reported: 16/10/2017. Analysis of Total Coliform Count (TCC), MPN/100mL was done for sample marking as following:</p> <ul style="list-style-type: none"> <li>- D1 (before water tap entering crèche water tank); TCC result: &lt;1 MPN/100mL</li> <li>- D2 (after water tank entering Robert’s house); TCC result: &gt;2419 MPN/100mL</li> <li>- D3 (after water pipe entering Augustus’s house water tank); TCC result: 160 MPN/100mL</li> </ul> <p>Due to the evidence sighted, it can be concluded that the CAP for the closure of previous Minor NC for this indicator was insufficient where the quarterly monitoring of drinking water by estate &amp; mill does not included the problematic parameter (Total Coliform) and annual inspection by Pegawai Kesihatan Bahagian Bintulu was yet to be conducted. Hence, this Minor indicator has been escalated to Major noncompliance due to recurrence.</p>	<p>Complied</p>
<p>6.5.4</p> <p>Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p>Keresa demonstrated their efforts to monitor and improve workers’ access to adequate, sufficient and affordable food through the provision of canteen at mill and sundries shop at both Sujan and Jiba estates. Prices of foods and sundries were sighted to be displayed at all premises.</p>	<p>Complied</p>
<p><b>Criterion 6.6:</b>  The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>		
<p>6.6.1</p> <p>A published statement in local languages recognising freedom of association shall be available.</p> <p>- Major compliance -</p>	<p>Policy established as Memorandum “Polisi Kebebasan Berpersatuan (Freedom of Association Policy) available in multiple language; Tarikh: 1/12/2009; Signed by MD Keresa Plantations Sdn. Bhd.</p> <p>Communications done through Workers Monthly Dialogue conducted with the workers’ representative from all estate divisions of all 3 estates with the management and TQM department. Sighted latest dialogue conducted on 29/6/2018.</p>	<p>Complied</p>

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6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Joint Consultative Committee (JCC) Meeting 1/2018; Date: 21/3/2018 between President (Mill Manager); HSE Officer (Communication Rep.); Sustainability Officer (Secretary); Women Rep., OSH Rep., Medical Rep., Worker Rep. and Security & Workplace Rep.	Complied
<b>Criterion 6.7:</b> Children are not employed or exploited.		
6.7.1 There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Based on the list of workers particulars in mill and both estates, no evidence that child labor of under 18 years old being employed by Keresas. Visit and interviews with few workers at the operational area and field confirmed that the minimum age requirement was met.	Complied
<b>Criterion 6.8:</b> Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.		
6.8.1 A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	An equal rights/opportunities policy available publicly in strategic area at mill and both estates been displayed at the notice board at the compound. Policy has been implemented since 1/12/2009.	Complied
6.8.2 Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Based on the workers' particulars lists and interviews, there's no any evidence of discrimination of employees and groups including local communities, women and migrant workers within Keresas.	Complied
6.8.3 It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Based on the workers' individual records and interviews, it was demonstrated that all workers among locals and foreigners were been screened through appropriate medical check-up and been assigned to specific tasks based on individuals' capabilities and qualities. Recommendation from medical check-up also determined the workers' tasks.	Complied
<b>Criterion 6.9:</b> There is no harassment or abuse in the work place, and reproductive rights are protected.		
6.9.1 Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Policy established as Memorandum "Prevention of Sexual Harassment & Domestic Violence in the Workplace Policy"; Dated: 1/12/2009; Signed by Managing Director Keresas Plantations Sdn. Bhd. The Sexual Harassment Talk & Company Policies Briefing programs conducted for all female workers (TKI), all staff, clerk & executive at all operating unit as following: - Sg. Kubud & Jiba Estate dated 25/6/2018 - Sujan Estate & Keresas Mill dated 26/6/2018	Complied
6.9.2 A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	Policy established as Memorandum "Kenyataan Dasar Hak Mengandung dan Melahirkan Anak; Tarikh: 7/11/2017; Signed by Group SGM Keresas Plantations Sdn. Bhd. The Sexual Harassment Talk & Company Policies Briefing programs conducted for all female workers (TKI), all staff, clerk & executive at all operating unit as following: - Sg. Kubud & Jiba Estate dated 25/6/2018 - Sujan Estate & Keresas Mill dated 26/6/2018	Complied

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6.9.3	<p>A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Specific grievance mechanism established through the use of Complaint Form with Flowchart of Complaint/Grievance available with specific person in-charge of each stage of the complaint flow. Sighted a sample of complaint form # 0401 dated 5/7/2018 has been taken action by the complaint recipient.</p> <p>Activities conducted:</p> <ul style="list-style-type: none"> <li>- Badminton tournament 21-23/3/2018 among all female workers (TKI), all staff, clerk &amp; executive at all operating unit</li> <li>- Health talk by clinic assistant to all female workers (TKI), all staff, clerk &amp; executive at all operating unit dated on 19/4/2018</li> </ul>	Complied
<p><b>Criterion 6.10:</b>            Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>			
6.10.1	<p>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p>- Minor compliance -</p>	<p>The current and past prices of FFB was publicly displayed in the mill at the weighbridge counter. The price was based on the MPOB guide/website.</p>	Complied
6.10.2	<p>Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation).</p> <p>- Major compliance -</p>	<p>Pricing mechanisms including FFB pricing were explained during meeting with smallholders and contractors as per latest sample sighted:</p> <ul style="list-style-type: none"> <li>- Minit Mesyuarat Bersama Tuai-tuai Rumah Siri-1 2018; Tarikh: 11/7/2018; Attended by Tuai Rumah (TR) Mabong, TR Anchai, TR Majang TR Iba, TR</li> <li>- Contractor Meeting Minute;</li> </ul>	Complied
6.10.3	<p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>- Minor compliance -</p>	<p>Evidence available as per following samples sighted:</p> <ul style="list-style-type: none"> <li>- Keresia Mill Sdn. Bhd. Agreement For Labour Quarters Construction In Keresia Mill Sdn. Bhd. Between Ling Brothers Machinery Sdn. Bhd. and Keresia Mill Sdn. Bhd.; Dated 15/5/2018</li> <li>- Keresia Plantations Sdn. Bhd. Agreement For Road Reconstruction &amp; Maintenance, Fixing Culvert &amp; Log Bridge &amp; Drain Desilting In Keresia Planations Sdn. Bhd. Between Tripple Tree Alliance Sdn. Bhd. and Keresia Plantations Sdn. Bhd.; Dated 1/5/2018</li> <li>- Keresia Plantations Sdn. Bhd. Agreement For Fresh Fruit Bunches, Fertilizers And Workers Transportation In Keresia Planations Sdn. Bhd. Between Lising Enterprise and Keresia Plantations Sdn. Bhd.; Dated 1/5/2018</li> </ul>	Complied
6.10.4	<p>Agreed payments shall be made in a timely manner.</p> <p>- Minor compliance -</p>	<p>Evidence of agreed payments made as per following samples sighted:</p> <ul style="list-style-type: none"> <li>- Ling Brothers Machinery; Invoice # I-000124 dated 31/5/2018; Payment Voucher # RPV 0716/18; dated 25/7/2018</li> </ul>	Complied
<p><b>Criterion 6.11:</b>            Growers and mills contribute to local sustainable development where appropriate.</p>			

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6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	CSR contributions including the following samples:  - Funeral donation to family of the longhouse members (Rumah Iba) whom has passed away; Voucher # EC 1344; dated: 8/1/2018  - Funeral donation to family of the longhouse members (Rumah Iba) whom has passed away; Voucher # EC 1402; dated: 15/1/2018  - Donation to the longhouse (Rumah Lawai); Voucher # EC 1407; dated: 22/3/2018	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	The Keresa Smallholders Group Scheme (KSGS) has been discontinued as the certified supply based under Keresa certification unit. However it is evidence that efforts and resources were continuously been allocated such as Fertilizer Supply Programs for each formal individual member of smallholder group. Sighted the installment schedule for Mix 924 fertilizer for the month of October and November 2017.	Complied
<b>Criterion 6.12:</b> No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	Based on the interviews with workers and evidence of work contract agreements as well pay slips available, there's no forms of forced or traffic labour are used.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	There's no any contract substitution among both local and foreign workers as per interview and records assessed.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Keresa implemented their equal rights/opportunities policy that applicable to all workers whether local, foreign, permanent or temporary. No casual or temporary workers except for foreign workers contract work period obligation according to Sabah Immigration Ordinance.	Complied
<b>Criterion 6.13:</b> Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	Policy established and documented as Memorandum "Kenyataan Dasar Kemanusiaan; Tarikh: 7/11/2017; Signed by Group SGM Keresa Plantations Sdn. Bhd.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Keresa Plantations Sdn. Bhd. had applied to the Ministry of Education Malaysia Department of Private Education for the establishment of Community Learning Centre (CLC) through a letter dated 17/7/2018. Visit by representatives from Consulate General of Indonesia was done on 15/5/2018 with the objective to set-up the CLC. Subsequently, the CLC has been set-up by Keresa and launched together with representatives from both Consulate General of Indonesia and CLC Sarawak on June 2018. The CLC has received Indonesian workers' children and started operation from August 2018.	Complied
<b>Principle 7: Responsible development of new plantings</b>			

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Criterion / Indicator	Assessment Findings	Compliance	
<p><b>Keresia Palm Oil Mill</b> Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area.</p>			
<p><b>Principle 8: Commitment to continual improvement in key areas of activity</b></p>			
<p><b>Criterion 8.1:</b> Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.</p>			
<p>8.1.1</p>	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);               <ul style="list-style-type: none"> <li>• Optimising the yield of the supply base.</li> </ul> </li> </ul> <p>- Major compliance -</p>	<p>The action plan for continual improvement at Keresia POM include the following:</p> <ul style="list-style-type: none"> <li>• Biogas plant under currently under construction (future),</li> <li>• Use of LED bulbs,</li> <li>• Upgrade of Shinko turbine - power output improvement</li> </ul> <p>At the estates, their on-going action plans include:</p> <ul style="list-style-type: none"> <li>• reduction in use of pesticide with simultaneous planting of beneficial plant as part of IPM program.</li> <li>• Recycle, Reuse and Reduce Program at mill. Estate office and plan to extend to linesite.</li> </ul>	<p>Complied</p>



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**Appendix B: Approved Time Bound Plan**

Keresia Plantations Sdn Bhd operates one palm oil mill and three estates. Palm Oil Mill, two estates and associated smallholder are certified since 2010. Kubud estate was planted in 2012 without prior HCV assessment. This issue was brought to RSPO voluntarily by the company to RSPO Technical Director on 17 September 2013. This area is under compensation mechanism and not certified. The timeline to certify Kubud Estate is depends on the approval of the Keresia Plantations Sdn Bhd’s compensation proposal by RSPO.

No	Production Units	Location	Status	TBP	Remark
	<b>Keresia Plantation</b>			To be completed by 2020 based on ACOP 2015	Company leased land from community and developed into oil palm Sg Kubud Estate to help the community. The land was opened by community since early 1900 through shifting cultivation. Kubud Estate yet to be included in the TBP because the community developed the land without prior HCV. This case was voluntarily reported to RSPO by Keresia and we are in the process of getting exemption from RSPO due to the land was originally cleared through shifting cultivation in early 1990s by the community and belongs to the community through Native Customary Right.
	Sujan Estate	Lavang Land District, Bintulu, Sarawak	Certified 2010		
	Jiba Estate	Lavang Land District, Bintulu, Sarawak	Certified 2010		
	Sg Kubud Estate	Lavang Land District, Bintulu, Sarawak	Pending for compensation proposal by RSPO		

**Appendix C: GHG Reporting Executive Summary**

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

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

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

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	16.68
PK	0

Extraction	%
OER	19.1
KER	4.08

Production	t/yr
FFB Process	227,763.56
CPO Produced	227,763.56
PKO Produced	0

Land Use	Ha
OP Planted Area	8,551.07
OP Planted on peat	1,231.5198
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>2,086.60</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	65,747.48	0.71	10,909.4	0.55	0	0	76,656.88	1.26
CO <sub>2</sub> Emission from fertilizer	6,324.84	0.07	1,179.92	0.06	0	0	7,504.76	0.13
NO <sub>2</sub> Emmision	4,086.49	0.04	818.98	0.04	0	0	4,905.47	0.08
Fuel Consumption	517.22	0.01	101.98	0.01	0	0	619.2	0.02
Peat Oxidation	0	0	1,040.12	0.03	0	0	1,040.12	0.03
<b>Sink</b>								
Crop Sequestration	-69,319.89	-0.67	-10,329.87	-0.52	0	0	-79,649.76	-1.19
Conservation Sequestration	0	0	0	0	0	0	0	0
<b>Total</b>	<b>14,356.14</b>	<b>0.15</b>	<b>3,720.53</b>	<b>0.17</b>	<b>0</b>	<b>0</b>	<b>18,076.67</b>	<b>0.32</b>

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	22,460.66	0.2
Fuel Consumption	27.02	0
Grid Electricity Utilisation	596.5	0.01
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>23,084.18</b>	<b>0.2</b>

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

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

\*This mill has no kernel crusher operation.

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

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

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

<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>			
	<b>Requirement</b>	<b>Evidence</b>	<b>Compliance</b>
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Keres Mill Sdn Bhd takes legal ownership and physically handles its RSPO certified oil palm products i.e. CPO and PK.	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Keres Mill is not a trading company. Therefore, this requirement is not applicable.	NA
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	The parent company (Keres Plantations Sdn Bhd) is the member of RSPO. Registration information as following: Member ID: RSPO_PO1000000340	Yes
5.1.4	Processing aids do not need to be included within an organization's scope of certification.	Processing aids are not used in the milling process.	Yes
<b>5.2 Supply chain model</b>			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	The mill has been receiving FFB from both certified and non-certified suppliers. Declassification of the CPO or PK was done in the correct order i.e. MB to conventional only.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Keres POM is MB certified and sales of the products were of MB or conventional only.	Yes
<b>5.3. Documented Procedures</b>			
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the</li> </ul>	Few procedures for supply chain have been established to guide the management on supply chain implementation i.e.: i) Supply Chain Procedures for FFB, CSPO & CSPK (MB), dated October 2017, first edition ii) Mass Balance (CPO), dated January 2017, first edition	No

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	elements of the supply chain model requirements.	<p>iii) Mass Balance (PK), dated January 2017, first edition</p> <p>iv) Internal Audit Procedure, dated July 2015, rev 1 (25/8/2017)</p> <p>v) Management Review Procedure, dated September 2015, version 1.0</p> <p>However, the procedures were found not adequately addressed the requirements of the latest version of RSPO SCC Standard, version 2017, especially the requirements of internal audit and management review. Thus, a non-conformity was assigned due to this lapse.</p>	
	<ul style="list-style-type: none"> <li>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	<p>Among the records included in the procedures are:</p> <ul style="list-style-type: none"> <li>Weighbridge tickets</li> <li>Dispatch of CPO/PK – weighbridge ticket, delivery order, shipping document</li> <li>Daily production report</li> <li>Record and balance</li> </ul>	Yes
	<ul style="list-style-type: none"> <li>Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard.</li> </ul>	<p>The mill manager, Sr Assistant Mill Manager and TQM Executive are the persons assigned to have overall responsibility [ref.: Mass Balance (CPO or PK) Procedures, clause 3.3].</p>	Yes
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>Addressed in the "Internal Audit Procedure", dated July 2015, rev 1 (25/8/2017). However, as mentioned in 5.3.1, the auditing of RSPO SCCS elements was not addressed and internal audit for RSPO supply chain has yet to be conducted. Thus, a non-conformity was assigned due to this lapse.</p>	No
	<p>ii) effectively implements and maintains the standard requirements within its organization</p>	<p>The internal audit for RSPO supply chain has yet to be conducted. Thus, a non-conformity was assigned due to this lapse (refer above).</p>	No (refer above)
<b>5.4. Purchasing and goods in</b>			
5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified</p>	<p>When FFB delivered to the mill from the estates, the transporters presented FFB chits to the mill weighbridge clerk in order the FFB to be received by the mill. All the</p>	Yes

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	<p>products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>information required by the supply chain standard was found to be available in the FFB chits and weighbridge tickets.</p>	
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	<p>The information was available in various documents such as mentioned above.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> <li>• The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	<p>All the certified suppliers i.e. from own plantations (Jiba and Sujan) and KSGS are certified under the same certificate with the mill. The mill does not receive any third party certified FFB. Although KSGS was also certified, the CPO and PK contributed from KSGS portion was categorised as conventional by Keresia. From this assessment onwards, Keresia has decided to exclude KSGS from its certification scope.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> <li>• A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>	<p>The certified suppliers are certified under the same certificate with the mill. Therefore, no checking of validity is necessary.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> <li>• The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of</li> </ul>	<p>NA – the mill does not purchase FFB from any certified trader.</p>	<p>NA</p>

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	shipping announcements / announcements.		
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Addressed in Mass Balance (CPO or PK) procedure clause 7.2 Over declared CSPO/CSPK. Based on the procedure, where there is an over-declared products whereby non-certified palm oil products were sent as certified products. Downgrading must be done and the amount of over-declared palm oil shall be removed from sustainable product account.	Yes
<b>5.5. Outsourcing activities</b>			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	Ref.: Agreement between Keresia Mill Sdn Bhd and CPO & PK transport companies. The validity of all the agreements is 2 years. Since the mill is using mass balance model, there is not much SC requirements applicable to transporter and no necessity to spell it out in the agreement.	NA
5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:	Not applicable. No outsourcing activity.	NA
	a. The site has legal ownership of all input material to be included in outsourced processes;		
	b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.	Not applicable. No outsourcing activity.	NA
	c. The site has a documented control system with explicit procedures for the outsourced process which is	Not applicable. No outsourcing activity.	NA

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	communicated to the relevant contractor.		
	d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	Not applicable. No outsourcing activity.	NA
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	NA
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	NA
<b>5.6. Sales and goods out</b>			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>Based on the sampled transactions, all the required information by the supply chain standard was available in various sales documents such as:</p> <ul style="list-style-type: none"> <li>• Sales contracts</li> <li>• Tax invoice</li> <li>• Mill weighbridge tickets – seal no. included (6 – 8 seals)</li> <li>• Buyer’s weighbridge ticket</li> <li>• MPOB form</li> <li>• Palm Kernel delivery note</li> <li>• CPO/PK Dispatch record book</li> </ul>	Yes
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	Information is complete and available in various documents as mentioned above.	Yes



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	<ul style="list-style-type: none"> <li>For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	Announcement registered in PalmTrace system is done by the Sr. Group Internal Audit Manager based in Keresas HQ, Kuching. Based on PalmTrace transaction report, there were 10 shipping announcements of CSPO and 12 shipping announcements for CSPK made since the last assessment.	Yes
<b>5.7. Registration of transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>are mills, traders, crushers and refineries and;</li> <li>take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	The registration of PalmTrace is carried out by the Sr. Group Internal Audit Manager based in Keresas HQ, Kuching. All transaction will be registered in the PalmTrace.	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> </ul>	Based on the announcement summary, all the registrations were found to be in order.	Yes
	<ul style="list-style-type: none"> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> </ul>	Not applicable. Products are not sold beyond refinery.	NA
	<ul style="list-style-type: none"> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>	Based on the MB accounting, the removal of volumes was done correctly when the products were sold as conventional.	Yes
	<ul style="list-style-type: none"> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming</li> </ul>	Based on the announcement summary, all the confirmations were found to be in order.	Yes

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	Shipping Announcements / Announcements.		
<b>5.8. Training</b>			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Training plan for supply chain has yet to be established. Thus, a non-conformity was assigned due to this lapse.	No
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	Based on training records, last training that related to supply chain was conducted on 14/10/2017 and attended by 8 persons from various departments and levels such as Total Quality Management (TQM), Purchasing, Weighbridge and Administration.	Yes
<b>5.9. Record Keeping</b>			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date and accessible.	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	As spelt out in its supply chain procedure, Clause 4.0, records are to be maintained minimum of 5 years.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Not applicable. The product of the facility is containing 100% palm oil.	NA
<b>5.10. Conversion factors</b>			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER. Previous period under review's average were 20.08% (OER) & 4.31% (KER).	Yes

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5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Yes
<b>5.11. Claims</b>			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	NA
<b>5.12. Complaints</b>			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Procedure for collecting and resolving stakeholder complaints was available – cross refer to 6.3.1.	Yes
<b>5.13. Management Review</b>			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	Management review has yet to be conducted. Therefore, a non-conformity was assigned due to this lapse.	No
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	Management review has yet to be conducted. Therefore, a non-conformity was assigned due to this lapse.	No (refer above)
5.13.3	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>	Management review has yet to be conducted. Therefore, a non-conformity was assigned due to this lapse.	No (refer above)

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

Requirements	Compliance
<b>E.1 Definition</b>	
E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill	Keresia Palm Oil Mill receives and processes both certified and non-certified FFB. Therefore, it uses the Mass

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<p>and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3<sup>rd</sup> party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Balance supply chain system and module. During the P&amp;C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>
<p><b>E.2 Explanation</b></p>	
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&amp;C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>E.2.2 The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p>	<p>All registrations and reporting requirements for the supply chain were through the RSPO Palmtrace. Estimation of CSPO and CSPK are available in the Palmtrace as well as the allocation for credits.</p>
<p><b>E.3 Documented procedures</b></p>	
<p>E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:  a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p>	<p>Non-conformity - Refer general requirements 5.3.1</p>
<p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>The mill manager, Sr Assistant Mill Manager and TQM Executive are the persons assigned to have overall responsibility [ref.: Mass Balance (CPO or PK) Procedures, clause 3.3].</p>
<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>The receiving and processing certified and non-certified FFBs procedure is addressed in the same procedure mentioned in RSPO P&amp;C Indicator 4.1.1.</p>
<p><b>E.4 Purchasing and goods in</b></p>	
<p>E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>The accompanying documents of incoming FFB from own estate are FFB chits which has the info about name of estate, date of delivery, field number and number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt.</p>

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	For non-certified third party crop, the mill keeps a list of its registered suppliers. The mill issues weighbridge ticket as confirmation of receipt of FFB.
E.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facility is aware of this procedure. No projected overproduction.
<b>E.5 Record keeping</b>	
E.5.1 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and/ or three-monthly basis.	Keres POM is using the three-monthly basis to record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK.
(b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.	Verification of its Mass Balance Records had shown that the deduction of palm oil and palm kernel was found to be in order and tally.
c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)	Based on verification of MB accounting which the mill opt for three-monthly basis recording, it was found that the certified CPO was always delivered from positive stock. There was no short sale made.

**Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (MT)</b>	<b>Volume of FFB from uncertified supply bases (MT)</b>	<b>Total FFB/Month (mt)</b>
1	Oct 2017	12,412.61	13,857.24	26,269.85
2	Nov 2017	12,096.86	13,541.49	25,638.35
3	Dec 2017	11,122.21	12,566.84	23,689.05
4	Jan 2018	7,798.88	9,243.51	17,042.39
5	Feb 2018	8,897.71	10,342.34	19,240.05
6	Mar 2018	7,227.67	8,672.30	15,899.97
7	Apr 2018	7,659.82	9,104.45	16,764.27
8	May 2018	7,758.53	9,203.16	16,961.69
9	Jun 2018	8,515.25	8,723.56	17,238.81
10	Jul 2018	9,347.69	10,792.37	20,140.06
	Total	92,837.23	106,047.26	198,884.49

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<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	Oct 2017	2,498.66	541.19
2	Nov 2017	2,435.10	527.42
3	Dec 2017	2,238.90	484.93
4	Jan 2018	1,569.91	340.03
5	Feb 2018	1,791.11	387.94
6	Mar 2018	1,454.93	315.13
7	Apr 2018	1,541.92	333.97
8	May 2018	1,561.79	338.27
9	Jun 2018	1,714.12	371.26
10	Jul 2018	1,881.69	407.56
	Total	18,688.13	4,047.70

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any) records base on transaction Oct 2017-Sep 2018</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading No</b>	<b>Certified CPO Sold (MT)</b>	<b>Certified PK Sold (MT)</b>
1	Buyer B	TR-75ffe0e0-9362	-	522.58
2	Buyer A	TR-d27100fbe93d	1,232.15	-
3	Buyer A	TR-5d55f8f9-41bd	3,962.95	-
4	Buyer B	TR-95328c1b-94e2	-	552.46
5	Buyer B	TR-4ac831b6-2c97	-	495.17
6	Buyer A	TR-491a301afb9b	2,365.81	-
7	Buyer B	TR-6034d1a3-b452	-	490.55
8	Buyer A	TR-1ff21177-ef3a	2,488.95	-
9	Buyer B	TR-26a7651aebb7	-	394.91
10	Buyer A	TR-149c3f42-3205	1,789.63	-
11	Buyer A	TR-2ebffd5a-633e	1,671.90	-
12	Buyer B	TR-0a0cbb77-c1b8	-	460.77

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13	Buyer B	TRdaa58062-c5c2	-	215.01
14	Buyer A	TR-49c35515-1861	1,443.46	-
15	Buyer A	TR-b6c90cfb-025a	2,415.41	-
<b>TOTAL</b>			17,370.26	3,642.37

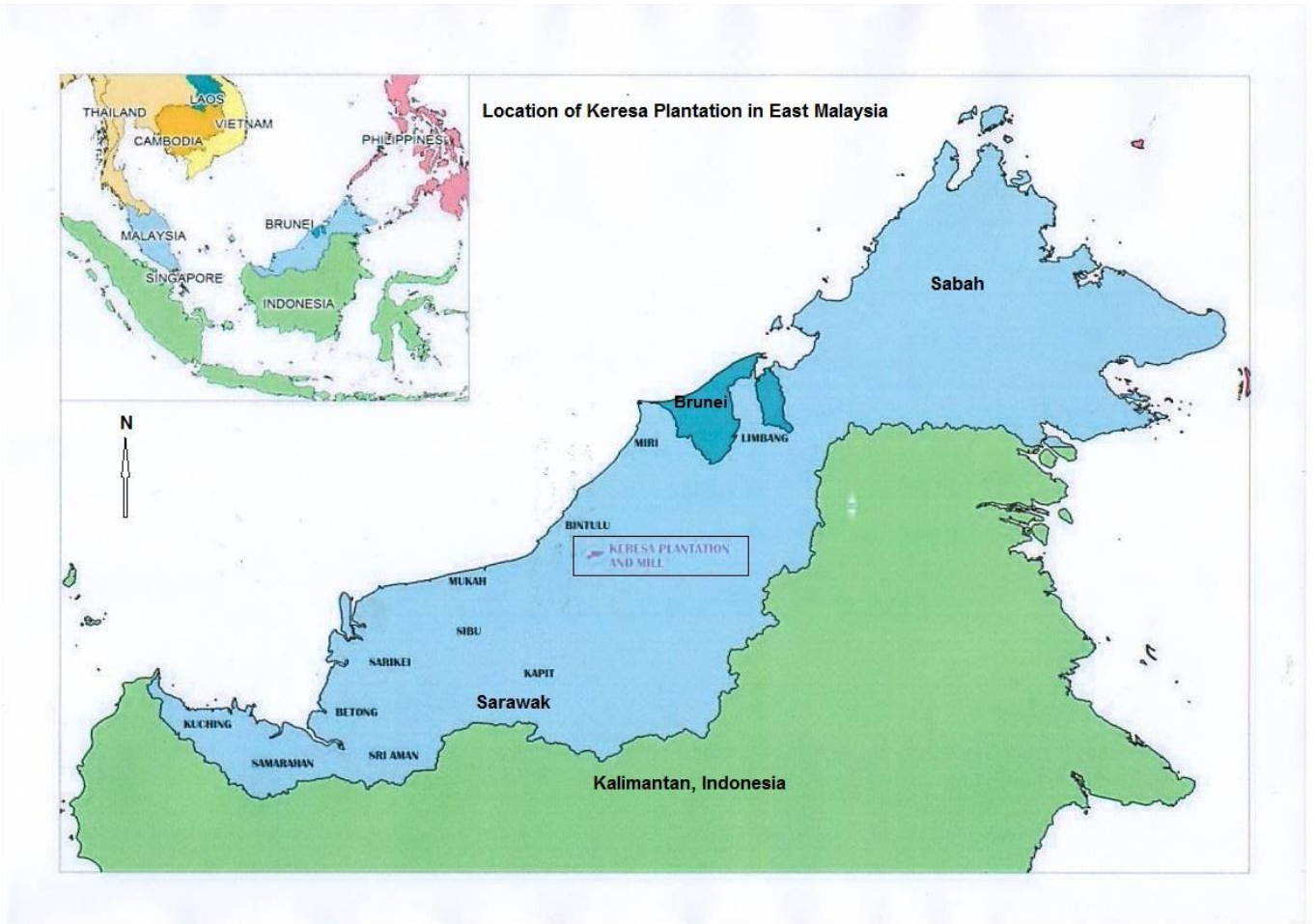
<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (MT)	PK Sold (MT)
-Nil-	n/a	n/a	n/a	n/a

<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>				
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)	
Nil	n/a	n/a	n/a	

\*Physical volume for credit sales add in to conventional sales.

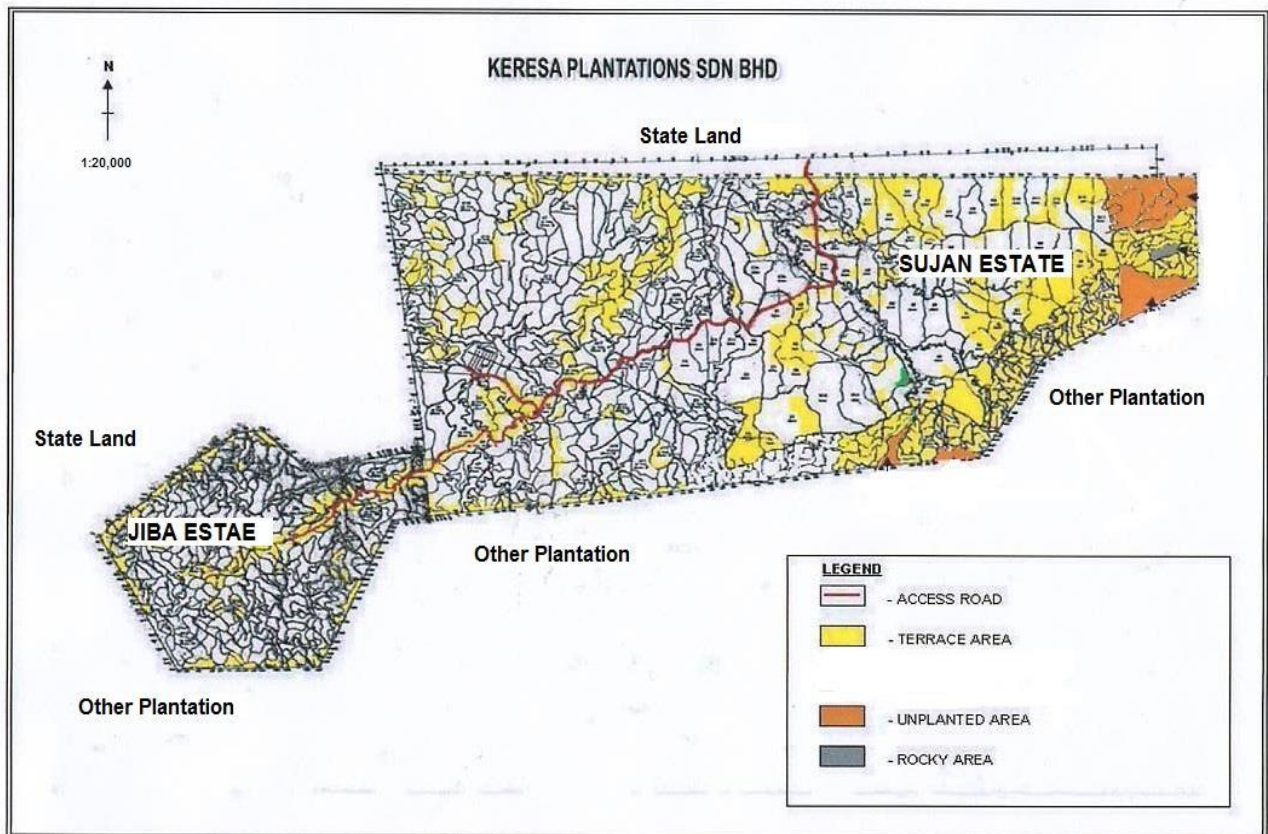
<b>F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading No	RSPO Credits of Certified CPO Sold (MT)
1	-Nil-	n/a	n/a

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





**Appendix G: Sujan & Jiba Estate Field Map**



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

Not applicable

## Appendix I: List of Abbreviations

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
CU	Certification Unit
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MRM	Management Review Meeting
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure