

**RSPO PRINCIPLE AND CRITERIA –
2nd ANNUAL SURVEILLANCE ASSESSMENT (ASA1_2)
Public Summary Report**

Sime Darby Plantation Berhad
Head Office: Level 3A, Main Block, Plantation Tower No. 2, Jalan P.J.U 1A/7 47301 Ara Damansara Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 22) Bukit Benut Palm Oil Mill and Supply Base KM 12, Jalan Mengkibol 86009 Kluang, Johor Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	06/09/2004
Parent Company Name	Sime Darby Plantation Berhad		
Address	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia		
Subsidiary	Strategic Operating Unit (SOU 22) – Bukit Benut Palm Oil Mill		
Address	KM 12, Jalan Mengkibol 86009 Kluang, Johor, Malaysia		
Contact Name	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr. Anuar bin Zakaria (Mill Manager)		
Website	www.simedarbyplantation.com	E-mail	kks.bk.benut@simedarby.com
Telephone	+603-78484379 (Head Office) +6013-2086959 (Mill)	Facsimile	+603-78484356 (Head Office) +607-7766479 (Mill)

2. Certification Information			
Certificate Number	RSPO 591229	Date of First Certification	05/10/2011
		Certificate Start Date	05/10/2016
		Certificate Expiry Date	04/10/2021
Scope of Certification	Palm oil and Palm Kernel Production from Bukit Benut Palm Oil Mill and Supply Base (Bukit Benut Estate, CEP Niyor Estate & Lambak Estate)		
Applicable Standards	RSPO P&C MYNI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
A0119	ISO 9001 QMS (Bukit Benut Mill)	SIRIM QAS International Sdn Bhd	14/09/2018
AR1094	ISO 9001 QMS (Bukit Benut Estate)	SIRIM QAS International Sdn Bhd	14/09/2018
MSPO 682040	MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	27/12/2022
MSPO 686845	MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3		27/12/2022

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4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Bukit Benut Palm Oil Mill (20 mt/hr)	KKS Bukit Benut PO Box 513, 86009 Kluang, Johor	1° 56' 00" N	103° 20' 28" E
Bukit Benut Estate	Ladang Bukit Benut PO Box 513 86009 Kluang, Johor	1° 54' 42" N	103° 21' 54" E
CEP Niyor Estate	Ladang CEP Niyor, K.B No. 514 86009 Kluang, Johor	1° 54' 30" N	103° 16' 22" E
Lambak Estate	Ladang Lambak/Elais PO Box 510 86009 Kluang, Johor	1° 58' 43" N	103° 19' 08" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Benut Estate	2,580.43	-	220.70	2,801.13	92.12
CEP Niyor Estate*	1,922.56	-	50.84	1,973.40	97.42
Lambak Estate	3,320.81	32.94	391.01	3,744.76	88.68
Total	7,823.80	32.94	662.55	8,519.29	91.84

* Sime Darby Plantation has 3 newly acquired Talisman Estate which were allotted as Talisman Division under CEP Niyor Estate. Total area in CEP Niyor Estate increased by 434.66 ha due to this acquirement (Refer Indicator 2.2.1).

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Benut Estate	102.38	1,258.94	805.42	413.69	0	2,478.05	102.38
CEP Niyor Estate	0	232.71	963.58	291.61	0	1,487.90	0
Lambak Estate	129.68	1662.47	1340.29	574.66	0	3,577.42	129.68
Total (ha)	232.06	3,174.82	3,136.96	1,279.96	0	7,591.74	232.06

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7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated Nov 2017 – Oct 2018	Actual Jul 2017 – Jun 2018	Forecast Nov 2018 – Oct 2019
Bukit Benut Estate	42,973.52	41,102.94	41,173.16
CEP Niyor Estate	68,679.991	61,308.03	38,423.78
Lambak Estate	27,839.584	25,836.89	41,735.66
Total	139,493.10	128,247.86	121,332.60

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated Nov 2017 – Oct 2018	Actual Jul 2017 – Jun 2018	Forecast Nov 2018 – Oct 2019
CEP Rengam	N/A	9,675.65	N/A
Cenas		4,280.93	
Sembrong		93.22	
Tun Dr Ismail		172.07	
Ulu Remis		7.50	
Pekan		104.12	
Total		14,333.49	

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated Nov 2017 – Oct 2018	Actual Jul 2017 – Jun 2018	Forecast Nov 2018 – Oct 2019
-Nil-	n/a	n/a	n/a
Total	n/a	n/a	n/a

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10. Certified Tonnage			
	Estimated Nov 2017 – Oct 2018	Actual Jul 2017 – Jun 2018	Forecast Nov 2018 – Oct 2019
	FFB	FFB	FFB
Mill Capacity: 20 MT/hr	139,493.10 mt	142,581.36 mt	121,332.60 mt
SCC Model: IP	CPO (OER: 21.71%)	CPO (OER: 20.64%)	CPO (OER: 22.00%)
	*28,286.15 mt	**29,428.79 mt	26,693.17 mt
	PK (KER: 5.50%)	PK (KER: 5.04%)	PK (KER: 5.50%)
	*7,672.12 mt	**7,186.10 mt	6,673.29 mt

*Extension CPO= 2,102.22mt and extension PK=561mt

** Total CPO produced for the period Jul 17 – Oct 17 was 9,666.28mt while for the period Nov 17 – Jun 18 was 19,762.51mt.

**Total PK produced for the period Jul 17 – Oct 17 was 2,945.87mt while for the period Nov 17 – Jun 18 was 4240.23mt.

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	12,042.09 mt	-	-	16,386.70 mt	28,428.79 mt

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	3,400.00 mt	-	-	2,786.10 mt	6,186.10 mt

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-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
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

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 (ASI-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 2-6/07/2018. 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 (Bukit Benut, CEP Niyor and Lambak 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 30th 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 1st 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 I.

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Bukit Benut Palm Oil Mill	√	√	√	√	√
Bukit Benut Estate		√	√	√	√
CEP Niyor Estate	√	√	√	√	√
Lambak Estate	√		√	√	√

Tentative Date of Next Visit: July 24, 2019 – July 27, 2019

Total No. of Mandays: 13 mandays (including 1.0 day for SC mill audit)

2.2 BSI Assessment Team:

Team Member Name	Role	Qualification
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 P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands and Gabon. During assessment, he covered the legal issues, social issues, worker’s welfare and stakeholder consultation. He is fluent in Bahasa Malaysia and English languages
Mohamed Hidhir Zainal Abidin	Team member	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 14001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.
Elzy Ovktafia	Team member	She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the AISP level (professional certificate and recognition from the Incorporated Society of Planters). She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI, etc) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest

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		and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.
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Accompanying Persons:

No.	Name	Role
Nil	n/a	n/a

2.3 Assessment Plan

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

Date	Time	Subjects	Hafri	Hidhir	Elzy
Sunday 1/7/2018	PM	Audit Team Leader traveling to Kluang (Anika Hotel)	√	-	-
Monday 2/7/2018	0830 - 1630	RSPO Supply Chain for CPO mill, weighbridge and storage area	√	-	-
	PM	Audit Team Member traveling to Kluang (Anika Hotel)	-	√	√
Bukit Benut Palm Oil Mill	0830 - 0900	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). Verification on previous audit findings 	√	√	√
	0900-1200	Bukit Benut Palm Oil Mill: Inspection of 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	Bukit Benut Palm Oil Mill: 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 4/07/2018	0830-1200	Bukit Benut Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area	√	√	√

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Bukit Benut Estate		(agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.			
	0900-1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	√
	1200-1300	Lunch			
	1300-1600	Bukit Benut Estate 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 5/7/2018	0830-1200	Lambak Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc. Verify previous nonconformities	√	√	√
	1200-1300	Lunch			
	1300-1600	Lambak Estate 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 Meeting	√	√	√
Friday 6/7/2018	0830-1200	CEP Niyor Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant & etc.), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill & etc. Verify previous nonconformities.	√	√	√
	1200-1300	Lunch	√	√	√
	1300-1600	CEP Niyor Estate: Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure,	√	√	√

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		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.			
		Audit team discussion & findings preparations	√	√	√
		Closing Meeting • Presentation of report by BSI Lead Auditor – briefing & discussion of findings • Acceptance & acknowledgement by Bukit Benut Palm Oil Mill & Estates	√	√	√
Saturday 7/7/2018	AM	Audit Team travel back to KL	√	√	√

Section 3: Assessment Findings

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

- Sime Darby Plantation Berhad 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
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	The time bound plan includes all SOUs in Malaysia and Indonesia. Malaysia- Effectively 34 SOUs: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. Indonesia- Effectively 25 SOUs. For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1 st quarter of 2019.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1 st quarter of 2019.	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> • Age of plantations. • Location. 	Sime Darby Plantation’s time bound plan for certification is initially 3 years, starting 2008 – 2011. SDP has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2016, all Malaysian	Yes

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<ul style="list-style-type: none"> • POM development • Infrastructure. • Compliance with applicable law. 	<p>SOU's have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets). The 2 new mills have been RSPO Certified in Jan and Feb 2014.</p> <p>For Indonesian operations, currently, 1 SOU in Indonesia (PT MAS) is pending for RSPO Certification due to social legacy issues. SDP's is actively working on its certification targets given the span across a large geographical location and over 200 estates and mills in operation.</p>	
<p>Have there been any changes since the last audit? Are they justified?</p>	<p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes and a new oil mill in Liberia has been commissioned in Feb 2016. SDP's time bound plan has been revised to take into consideration the social challenges encountered in Indonesia for the remaining SOU (PT MAS) yet to be certified.</p> <p>Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter.</p> <p>For Indonesia operation, the reported Case No: DSF 007 between the parties PT Mistra Austral Sejahtera (a subsidiary of Sime Darby Plantation Sdn Bhd) and Kerunang/Entapang community. New status has been updated for dispute tracker for following case, http://www.rspo.org/members/dispute-settlement-facility/status-of-disputes#007.</p>	<p>Yes</p>
<p>If there have been changes, what circumstances have occurred?</p>	<p>Indonesia- PT MAS has undergone RSPO Main Assessment in July 2011. The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO for Partial Certification and the report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. Ongoing and regular (bi-monthly) discussions is ongoing between Sime Darby Plantation and the project affected communities. Reports on the progress update are submitted to RSPO on a regular basis since November 2012. The latest progress report submitted to RPSO dated 30th June 2016.</p> <p>Smallholders- As at June 2016, total of 24,820 Ha (59%) of total Ha, (42,008 Ha) of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholders areas is on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and outgrowers by end 2019.</p> <p>Liberia- A new mill to be set up in Liberia and planned for commissioning in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1st quarter of 2019. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps completed.</p>	<p>Yes</p>
<p>Have there been any stakeholder comments?</p>	<p>Up to date, there is no comment. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat.</p>	<p>Yes</p>

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<p>Have there been any newly acquired subsidiaries?</p>	<p>In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified.</p> <p>A new mill has been set up in Liberia and planned for commissioning in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. *RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in completed. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audt was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1st quarter of 2019.</p>	<p>Yes</p>
<p>If yes, have the newly acquisitions certified within a three-year timeframe?</p>	<p>A new mill has been set up in Liberia and planned for commissioning in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audt was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1st quarter of 2019.. *RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in completed..</p>	
<p>Have there been any isolated lapses in implementation of the plan?</p>	<p>No lapses.</p>	<p>Yes</p>
<p>Un-Certified Units or Holdings</p>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	<p>HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p>	<p>Yes</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audt was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1st quarter of 2019. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p> <p>*Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</p>	<p>Yes</p>

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<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p>	<p>Latest update based on RSPO Case Tracker (19 potential liabilities; 5 LUCA submitted, 1 LUCA is passed, 1 CN submitted, 1 CN approved) on LUCA submission status as per below table:</p> <p style="text-align: center;"><u>SIME DARBY PLANTATION: LUCA SUBMISSION TIMELINE</u></p> <table border="1" data-bbox="459 510 1294 1211"> <thead> <tr> <th>No.</th> <th>PT/ Company</th> <th>Report Submission to RSPO</th> <th>Current Status (14 Aug 2018)</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>PT Lahan Tani Sakti</td> <td>Submitted on 31 May 2017</td> <td>LUCA approved by reviewer</td> </tr> <tr> <td>2.</td> <td>PT Bina Sains Cemerlang</td> <td>Submitted on 29 Sept 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>3.</td> <td>PT Swadaya Andika</td> <td>Submitted on 6 Oct 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>4.</td> <td>PT Langgeng Muara Makmur</td> <td>Submitted on 8 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>5.</td> <td>PT Laguna Mandiri</td> <td>Submitted on 20 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>6.</td> <td>PT Kridatama Lancar</td> <td>Submitted on 22 Sept 2017</td> <td rowspan="13">Shapefiles to be submitted to RSPO by 17 Aug 2018</td> </tr> <tr> <td>7.</td> <td>PT Paripurna Swakarsa</td> <td>Submitted on 29 Sept 2017</td> </tr> <tr> <td>8.</td> <td>PT Sime Indo Agro</td> <td>Submitted on 10 Nov 2017</td> </tr> <tr> <td>9.</td> <td>PT Bhumireksa Nusa Sejati</td> <td>Submitted on 12 Dec 2017</td> </tr> <tr> <td>10.</td> <td>PT Budidaya Agro Lestari</td> <td>Submitted on 15 Dec 2017 <i>*Re-submitted on 29 Dec 2017</i></td> </tr> <tr> <td>11.</td> <td>PT Teguh Sempurna</td> <td>Submitted on 15 Dec 2017 <i>*Re-submitted on 29 Dec 2017</i></td> </tr> <tr> <td>12.</td> <td>PT Bahari Gembira Ria</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>13.</td> <td>PT Guthrie Pecconina Indonesia</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>14.</td> <td>PT Sajang Heulang</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>15.</td> <td>PT Bersama Sejahtera Sakti</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>16.</td> <td>PT Tunggal Mitra Plantation</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>17.</td> <td>PT Ladangrumpun Suburabadi</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>18.</td> <td>PT Aneka Inti Persada</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>19.</td> <td>PT Mitra Austral Sejahtera</td> <td>Submitted on 29 Dec 2017</td> </tr> </tbody> </table> <p>Note: SDP's LUCA is still in queue for review process pending finalization of the contract between RSPO and the reviewer. Sime Darby Plantation has also submitted its RSPO Compensation Plan (CP) for evaluation by RSPO.</p>	No.	PT/ Company	Report Submission to RSPO	Current Status (14 Aug 2018)	1.	PT Lahan Tani Sakti	Submitted on 31 May 2017	LUCA approved by reviewer	2.	PT Bina Sains Cemerlang	Submitted on 29 Sept 2017	Shapefiles submitted to RSPO	3.	PT Swadaya Andika	Submitted on 6 Oct 2017	Shapefiles submitted to RSPO	4.	PT Langgeng Muara Makmur	Submitted on 8 Dec 2017	Shapefiles submitted to RSPO	5.	PT Laguna Mandiri	Submitted on 20 Dec 2017	Shapefiles submitted to RSPO	6.	PT Kridatama Lancar	Submitted on 22 Sept 2017	Shapefiles to be submitted to RSPO by 17 Aug 2018	7.	PT Paripurna Swakarsa	Submitted on 29 Sept 2017	8.	PT Sime Indo Agro	Submitted on 10 Nov 2017	9.	PT Bhumireksa Nusa Sejati	Submitted on 12 Dec 2017	10.	PT Budidaya Agro Lestari	Submitted on 15 Dec 2017 <i>*Re-submitted on 29 Dec 2017</i>	11.	PT Teguh Sempurna	Submitted on 15 Dec 2017 <i>*Re-submitted on 29 Dec 2017</i>	12.	PT Bahari Gembira Ria	Submitted on 29 Dec 2017	13.	PT Guthrie Pecconina Indonesia	Submitted on 29 Dec 2017	14.	PT Sajang Heulang	Submitted on 29 Dec 2017	15.	PT Bersama Sejahtera Sakti	Submitted on 29 Dec 2017	16.	PT Tunggal Mitra Plantation	Submitted on 29 Dec 2017	17.	PT Ladangrumpun Suburabadi	Submitted on 29 Dec 2017	18.	PT Aneka Inti Persada	Submitted on 29 Dec 2017	19.	PT Mitra Austral Sejahtera	Submitted on 29 Dec 2017	<p>Yes</p>
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<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p>	<p>No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>None noted. No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Did the company conduct an internal audit? If so, has a positive assurance statement been produced?</p>	<p>Yes</p>	<p>Yes</p>																																																																			

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

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

3.4 Details of findings

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

During the Certification Assessment there were one (1) Major and three (3) Minor nonconformities raised. The Bukit Benut 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			
NCR Ref #	1655429-201807-M1	Clause & Category (Major/Minor)	Indicator 4.3.1 Major
Date Issued	06/07/2018	Due Date	04/10/2018
Closed (Yes/No)	Yes	Date of nonconformity closure	
Statement of Nonconformity	No soil map available for newly acquired Talisman Division.		
Requirement Reference	Maps of any fragile soils shall be available.		
Objective Evidence	CEP Niyor Estate: Based on feasibility study by SID, Upstream/ASM dated December 2015, there is marginal shallow peat identified within estate with depth range of (50-100 cm). No soil map available to finalize the classification of soil categories at Talisman Division.		
Corrections	A detail soil survey has been conducted on 16 th July 2018 and full report will be made available latest by August 2018.		
Root Cause Analysis	The soil mapping is not yet conducted at Talisman division.		
Corrective Action	GSQM/RSQM to work closely with Strategic Department to ensure detailed soil map is available or conducted for all the newly acquired land immediately after sign-off of S&P agreement.		
Assessment Conclusion	Evidence submitted:		

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	<p>- CEP Niyor Estate Talisman Division Soil Series Map; Prepared by: R&D - Plantation Research & Advisory, Precision Agriculture Unit (NHS); 2/8/2018. The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation does not require on-site closure of NCR since it can be verified through the documented information submitted. Hence, Major NC is closed on 26/8/2018.</p>
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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1655429-201807-N1	Clause & Category (Major/Minor)	Indicator 2.1.3 Minor
Date Issued	06/07/2018	Due Date	Next annual surveillance assessment
Closed (Yes/No)	No	Date of nonconformity closure	N/A
Statement of Nonconformity	Mechanism for ensuring compliance was not effectively implemented		
Requirement Reference	A mechanism for ensuring compliance shall be implemented.		
Objective Evidence	Bukit Benut POM: i) Personal Chemical Exposure Monitoring (PCEM) – last monitoring was carried out in 8/12/16. As per assessor recommendation, Schedule II chemical (N-hexane) monitoring has to be carried out as per required frequency unless justified unnecessary by industrial hygiene technician. ii) Based on Noise Exposure Regulation 1989, under regulation 23, STS workers must be sent for retest within 3 month from the last date of monitoring. Date of monitoring was done on 18/9/17 however the retest was done on 8/1/18.		
Corrections	i) To liaise with industrial hygiene technician on the recommendation given by assessor to review on the frequency of the monitoring since the result is below PEL for Bukit Benut POM. ii) Mill management to ensure re-test of audiometric test is done one (1) month after getting the result of the monitoring (if any).		
Root Cause Analysis	i) Lack of monitoring by the mill management due to result of the chemical exposure limit is below PEL which is <0.0002 during testing on 18/09/2017. ii) Delay in receiving the result of the noise monitoring is 13.10.2017 from the OHD. Resulted late STS workers sent for re-test.		
Corrective Action	i) Personal Chemical Exposure Monitoring was carried out by Rank Chemical Sdn Bhd on 11.07.2018. Awaiting result from the vendor. ii) Mill management to ensure immediate action taken once received report from the OHD.		
Assessment Conclusion	The proposed correction and corrective action to be taken were accepted. Effectiveness of the implementation shall be verified in the next assessment.		

Summary of Total Number of Nonconformity			
Nonconformity			

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NCR Ref #	1655429-201807-N2	Clause & Category (Major/Minor)	Indicator 4.2.3 Minor
Date Issued	06/07/2018	Due Date	Next annual surveillance assessment
Closed (Yes/No)	No	Date of nonconformity closure	N/A
Statement of Nonconformity	No evidence of periodic tissue and soil sampling to monitor changes in nutrient status for the new acquired area under Talisman Division.		
Requirement Reference	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status.		
Objective Evidence	CEP Niyor Estate: No soil sampling carried out for Talisman Division estate.		
Corrections	Soil sampling for Talisman estate was conducted July 2018.		
Root Cause Analysis	The area have been acquired in 2017. The soil sampling was schedule in early 2018. However the plan for Talisman Estate has been postponed due to other projects by R&D.		
Corrective Action	GSQM/RSQM to work closely with Strategic Department to ensure soil sampling is available or conducted for all the newly acquired land immediately after sign-off of SAP agreement.		
Assessment Conclusion	The proposed correction and corrective action to be taken were accepted. Effectiveness of the implementation shall be verified in the next assessment.		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1655429-201807-N3	Clause & Category (Major/Minor)	Indicator 4.6.10 Minor
Date Issued	06/07/2018	Due Date	Next annual surveillance assessment
Closed (Yes/No)	No	Date of nonconformity closure	N/A
Statement of Nonconformity	Waste material disposal according to procedures were not being fully demonstrated.		
Requirement Reference	<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>Sime Darby Plantation Sustainability and Quality Management System (PSQM); Operational Control Procedure – Landfill Management in Estate; Doc. # SD/SDP/PSQM(ESH)/203-EN7; Rev. 0; Dated 13/3/2017</p> <p>A) For estates/mills located within 20km of a municipal landfill • Hauling bin > 3km residential area, office or other premise</p> <p>B) For estates/mills located more than 20km of a municipal landfill</p> <ul style="list-style-type: none"> • Landfill site > 3km residential area, office or other premise • Landfill site > 3km nearest river or waterway • Excavated 3m deep, 2m width, 		
Objective Evidence	Bukit Benut Estate: Waste consists of used tyres, scrap metals and plastics were found being dumped improperly into the ravine by the road side at field Block # 10A opposite of housing area Zone C with about 300m distant.		

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Corrections	Estate management to immediately close the dump site at field block #10A. Collect, store and dispose used tyres and scrap metals as per company SOP.
Root Cause Analysis	Lack of awareness on the requirement of landfill by the employee and dependents.
Corrective Action	To educate all workers housing residents on the waste management and disposal. Estate management to include monitoring of landfill area location within the estate compound in the 3 monthly site/workplace inspection.
Assessment Conclusion	The proposed correction and corrective action to be taken were accepted. Effectiveness of the implementation shall be verified in the next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	1655429-201807-I1 Clause : Code of Conduct for Members The latest Sime Darby Plantation Annual Communication of Progress (ACOP 2017) report on newly acquired concession sites need to be reflective of any that have changed ownership

Positive Findings	
PF #	Description
PF 1	Good commitment from management

3.4.1 Status of Nonconformities Previously Identified and Observations

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1503698-201707-N1	Clause & Category (Major/Minor)	Indicator 6.5.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	03/07/2018
Statement of Nonconformity	Linesite inspection was not implemented effectively.		
Requirement Reference	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities and available or accessible.		
Objective Evidence	During site visit to the linesite in Lambak Estate found that the whole stretch of the drain in front of House No. 29B (P-11/2011) was blocked. It was also observed that breeding of mosquitoes larvae has happened in that drain.		
Corrective Action	Estate Management will monitor on the linesite inspection / condition on weekly interval.		
Assessment Conclusion	<p>ASA1_2 verification Linesite inspection conducted at Bukit Benut POM, Bukit Benut Estate, Lambak Estate and CEP Niyor Estate. Revisit House No. 29B (P-11/2011) shown that the drain is dry, completed the grass cutting and no blockage. Seen the new detailed linesite inspection checklist updated in weekly basis by Health Care Assistant in Lambak Estate.</p> <p>Linesite visits also been conducted to other estates and Bukit Benut POM too. So far, cleanliness is maintained, records are available and interviewed some of the foreign workers shown that the complaints raised were solve.</p> <p>Thus, NCR was effectively closed on 03/07/2018.</p>		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1503698-201707-N2	Clause & Category (Major/Minor)	Indicator 6.9.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	03/07/2018
Statement of Nonconformity	Frequency of the meeting was not accordance to the Gender Committee Handbook.		
Requirement Reference	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.		
Objective Evidence	SDPSB has implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. According to the handbook, the meeting shall be conducted quarterly (once every 3 months). However, in Lambak Estate, the meeting was conducted once a year and the last meeting was conducted on 19/7/2018 and 25/5/2016.		
Corrective Action	Lambak Estate management will monitor on the Gender Committee meeting's schedule accordingly.		

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<p>Assessment Conclusion</p>	<p>ASA1_2 verification Gender Committee meeting has been conducted in 3 months once at Bukit Benut POM, Bukit Benut Estate, Lambak Estate and CEP Niyor. Gender Committee Meeting was conducted on 12/05/2018, 29/01/2018, 16/10/2017 and 12/07/2017 in Bukit Benut POM. Meeting minutes were sighted and no sexual harassment or violence cases reported to date. Activities have been conducted such as Mother’s Day (12/5/18) and Senamrobik (10/02/18). In Bukit Benut Estate, the issue is regarding domestic violence on 12.04.18 reported during the Gender Committee meeting on 28.05.18, 26.02.18, 17.11.17 and 18.07.17. In Lambak Estate, the minutes of meeting for Gender Committee sighted on 28.06.18, 26.02.18, 13.10.17 and 19.07.17. In CEP Niyor Estate, the gender committee meeting conducted on 26.6.18, 16.3.18, 20.12.17 and 14.9.17</p> <p>Thus, NCR was effectively closed on 03/07/2018.</p>
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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1503698-201707-N3	Clause & Category (Major/Minor)	Indicator 5.1.2 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	03/07/2018
Statement of Nonconformity	Environment management plan is not developed and implemented comprehensively.		
Requirement Reference	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.		
Objective Evidence	In Bukit Benut and Lambak/Elaeis estate, environment management plan FY2016/17 is not developed and implemented comprehensively as it does not reflect the significant risk according to the evaluation of environmental aspect and impact FY2016/2017.		
Corrective Action	Estate management to continuously monitor on the environmental impact available and to observe the effectiveness of the action plan taken.		
Assessment Conclusion	<p>ASA1_2 verification The EMP has been cross-referred to Sime Darby Plantation Estate Quality Management System (EQMS) Level 3.0 Standard Operating Procedure (SOP); Section VII; Handling of Environmental Aspects; Issue date: 1/11/2008; Consist of operational environmental aspects control as following:</p> <ul style="list-style-type: none"> - Handling of Scheduled Wastes - Handling of Rags and Filters - Handling of Waste Oil - Handling of Solid Waste - Handling of Chemicals - Handling of Used Containers - Handling of Diesel and Petrol <p>And Sime Darby Plantation – Plantation Quality Management; Sustainable Plantation Management System; Section 6; Quality, Safety & Health and Environmental Management; Version 1; Year: 2008; Issue no.: 1; Issue date: 1/11/2008; Sub-section 6.3: Environment Management System.</p> <p>Thus, NCR was effectively closed on 03/07/2018.</p>		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1503698-201707-N4	Clause & Category (Major/Minor)	Indicator 4.7.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	04/07/2018
Statement of Nonconformity	Adequate and appropriate protective equipment was not made available to all workers at the place of work.		
Requirement Reference	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.		
Objective Evidence	Bukit Benut Estate Observed at block 97B, CDA sprayer gang was not provided with eye protection @ goggles as per Sime Darby's Pictorial Safety Standard.		
Corrective Action	<ul style="list-style-type: none"> i) To conduct a refresher training on chemical handling and emphasize on the PPE usage. ii) To provide safety glasses and allow feedbacks from workers on the suitability of the usage for the sprayers. Improvement on the selection of safety glasses will be done where necessary. iii) To ensure that continuous supervision and monitoring on the PPE usage (Control: Workplace Inspection) 		
Assessment Conclusion	<p>ASA1_2 verification Bukit Benut Estate</p> <p>i) The latest chemical handling training was carried out by chemical supplier, Bayer on 21/5/18.</p> <p>ii) PPE issuance records – Checked individual sprayers (96852, 17717, 90232, 109109, 96854). All complete PPE was given to the said workers based on the issuance records. Based on the site verification at block 17A, all sprayers equipped with full complete PPE with consist of safety goggle, single cartridge respirator, apron, wellington boots and safety helmet.</p> <p>iii) Workplace inspection was carried out in March 2018 at spraying block. Based on the monitoring report and safety committee minute dated 23/3/18 and 4/6/18, no issue of PPE compliance observed at spraying block.</p> <p>Based on the site verification at block 17A, all sprayers equipped with full complete PPE with consist of safety goggle, single cartridge respirator, apron, wellington boots and safety helmet.</p> <p>Thus, the minor NC was effectively closed on 4/7/2018.</p>		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1503698-201707-N5	Clause & Category (Major/Minor)	Indicator 4.7.5 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	03/07/2018
Statement of Nonconformity	Emergency preparedness was not effectively implemented.		
Requirement Reference	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.		
Objective Evidence	Bukit Benut Palm Oil Mill: i) Expired item (antiseptic solution @ Dettol) with date of expiry 15/7/17 was found in the first aid box at mill's workshop. ii) Based on the inspection records, only 8 out of 10 first aid boxes were inspected and replenished since December 2016 which has not included the first aid box located at mill's workshop.		
Corrective Action	i) Person in-charge been appointed to monitor and update to mill executive on monthly basis (to be recorded) PIC – En. Aimi Sulong (Lab Analyst) ii) Once a month the first aid box must be presented to BBE MA for verification to ensure this non-conformance from recurring (to be recorded) iii) To conduct a refresher training on First Aif which covers usage of First Aid and emphasize on the monitoting of the items to all first aider.		
Assessment Conclusion	ASA1_2 verification i) Appointment as emergency response team (ERT) and person-in-charge of first aid kit, laboratory assistant. ii) Inspection of first aid kit – monthly inspection was done promptly by the appointed person. Refer to latest inspection record 30/6/18. iii) Refresher training on first aid kit 20/5/18 was carried out to all appointed first aider from workshop, office, wireman, lab analyst, supervisor and process. Thus, the minor NC was effectively closed on 3/7/2018.		

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)
1359037M1 – 2.1.1	Major	29/7/2016	Closed out on 5/9/2016
1359037M2 – 4.6.11	Major	29/7/2016	Closed out on 5/9/2016
1359037M3 – 6.5.2	Major	29/7/2016	Closed out on 29/9/2016
1359037M4 – 5.3.3	Major	29/7/2016	Closed out on 5/9/2016

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1359037M5 – D2.2	Major	29/7/2016	Closed out on 5/9/2016
1359037N1 – 2.1.2	Minor	29/7/2016	Closed out on 21/07/2017
1359037N2 – 4.6.10	Minor	29/7/2016	Closed out on 21/07/2017
1359037N3 – 4.7.6	Minor	29/7/2016	Closed out on 21/07/2017
1503698-201707-N1 – 6.5.3	Minor	21/07/2017	Closed out on 06/07/2018
1503698-201707-N2 – 6.9.3	Minor	21/07/2017	Closed out on 06/07/2018
1503698-201707-N3 – 5.1.2	Minor	21/07/2017	Closed out on 06/07/2018
1503698-201707-N4 – 4.7.3	Minor	21/07/2017	Closed out on 06/07/2018
1503698-201707-N5 – 4.7.5	Minor	21/07/2017	Closed out on 06/07/2018
1655429-201807-M1 – 4.3.1	Major	06/07/2018	Closed out on 26/08/2018
1655429-201807-N1 – 2.1.3	Minor	06/07/2018	“Open”
1655429-201807-N2 – 4.2.3	Minor	06/07/2018	“Open”
1655429-201807-N3 - 4.6.10	Minor	06/07/2018	“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 Bukit Benut Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

List of Stakeholders Contacted	
<p>Internal Stakeholders</p> <p>NUPW Representative Gender Committee Mill Operators Sprayer Harvester</p>	<p>Union/Contractors/Local Communities</p> <p>Mill supplier/vendor Estate field service contractor Head of Village, Kampung Mengkibol</p>
<p>Government Departments</p> <p>Renggam Police Station Representative JTK Kluang Representative SK Ladang Bukit Benut Representative SJK (T) Ladang Bukit Benut Representative</p>	<p>NGO</p> <p>No complaint by NGO for Bukit Benut CU. Therefore, NGO was not contacted.</p>

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IS #	Description
1	<p>Issues: <u>JTK Kluang</u> The JTK Officer shared the information to all as below:</p> <ol style="list-style-type: none"> 1. Estate's linesite need to obtain CF. 2. Salary deduction for any other than approved by National Law, must get approval from JTK and consent from workers. The deduction made must have subsidy from company. 3. For temple fund, the temple must have organizational and own account. <p>For housing that using treated water must have the approval JTK.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Issues: <u>Head of Village: Kampung Mengkibol</u> Concern raised on the railway gate is not closed during the train moved at night. The location of this railway is in border between Kg Mengkibol and Lambak Estate.</p> <p>Management Responses: Normally estate will close the gate at 12.00 am onwards every day and estate will give briefing again to the person in charge.</p> <p>Audit Team Findings: No further issue.</p>
3	<p>Issues: <u>Worker's Representative for Bukit Benut POM and Bukit Benut Estate</u> There is suggestion for the tractors to install the side mirror for safety purpose.</p> <p>Management Responses: The current tractors has the big backside mirror which considered suitable for safety which considered appropriate.</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Issues: <u>SKJ(T) Ladang Bukit Benut & SK Ladang Bukit Benut</u> Estate management has given the good supports and cooperation to both of school and would like to take the opportunity to say thanks. For SK Ladang Bukit Benut, they have requested estate to do mosquito fog in the school compound but since no feedback from estate, school has request the nearest Klinik Kesihatan to do it. However the mosquito issues has coming up again at the septic tanks area and school would like to request for next fogging.</p> <p>Management Responses: Estate management will continue to give support to the school and keep the good relationship. For the fogging issue, Visiting Medical Officer (Dr. Helen) has informed that school need to keep the school compound neat with low grasscutting level in order to prevent the mosquito. Fogging is not the recommended to be routine practice because mosquito will become immune to the fogging.</p> <p>Audit Team Findings: No further issue.</p>
5	<p>Issues: <u>Gender Committee Ladang Bukit Benut</u> All the meeting has been conducted 4 times per year with minutes recorded. Activities also been held accordingly. There is one case of domestic violence happened to one of the worker at lading Bukit Benut and the case is already closed.</p>

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	<p>Management Responses Management will continue to maintain the mechanism in grievance and complaint regarding sexual harassment including the domestic violence.</p>
6	<p>Issues: <u>Balai Polis Renggam</u> This is the first time that the Police Officer came to Bukit Benut POM and so far no criminal issue reported from Sime Darby Plantation particularly Bukit Benut POM and supply bases.</p>
	<p>Management Responses: Management will maintain the security inside the estate and mill complex.</p>
	<p>Audit Team Findings: No further issue.</p>

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Bukit Benut Palm Mill Certification Unit has complied with 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 Bukit Benut Palm Oil Mill Certification Unit is continued.

Report prepared by	Acceptance of Assessment Conclusion
<p>Name: Hafriazhar Mohd Mokhtar</p>	<p>Name: Shylaja Devi Vasudevan Nair</p>
<p>Company Name: BSI Services Malaysia Sdn Bhd</p>	<p>Company Name: Sime Darby Plantation Sdn. Bhd.</p>
<p>Title: Lead Auditor</p>	<p>Title: Head Sustainability - GSQM</p>
<p>Signature:</p> 	<p>Signature:</p> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<p>Date: 27/8/2018</p>	<p>Date: 29/8/2018</p>

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	The requests were normally from internal stakeholders related to the house repairing work. Besides form, the stakeholders will write in formal letter if they are requested for some assistance from the operating units. Most of the requests were fulfilled by the operating units. In Bukit Benut Estate, there is the records from stakeholders regarding various issues such as donation for school activities request from SRJK (T) Ladang Bukit Benut on 15.04.18.	Complied
Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			
1.2.1	Publicly available documents shall include, but are not necessary limited to: • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). - Major compliance –	There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. Sime Darby Plantations Sdn Bhd continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available through Sime Darby Plantations Sdn. Bhd. website as following link: http://www.simedarbyplantation.com/sustainability/beliefs-progress/human-rights/labour-standards/grievance-mechanisms Sample of the documents that were made available for viewing are: • Environmental Management Plan/Pollution Prevention Plan (Bukit Benut Estate) Towards RSPO in Sime Darby Plantations; A report prepared by Muhammad Muslihin Musa for Bukit Benut Estate; Date: 1/11/2017, 1/3/2018 & 1/7/2018 • Bukit Benut Estate EAI/EIE Review Meeting FY 2018/2019; Date: 21/6/2018 • Environmental Impact Evaluation Form; Serial # EIE/PD2017/01-001 to 2017/17-001	Complied
Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.			

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Criterion / Indicator	Assessment Findings	Compliance	
1.3.1	<p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Sime Darby Plantation has established policy on code of ethical conduct and integrity (Code of Business Conduct-COBC) which covers all operations in the plantation operation. Policy displayed on the notice board and communicated to employees.</p> <p>Briefing of policies were given to the workers during the COBC training on 02-04.06.18 to all 73 workers (Bukit Benut POM), on 04.06.18 (Bukit Benut Estate) to new 12 workers joined, for Lambak Estate on 25.5.18 to all 5 contractors 314 workers and CEP Niyor Estate on 26.9.17 to 178 workers.</p>	Complied
<p>Principle 2: Compliance with applicable laws and regulations</p>			
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			

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Criterion / Indicator	Assessment Findings	Compliance
2.1.1	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p><u>CEP Niyor Estate</u> i) MPOB License: 508445102000 valid until 31 March 2019. ii) Diesel & Petrol Permit, serial number J030606, reference number: BPGK JH (KLU) 0614 SK valid till 13 August 2018.</p> <p>SOU22 had documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment.</p> <p>Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008.</p> <p>In Bukit Benut POM, the LORR has been prepared, checked, and approved for compliance as dated. The latest review done on January 2018.</p>	
2.1.2	<p>A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -</p>	Complied
2.1.3	<p>A mechanism for ensuring compliance shall be implemented. - Minor compliance -</p> <p>Evaluation of the legal requirements and compliance status with legal requirement are monitored by the operating units through the internal audit on annual basis.</p> <p>Following the internal date for SOU22: Bukit Benut POM-7 June 2017, 2 major, 2 minor closed on 25/6/18.</p> <p><u>Bukit Benut POM</u> i) Personal Chemical Exposure Monitoring (PCEM) – last monitoring was carried out in 8/12/16. As per assessor recommendation, Schedule II chemical (N-hexane) monitoring, has to be carried out as per required frequency unless justified by industrial hygiene technician.</p> <p>ii) Based on Noise Exposure Regulation 1989, under regulation 23, STS workers must be sent for retest within 3 month from the last date of monitoring. Date of monitoring was done on 18/9/17 however the retest was done on 8/1/18.</p> <p>Thus, a minor NC was raised.</p>	Minor Nonconformance

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Criterion / Indicator	Assessment Findings	Compliance	
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking system to identify changes in the relevant regulations is available through the head office, website information and is communicated from the Group Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operation. Tracking system on any changes in the law had been well implemented. The latest Employee Insurance System (EIS).	Complied
Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			
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 (agriculture) of the land were made available at all visited sites.</p> <p>Field Area Details (Hectarage Statement HRVRM029; 4/7/2018) From Field Monthly Info for the Month of Jun 2018; Company: Sime Darby Plantation Bhd.; Op. Unit: Bukit Benut Estate – consists of total 19 titles. Sample of land title sighted as following:</p> <ul style="list-style-type: none"> i) Grant (Title) # 21382; Lot # 875; Area: 45.2741ha; District: Mukim Renggam; File # 661/53 ii) Grant (Title) #120736; Lot # 1064; Area: 42.0114ha; District: Mukim Renggam; File # 137/47 <p>Lambak Estate sample land title sighted as following:</p> <ul style="list-style-type: none"> i) Grant (Title) # 94876; Lot # 3139; Area: 6.0475ha; District: Mukim Kluang ii) Grant (Title) # 134839; Lot # 2983; Area: 505.8563 ha; District: Mukim Kluang <p>CEP Niyor Estate consists of 18 titles. Sample of land title sighted as following:</p> <ul style="list-style-type: none"> i) Grant (Title) # GN 101738; Lot # 309; Area: 53.3678ha; District: Mukim Niyor; File # 253/51 ii) Grant (Title) # G 325900; Lot # 1752; Area: 3.9204ha; District: Mukim Niyor; File # 1863/17; R 800/20 & 809/20 <p>Sime Darby Plantation has 3 newly acquired Talisman Estate which were allotted as Talisman Division under CEP Niyor Estate. Sighted the evidence of Business Asset Purchase Agreement between Yong Peng Realty Sdn. Bhd. and Sime Darby Plantation Sdn. Bhd. dated 5/10/2016; Vendor’s Solicitors file ref. # AGS/50785/16 & Puchaser’s Solicitors file ref. # 2016.86128.JW.AW.CSW.TMJ and quit rent payment receipt for following 3 newly added titles:</p> <ul style="list-style-type: none"> i) Grant (Title) # GRN 391652; Lot # 101; Area: 16.3771ha; District: Mukim Niyor; Receipt # 1028913 date: 30/5/2018 ii) Grant (Title) # GRN 86982; Lot # 2373; Area: 415.4105ha; District: Mukim Niyor; Receipt # 1028925 date: 30/5/2018 iii) Grant (Title) # GM 660; Lot # 633; Area: 2.8682ha; District: Mukim Niyor; Receipt # 1028906 date: 30/5/2018 	Complied

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Criterion / Indicator	Assessment Findings	Compliance
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	<p>During the field visit it was noted that legal boundaries are clearly demarcated and visibly maintained near to Bukit Benut Estate at field P02A which is adjacent to smallholder farm. In addition, physical boundary (trenches) and boundary marker were also clearly demarcated and visibly maintained.</p> <p><u>Lambak Estate</u> Boundary marker is clearly demarcated and visibility maintained near to the boundary along P01A-1 and P01A-2 which adjacent to government road reserve.</p> <p><u>CEP Niyor Estate</u> Physical boundary (trench) is constructed along boundary with smallholder at P15F and P01A. Company in the progress of demarcating boundary marker for the new acquired area at Talisman Division.</p>	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 Bukit Benut POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Not applicable
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 Bukit Benut POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Not applicable
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 Bukit Benut POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Not applicable
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 Bukit Benut POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Not applicable
<p>Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.</p>		

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Criterion / Indicator	Assessment Findings	Compliance
2.3.1	There is no land dispute in the Bukit Benut POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Not applicable
2.3.2	There is no land dispute in the Bukit Benut POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Not applicable
2.3.3	There is no land dispute in the Bukit Benut POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Not applicable
2.3.4	There is no land dispute in the Bukit Benut POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview.	Not applicable

Principle 3: Commitment to long-term economic and financial viability

Criterion 3.1:

There is an implemented management plan that aims to achieve long-term economic and financial viability.

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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>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER, and KER, OPEX, CAPEX etc. Bukit Benut Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year. CAPEX allocation for mill and estate was made available for review for FY 18/19:</p> <p>Mill : operation and environment ESP system installation – Clean Air Regulation 2014 compliance by 2019 BOD polishing plant – BOD 50 requirement by DOE Johor Aerobic pond – to reduce AN and BOD (additional aeration pond) Press P15 press operation – upgrading 10 mt cages (3 additional unit) –</p> <p>Estate: operation Kubota L3200DT c/w grabber – mechanization @ SD3 Mechanical Buffalo L100 – additional asset for FFB evacuation.</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>SOU22 estate’s has documented a long range replanting program for a minimum of 5 years. Replanting is planned for tall palm and older than 25 years old. Replanting programme for the next financial year as follow:</p> <p><u>Bukit Benut Estate</u> FY 18/19 : no replanting programme FY 19/20 : 84.11 ha FY 20/21 : 86.76 ha</p> <p><u>Lambak Estate</u> FY 18/19 : 63.12 ha (1994B) FY 19/20 : 169.49 ha (1995C1 and 1996B) FY 20/21 : 147.31 ha (1996A and 1996C)</p> <p><u>CEP Niyor Estate</u> FY 18/19 : 56.94 ha (1995A, 1995B and 1995) FY 19/20 : no replanting programme FY 20/21 : 95.11 ha</p>	<p>Complied</p>
<p>Principle 4: Use of appropriate best practices by growers and millers</p>		
<p>Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.</p>		

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Criterion / Indicator	Assessment Findings	Compliance																
<p>4.1.1</p> <p>Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>SOP available for the Palm Oil Mill and the Estates. Palm Oil Mill holds two SOPs: Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. SOP for the Composting Plant dated 15/8/2011: Composting Management System version 1:2011</p> <p>Estates have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc. Noted updated procedure under SOP for water analysis and RSPO SCCS procedure:</p> <p>i) SPMS, Appendix 7: SOP for water quality monitoring, issue:2 dated 1/6/16.</p> <p>SOP for sampling guideline</p> <p>i) Water and Wastewater Sampling Guideline, issue:1 dated 1/6/16.</p> <p>ii) RSPO Supply Chain Certification Standard and Traceability for handling certified and non- certified FFB under Appendix 15, version:2, issue: 2 dated October 2016</p>	<p>Complied</p>																
<p>4.1.2</p> <p>A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p>	<p>External Mill Advisor and a Planting Advisor inspect and report on the operations on annual basis. There were other audits by PSQM and GCAD to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements.</p>	<p>Complied</p>																
<p>4.1.3</p> <p>Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -</p>	<p>Mill Advisor's latest visit was carried out on 23-24/5/18. (report No.: SOU22/BBM/02/17-18). Report includes monitoring of all activities in the mill covering the OER & KER performance, process losses, mill throughput (maintenance, downtime), product quality and compliance monitoring. Average rating is 72.92.</p> <p>For example at Bukit Benut estate, agronomist report, FY2018/2019 was carried out on 12/3/18. Monitoring of (rainfall, yield [performing and under-performing], palm nutrition status, fertilizer recommendation has been included in the report. Other matters such as field observation and agronomic matters was also incorporated in the report i.e bagworm infestation etc. 3 years manuring history summarized as per below:</p> <table border="1" data-bbox="659 1715 1286 1933"> <thead> <tr> <th colspan="4">Ave. fertilizer rate per palm (kg/palm/year)</th> </tr> <tr> <th></th> <th>FY15/16</th> <th>FY16/17</th> <th>FY 17/18</th> </tr> </thead> <tbody> <tr> <td>Recommen dation</td> <td>11.48</td> <td>9.87</td> <td>10.74</td> </tr> <tr> <td>Applied</td> <td>6.90</td> <td>11.59</td> <td>8.14</td> </tr> </tbody> </table>	Ave. fertilizer rate per palm (kg/palm/year)					FY15/16	FY16/17	FY 17/18	Recommen dation	11.48	9.87	10.74	Applied	6.90	11.59	8.14	<p>Complied</p>
Ave. fertilizer rate per palm (kg/palm/year)																		
	FY15/16	FY16/17	FY 17/18															
Recommen dation	11.48	9.87	10.74															
Applied	6.90	11.59	8.14															

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Criterion / Indicator		Assessment Findings	Compliance
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Bukit Benut mill receives only own certified crops for processing from own certification unit estates and group estates. The records of origin for all FFB supplier confirmed no any external or third party supplier of FFB.	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield.	Complied
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	<p><u>Bukit Benut Estate</u></p> <p>Fertilizer application programme is based on the recommendation by agronomist under Appendix Ia, 2017 Agronomist and Fertilizer Recommendations Report. Date of visit: 25-26/5/16. Programme for mature and immature fields available for review. Sample of programme for RP (28% P2O5) P06B (44.45 ha)</p> <p>Application date: 1 - 4 April 2018, Fertilizer: MOP recommendation rate: 1.75 kg/palm for total of 553.30 mt.</p> <p>For FY2018/2019, manuring programme will start in July 2018 for mature area (AS 21%N programme) and immature (AS 21%N, MOP 60% K2O, RP 28%P2O5 programme) in July 2018. Refer to 2017/2018 Agronomic & Fertiliser Recommendation Report – Oil Palm, Appendix I dated 11/6/18.</p> <p><u>Lambak Estate</u></p> <p>Fertilizer application follows the Agronomist recommendation from the R&D department. Recommendation for FY2017/2018 based on agronomist dated 6th June 2017.</p> <p>Immature: AC 21%N programme for total of 91.11 Ha, application rate 2 kg/palm for the total of 25.33 mt.</p> <p>For FY2018/2019, manuring programme will start in July 2018 for mature area (AS 21%N programme) and immature (COMP 45 [12:12:17:2] programme) in July 2018. Refer to 2017/2018 Agronomic & Fertiliser Recommendation Report – Oil Palm, Appendix I dated 11/6/18.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.3</p> <p>There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -</p>	<p>Sime Darby Seeds and Agriculture Services Sdn Bhd prepare the annual fertilizer recommendation. Leaf analysis result which shows the nutrient level was used as guidance for the fertilizer recommendation. At Bukit Benut Estate, leaf sampling was carried out in March 2018 during agronomist visit. Foliar nutrient status reported under the latest agronomist report for FY2018/2019 dated 11th June 2018. Soil analysis carried out at 5 years interval. The last soil analysis was carried out on 16/3/15, Report# S20/2015 dated 16/3/15.</p> <p><u>Lambak Estate</u> The latest leaf sampling analysis was carried out in March 2018 for central (main) and Elaeis. Leaf foliar analysis report incorporated under agronomist report for Lambak Estate 2018/2019 Agronomic & Fertilizer Recommendation Report dated 11 June 2018. Soil sampling is valid for 5 years refer to analysis report dated 24/4/15, report ref#S37/2015.</p> <p><u>CEP Niyor Estate</u> Leaf sampling was carried out by agronomist based on the latest visit on 24th January 2018. Refer to agronomist report dated 24th January 2018 has included all division under CEP Niyor, Bukit Paloh and Talisman. However, as to date no soil sampling carried out at Talisman division after new acquisition.</p> <p>Thus a minor NC was issued.</p>	<p>Minor nonconformance</p>
<p>4.2.4</p> <p>A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -</p>	<p>Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. EFB applied at selected fields at the estates. Recommended rate is 40mt/ha for mature field and 35mt/ha for immature field.</p> <p><u>Bukit Benut Estate</u> POME is applied at only selected field namely 1995, 1997A, 1997B, 2002A and 2007C. Total hectare covered for June 2018 is 82.16 ha.</p> <p>EFB mulching applied at selected field 2013A, 2010C and 2011B. Total of 1442.12 mt of EFB was applied at selected field.</p> <p><u>Lambak Estate</u> Specific field application at 2016A, 2016B and 2017B for FY2017/2018. Total of 2,834.42 mt of EFB applied with total of 75.54 ha area covered.</p>	<p>Complied</p>
<p>Criterion 4.3: Practices minimise and control erosion and degradation of soils.</p>		

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Criterion / Indicator	Assessment Findings	Compliance																												
<p>4.3.1 Maps of any fragile soils shall be available. - Major compliance -</p>	<p>Soil series map available. Soil series summary as follow:</p> <p><u>Bukit Benut Estate</u></p> <p>Majority: Rengam: 1,682.64 ha (61.86%), Renggam/Bkt Lunchu: 717.58 ha (27.62%), Jerangau: 242.18 ha (8.23%) and Bukit Lunchu: 64.29 ha (2.29%)</p> <p><u>Lambak Estate</u></p> <table border="1" data-bbox="662 629 1289 1301"> <thead> <tr> <th>Soil Series</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr><td>Berserah</td><td>0.73</td></tr> <tr><td>Berserah/Lambak</td><td>6.30</td></tr> <tr><td>Jerangau</td><td>0.33</td></tr> <tr><td>Lambak</td><td>1.41</td></tr> <tr><td>Local Alluvium I</td><td>16.37</td></tr> <tr><td>Local Alluvium II</td><td>3.36</td></tr> <tr><td>Masai</td><td>0.24</td></tr> <tr><td>Masai/Rengam Associated</td><td>1.75</td></tr> <tr><td>Masai/Rengam Associated Shallow</td><td>1.05</td></tr> <tr><td>Plepah</td><td>0.17</td></tr> <tr><td>Rengam</td><td>55.68</td></tr> <tr><td>Rengam Shallow</td><td>12.01</td></tr> <tr><td>Terbok</td><td>0.6</td></tr> </tbody> </table> <p>There are no peat soils or soil categorised as problematic or fragile soil at all estates.</p> <p><u>CEP Niyor Estate</u></p> <p>Based on feasibility study by SID, Upstream/ASM dated December 2015 prior to Talisman Division acquisition, there is marginal shallow peat identified within estate with depth range of (50-100 cm). No soil map available to finalize the classification of soil categories at Talisman Division.</p> <p>Thus, a major NC was raised.</p>	Soil Series	Percentage (%)	Berserah	0.73	Berserah/Lambak	6.30	Jerangau	0.33	Lambak	1.41	Local Alluvium I	16.37	Local Alluvium II	3.36	Masai	0.24	Masai/Rengam Associated	1.75	Masai/Rengam Associated Shallow	1.05	Plepah	0.17	Rengam	55.68	Rengam Shallow	12.01	Terbok	0.6	<p>Major nonconformance</p>
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Criterion / Indicator		Assessment Findings	Compliance
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 -	Most of the area in SOU 22 area are undulating and low lying area. The directive for planting terraces in accordance with SDPSB policy where slope >10° need to establish with cover crops such as muccuna and soft grasses and ferns. <u>Bukit Benut Estate</u> Terrain classification: Flat (0-2°) – 8.9%, undulating (2-6°) – 43.18%, rolling (6-12°) – 35.90%, (12-20°) – 10.85%, (20-25°) – 1%, >25% - 0.17%. <u>Lambak Estate</u> Terrain classification: Flat (0-2°) – 14.92 %, undulating (2-6°) – 50.99%, rolling (6-12°) – 25.29%, (12-20°) – 5.80%, (20-25°) – 1.46%, >25% - 0.60%.	Complied
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Estates visited have implemented annual Road Maintenance Programme FY2017/2018. Plan for the next financial year (FY 2018/2019) available for grading and compacting, resurfacing and road side pruning. Example of road maintenance programme checked: <u>Bukit Benut (Tembuku D)</u> Field 2014B and 2002C – patching and grading (April 2018)	Complied
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	Based on feasibility study by SID, Upstream/ASM dated December 2015 prior to Talisman Division acquisition, there is marginal shallow peat identified within estate with depth range of (50-100 cm). No soil map available to finalize the classification of soil categories at Talisman Division. Refer to major NC under 4.3.1.	Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	Based on feasibility study by SID, Upstream/ASM dated December 2015 prior to Talisman Division acquisition, there is marginal shallow peat identified within estate with depth range of (50-100 cm). No soil map available to finalize the classification of soil categories at Talisman Division. Refer to major NC under 4.3.1.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	Based on feasibility study by SID, Upstream/ASM dated December 2015 prior to Talisman Division acquisition, there is marginal shallow peat identified within estate with depth range of (50-100 cm). No soil map available to finalize the classification of soil categories at Talisman Division. Refer to major NC under 4.3.1.	Complied
Criterion 4.4:			
Practices maintain the quality and availability of surface and ground water.			
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	Mill and estates water management plan consist of the following: - Source of water identified - Government supply, estate water treatment plant, renewable water source (rainwater harvesting) - Water usage records – consumption volume - Identification & Management of Wastewaters A sample Water Management Plan for FY 18/19 sighted at Lambak Elaeis Estate consists of water source, areas of concern (Ellar Div.), monitoring of water usage and contingency plan.	Complied

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Criterion / Indicator	Assessment Findings	Compliance												
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 -	<p>Documented as a Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). Buffer zones established as following:</p> <table border="1" data-bbox="660 533 1291 719"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>In Bukit Benut Estate, visited to block P10B has verified the buffer zone of River Melantai is well maintained with the signage and demarcation.</p>	River width	Buffer zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters	Complied
River width	Buffer zone													
> 40 meters	50 meters													
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Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.3</p> <p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -</p>	<p>Based on Sustainable Plantation Management System Appendix 10 Procedure for Mill Environmental Performance version 1, year 2008, issue no. 1, dated 1 October 2008. Uses the Mill Environmental Performance Review (Form A) Mill environmental monitoring records available/sighted:</p> <ul style="list-style-type: none"> • Water monitoring records: Microbiology Samples Analysis; Microbiology Analysis Test Report # ML208/2018 dated 26/4/2018 by Sime Darby Research Sdn. Bhd.; parameter monitored: E. Coli & Total Coliform • Water monitoring records: Industrial Effluent (Water) Analysis; Water Analysis Test Report # IE622/2018 dated 28/5/2018 by Sime Darby Research Sdn. Bhd.; parameter monitored: BOD, COD, pH, TDS, Turbidity, Chloride & Al* • Water monitoring records: Pesticide in Water Analysis; Water Analysis Test Report # PL320/2018 dated 8/5/2018 by Sime Darby Research Sdn. Bhd.; parameter monitored: Aldrin, Dieldrin, t-DDT, Heptachlor, Heptachlor Epoxide, *Chlordane, Lindane, Endosulfan • Noise Boundary Report for KKS Bukit Benut; Monitoring date: 11/7/2017; Prepared by: PSQM-ESH; Noise management survey instrument TES Sound Level Meter (SLM) Model TES-1350A; Standard IEC 61672; Serial # 130403182; Cert. of calibration # ST6172966; Validity: 8/11/2016 – 8/11/2017 • Bukit Benut Palm Oil Mill; Stack Emission Monitoring for Boiler no. 3; Lab # E/SE/1803/20377; Report Ref.: ETD/SE/BBPOM/2018/03/17593; Monitoring date: 17/3/2018; Report date: 27/4/2018; by Spectrum Laboratories (Johore) Sdn. Bhd.; Dust Emission Load dry @ 12% CO² = 0.018g/Nm³ <p>Estate: based on Sustainable Plantation Management System Appendix 8 Standard Operation Procedure and Estate Quality Management System (EQMS). Estate environmental monitoring records available/sighted: Water monitoring records: Industrial Effluent (Water) Analysis; Water Analysis Test Report # IE855/2017 dated 14/8/2017 by Sime Darby Research Sdn. Bhd.; parameter monitored: pH, TDS, Turbidity, Chloride & Al*.</p>	<p>Complied</p>
<p>4.4.4</p> <p>Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -</p>	<p>Monitored records were sighted as following:</p> <p>Mill: Total average water consumption = 1.22 mt/FFB processed</p> <p>Bukit Benut Estate: Total rainfall Jan – Oct 2018 = 2627mm/164 days</p> <p>Lambak Estate: Total rainfall Jan – Oct 2018 = 4726mm/475 days</p> <p>CEP Niyor Estate: Total rainfall Jan – Oct 2018 = 2206mm/151 days</p>	<p>Complied</p>
<p>Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>		

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Criterion / Indicator		Assessment Findings	Compliance						
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators. The estates are continue to plant beneficial plants such as Turnera subulata. Latest updates of Bukit Benut Estate IPM's as per below:</p> <p>Beneficial plant: 6:2:2 (target for minimum 1 dm/ha)</p> <p>Rat baiting: calendar baiting (2nd campaign) completed for field 2013A – 18% below threshold level) using warfarin (1st generation)</p> <p>Barn owl box: Occupancy rate average at 56% (1st round in February 2018) together with BOB maintenance and replacement/new box.</p> <p><u>Lambak Estate</u></p> <p>Beneficial plant: 6:2:2 (planted 1.5 dm/ha)</p> <p>Rat baiting: calendar baiting (2nd campaign) completed in April 2018 at field 2018c – 16% below threshold level) using warfarin (1st generation)</p> <p>Barn owl box census: 2 rounds per year. February 2017 census: Occupancy rate – 76.64% BOB maintenance and replacement/new box</p>	Complied						
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>IPM training is given by the Agronomist and plantation executives with qualification in agriculture. Interview with the barn owl occupancy census team confirm their understanding of the Sime Darby SOP in Agricultural Reference Manual v.1 Section 15 on census. The latest IPM training (IPM and trunk injection) was carried on 18/1/18 at Bukit Benut Estate. Other related IPM training carried out at SOU22 estates:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>3/1/18</td> <td>BOB census training</td> <td>Bukit Benut</td> </tr> </tbody> </table>	Date	Training	Estate	3/1/18	BOB census training	Bukit Benut	Complied
Date	Training	Estate							
3/1/18	BOB census training	Bukit Benut							
<p>Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment</p>									

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Criterion / Indicator	Assessment Findings	Compliance									
<p>4.6.1</p> <p>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.</p> <p>- Major compliance -</p>	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease. Some of recommended pesticides are:</p> <p>Immature planting (sample)</p> <ul style="list-style-type: none"> - General weeds : Glyphosate - Legume & broad leave : Metsulfuron Methyl - Stenochlaena palustris : Sodium chlorate <p>Mature planting</p> <ul style="list-style-type: none"> - VOPs : glyphosate & sodium chlorate <p>The selection is also evaluated by the agronomist during his visit to the estate.</p>	<p>Complied</p>									
<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 use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Summary of Ai/Ha for FY2017/2018 as per below table:</p> <table border="1" data-bbox="660 1115 1281 1263"> <thead> <tr> <th>Ai/Ha</th> <th>Estate</th> <th>Chemicals/pesticides</th> </tr> </thead> <tbody> <tr> <td>2.22</td> <td>Bukit Benut</td> <td>Ally, Cypermethrin, Warfarin, Glufosinate Ammonium</td> </tr> <tr> <td>1.68</td> <td>Lambak</td> <td>Glyphosate, Acephate, Metsulfuron Methyl, Warfarin</td> </tr> </tbody> </table>	Ai/Ha	Estate	Chemicals/pesticides	2.22	Bukit Benut	Ally, Cypermethrin, Warfarin, Glufosinate Ammonium	1.68	Lambak	Glyphosate, Acephate, Metsulfuron Methyl, Warfarin	<p>Complied</p>
Ai/Ha	Estate	Chemicals/pesticides									
2.22	Bukit Benut	Ally, Cypermethrin, Warfarin, Glufosinate Ammonium									
1.68	Lambak	Glyphosate, Acephate, Metsulfuron Methyl, Warfarin									
<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>The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.</p>	<p>Complied</p>									
<p>4.6.4</p> <p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, 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.</p> <p>- Minor compliance -</p>	<p>Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III & IV chemical used at visited estates. Alternative for class IA chemical, Methamidophos was used named Acephate under class III for bagworm infestation. Refer to permit to buy Acephate, JHR/2018/ACP/53(GL) dated 11/4/18 for total of 300 kg.</p> <p><u>Lambak Estate</u> Permit for to buy controlled chemical/Acephate, permit number: JHR/2018/ACP/11(GL) for 600 kg issued on 22/1/18.</p>	<p>Complied</p>									

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Criterion / Indicator	Assessment Findings	Compliance
4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipments and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers. Bagworm infestation is treated using trunk injection. Alternative for class IA chemical, Acephate is used for activity.	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 visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.	Complied
4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5. For weeding activities, knapsack spray pump and low volume CDA spray are used for selective and circle spraying. For bagworm, bagworm infestation is treated using trunk injection.	Complied
4.6.8 Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spray at SOU22	Complied
4.6.9 Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders at SOU22. Employees demonstrate knowledge and skills on pesticide handling. MSDS/SDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as the use of safety pictorial poster for the easy understanding of the agrochemical handlers.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.10 Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -</p>	<p>Proper disposal of waste material were supposed to be implemented as per Sime Darby Plantation Sustainability and Quality Management System (PSQM); Operational Control Procedure – Landfill Management in Estate; Doc. # SD/SDP/PSQM(ESH)/203-EN7; Rev. 0; Dated 13/3/2017</p> <p>A) For estates/mills located within 20km of a municipal landfill</p> <ul style="list-style-type: none"> • Hauling bin > 3km residential area, office or other premise <p>B) For estates/mills located more than 20km of a municipal landfill</p> <ul style="list-style-type: none"> • Landfill site > 3km residential area, office or other premise • Landfill site > 3km nearest river or waterway • Excavated 3m deep, 2m width, <20m length and shall be <5 palm planting points • Landfill pit shall be divided into few sections. Each sections should be separated by approximately 6m length or as far as distance between 2 palms <p>However, it was sighted in Bukit Benut Estate, waste consists of used tyres, scrap metals and plastics were found being dumped improperly into the ravine by the road side at field Block # 10A opposite of housing area Zone C with about 300m distant. This indicated that the waste material disposal according to procedures were not being fully demonstrated.</p> <p>Hence, a minor noncompliance has been raised.</p>	<p>Minor nonconformance</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p>	<p><u>Bukit Benut Estate</u> Medical surveillance was carried out by OHD, HQ/08/DOC/00/597 under Klinik Renggam on 2-5/7/18 for total of 39 workers from different work units based on CHRA recommendation. Group of sprayers, trunk injector, sprayer, store keeper and foreman was sent for medical surveillance. Results is still pending as the programme was recently started in early July 2018.</p> <p><u>Lambak Estate</u> Medical surveillance for 2017 was carried out on 21-25/8/17 for total of 44 workers for different type of work units (workshop, spraying, trunk injector and water pump operator). Verified the medical report by registered OHS, HQ/08/DOC/597 under Klinik Renggam and found all workers are fit to work without any occupational related disease. The next surveillance programme will be carried out in August 2018.</p> <p><u>CEP Niyor Estate</u> Medical surveillance for 2017 was carried out on 26-28/12/17 for total of 24 workers for different type of work units (workshop, spraying, trunk injector). Verified the medical report by registered OHS, HQ/08/DOC/597 under Klinik Renggam and found all workers are fit to work without any occupational related disease. The next surveillance programme will be carried out in December 2018.</p>	<p>Complied</p>
<p>4.6.12 No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -</p>	<p>Noted there were a few women working as chemical mixers and sprayers. Verified that the worker were over the reproductive age.</p>	<p>Complied</p>
<p>Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>		

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Criterion / Indicator	Assessment Findings	Compliance								
<p>4.7.1</p> <p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>SOU22 has maintained an approved Health and Safety Policy dated January 2015 that is displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site safety officers and monitored by OSH Manager from Head Office. Sample of Bukit Benut Palm Oil Mill ESH programme for FY2017/2018:</p> <p><u>Medical Surveillance</u> The last medical surveillance was carried out on 20/6/18 by registered OHD under "Klinik Renggam" HQ/08/DOC/00/597 for total of 22 workers from workshop and laboratory. All workers are found fit to work with no detrimental of health based on USECHH 3 and 4.</p> <p><u>Audiometric Testing</u> The last audiometric testing was last carried out on 18/9/17 for total of 90 workers. 16 workers reported to have Hearing Impairment (HI) and 9 with Standard Threshold Shift (STS). Retest was carried in 8/1/18 for the STS workers and found 2 workers having Noise Induced hearing Loss (NIHL). JKPP 7 was submitted to DOSH on 24/1/18 for the occurrence of occupational disease.</p> <p><u>LEV Testing and Inspection</u> Last inspection was carried out on 16/3/18 by Spectrum Laboratories (Johore) Sdn Bhd. DOSH registered IHT II, JKPP HIE 127/171-3/2(164). Face velocity (hood) and travel velocity (ducting) within and higher than recommended value of ACGIH. Monthly inspection done by internal technician. Refer to inspection checklist for the month of June 2018.</p> <p><u>Chemical Hazard Risk Assessment (CHRA)</u> CHRA was last revisited on 11-12/2/14 by registered DOSH assessor, JKPP HIE 127/171-2(137). 8 work units were assessed and related recommendation report under from F of the report. Example of recommendation as per below:</p> <table border="1" data-bbox="659 1518 1289 1933"> <thead> <tr> <th>Work unit</th> <th>Recommendation</th> </tr> </thead> <tbody> <tr> <td>Storekeeper</td> <td>Chemical safe handling every 2 years Medical surveillance programme</td> </tr> <tr> <td>Laboratory</td> <td>Chemical safe handling every 2 years Biological monitoring/medical surveillance programme Chemical exposure monitoring (potassium chromate and n-hexane) Emergency eyewash and shower</td> </tr> <tr> <td>Workshop</td> <td>Chemical safe handling every 2 years Biological monitoring/medical surveillance programme Chemical exposure monitoring (potassium chromate and n-hexane)</td> </tr> </tbody> </table>	Work unit	Recommendation	Storekeeper	Chemical safe handling every 2 years Medical surveillance programme	Laboratory	Chemical safe handling every 2 years Biological monitoring/medical surveillance programme Chemical exposure monitoring (potassium chromate and n-hexane) Emergency eyewash and shower	Workshop	Chemical safe handling every 2 years Biological monitoring/medical surveillance programme Chemical exposure monitoring (potassium chromate and n-hexane)	<p>Complied</p>
Work unit	Recommendation									
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Workshop	Chemical safe handling every 2 years Biological monitoring/medical surveillance programme Chemical exposure monitoring (potassium chromate and n-hexane)									

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>- Major compliance -</p>	<p>SOU 22 had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. Refer to revisited CHRA report for Bukit Benut POM, (JKKP HIE 127/171-(2)317 dated February 2014.</p> <p>For Bukit Benut Estate, CHRA report reference; CHRA(J)/15-08/03 dated 13 October 2015 by JKKP HIE 127/171-2(363) has include the new chemical used for trunk injection, namely Acephate under class III category.</p> <p>Revised HIRARC checked at the visited operating units as per the following:</p> <p><u>Lambak Estate</u></p> <p>HIRARC revised after accident occurrence (slip, trip and fall and cut by harvesting tool). HIRARC review meeting was carried out on 4/1/18. The latest revised HIRARC on 19/6/18 after occurrence of accident.</p> <p><u>Bukit Benut Estate</u></p> <p>Revised after accident occurrence, MB driver accident (engine belting snapped). Date of revision 1/2/18</p> <p><u>Bukit Benut POM</u></p> <p>Revised HIRARC after accident dated 26/1/18 (ripple mill repair work).</p> <p>All the above HIRARC rating and current control measure has been updated in the register.</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.</p> <p>- Minor compliance -</p>	<p>Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Suitable PPE has been provided to the workers based on the information in the MSDS/CSDS and CHRA assessor's recommendation.</p> <p>List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities.</p> <ul style="list-style-type: none"> i) Sterilizer and boiler/power operator – Safety Helmet, Semi leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff ii) Lab operator – Respirator (double cartridge) Nitrile Glove (chemical resistant), safety boots, Ear plug (NRR = 24 dB) iii) Field workers (sprayer, manurer & harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover. 	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>Assistant manager and QA at each of the operating units are appointed as OSH Coordinators and Estate Hospital Assistant as Safety and Health Committee Secretary. OSH Committees meeting conducted quarterly and meeting minutes includes issues raised and action taken from workplace inspection report etc. The latest meeting was conducted on the 27/6/18 at Bukit Benut Palm Oil Mill. All members has attended the meeting with discussion on the accident review, safety improvement plan, issues from workers has been discussed and action to be taken. There was no major issue.</p> <p>For estate, person in charge for appointed for OSH coordinator are Estate Hospital Assistant and Estate assistant. At Bukit Benut Estate, the latest SHC meeting – 2018 (1st meeting: 5/2/18, 2nd meeting: 3/5/18). Workplace inspection carried before ESH quarterly meeting. All issues identified highlighted in the meeting for improvement.</p>	<p>Complied</p>
<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. - Minor compliance -</p>	<p>Emergency Response Plan (ERP) has been established and defined in procedure, Level 2, Standard Operation Manual, Sub Section 5.5, Management Responsibility, Appendix 5.5.3.3 Emergency Preparedness and Response Procedure, version:1, issue :1 dated 1/11/2008. Emergency response activities were also included in the ESH plan FY 17/18. The following Emergency Response Plan were addressed: Fire Outbreak, Accident and incident occurrence, Oil Spillage and etc. Latest fire evacuation drill was done on 5/2/18 at Bukit Benut Oil Mill.</p> <p>Accident and emergency procedures have been communicated to employees, contractors and visitors. Workers trained in First Aid were present in the mill and field operations. Records on all incidents kept and summary sent to Head Office. Quarterly review on accident cases carried out during OSH quarterly meeting. All operating units keeping all the JKPP 6,7 & 8 forms.</p>	<p>Complied</p>

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4.7.6	<p>All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p>	<p>Medical care is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme. Sample of insurance policies and social security (SOCSO) checked:</p> <p><u>Bukit Benut POM</u></p> <table border="1" data-bbox="660 562 1291 949"> <thead> <tr> <th>Employee</th> <th>Policy</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>B2713821</td> <td>MW177045 under RHB Insurance Berhad</td> <td>16/8/17 -15/8/18</td> </tr> <tr> <td>A9479244</td> <td>FW229203 under RHB Insurance Berhad</td> <td>2/6/18 - 8/8/18</td> </tr> <tr> <td>AT976334</td> <td>FW232309 under RHB Insurance Berhad</td> <td>22/6/18 - 25/8/18</td> </tr> </tbody> </table> <p>Checked social security payment, "Jadual Caruman" @ 8A form for June 2018 involving 75 workers. Refer to employer ID code, E12000011318M.</p> <p><u>Bukit Benut Estate</u></p> <table border="1" data-bbox="660 1099 1291 1543"> <thead> <tr> <th>Employee</th> <th>Policy</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>B8297378</td> <td>MW218328 under RHB Insurance Berhad</td> <td>28/4/18 -27/4/19</td> </tr> <tr> <td>BM0081431</td> <td>MW196778 under RHB Insurance Berhad</td> <td>3/12/17 -2/12/18</td> </tr> <tr> <td>BN0243991</td> <td>MW218330 under RHB Insurance Berhad</td> <td>27/4/18 - 26/4/19</td> </tr> </tbody> </table> <p><u>Lambak Estate</u></p> <table border="1" data-bbox="660 1592 1291 2029"> <thead> <tr> <th>Employee</th> <th>Policy</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>BM0081031</td> <td>MW203643 under RHB Insurance Berhad</td> <td>22/12/18 - 21/12/19</td> </tr> <tr> <td>AT398864</td> <td>MW224290 under RHB Insurance Berhad</td> <td>31/5/18 - 30/5/19</td> </tr> <tr> <td>AT341740</td> <td>MW224281 under RHB Insurance Berhad</td> <td>9/5/18 - 8/5/19</td> </tr> </tbody> </table>	Employee	Policy	Validity	B2713821	MW177045 under RHB Insurance Berhad	16/8/17 -15/8/18	A9479244	FW229203 under RHB Insurance Berhad	2/6/18 - 8/8/18	AT976334	FW232309 under RHB Insurance Berhad	22/6/18 - 25/8/18	Employee	Policy	Validity	B8297378	MW218328 under RHB Insurance Berhad	28/4/18 -27/4/19	BM0081431	MW196778 under RHB Insurance Berhad	3/12/17 -2/12/18	BN0243991	MW218330 under RHB Insurance Berhad	27/4/18 - 26/4/19	Employee	Policy	Validity	BM0081031	MW203643 under RHB Insurance Berhad	22/12/18 - 21/12/19	AT398864	MW224290 under RHB Insurance Berhad	31/5/18 - 30/5/19	AT341740	MW224281 under RHB Insurance Berhad	9/5/18 - 8/5/19	Complied
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Criterion / Indicator		Assessment Findings	Compliance															
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	Records on Lost Time Accident (LTA) metrics displayed at the operating units through Safety Statistic Billboard and reported to PSQM-ESH department using new online system called SMS-IT. Sample of accident statistic as shown below: <table border="1" data-bbox="662 533 1289 846"> <thead> <tr> <th>Year</th> <th>Bukit Benut POM</th> <th>Bukit Benut Estate</th> <th>Lambak Estate</th> <th>CEP Niyor Estate</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>4 case (275 LTA)</td> <td>3 cases (13 LTA)</td> <td>3 cases (15 LTA)</td> <td>2 cases (10 LTA)</td> </tr> <tr> <td>2018 to date</td> <td>0 case</td> <td>1 case (2 LTA)</td> <td>4 cases (34 LTA)</td> <td>1 case (1 LTA)</td> </tr> </tbody> </table> *Summary of LTA is based on GSQM ESH Portal as at June 2018	Year	Bukit Benut POM	Bukit Benut Estate	Lambak Estate	CEP Niyor Estate	2017	4 case (275 LTA)	3 cases (13 LTA)	3 cases (15 LTA)	2 cases (10 LTA)	2018 to date	0 case	1 case (2 LTA)	4 cases (34 LTA)	1 case (1 LTA)	Complied
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Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.																		
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 -	SOU22 has established an annual training program FY 2017/2018 that covers all aspects including OSH, environmental, machinery, emergency, 5s housekeeping as well as RSPO Principles and Criteria.	Complied															

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Criterion / Indicator	Assessment Findings	Compliance																																						
4.8.2 Records of training for each employee shall be maintained. - Minor compliance -	<p>Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C requirement. Samples of training record as follows:</p> <p>Bukit Benut POM</p> <table border="1" data-bbox="660 533 1284 779"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>30/3/18</td> <td>Chemical and boiler water training</td> </tr> <tr> <td>24/1/18</td> <td>First Aid Training</td> </tr> <tr> <td>5/2/18</td> <td>Fire & emergency drill</td> </tr> <tr> <td>6/3/18</td> <td>Safety work procedure for cutting and welding (workshop)</td> </tr> </tbody> </table> <p>Bukit Benut Estate</p> <table border="1" data-bbox="660 835 1284 1037"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>22/5/18</td> <td>First Aid Training</td> </tr> <tr> <td>18/1/18</td> <td>Trunk Injector Training</td> </tr> <tr> <td>3/1/18</td> <td>GAP training (Pollarding Seedling Training)</td> </tr> </tbody> </table> <p>Lambak/ Elaeis Estate</p> <table border="1" data-bbox="660 1093 1284 1384"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>4/4/18</td> <td>Workshop maintenance and welding training</td> </tr> <tr> <td>4/5/18</td> <td>Fire Drill</td> </tr> <tr> <td>4/5/18</td> <td>First Aid Training</td> </tr> <tr> <td>16/5/18</td> <td>Safety Town Hall Training 6.0</td> </tr> </tbody> </table> <p>CEP Niyor Estate</p> <table border="1" data-bbox="660 1440 1284 1709"> <thead> <tr> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>8/3/18</td> <td>Manuring Training</td> </tr> <tr> <td>2/3/18</td> <td>Harvesting Training</td> </tr> <tr> <td>18/11/17</td> <td>Trunk Injection Training</td> </tr> <tr> <td>27/5/18</td> <td>Safety Town Hall Training</td> </tr> </tbody> </table>	Date	Training	30/3/18	Chemical and boiler water training	24/1/18	First Aid Training	5/2/18	Fire & emergency drill	6/3/18	Safety work procedure for cutting and welding (workshop)	Date	Training	22/5/18	First Aid Training	18/1/18	Trunk Injector Training	3/1/18	GAP training (Pollarding Seedling Training)	Date	Training	4/4/18	Workshop maintenance and welding training	4/5/18	Fire Drill	4/5/18	First Aid Training	16/5/18	Safety Town Hall Training 6.0	Date	Training	8/3/18	Manuring Training	2/3/18	Harvesting Training	18/11/17	Trunk Injection Training	27/5/18	Safety Town Hall Training	<p>Complied</p>
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Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

Criterion 5.1:

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

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Criterion / Indicator		Assessment Findings	Compliance
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	The environmental impact assessment was documented as Environment Aspect & Impact (EAI) Identification for F/Y 2017/2018 KKS Bukit Benut; Serial # EAI/2018/001-1 to 015-1; Notes: Operation/Activities remain the same as per 2010/2011; date 1/7/2017. However an aspect related to leachate was developed based on newly implemented control system involving installation of pump. Environment Impact Evaluation (EIE) for F/Y 2017/2018 KKS Bukit Benut; Serial # EIE/2018/001-1 to 015-1; Notes: Operation/Activities remain the same as per 2015/2016; date: 1/7/2017. Bukit Benut Estate EAI/EIE Review Meeting; FY 2018/2019; Date: 21/6/2018; Bukit Benut Meeting Room Specific replanting activities applicable in Lambak Estate documented in File # SM/5.1/EAI Environmental Aspect and Impact Identification (EAI) Form; Serial # EAI/2009/11-01 until EAI/2009/11-13 and Environmental Impact Evaluation Form (EIE)	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 -	The mill and estates continuously implemented their annual programs that were established as part of its individual Pollution Prevention Plan. Managers and assistant managers of mill and estates were identified as person-in-charge of the programs which were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were done annually if there's no any new activity within respective sites. Sighted that there was a newly identified aspect for the operation of EFB Leachate Pump through review dated on 5/6/2018 in mill.	Complied
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 on the EAI & EIE established, few monitoring were implemented as part of the impact operational control. The plan consists of Environmental Management Plan, Pollution Prevention Plan, Waste Management Plan were reviewed periodically at least once a year or in case of any operational changes in both mill and estates. All routine operational activities identified were remained its control of negative impacts whilst under monitoring by operating unit management team and regional sustainability team and top management representatives.	Complied
Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>5.2.1</p> <p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p>	<p>Information of HCV were described in the reports of High Conservation Value (HCV) Re-Assessment for SOU 22 Bukit Benut & SOU 23 Ulu Remis; PSQM Department Sime Darby Plantation; Interim Report (Version II) December 2015. The previous report was Biodiversity Baseline Assessment Report for SOU 22 prepared by: PS-RSPO, TQEM Department, Sime Darby Plantation; Date: February 2009.</p> <p>Addendum to HCV Re-Assessment for Strategic Operating Unit (SOU) 22 Bukit Benut, Southern Region – Talisman Division (Division of CEP Niyor Estate); Prepared by: PSQM Department, Sime Darby Plantation Sdn. Bhd. October 2017 (Final) – 80% of soil in Talisman Estate is sandy soil; 10% is lateritic soil and another 10% is peat (shallow).</p> <p>The report specified that most of HCV area identified for SOU 22 falls under HCV category 4: Pond/River Reserve/ Water Catchment area. The total area is 32.94 Ha distributed among Lambak Elaeis, CEP Niyor, and Bukit Benut estates.</p>	<p>Complied</p>
<p>5.2.2</p> <p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>Reference on appropriate measures expected to be maintain or enhance was based on the group procedure of Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System (SPMS); Section III; Version: 1; Year: 2008; Issue no.: 1; Issue date: 1/11/2008; Section no.: 5; Sub-section no.: 5.8: Biodiversity & Appendix 6: List of Protected Species.</p> <p>Since the identified HCVs were water catchment only the management plans were established as following:</p> <ul style="list-style-type: none"> • Ensure signage is maintain at site and retrievable • To update the monitoring record of terracing • To promote awareness on HCV <p>To identify how task relating to HCV/biodiversity are to be performed</p>	<p>Complied</p>
<p>5.2.3</p> <p>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.</p> <p>- Minor compliance -</p>	<p>Regular educational programs related to HCV & RTE were conducted by both operating unit management team and regional sustainability management team. Sighted the latest HCV & Conservation Areas Management Plan Lambak/Elaeis Estate FY 17/18. HCV Training SOU 22 – Bukit Benut; Date: 28/12/2016; latest conducted on 6/6/2018.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	Action Plan Biodiversity of Sime Plantations Lambak/Elaeis Estate Towards RSPO in Sime Darby Plantations; A report prepare by Mohamad Fakhrolrodzi Aziz; as following: <ul style="list-style-type: none"> - Identification of remnant forest patches, area more than 25 degree slope - Identification of riparian reserved/buffer zone - Training - Planting of beneficial plant - Plat fruit trees & plant Monitoring records included HCV Monitoring Book for the patrolling, wildlife sightings and conservation of HCV area as part of HCV & Conservation Areas Lambak/Elaeis Estate for water catchment area, natural pond and.	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 within Bukit Benut certification unit.	Complied
Criterion 5.3: 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 -	As per Sustainable Plantation Management System Appendix 9 Procedure for Handling of Domestic Waste version 1, year 2008, issue no. 1, dated 1 October 2008. Mill type of waste: <ul style="list-style-type: none"> - Scheduled waste, domestic waste and recyclable waste. These categories include: effluent, fibre/shell, EFB, boiler clinker, wash water, scrap metal, scheduled waste, boiler blowdown, hydro-cyclone wash water, methane gas. Estate type of waste: <ul style="list-style-type: none"> - Scheduled waste – SW102, SW305, SW306, SW409, SW410, SW404 – workshop, clinic, SW store, store; - Domestic waste – rubbish & sewage – line-site, office, workshop, store, shop - Recycle waste – empty container, waste oil - Industrial waste – Scrap iron Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained accordingly.	Complied
5.3.2 All chemicals and their containers shall be disposed of responsibly. - Major compliance -	The chemicals and their containers were evidently disposed of responsibly as per sighted sample of Cash Sale receipt # 1004 & 1005 dated 5/2/2018 & 6/2/2018 for the sale/disposal of empty chemical container that has been triple rinsed and punctured to SS Setia Teknologi Enterprise.	Complied

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5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	The waste management and disposal plan established were consistently implemented as following: Mill: Latest Scheduled waste disposal done on 3/4/2018 by Kualiti Alam Sdn. Bhd. for type of scheduled waste with consignments of SW409 (# 2018040312KNR2S9); SW424 (# 2018040313LRDCWI); SW410 (2018040313PLGQ4Z). Previous disposal was done on 5/10/2017 for SW324 (# 2017100510GU32NK). Estates: Latest Scheduled waste disposal done on 17/4/2018 by Kualiti Alam Sdn. Bhd. for type of scheduled waste with consignments of SW404 (# 0202302) and SW305 (# 16472) dated 30/5/2018 by Perniagaan Saudara Baru. Previous disposal was done on 24/10/2017 for SW404 (# 0177340).	Complied
Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.		
5.4.1 A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	Efficiency of fossil fuels improvement plans was mainly to increase and optimize renewable energy fuels consumptions. Monitoring records sighted for total fibre and shell usage (Renewable Energy Usage) for FY 17/18 = 4.84 mt/mt CPO.	Complied
Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.		
5.5.1 There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law –EQA and Regulations 1974. No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as (felling & chipping, cambering/land forming and path construction).	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 -	No use of fire for land preparation during replanting.	Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.		

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Criterion / Indicator	Assessment Findings	Compliance
<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>Assessment of all polluting activities as per EAI & EIE included with monitoring of the gaseous and particulate emissions as well as effluent final discharge quality. Records of monitoring sighted as following:</p> <ul style="list-style-type: none"> - Bukit Benut Palm Oil Mill; Stack Emission Monitoring for Boiler no. 3; Lab # E/SE/1803/20377; Report Ref.: ETD/SE/BBPOM/2018/03/17593; Monitoring date: 17/3/2018; Report date: 27/4/2018; by Spectrum Laboratories (Johore) Sdn. Bhd.; Dust Emission Load dry @ 12% CO₂ = 0.018g/Nm³ - Water monitoring records: Industrial Effluent (Water) Analysis; Water Analysis Test Report # IE622/2018 dated 28/5/2018 by Sime Darby Research Sdn. Bhd.; parameter monitored: BOD, COD, pH, TDS, Turbidity, Chloride & Al* 	<p>Complied</p>
<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>For mill, GHG emission identified from POME, fuel consumption and grid electricity utilization. 5 years plan for GHG reduction (phase I, 20 mills (Malaysia) was sighted. Programme such as feed in tariff (FIT), flaring, CNG, CaP, Co-gen was included in the plan.</p> <p>For the estate, GHG emissions identified including CO_x, SO_x and NO_x from various sources including fossil fuel, chemical, peat oxidation, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area.</p> <p>The Carbon Emission Reduction Strategy is the overall implementation plan that cuts across SDP's value chain upstream, downstream and other related business. The group target is to reduce emission by 40% at 2021.</p>	<p>Complied</p>
<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>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>The water samples were sent to Sime Darby R&D Laboratory for analysis. Records are maintained and verified on-site to have met the permissible regulatory limits. Quarterly reporting to DOE was also done and record documented.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied. The report prepared on for 2017.</p> <p>These GHG calculations were done as per certification unit basics including 5 estate and mill. Summary of emissions details for GHG calculation can be found under Appendix K: GHG Reporting Executive Summary.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</p>			
<p>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.</p>			
<p>6.1.1</p>	<p>A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -</p>	<p>Social Impact Assessment (SIA) was conducted on 16-19/5/2016 by Sustainability Strategy Unit, PSQM Department. The methodologies of the assessment were interview with the workers and external stakeholders such as local communities, site observations and documentation review. Attendant list of the interviewed stakeholder was sighted in the report. For newly division Talisman in CEP Niyor Estate, the Addendum to SIA report been done on 28.9.17 by Sustainability Unit, PSQM department.</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. - Major compliance -</p>	<p>The assessment was conducted with the participation of relevant stakeholders such as neighboring villagers, government authority, contractors and suppliers, internal workers and etc. Attendance list of the stakeholders was sighted. Apart from that, the management also has the annual stakeholder's meeting conducted to discuss the current issue.</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. - Major compliance -</p>	<p>The mill and estate's management have developed an action plan for social assessment based on the issues raised during SIA for SOU 22 Bukit Benut dated 16-19 May 2016 by Sustainability Strategy Unit, PSQM Department. The plan has incorporated timetable with responsibilities for mitigation and monitoring of the social impacts were developed and reviewed as necessary.</p>	<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. - Minor compliance -</p>	<p>The plan was reviewed on yearly basis and last reviewed was conducted on June 2018 in mill. Among the issues are: - Housing condition:/Living Improvement: To expedite the process of attending to their housing complaints. - Fogging to be carried out periodically. - Management to consider organizing social activities at least once a year. - Census at housing site should be conducted. Bad road condition in Talisman division.</p>	<p>Complied</p>
<p>6.1.5</p>	<p>Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -</p>	<p>No smallholder scheme was involved in the certification units.</p>	<p>Not applicable</p>
<p>Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.</p>			

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Criterion / Indicator		Assessment Findings	Compliance
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	SDPSB has developed a documented procedure in Sustainable Plantation Management System on handling social issues, Appendix 5, Version 1, and Issue No.1, dated 01/4/2008. The procedure has detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	Mill Manager has been appointed as Social officer to handle all issues. For Bukit Benut Estate, the Senior Assistant (Mr. Ramesh Rajagopal) has been appointed as the Social Officer as per appointment letter dated 20.04.18. For Lambak Estate, the Assistant Manager (Muhammad Adli) is appointed as Social Officer on 07.7.17 while for CEP Niyor Estate, the social officer appointed is the Assistant Manager (Mohd Noor Azhan) on 06.5.16.	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 -	Stakeholder's meeting was conducted on 19/03/2018 (Bukit Benut POM and Bukit Benut Estate) with the participation from the external and internal stakeholders. For Lambak Estate, the stakeholder's meeting conducted separately for contractors (20/10/2017), Grocery (20/06/2017), Village People (21/06/17) while for CEP Niyor Estate is on 2/6/18 and 14/2/18. Meeting minutes was sighted and the issues raised during the meeting has been diverted to the coming Zone meeting and estate. No further issue was sighted. Stakeholder list was updated as at FY 2018/19 for Bukit Benut POM, Bukit Benut POM with the inclusion of local communities, government authorities, contractors and suppliers.	Complied
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			
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 -	A documented dispute resolution procedure is available in Mill and Estate Quality Management System Manual which is effective, timely, appropriate and open to any affected parties. The complaint and grievances is open to effected parties including internal and external stakeholders.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	The mill management has implemented internal/external and Record of Request Book logbook and Borang Aduan/Cadangan for CEP Niyor Estate. Most of the complaints were regarding repairs the housing facilities, request for documents, request for giving the seminar and others. The management has taken action to rectify the problem. The estate's management has implemented Workers' quarters/office/building repairs complaint form for internal workers. Most of the complaints were regarding house repair such as toilet clogged. No other complaint received other than housing facilities.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
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 -	SOP to identify legal and customary rights as well as people entitled to compensation has been established with titled "Handling Land Disputes" dated 1/11/2008. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	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 -	SOP as per Clause 6.4.1.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.1 Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>The mill and estates have recruited local workers and foreign workers. The management has included basic pay, net pay, gross pay, deduction of salary, phone allowance, holiday pay and others on the pay slip.</p> <p>Payslip of month May'18, Feb'18 and Dec'17 for workers have been sampled as below:</p> <p>Bukit Benut POM: a) Employee No.: 17407 (Malaysian) b) Employee No.: 17505 (Malaysian) c) Employee No.: 121482 (Indonesian) d) Employee No.: 123068 (Indonesian) e) Employee No.: 140255 (Indonesian)</p> <p>Bukit Benut Estate: a) Employee No.: 141439 (Indian) b) Employee No.: 90224 (Bangladeshi) c) Employee No.: 143280 (Indonesian) d) Employee No.: 136523 (Nepalese)</p> <p>Lambak Estate: a) Employee No.: 104015 (Indian) b) Employee No.: 109050 (Bangladeshi) d) Employee No.: 132467 (Nepalese) e) Employee No.: 37187 (Malaysian)</p> <p>CEP Niyor Estate: a) Employee No.: 96246 (Myanmar) b) Employee No.: 112860 (Indian) c) Employee No.: 123085 (Indonesian) d) Employee No.: 137523 (Indian)</p> <p>All the sampled workers below were achieved Minimum Wage Order 2016 of RM 1000/month or RM 38.46/ day.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.2</p> <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p>	<p>Employment contract are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, medical assistance, holiday and annual leave, termination of services and etc. The contract was signed by the workers and sampled contracts as below:</p> <p>Bukit Benut POM (only Indonesian foreign worker hired):</p> <p>a) Employee No.: 17407 (Malaysian) b) Employee No.: 17505 (Malaysian) c) Employee No.: 121482 (Indonesian) d) Employee No.: 123068 (Indonesian) e) Employee No.: 140255 (Indonesian)</p> <p>Bukit Benut Estate:</p> <p>a) Employee No.: 141439 (Indian) b) Employee No.: 90224 (Bangladeshi) c) Employee No.: 143280 (Indonesian) d) Employee No.: 136523 (Nepalese)</p> <p>Lambak Estate:</p> <p>a) Employee No.: 104015 (Indian) b) Employee No.: 109050 (Bangladeshi) d) Employee No.: 132467 (Nepalese) e) Employee No.: 37187 (Malaysian)</p> <p>CEP Niyor Estate:</p> <p>a) Employee No.: 96246 (Myanmar) b) Employee No.: 112860 (Indian) c) Employee No.: 123085 (Indonesian) d) Employee No.: 137523 (Indian)</p>	<p>Complied</p>
<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>The management has provided water and electricity supply to the workers through government supply. Besides, the management has a medical facility in the compound where the employees are allowed to access the facility throughout the serving period without any charges. Employees are staying in the linesite provided by the management without any rental incurred. In Lambak Estate, division Elar has used the treated water for domestic consumption. Seen the application for the usage of treated water to JTK on 18.5.17 (status awaiting for JTK approval) as well as the water analysis conducted and the result for e-coli and total coliform were not detected on 18.05.18.</p> <p>There is line site inspection conducted on weekly basis by Muhd Muslihin Bin Musa (Medical Assistant) to Bukit Benut Oil Mill and Bukit Benut Estate together with the result of inspection. In Lambak Estate, Mr. S. Jaya Perigas (Health Care Assistant) has conducted the linesite inspection in weekly basis while for CEP Niyor Estate is Ahmad Abid Uwais Bin Yasin (Medical Assistant).</p>	<p>Complied</p>

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6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	Foods and goods for employees were provided through sundry shop at the vicinity of the operating units. Besides, the mill and estate were nearby the town or village where the workers are easily access to the shop to purchase goods and foods. Interviewed with the workers found that they were understood and satisfied with the foods and goods price selling in the operating unit's compound.	Complied
Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	SDPSB has implemented Social Policy dated January 2015 where the management is committed and respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively.	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	<p><u>Bukit Benut POM:</u> Meeting with Worker's Representatives with Employer was conducted on 07/06/2018 with total 6 participants. Meeting minute is sighted and sighted the requests from the participant with the person in charge. Interview with the Union representatives confirmed that no issue.</p> <p><u>Bukit Benut Estate:</u> Meeting with NUPW was conducted on 18/1/2018. Meeting minutes was sighted. There were 4 issues raised during the meeting which are:</p> <ol style="list-style-type: none"> 1. Application for unpaid leave for attending the funeral. 2. Work change from tractor's driver to general worker for Mr. Kannan. 3. Issue on salary not paid on 04.10.2017 & 4.11.2017 due to continuous raining. 4. Issue on HA assistant giving not good treatment to foreign worker especially Bangladeshi. <p><u>Lambak Estate:</u> NUPW meeting was conducted on 08/5/18. Among the issues raised were:</p> <ol style="list-style-type: none"> 1. Safety & health: Unsafe act. 2. Worker's discipline 3. CSR 4. Dogs 5. Salary payment. <p><u>CEP Niyor Estate:</u> Union meeting was conducted on 08/6/18. Among the issues raised were:</p> <ol style="list-style-type: none"> 1. Housing area: high electric bill and request to push down the big tree. 2. Workers: attendance, broken PPE and annual leaves. 	Complied
Criterion 6.7: Children are not employed or exploited.			

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Criterion / Indicator		Assessment Findings	Compliance
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	The company has developed Child Protection policy dated January 2015. Operating units are complied with the minimum age requirement. No employees below the age of 18 were sighted through the master list of active employee list and interview with worker.	Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	SDPSB has implemented Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.	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 -	Mill has recruited local communities, women, and foreign workers to work in the mill. All of them are given equal opportunity and treat fairly on the housing provided, job that has been offered, salary and etc. Salary of local workers and foreign workers were based on MAPA/NUPW and Minimum Wage Order 2016 and no discrimination happened.	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 -	There is no any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	SDPSB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. Briefing of policies were given to the workers during Policy/Objective/PPE Training on 2.5.18 Policy for Bukit Benut POM, 5.6.18 for Bukit Benut Estate, 16.05.18 for Lambak Estate through Safety Town Hall 6.0 meeting while for CEP Niyor Estate on 26.9.17 through COBC Training and Townhall meeting.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
6.9.2 A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	SDPSB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of policies were given to the workers during Policy/Objective/PPE Training on 2.5.18 Policy for Bukit Benut POM, 5.6.18 for Bukit Benut Estate, 16.05.18 for Lambak Estate through Safety Town Hall 6.0 meeting while for CEP Niyor Estate on 26.9.17 through COBC Training and Townhall meeting.	Complied
6.9.3 A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	The mill and estate management have established a Gender Committee to discuss and resolve issues related to women. The managements had implemented procedure for sexual harassment grievance and complaint form to any incidences of sexual harassment is implemented. Gender Committee Meeting was conducted on 12/05/2018, 29/01/2018, 16/10//2017 and 12/07/2017 in Bukit Benut POM. Meeting minutes were sighted and no sexual harassment or violence cases reported to date. Activities have been conducted such as Mother's Day (12/5/18) and Senamrobik (10/02/18). In Bukit Benut Estate, the issue is regarding domestic violence on 12.04.18 reported during the Gender Committee meeting on 28.05.18, 26.02.18, 17.11.17 and 18.07.17. In Lambak Estate, the minutes of meeting for Gender Committee sighted on 28.06.18, 26.02.18, 13.10.17 and 19.07.17. In CEP Niyor Estate, the gender committee meeting conducted on 26.6.18, 16.3.18, 20.12.17 and 14.9.17. Briefing of policies were given to the workers during Policy/Objective/PPE Training on 2.5.18 Policy for Bukit Benut POM, 5.6.18 for Bukit Benut Estate, 16.05.18 for Lambak Estate through Safety Town Hall 6.0 meeting while for CEP Niyor Estate on 26.9.17 through COBC Training and Townhall meeting.	Complied
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.		
6.10.1 Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Bukit Benut POM process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	Complied
6.10.2 Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	Bukit Benut POM process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.10.3</p> <p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -</p>	<p>Bukit Benut POM process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.</p> <p>Sampled contract agreement was verified during the audit and sampled contracts were as below:</p> <ul style="list-style-type: none"> - Bukit Benut POM: Bestro Eng Sdn Bhd for Fire Fighting & Protection System Servicing and Maintenance (Contract Agreement), Doc no: 4300393810, date: 02.11.17 - Bukit Benut POM: AVN Brothers for services of one unit suitable Machine/Vehicle c/w driver (i.e: Caterpillar 920 wheel loader or functionally equivalent machine's acceptable to the mill management). - Bukit Benut Estate: Syarikat Sin Kim Huat for FFB Ad Hoc Transportation Service for Peninsular Estates on 29.07.16. - Bukit Benut Estate: Zaidah Maju Enterprise for grasscutting on 01.05.18. - Lambak Estate: Leok Brothers for Replanting on 23.06.2017. - CEP Niyor Estate: GNKL Construction Enterprise on 18.7.16. <p>The terms and conditions were stated in the agreement.</p>	<p>Complied</p>
<p>6.10.4</p> <p>Agreed payments shall be made in a timely manner. - Minor compliance -</p>	<p>Payment will be made upon inspection and checking on work standard and hours of works prior to submission for monthly payment. Payment was made through the financial department at head office. Seen the sampled payment as below:</p> <ol style="list-style-type: none"> a. Bukit Benut POM: AVN Brothers: Invoice No: OCT17-013 date: 31.10.17 amount RM 29,912.78 for Machinery, renting of lorry transport (ASH) & machinery, renting of backhoe Oct'17. b. Bukit Benut POM: Bestro Eng Sdn Bhd: Invoice No: Bestro/Inv/20180530, date: 31.5.18 amount RM 1,272.00 for Fire Fighting & Protection System Servicing and Maintenance. c. Bukit Benut Estate: Syarikat Sin Kim Huat: Invoice No: I-000413, date: 30.06.18 amount RM 39,688.19 for transporting FFB from Bukit Benut Estate to Bukit Benut Oil Mill. d. Bukit Benut Estate: Zaidah Maju Enterprise: Invoice No: LBB062018, date: 30.06.18 amount RM 6,450 for grasscutting. e. Lambak Estate: Leok Brothers: Invoice No: INV 0282, date: 02.12.17 amount RM 95,191.71 for felling, chipping & stacking. f. CEP Niyor Estate: GNKL Construction Enterprise on 31.3.18 amount RM 19,444.89 for FFB transport. 	<p>Complied</p>
<p>Criterion 6.11: Growers and millers 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 –	<p>The mill and estate’s management have made contribution to the local communities, school and the internal stakeholders. Example seen in Bukit Benut POM:</p> <ol style="list-style-type: none"> 1. Bukit Benut POM: Kejohan Sukan & Balapan SK Ladang Bukit Benut (10.03.18) – RM 200. 2. Bukit Benut POM: Gotong-royong di Masjid Bukit Benut (13.05.18). 3. Bukit Benut POM: Family Day in KKS Bukit Benut (13.05.18) – RM6,000.00 4. Bukit Benut Estate: Grass cutting at school field (19.01.2018 & 15.03.2018)-RM 150/work trip. 5. Bukit Benut Estate: Sport day for employees (01.05.2018) – RM 3,000.00. 6. Lambak Estate: Majlis Sambutan Hari Raya Kampung Mengkibol (22.07.17) – RM500 7. Lambak Estate: Donation for Maulidur Rasul at Surau An-Nur Kampung Mengkibol (12.2.18) – RM300. 8. Lambak Estate: Request to use Padang Ladang Lambak for sports day on 04.03.2018. 9. CEP Niyor Estate: Kejohanan Olahraga kali ke 29 on 11.2.18. 10. CEP Niyor Estate: Request of using tractor by JKK Kampung Melayu Niyor on 01-02.3.18. <p>Interviewed with the local community and school representatives confirmed that the management was very supportive to provide contributions to them upon request.</p>	Complied
6.11.2 Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	There were no scheme smallholders under the certification unit.	Not applicable
<p>Criterion 6.12: No forms of forced or trafficked labour are used.</p>		
6.12.1 There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	All employees are legal with local identification card for local employees and foreign employees are with valid passports and working permits. No evident of trafficked workers were found during the audit.	Complied
6.12.2 Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	No contract substitution was noted in the document as well as based on the worker’s interview during line site visit.	Complied
6.12.3 Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Equal opportunity and non-discriminatory policy is implemented. No temporary workers. Migrant workers are treated equally as per the locals.	Complied
<p>Criterion 6.13: Growers and millers respect human rights.</p>		

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6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	The Social and Humanity management policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations. Briefing of policies were given to the workers during Policy/Objective/PPE Training on 2.5.18 Policy for Bukit Benut POM, 5.6.18 for Bukit Benut Estate, 16.05.18 for Lambak Estate through Safety Town Hall 6.0 meeting while for CEP Niyor Estate on 26.9.17 through COBC Training and Townhall meeting.	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.	This site is located at Peninsular Malaysia, hence this requirement is not applicable.	Not applicable
Principle 7: Responsible development of new plantings			
Bukit Benut Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			
8.1.1	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. As a minimum, these shall include, but are not necessarily be limited to: • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); • Optimising the yield of the supply base. - Major compliance -	The company is continues committed to reduce pesticide use and hazardous agrochemical use. All operating units are not using paraquat and class 1a or 1b agrochemicals. Alternative for class 1b chemical, Acephate was introduced for Bagworm treatment which less hazardous under class III category These efforts are continue to reflect the commitment to reduce the use of hazardous agrochemicals. Systemic herbicides such as glyphosate are used with increased efforts in IPM. Barn owl is being introduced as well. These are the continuous efforts from operating units to reduce pesticide use. All operating units have carried out annual review of the environmental and social aspects of its operations to identify improvements. The Social Action Plan has continued to work towards improving stakeholder relationship through engagement and dialogue besides further improving the workers housing. Initiative on KAIZEN project at operating units showed commitment towards continual improvement to improve safety and environment quality through 5s implementation. On the social improvement efforts, the operating units continue to have good relationship with stakeholders.	Complied

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Appendix B: Approved Time Bound Plan

SDP- RSPO Certification Status for Malaysia Operations

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	11-Aug-20	RSPO 550179	N.A
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	N.A
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	N.A
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	N.A
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	N.A
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	N.A
5a	Sg Samak		3 Mar '11	NA	NA	Mill was closed down.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	N.A
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	N.A
8	East	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543543	N.A
9	West	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543594	N.A
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Mill was closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '16	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020, MUTU – RSPO/091	N.A
11	Kerdau	Temerloh, Pahang	7 Jul '16	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019, MUTU-RSPO/094	N.A
12	Jabor	Kuantan, Pahang	7 Jul '16	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049, MUTU-RSPO/092	N.A
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-855480	N.A
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	RSPO 541905	

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15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-19	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '16	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051, MUTU-RSPO/093	N.A
17	Kempas	Jasin, Melaka	19 May '10	18-May-20	RSPO 005	N.A
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	N.A
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-19	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	RSPO 550182	Mill was closed down.
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	N.A
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	N.A
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	N.A
23	Ulu Remis	Layang-layang, Johor	11 Apr '16	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042, BV-RSPO-20170705-01	N.A
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BV-RSPO-20170623-01	N.A
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	RSPO 547123	Mill was closed down.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-18	RSPO 537872	N.A
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	N.A
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	N.A
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	Mill was closed down.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Mill was closed down.
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	N.A
32	Rajawali	Bintulu, Sarawak	30 Dec '16	29-Dec-21	CU-RSPO-819167, RSPO 0020	N.A
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	N.A

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34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO- 815150, MUTU- RSPO/054	N.A
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Legends

Certification Withdrawal

NA - NOT APPLICABLE

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

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	SGS-RSPO/PC17-00005	N.A
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	3-Jul-18	MUTU-RSPO/027	N.A
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	N.A
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	N.A
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	N.A
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	N.A
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	MUTU-RSPO/002	N.A
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	N.A
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	N.A
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	N.A
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	30-Dec-16	MUTU-RSPO/009	N.A
13		BETUNG		1-April-14	1-April-19	MUTU-RSPO/035	

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14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU- RSPO/001	N.A
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	15-Mar-17	MUTU- RSPO/015	Cert. discontinued – supply bases extended to Rantau POM
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU- RSPO/020	N.A
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU- RSPO/004	N.A
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Iilir, Riau	01-Dec-16	30-Nov-21	MUTU- RSPO/008	N.A
19		MANDAH		1 April 2014	1 April 2019	MUTU- RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU- RSPO/007	N.A
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU- RSPO/018	N.A
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU- RSPO/088	N.A
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	3-May-18	MUTU- RSPO/026	N.A
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-19	MUTU- RSPO/044	N.A
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	N.A

Legends

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

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2017 for Bukit Benut 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 Bukit Benut Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.38
PKO	1.38

Extraction	%
OER	20.91
KER	5.11

Production	t/yr
FFB Process	114,585.31
CPO Produced	23,963.31
PKO Produced	5,855.2

Land Use	Ha
OP Planted Area	27,632.04
OP Planted on peat	190.8508
Conservation (forested)	0
Conservation (non-forested)	0
Total	27,822.8908

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	65,747.48	0.71	10,909.4	0.55	0	0	76,656.88	1.26
CO ₂ Emission from fertilizer	6,324.84	0.07	1,179.92	0.06	0	0	7,504.76	0.13
NO ₂ 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
Sink								
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
Total	14,356.14	0.15	3,720.53	0.17	0	0	18,076.67	0.32

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

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

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	8,082.4
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

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

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

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

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence	Compliance (Yes / No or N/A) For any N/A raised, justification is required.
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.	Bukit Benut mill control the receipt of its FFB from certified source only within own certification unit and group estates. Certificate copies for own certification unit and all other group estates supplying their FFB sighted available as following: <ul style="list-style-type: none"> - Bukit Benut POM (SOU 22) Certificate # RSPO 591229. Validity period 2/12/2016 – 4/10/2021 - Ulu Remis POM (SOU 23) Cert. # BVC-RSPO-20170705-01 by Bereau Veritas validity period 5/7/2017 – 10/4/2021 (Ulu Remis, Bukit Badak, Sembrong, Pekan Ropel, Tun Dr. Ismail, Cenas Ropel) - Hadapan POM (SOU 24) Cert. # BVC-RSPO-20170623-01 by Bereau Veritas validity period 23/6/2017 – 28/3/2021 (CEP Rengam, Kulai, Layang, Seri Pulai) 	Complied
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.	Bukit Benut is not a trader or distributor. The mill license available at PalmTrace as following: <ul style="list-style-type: none"> - Sub-license ID: CB61515 - Member ID: RSPO_PO1000000194 - Model: IP 	Complied
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.	Membership registered under Sime Darby Plantation Berhad – SOU 2 Bukit Benut Palm Oil Mill RSPO Membership Number: 1-0008-04-000-00	Complied
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Processing aids were not available and not included within Bukit Benut scope of certification.	Complied
5.2 Supply chain model			

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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 supply chain model for Bukit Benut Mill is Identity Preserved (IP). However declassification of segregation was made for combined certification.	Complied
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	<p>Combined supply chain certification for multiple models were certified by Bureau Veritas Hong Kong under the RSPO P&C MYNI 2014; RSPO Supply Chain Certification Standard for Palm Oil Mill (version 21/11/2014) as per following certificate numbers:</p> <p>i) BVC-RSPO-20170705-01 ii) BVC-RSPO-20170623-01</p>	Complied
5.3. Documented Procedures			
5.3.1	<p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	<p>Procedure namely Sime Darby Plantation – Plantation Quality Management System – Sustainable Plantation Management System ; Appendix 15; Standard Operating Procedure (SOP) for Sustainability Supply Chain and Traceability; Version 2; Issue no.: 3; Issue date: Feb 2018. The procedure was established which covered responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc.</p>	Complied
	<ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	<p>Training on Summary of New Changes in Sustainability Supply Chain and Traceability SOP: Sustainable Plantation Management System (SPMS) – Appendix 15; Plantation Sustainability and Quality Management Department date: 14/5/2018 by PSQM HQ personnel.</p> <p>Mill SCCS Refresher Training by Ahad Faiz (PIC) dated on 6/6/2018 attended by SCCS personnel including weighbridge clerk and other SCCS personnel.</p>	Complied
	<ul style="list-style-type: none"> • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person 	<p>The Head of Operating Unit have the overall responsibility for the implementation of SOP and he may assign roles to relevant personnel or invite personnel from various</p>	Complied

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	shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard.	departments necessary to assist in the SOP implementation.	
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	The SOP specified that the implementation was referred to Internal Audit Procedure; Doc. # SD/SDP/PSQM/IAP; Rev. 2; Date: 1/11/2017. Audit conducted by Regional SQM on annual basis and as or when required. Latest internal audit was conducted on 30/5/2018.	Complied
	ii) effectively implements and maintains the standard requirements within its organization	Findings from internal audit were being closed by mill and verified by the internal auditor accordingly.	Complied
5.4. Purchasing and goods in			
5.4.1	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form: <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	Information were verified complete for purchasing and goods in sample as following: <ol style="list-style-type: none"> 1) Buyer: M180-M-Bukit Benut Supplier: E111-E-Lambak/Elais Product: 0001-FFB A Crop DO # 37412 Date delivered: 1/6/2018 Net Weight: 13,0790kg Estate FFB ticket # 37412 Mill FFB received ticket # 7728 (Hadapan SOU Cert. # BVC-RSPO-20170623-01) 2) Buyer: M180-M-Bukit Benut Supplier: E031-E-CEP Rengam Product: 0001-FFB A Crop DO # 41522 Date delivered: 13/5/2018 Net Weight: 13,360kg Estate FFB ticket # 41522 Mill FFB received ticket # 7218 (Hadapan SOU Cert. # BVC-RSPO-20170623-01) 	Complied
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit that Bukit Benut Mill received only own or group certified crops. FFB receive detail report by supplier/division/product available	Complied

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		with complete information daily transactions of goods in and products out.	
	<ul style="list-style-type: none"> The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. 	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit that Bukit Benut Mill received only own or group certified crops.</p> <p>FFB receive detail report by supplier/division/product available with complete information daily transactions of goods in and products out.</p>	Complied
	<ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	Bukit Benut Mill received only own or group certified crops.	Not applicable
	<ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	Bukit Benut Mill is not traders or distributors.	Not applicable
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	The mechanism was specified in the Procedure i.e. Sime Darby Plantation – Plantation Quality Management System – Sustainable Plantation Management System ; Appendix 15; Standard Operating Procedure (SOP) for Sustainability Supply Chain and Traceability; Version 2; Issue no.: 3; Issue date: Feb 2018.	Complied
5.5. Outsourcing activities			
5.5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and	There's no any outsourcing activities related to processing and storage except for transport only. Specific instruction to comply with RSPO SCCS was specified in the agreements with transporter.	Complied

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	<p>independement 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>		
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	There's no any outsourcing activities related to processing and storage except for transport only.	Not applicable
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	There's no any outsourcing activities related to processing and storage except for transport only.	Not applicable
	<p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	There's no any outsourcing activities related to processing and storage except for transport only.	Not applicable
	<p>d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p>	There's no any outsourcing activities related to processing and storage except for transport only.	Not applicable
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	There's no any outsourcing activities related to processing and storage except for transport only.	Not applicable
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	There's no any outsourcing activities related to processing and storage except for transport only.	Not applicable

5.6. Sales and goods out

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<p>5.6.1</p>	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	<p>Information were verified complete for sales and goods out sample:</p> <p>CSPO:</p> <ol style="list-style-type: none"> 1) Buyer: SDP JOMA REF Supplier: M180-M-Bukit Benut Product: 0007-Crude Palm Oil (CPO)-RSPO IP DO # 5228 Date delivered: 3/4/2018 Net Weight: 36,360kg Despatch ticket # 007129 Contract # S/C-PSD/1803/CPO0178E 2) Buyer: SDP Nuri Edible Oil (NEO) Supplier: M180-M-Bukit Benut Product: 0007-Crude Palm Oil (CPO)-RSPO IP DO # 5166 Date delivered: 1/3/2018 Net Weight: 40,250kg Despatch ticket # 007047 Contract # S/C-PSD/1802/CPO0144C <p>CSPK:</p> <ol style="list-style-type: none"> 1) Buyer: SDP KCP Supplier: M180-M-Bukit Benut Product: 0008-Palm Kernel RSPO IP DO # 1787 Date delivered: 15/5/2018 Net Weight: 25,320kg Despatch ticket # 007206 Contract # S/C-PSD/1805/PK0293 2) Buyer: SDP KCP Supplier: M180-M-Bukit Benut Product: 0008-Palm Kernel RSPO IP DO # 1776 Date delivered: 14/4/2018 Net Weight: 38,940kg Despatch ticket # 007163 Contract # S/C-PSD/1804/PK0203 	<p>Complied</p>
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery 	<p>Information was complete as per samples verified above.</p>	<p>Complied</p>

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	notes, shipping documents and specification documentation).		
	<ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	Shipping announcement done by Global Trading & Marketing (GTOM) personnel as following: <ol style="list-style-type: none"> En. Hanif & En. Faris (CPO) Pn. Siti Nilah (Kernel) 	Complied
5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	<p>The registration of PalmTrace will be carried out by the GTM Department, HQ. All transaction will be registered in the PalmTrace. The mill registered license available in PalmTrace as following:</p> <ul style="list-style-type: none"> - Sub-license ID: CB61515 - Member ID: RSPO_PO1000000194 - Model: IP 	Complied
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. 	<p>Shipping announcement done by Global Trading & Marketing (GTOM) personnel as following:</p> <ol style="list-style-type: none"> En. Hanif & En. Faris (CPO) Pn. Siti Nilah (Kernel) <p>All necessary action related to shipping announcement was described in the Standard Operating Procedure (SOP) for Sustainability Supply Chain and Traceability; Version 2; Issue no.: 3; Issue date: Feb 2018</p>	Complied
	<ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. 	Every shipping announcement made with unique id for traceability and recorded accordingly.	Complied
	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	There were volume sold for other scheme and conventional (refer to Table 11 & 12; Supply Chain	Complied

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		declaration of Table D & E; Summary Template).	
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Sampled of shipping announcement documents and found that the management done the shipping announcement accordingly.	Complied
5.8. Training			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Training plan established as annual Training Requirement for Operating Units (Mill) sighted for SOU 22 Bukit Benut Oil Mill (FY 18/19). Training for RSPO/ISO/SCCS/LSS/HACCP/MSPO were planned and conducted on Dec 2017 and Apr 2018.	Complied
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.	Training was provided by regional sustainability personnel as per sighted records of New RSPO Supply Chain Standard & System Document 2017 by Nurulashida Mohd. Saad, SQM-Southern dated 11/4/2018.	Complied
5.9. Record Keeping			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Records of following: <ul style="list-style-type: none"> - Daily Production Summary Report for Production Date: 3/6/2018; Rpt. ID: Z2501RMM_DAILY_SUMM User ID: Z0056148; Date: 5/6/18 - Mass Balancing Records; KKS Bukit Benut; Period Jan – Oct 2018 Were maintain accurate, complete, up-to-date and accessible during the on-site audit.	Complied
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.	Retention times for all records and reports available for the period of up to 7 years.	Complied
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	The estimate volume of CSPO and CSPK were being monitored as per the records of monitoring for contractual sales of CSPO and PK – CPO/Kernel Despatch Contract Balance monitoring sheet by the person in-charge (Mill Manager) and mill weighbridge personnel.	Complied
5.10. Conversion factors			

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5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Not applicable	n/a
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Not applicable	n/a
5.11. Claims			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	Not in use.	n/a
5.12. Complaints			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	The supply chain procedure (SPMS Appendix 15 – SOP for Sustainable Supply Chain and Traceability; Ver. # 2; Issue # 3; Date: Feb 2018) specified that any stakeholder complaints received will be handle in accordance to Procedure for External Communication (MQMS Sub-Section 5.5; Appendix 5.5.3.2; Ver. # 2; Issue # 0; Date: 25/5/2015) established.	Complied
5.13. Management Review			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	Management review was conducted on 11/6/2018 chaired by the Mill Manager at Conference Room Bukit Benut Oil Mill.	Complied
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. 	The minutes of meeting records for the management review meeting conducted confirmed all inputs were including information of the following: <ul style="list-style-type: none"> - Results of internal audits covering RSPO Supply Chain Certification Standard. - Customer feedback. 	Complied

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	<ul style="list-style-type: none"> • Changes that could affect the management system. • Recommendations for improvement. 	<ul style="list-style-type: none"> - Status of preventive and corrective actions. - Follow-up actions from management reviews. - Changes that could affect the management system. - Recommendations for improvement. 	
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	<p>The minutes of meeting records for the management review meeting conducted confirmed all outputs were including the decisions and actions related to the following:</p> <ul style="list-style-type: none"> - Improvement of the effectiveness of the management system and its processes - Resource needs 	Complied

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

Requirements	Compliance
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<p>D.1 Definition</p>	
<p>D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.</p>	<p>The Benut Benut Palm Oil Mill only receives certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products</p>
<p>D.2 Explanation</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 certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products 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>D.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>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>
<p>D.3 Documented procedures</p>	
<p>D.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p>	<p>Latest written documented procedures (RSPO SCCS v.2 Year 2014) for the chain of custody is with Identity Preserved (IP) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15. This developed based on the RSPO SCCS February 2014. The previous SOP was for SG. The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive. The IP model is used because only certified FFB from own supply base is received and processed at Bukit Benut Palm Oil Mill. Noted draft procedure, SD/SSDP/PSQM/001, rev.: 0 dated 1/3/15 has yet to be approved for the SCCS procedure to incorporate latest changes internally and externally under RSPO SCCS November 2014.</p> <p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the</p>

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	implementation of these requirements and compliance with all applicable requirements.
b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.	Sighted the letter of Appointment as Person-in-charge for Environmental/Quality Management System dated 3/7/2018 of the Assistant Mill Manager whom also covers the functions of assisting in the certifications including RSPO Supply Chain Certification System for the .
D.3.2 The site shall have documented procedures for receiving and processing certified FFBs.	Bukit Benut Palm Oil mill has documented procedures (as per above in D 3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing certified and non-certified FFBs.
D.4 Purchasing and goods in	
D.4.1 The site shall verify and document the tonnage and sources of certified FFBs received.	<p>Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. Bukit Benut mill have system to verify at the weighbridge.</p> <p>Sample of weighbridge ticket for diversion crop:</p> <p>1) Buyer: M180-M-Bukit Benut Supplier: E111-E-Lambak/Elais Product: 0001-FFB A Crop DO # 37412 Date delivered: 1/6/2018 Net Weight: 13,0790kg Estate FFB ticket # 37412 Mill FFB received ticket # 7728 (Hadapan SOU Cert. # BVC-RSPO-20170623-01)</p> <p>2) Buyer: M180-M-Bukit Benut Supplier: E031-E-CEP Rengam Product: 0001-FFB A Crop DO # 41522 Date delivered: 13/5/2018 Net Weight: 13,360kg Estate FFB ticket # 41522 Mill FFB received ticket # 7218 (Hadapan SOU Cert. # BVC-RSPO-20170623-01)</p>
D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The person in-charge aware that CB will be informed immediately if there is a projected overproduction of certified tonnage. The volume extension was made prior to the on-site audit.
D.5 Record keeping	
D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	All the inventory records are maintained and updated on daily basis and monthly and reported on monthly and 3 monthly inventory. Computerized system in place. No PKO and PKE produced at Bukit Benut Palm Oil mill. PK is

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	<p>sold to Sime Darby's Kernel Crushing Plant and also other 3rd party KCP. CPO sold to Sime Darby's owned refineries (SDP Joma) and the other 3rd party buyer. Daily records are prepared at the entry point at the weighbridge. Samples of certified FFB received sighted as per sample above (D.4). Samples of certified products deliveries sighted as following:</p> <p>CSPO:</p> <ol style="list-style-type: none"> 1) Buyer: SDP JOMA REF Supplier: M180-M-Bukit Benut Product: 0007-Crude Palm Oil (CPO)-RSPO IP DO # 5228 Date delivered: 3/4/2018 Net Weight: 36,360kg Despatch ticket # 007129 Contract # S/C-PSD/1803/CPO0178E 2) Buyer: SDP Nuri Edible Oil (NEO) Supplier: M180-M-Bukit Benut Product: 0007-Crude Palm Oil (CPO)-RSPO IP DO # 5166 Date delivered: 1/3/2018 Net Weight: 40,250kg Despatch ticket # 007047 Contract # S/C-PSD/1802/CPO0144C <p>CSPK:</p> <ol style="list-style-type: none"> 1) Buyer: SDP KCP Supplier: M180-M-Bukit Benut Product: 0008-Palm Kernel RSPO IP DO # 1787 Date delivered: 15/5/2018 Net Weight: 25,320kg Despatch ticket # 007206 Contract # S/C-PSD/1805/PK0293 2) Buyer: SDP KCP Supplier: M180-M-Bukit Benut Product: 0008-Palm Kernel RSPO IP DO # 1776 Date delivered: 14/4/2018 Net Weight: 38,940kg Despatch ticket # 007163 Contract # S/C-PSD/1804/PK0203
<p>D.6 Processing</p>	
<p>D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm product including during transport and storage to strive for 100% separation.</p>	<p>Bukit Benut mill control the receipt of its FFB from certified source only within own certification unit and group estates. Certificate copies for own certification unit and all other group estates supplying their FFB sighted available as following:</p>

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	<ul style="list-style-type: none"> - Bukit Benut POM (SOU 22) Certificate # RSPO 591229. Validity period 2/12/2016 – 4/10/2021 - Ulu Remis POM (SOU 23) Cert. # BVC-RSPO-20170705-01 by Bereau Veritas validity period 5/7/2017 – 10/4/2021 (Ulu Remis, Bukit Badak, Sembrong, Pekan Ropel, Tun Dr. Ismail, Cenas Ropel) - Hadapan POM (SOU 24) Cert. # BVC-RSPO-20170623-01 by Bereau Veritas validity period 23/6/2017 – 28/3/2021 (CEP Rengam, Kulai, Layang, Seri Pulai)
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Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (MT)	Volume of FFB from uncertified supply bases (MT)	Total FFB/Month (mt)
1	July 2017	11,427.20	-	11,427.20
2	August 2017	13,740.71	-	13,740.71
3	September 2017	12,837.21	-	12,837.21
4	October 2017	14,823.83	-	14,823.83
5	November 2017	15,975.90	-	15,975.90
6	December 2017	13,368.54	-	13,368.54
7	January 2018	12,263.51	-	12,263.51
8	February 2018	10,990.45	-	10,990.45
9	March 2018	10,561.76	-	10,561.76
10	April 2018	9,724.94	-	9,724.94
11	May 2018	8,024.65	-	8,024.65
12	June 2018	8,842.69	-	8,842.69
	Total	142,581.36		142,581.36

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	July 2017	1,818.62	614.32
2	August 2017	2,530.07	782.24
3	September 2017	2,372.79	723.81
4	October 2017	2,944.80	825.5

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5	November 2017	3,125.28	607.16
6	December 2017	2,898.50	479.04
7	January 2018	3,390.32	726.06
8	February 2018	1,877.38	638.92
9	March 2018	1,965.80	348.38
10	April 2018	3,004.24	546.59
11	May 2018	1,929.87	558.52
12	June 2018	1,571.12	335.56
	TOTAL	29,428.79	7,186.10

C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) records base on transaction July 2017-June 2018				
No.	Buyers Name	Palmtrace Trading No	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	S/CPSD/1608/CPO0924	TRbe07a666-becf	400.00	-
2	S/CPSD/1608/CPO0940	TR-65e2925bdad5	400.00	-
3	S/CPSD/1608/CPO0962	TRb5e5c9e7-de49	400.00	-
4	S/CPSD/1608/CPO01028	TR-54949889-19e4	500.00	-
5	P/CPNK/1701/PK0028	TR-45159328-bfcd	-	300.00
6	S/CPSD/1609/CPO0982	TR-8ac1b093-ac22	400.00	-
7	S/CPSD/1609/CPO1138	TR-88b9fb82-248b	400.00	-
8	S/CPSD/1609/CPO1149	TRa4101552-0519	400.00	-
9	S/CPSD/1609/CPO1194	TR-32da7b27-a38e	400.00	-
10	S/CPSD/1609/CPO1251	TR-0e7831dc-0129	400.00	-
11	S/CPSD/1609/CPO1275G	TR-152d09f1-817b	300.06	-
12	P/CPNK/1703/PK0075	TR-e5fda989-8cf8	-	300.00
13	P/CPNK/1702/PK0049	TRd299edb3-89c6	-	300.00
14	P/CPNR/1610/CPO0617AD	TRb2a71a95-b9c3	400.00	-
15	P/CPNR/1610/CPO0617G	TR-2ccdd714-b259	400.00	-
16	P/CPNR/1610/CPO0617Z	TR-f22ddda0-0d6f	400.00	-
17	P/CPNR/1611/CPO0621C	TRab8514b1-dccf	400.00	-
18	P/CPJR/1710/CPO1501H	TR-6b6f0446-63c6	250.00	-
19	P/CPJR/1711/CPO1517B	TR-9e39a3a6-924e	250.00	-
20	P/CPNK/1710/PK0286	TRa124c441-a7b2	-	500.00

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21	P/CPNK/1711/PK0308	TReed7ab6-9f80	-	400.00
22	P/CPNK/1712/PK0332	TR-5fa09f17-3e2f	-	300.00
23	4600075067	TR-92fa86e5-9f75	33.85	-
24	S/CPSD/1611/CPO1318	TR-6314ae64-d557	400.00	-
25	S/CPSD/1611/CPO1343	TR-3a4d81a9-985f	400.00	-
26	S/CPSD/1611/CPO1355	TR-92bf15b6-e96a	400.00	-
27	S/CPSD/1611/CPO1378	TR-0efd1109-c2aa	400.00	-
28	P/CPMK/1801/PK0018	TR-4cb59c80-0083	-	500.00
29	P/CPJR/1712/CPO1675J	TR-4bd87da8-848e	300.00	-
30	P/CPJR/1801/CPO0267G	TR-8f510bb8-c7bd	250.00	-
31	P/CPJR/1801/CPO0268C	TR-855ea28c-51ab	250.00	-
32	P/CPNK/1802/PK0048	TRc617eaea-6f34	-	450.00
33	P/CPNK/1803/PK0068	TR-5e5004fa-94f8	-	50.00
34	P/CPNK/1804/PK0092	TR-8a5c74fb-27da	-	200.00
35	P/CPNK/1804/PK0106	TR-429633ced7c8	-	100.00
36	P/CPSD/1806/CPO0018	TRc778e053-00fe	36.09	-
37	P/CPSD/1806/CPO0018	TR-132286df5736	39.33	-
38	P/CPSD/1806/CPO0018	TR-bc7f99c0-5d5c	41.44	-
39	P/CPSD/1806/CPO0018	TR-1fa91f2a60af	39.73	-
40	P/CPSD/1806/CPO0018	TR579a7a41-09b5	39.96	-
41	P/CPSD/1806/CPO0018	TR-fd6eb06b-7522	41.25	-
42	P/CPSD/1806/CPO0018	TR-bd3b73ac-2fe2	0.27	-
43	P/CPSD/1806/CPO0021	TR-c78ae3ad-2c88	39.69	-
44	P/CPSD/1806/CPO0021	TR-da944f2d-580e	39.55	-
45	P/CPSD/1806/CPO0021	TR-8349be26-e36	39.76	-
46	P/CPSD/1806/CPO0021	TR-b3512f03-40cd	37.61	-
47	P/CPSD/1806/CPO0021	TR-3839846b-0e97	41.02	-
48	P/CPSD/1806/CPO0021	TR-20a86ff4-57ea	40.93	-
49	P/CPSD/1806/CPO0021	TR-aba854ad-da3b	11.44	-
50	P/CPSD/1806/CPO0023	TRcc962918-7962	27.76	-
51	P/CPSD/1806/CPO0023	TR-cdf1bad9-5c10	41.17	-
52	P/CPSD/1806/CPO0023	TR-4df9dd32-6ff3	40.23	-
53	P/CPSD/1806/CPO0023	TRc5dd32b7-20b4	35.00	-
54	P/CPSD/1806/CPO0023	TR-f9ae6eca-1f78	26.93	-

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55	P/CPNR/1808/CPO0171	TR-dc2d1510-96e1	12.37	-
56	P/CPNR/1808/CPO0171	TR-006cb2e3-1eae	40.53	-
57	P/CPNR/1808/CPO0171	TR-08f3f3a0-149d	39.48	-
58	P/CPNR/1808/CPO0171	TR-7aaab451-9d76	39.78	-
59	P/CPNR/1808/CPO0171	TR-e9715be0-6e57	39.62	-
60	P/CPNR/1808/CPO0171	TR-f4ccf21c-2d50	40.10	-
61	P/CPNR/1808/CPO0171	TR-dc82e0ae-4deb	37.43	-
62	P/CPNR/1808/CPO0184	TR-72484da7-0712	2.15	-
63	P/CPNR/1808/CPO0184	TR-7f519241-3dc5	90.86	-
64	P/CPNR/1809/CPO0194	TR-58a7e5b2-9b4a	250.00	-
65	P/CPNR/1809/CPO0204	TR-ad53bdc6-405	500.00	-
66	P/CPNR/1809/CPO0214	TR-8edd60fe-fda6	250.00	-
67	P/CPNR/1809/CPO0216	TR-1739ec1e-1929	250.00	-
68	P/CPNR/1809/CPO0217	TR-ba2c9fea-a6f6	250.00	-
69	P/CPNR/1809/CPO0219	TR-6d0d25fd-3727	250.00	-
70	P/CPNR/1810/CPO0223	TR-08bedf4b-4349	250.00	-
71	P/CPNR/1809/CPO0211	TR2e0967c7-1f11	6.70	-
72	P/CPJR/1810/CPO1363G	TR-d044a56b-2d98	250.00	-
73	P/CPJR/1810/CPO1364E	TR-0e98b4bb-0c56	250.00	-
TOTAL			12,042.09	3,400.00

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

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)				
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)	

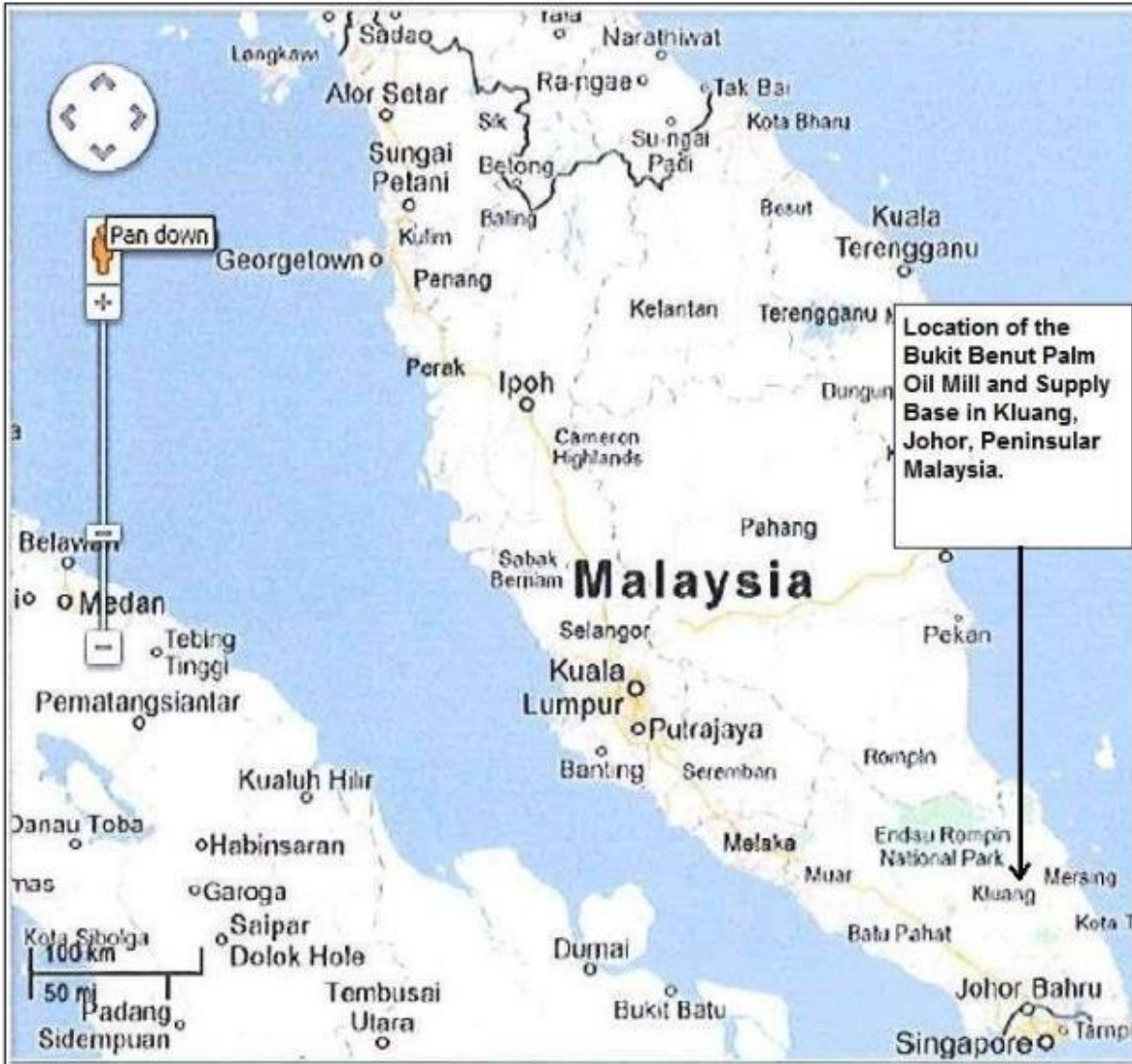
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1	XXX	16,386.70 mt	-
2	XXX	-	2,786.10 mt

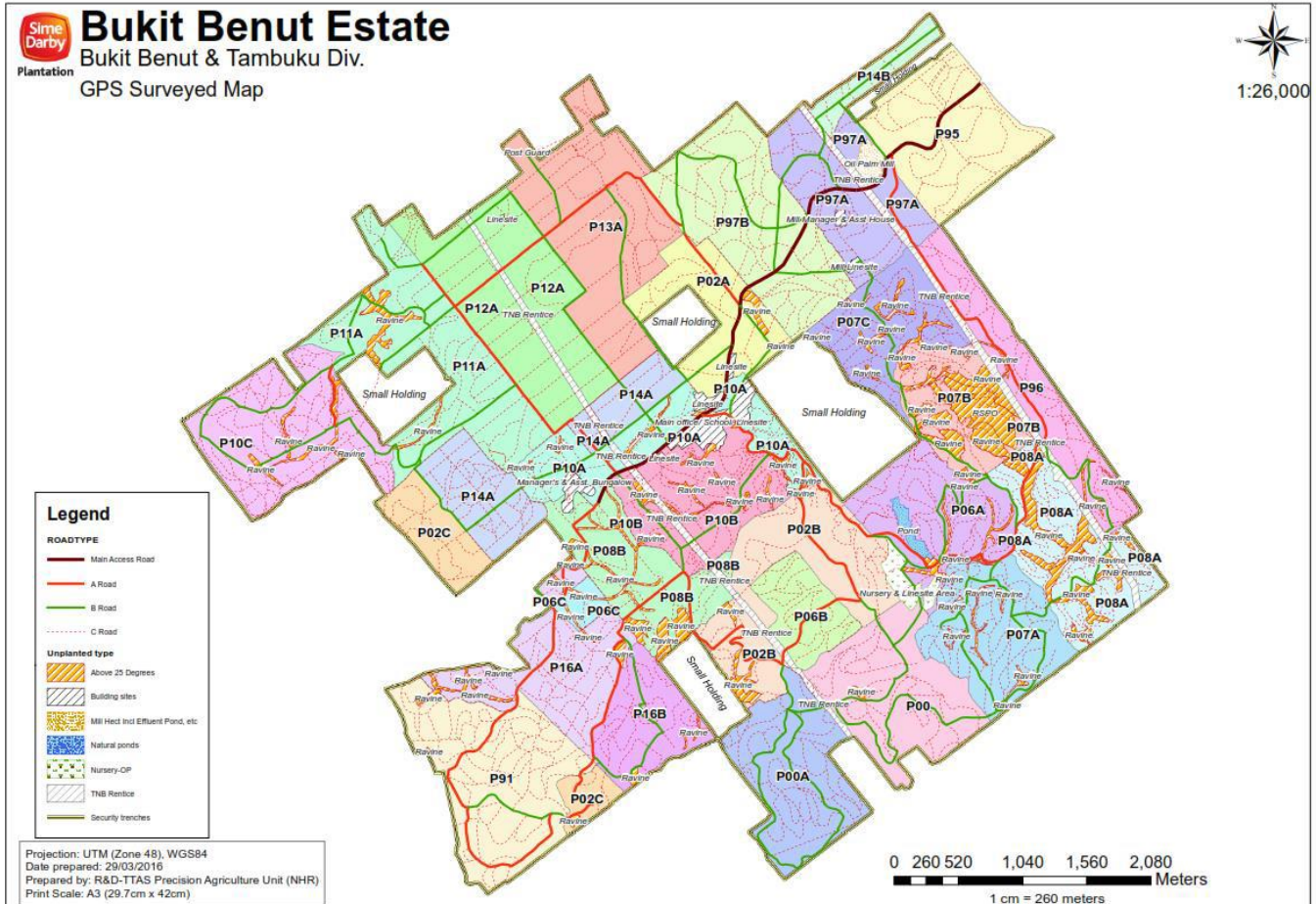
F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading No	RSPO Credits of Certified CPO Sold (MT)
Nil	n/a	n/a	n/a

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

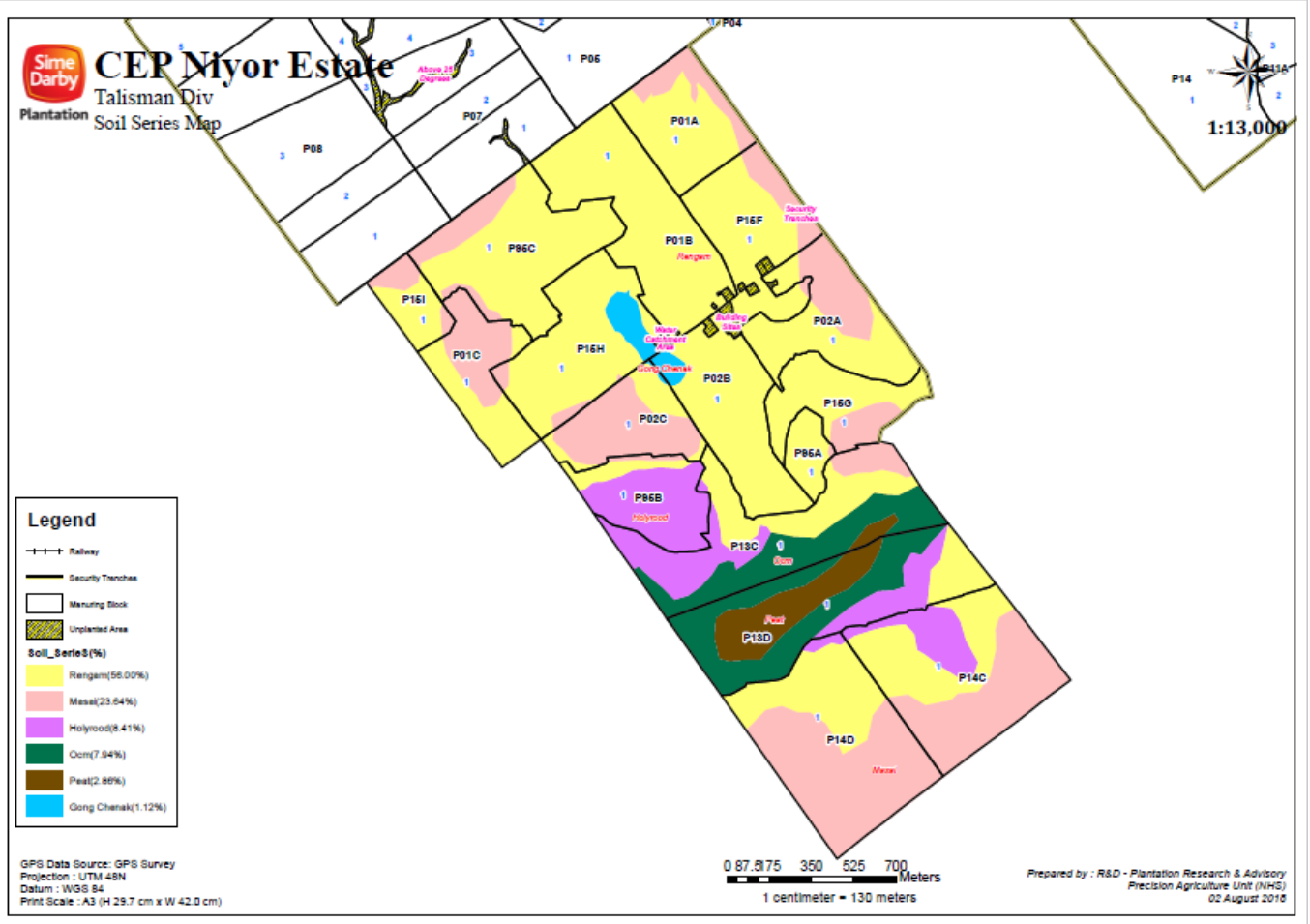
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Appendix G: Bukit Benut Estate Field Map



Appendix I: CEP Niyor Estate Field Map



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

Not applicable

Appendix K : List of Abbreviations

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
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
SDPSB	Sime Darby Plantation Sdn Bhd
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SOU	Strategic Operating Unit