

**RSPO PRINCIPLE AND CRITERIA –  
RECERTIFICATION ASSESSMENT (RC)  
Public Summary Report**

<b>TDM Plantation SdnBhd</b>
Client company Address: Level 3, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin 21000 Kuala Terengganu Terengganu, Malaysia
Certification Unit:  <b>Kemaman Palm Oil Mill</b> KM 121, Jerangau – Jabor Highway 24101 Kemaman Terengganu, Malaysia

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### Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0095-11-000-00	<b>Membership Approval Date</b>	28/02/2011
<b>Parent Company Name</b>	TDM Plantation Sdn Bhd		
<b>Address</b>	Aras 1-5, Bangunan UMNO Terengganu. Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Terengganu, Malaysia		
<b>Subsidiary (Certification Unit Name)</b>	Kemaman Palm Oil Mill		
<b>Address</b>	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia		
<b>Contact Name</b>	Mr Shahbudin Bin Usop		
<b>Website</b>	<a href="http://www.tdmberhad.com.my">www.tdmberhad.com.my</a>	<b>E-mail</b>	<a href="mailto:kpom.tdmp@tdmberhad.com.my">kpom.tdmp@tdmberhad.com.my</a>
<b>Telephone</b>	09 822 6566	<b>Facsimile</b>	09 822 6704

2. Certification Information			
<b>Certificate Number</b>	RSPO 587626	<b>Date of First Certification</b>	01/11/2013
		<b>Certificate Start Date</b>	01/11/2018
		<b>Certificate Expiry Date</b>	31/10/2023
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production from Kemaman Palm Oil Mill and supply base (Tebak, Pelantoh, Jernih, Air Putih, Gajah Mati & MAIDAM Estate)		
<b>Applicable Standards</b>	RSPO P&C 2013 (MY-NI 2014) ; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D Identity Preserved)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 678572	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	14/12/2022
MSPO 686877	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Kemaman Palm Oil Mill	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	4° 24' 10.80" N	103° 14' 52.80" E
Tebak Estate	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	4° 25' 48.61" N	103° 13' 35.40" E
Pelantoh Estate	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	4° 24' 19.23" N	103° 14' 59.64" E
Jernih Estate	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	4° 26' 24" N	103° 12' 39.59" E
Air Putih Estate	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	4° 8' 23.99" N	103° 7' 47.99" E
Gajah Mati Estate	Bukit Besi 23000 Dungun, Terengganu, Malaysia	4° 41' 45.05" N	103° 12' 23.30" E
MAIDAM Estate	Bukit Besi 23000 Dungun, Terengganu, Malaysia	4° 37' 39.58" N	103° 12' 24.42" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Tebak Estate	2,922.33	30.46	340.84	3,293.63	88.73
Pelantoh Estate	3,153.27	0.25	138.08	3,291.60	95.80
Jernih Estate	2,822.07	65.46	248.07	3,135.60	90
Air Putih Estate	4,042.70	187.70	121.58	4351.98	94
Gajah Mati Estate	3,520.87	153.13	208.78	3,882.78	90.68
MAIDAM Estate	755.96	6.74	151.38	914.08	83.32
<b>Total</b>	17,217.20	443.74	1,208.73	18,869.67	91.24

1. The hectareage and HCV area was different due to GIS resurvey for Kemaman CU in 2018 by internal team.

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Tebak Estate	564.39	87.39	227.29	1,904.35	138.91	2,357.94	564.39
Pelantoh Estate	622.26			1,633.68	897.33	2,531.01	622.26
Jernih Estate	405.40	-	1,746.09	670.58	-	2,416.67	405.40
Air Putih Estate	567.40	1,510.92	-	188.76	1336.21	3603.29	439.41
Gajah Mati Estate	1,457.34	687.60	352.21	1,023.72	-	2,063.53	1,457.34
MAIDAM Estate	255.80	-	-	500.16	-	500.16	255.80
<b>Total (ha)</b>	<b>3,872.59</b>	<b>2,285.91</b>	<b>2,325.59</b>	<b>5,921.25</b>	<b>2,372.45</b>	<b>13,472.60</b>	<b>3,744.60</b>

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (Nov 2017 – Oct 2018)	Actual (Aug 2017- June 2018)	Forecast (Nov 2018- Oct 2019)
Tebak Estate	51,430.00	40,929.80	46,873.72
Pelantoh Estate	54,000.00	47,302.91	49,538.90
Jernih Estate	42,300.00	39,438.57	49,891.80
Air Putih Estate	35,450.00	28,709.65	31,424.55
Gajah Mati Estate	31,300.00	24,427.28	32,681.86
MAIDAM Estate	6,780.00	3,561.31	5,203.81
<b>Total</b>	<b>221,260.00</b>	<b>184,369.52</b>	<b>215,614.64</b>

1. The Actual volume certified FFB figure in the table was from 2 period ( Aug 17 – Sept 17 and Oct 17 – June 18)
2. FFB received for the period Aug 17 – Sept 17 was 34,544.11 mt while for the period Oct 17 – June 18 was 148,925.41mt

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (Nov 2017 – Oct 2018)	Actual (Aug 2017- June 2018)	Forecast (Nov 2018- Oct 2019)
N/A	N/A	N/A	N/A
<b>Total</b>			

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<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>			
Independent FFB Supplier	Tonnage / year		
	Estimated (Nov 2017 – Oct 2018)	Actual (Aug 2017- June 2018)	Forecast (Nov 2018- Oct 2019)
N/A			
<b>Total</b>			

<b>10.Certified Tonnage</b>			
Mill Capacity: 60 MT/hr	Estimated (Nov 2017 – Oct 2018)	Actual (Aug 2017- June 2018)	Forecast (Nov 2018- Oct 2019)
	FFB	FFB	FFB
	221,260.00 mt	184,369.52 mt	215,614.64 mt
SCC Model: IP	CPO (OER: 20.50 %)	CPO (OER: 22%)	CPO (OER:20.50 %)
	45,358.30 mt	41,238.06 mt	44,201.00 mt
	PK (KER: 5.00 %)	PK (KER:5.8 %)	PK (KER:5.00 %)
	11,063.00mt	10,817.64 mt	10,780.73 mt

1. The Actual volume figure in table was from 2 period ( Aug 17 – Sept 17 and Oct 17 – June 18)
2. FFB received for the period Aug 17 – Sept 17 was 34,544.11 mt while for the period Oct 17 – June 18 was 149,825.41 mt
3. Total CPO produced for the period Aug 17 – Sept 17 was 7,668.98 mt while for the period Oct 17 – June 18 was 33,569.08 mt
4. Total PK produced for the period Aug 17 – Sept 17 was 2,004.55 mt while for the period Oct 17 – June 18 was 8,813.09mt mt

<b>11.Actual Sold Volume(CPO)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>CPO (MT)</b>	41,130.44	-	-	-	41,130.44

**Note:**

1. The Actual volume figure in table was from 2 period ( Aug 17 – Sept 17 and Oct 17 – June 18)
2. Actual sold volume (RSPO certified) for the period Aug 17 – Sept 17 was 7,716.99 mt while for the period Oct 17 – June 18 was 33,413.45 mt

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<b>12.Actual Sold Volume (PK)</b>					
	<b>RSP0 Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSB</b>		
<b>PK (MT)</b>	10,640.20				10,640.20

**Note:**

1. The Actual volume figure in table was from 2 period ( Aug 17 – Sept 17 and Oct 17 – June 18)
2. Actual sold volume (RSP0 certified) for the period Aug 17 – Sept 17 was 2,004.55 mt while for the period Oct 17 – June 18 was 8,635.65 mt

<b>13.Actual Group certification Claims</b>		
	<b>Credit</b>	<b>Physical Volume (MT)</b>
<b>IS-CSP0</b>	0	0
<b>IS-CSPKO</b>	0	0
<b>IS-CSPKE</b>	0	0

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia SdnBhd,  
(ASI Accreditation Number: RSPO-ACC-67)  
Unit 3, Level 10, Tower A  
The Vertical Business Suites, Bangsar South  
No. 8, JalanKerinchi  
59200 Kuala Lumpur  
Tel +603 2242 4211 Fax +603 2242 4218  
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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (RSPO-ACC-67) 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 recertification assessment was conducted from 23-26/07/2018. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates (Tebak & Pelantoh 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 Major NC close out on-site assessment was conducted on 18/10/2018. 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 & Criterias 2013 (RSPO P&C MYNI-2014) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (0.8\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment (*Note: This is applicable starting from 1<sup>st</sup> July 2018*).
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix 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. The stakeholder notification was made on 20<sup>th</sup> June 2018, refer to [https://www.rspo.org/certification/public-announcement?keywords=kemaman&country=&assessment\\_type=](https://www.rspo.org/certification/public-announcement?keywords=kemaman&country=&assessment_type=)

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Kemaman POM	√	√	√	√	√
Tebak Estate	√			√	
Pelantoh Estate	√			√	
Jernih Estate		√			√
Air Putih Estate			√		
Gajah Mati Estate		√			√
MAIDAM Estate			√		

**Tentative Date of Next Visit:** July 15, 2019 - July 18, 2019

**Total No. of Mandays:** 10 mandays including 1 day SC for mill

**2.2 BSI Assessment Team:**

Team Member Name	Role	Qualifications <i>(Short description of the team members)</i>
Mohd Hafiz Mat Hussain	Lead Auditor	He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 140001, 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 2013, Endorsed RSPO P&C Lead Auditor Course in 2014, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2016. He had been involved in ISO9001, ISO14001 and OHSAS 18001 auditing since May 2013 within Malaysia, Brunei, Indonesia and RSPO auditing within Malaysia, Papua New Guinea, Solomon Islands, Gabon and Liberia. During this assessment, he assessed on the aspects of legal, mill best practices, SCC for CPO mill, estate best practices, safety and health, environmental and workers and stakeholders consultation.
Valence Shem	Team Member	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English.
Elzy Ovktafia Chairul	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) 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 and Diseases Training, Quality Control as

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		<p>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.</p>
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**Accompanying Persons:**

No.	Name	Role
1	Muhammad Fadzli Mazran	Observer from BSI Services Malaysia SdnBhd

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**2.3 Assessment Plan**

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

Date	Time	Subjects	MH	VS	EO
Sunday 22/07/2018	PM	Travel to Kuantan	√	√	-
Monday 23/07/2018  <b>Kemaman Palm Oil Mill</b>	13:00-13:30	Opening meeting: <ul style="list-style-type: none"> <li>Opening presentation by Audit Team leader</li> <li>Confirmation of assessment scope and finalize audit plan (including stakeholder consultation)</li> <li>Verification on previous audit findings</li> </ul>	√	√	-
	13:30-17:00	<b>RSPO Supply Chain</b> for Kemaman Palm Oil Mill General Chain of Custody : Element 5.1 – 5.113	√	√	-
		<b>RSPO Supply Chain</b>	√	√	-
	17:00	Interim	√	√	-
	PM	Travel to Kuantan	-	-	√
Tuesday 24/7/2018  <b>Kemaman Palm Oil Mill</b>	09:00-12:30	<b>Kemaman POM</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	√
	10:00-12:30	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	√
	12:30-13:30	Lunch	√	√	√
	13:30-16:30	<b>Kemaman POM:</b> Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	√	√	√
	16:30-1700	Interim Closing Briefing	√	√	√
Wednesday 25/7/2018  <b>Tebak Estate</b>	09:00-12:30	<b>Tebak Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√

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	10:00-12:30	<b>Meeting with stakeholders for Tebak Estate</b> (Government, village rep,smallholders, Union Leader, contractor etc.)	√	√	√
	12:30-13:30	Lunch	√	√	√
	13:30-16:30	<b>Tebak Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16:30-17:00	Interim Closing Briefing	√	√	√
Thursday 26/7/2018  <b>Pelantoh Estate</b>	09:00-12:30	<b>Pelantoh Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	10:00-12:30	<b>Meeting with stakeholders for Pelantoh Estate</b> (Government, village rep,smallholders, Union Leader, contractor etc.)	√	√	√
	12:30-13:30	Lunch	√	√	√
	13:30-15:30	<b>Pelantoh Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	15:30	Verify any outstanding issues & Preparation for closing Meeting	√	√	√
	16:00-17:00	Closing Meeting			
Friday 27/7/2018	AM	Travel back to KL	√	√	√

### Section 3: Assessment Findings

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

- TDM Plantation Sdn Bhd Time Bound Plan
- RSPO P&C 2013 Generic Checklist
- RSPO Group Certification Standard 2016 Checklist
- RSPO Supply Chain Certification Checklist June 2017
- RSPO P&C GA-NIWG 2017 Checklist
- RSPO P&C INA-NIWG 2016 Checklist
- RSPO P&C MY-NIWG 2014 Checklist
- RSPO P&C PNG-NIWG 2017 Checklist

#### 3.2 Progress against Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
<b>Summary of the Time Bound Plan</b>		
Does the plan include all subsidiaries, estates and mills?	The time bound plan includes all operating units in Malaysia	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	All the estates and mills certified within five years	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> <li>• Age of plantations.</li> <li>• Location.</li> <li>• POM development</li> <li>• Infrastructure.</li> <li>• Compliance with applicable law.</li> </ul>	The TBP is challenging due to the increasing regulations in the local laws including the current focus of the company's management to implement MSPO which is a mandatory requirement.	Yes
Have there been any changes since the last audit? Are they justified?	No changes since last audit	Yes
If there have been changes, what circumstances have occurred?	N/A	N/A
Have there been any stakeholder comments?	To-date, no comments received from stakeholders on the TBP.	Yes
Have there been any newly acquired subsidiaries?	No	Yes
If yes, have the newly acquisitions certified within a three-year timeframe?	N/A	N/A

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Have there been any isolated lapses in implementation of the plan?	No	Yes
<b>Un-Certified Units or Holdings</b>		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	No uncertified units.	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	Any new NPP will be submitted but during this audit, the NPP for Pelung Estate is still in progress.	Yes
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.	There's no land conflicts reported against the company	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	To-date, no complaints on labour disputes received by the company.	Yes
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	None so far. No stakeholder comments or complaints received.	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	No uncertified units.	Yes

**3.3 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	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 seven (7) Major nonconformities raised. The Kemaman Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1664201-201807-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.5.1 Major
<b>Date Issued</b>	26/07/2018	<b>Due Date</b>	23/10/2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/10/2018
<b>Statement of Nonconformity:</b>	Documentation for pay and condition was not effectively implemented.		
<b>Requirement Reference:</b>	Documentation of pay and conditions shall be available.		
<b>Objective Evidence:</b>	Tebak Estate & Pelantoh Estate, there was no approval from Labour Department on the salary deduction for electric and water bill, insurance, union.		
<b>Corrections:</b>	The related document will be attached with the report and available at estate.		
<b>Root Cause Analysis:</b>	The documentation related to Labour Department and Employment Act was recorded and updated. However, due to short time period during audit and labour exchange among estate, the document failed to show to auditor.		
<b>Corrective Actions:</b>	Monitoring system-Display the approved permit at estate's office		
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <ul style="list-style-type: none"> <li>i) Salary deduction permit available at Tebak estate, refer to permit serial no. PMT.2009/0015 effective date 25/9/18.</li> <li>ii) Verified acknowledgement from employee for electricity and water deduction</li> <li>iii) Interviewed with the sampled worker, TB 1200656 confirmed that he signed the acknowledgment for deduction.</li> <li>iv) Application for the salary deduction permit verified at Pelantoh Estate, refer to letter to Labour Department office dated 26/9/18. I</li> <li>v) List of workers acknowledgement for deduction available at Pelantoh Estate.</li> <li>vi) Interviewed with the sampled worker, ID 730315-XX-XXXX and ID 670116-XX-XXXX confirmed that they signed the acknowledgment for deduction.</li> </ul> <p>Corrective action is found to be effective, thus the major NC was closed on 18/10/18 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment</p>		



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<b>NCR Ref #</b>	1664201-201807-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.4.2 Major
<b>Date Issued</b>	26/07/2018	<b>Due Date</b>	23/10/2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/10/2018
<b>Statement of Nonconformity:</b>	The maintenance of the allocated riparian zones was not implemented in accordance to the established environmental management plan.		
<b>Requirement Reference:</b>	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.		
<b>Objective Evidence:</b>	Based on the visits to the riparian zones at Sg Mas, Tebak Estate (Block 95B2, 92A1) and Sg Tebak, Pelantoh Estate (Block 93B), traces of herbicides spraying on palm circles near the rivers were observed. There was also no clear demarcation to indicate the boundary of the buffer zones.		
<b>Corrections:</b>	For immediate action, estate already call the worker and all of them need to submit a show cause letter regarding this matter.		
<b>Root Cause Analysis:</b>	<p>We have found that, the new sprayer was performed the spraying work and based on record, we have informed and trained the workers clearly which worker should not conduct spraying at buffer zones.</p> <p>No clear demarcation of the buffer zone due to monsoon season which the flood cause the mark disappear</p>		
<b>Corrective Actions:</b>	<p>i)Following that, a refreshment training and monitoring record will be provided and monitored.</p> <p>ii)The buffer zone area will be clearly marked and maintenance will be performed according to the TDMP' s Policy on Slope Protection</p>		
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>i) Show cause letter to the said sprayer was verified. Interviewed with the Bangladeshi translator and he has explained the intent of show cause given to the said group of sprayers.</p> <p>ii) Briefing given to the spraying gang on the buffer zone protection dated 30/7/18 was verified. Interview with other group of sprayers found the can clearly identified the buffer zone area.</p> <p>iii) Further check at buffer zone area (98B2 and 92A1 at Tebak Estate) and (93B at Pelatoh Estate), it was evident that demarcation and marking are visible and clear.</p> <p>iv) Training was given to the group of CDA sprayers on 16/8/18 at Pelantoh Estate. Further interview with the group of sprayer found that they understand the purpose of buffer zone demarcation and prohibition of upkeep activities at buffer zone area.</p> <p>Corrective action is found to be effective, thus the major NC was closed on 18/10/18 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment.</p>		

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<b>NCR Ref #</b>	1664201-201807-M3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.3.2 Major
<b>Date Issued</b>	26/07/2018	<b>Due Date</b>	23/10/2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/10/2018
<b>Statement of Nonconformity:</b>	The disposal of empty pesticide containers was not effectively implemented.		
<b>Requirement Reference:</b>	All chemicals and their containers shall be disposed of responsibly.		
<b>Objective Evidence:</b>	<p>The following lapses were found: Rat bait (Storm) container was used by a worker for keeping rice. This was found at Pelantoh line-site, house no. 143. Glyphosate containers used to keep petrol and rubbish by a couple of workers at line-site.</p> <p>Crosschecking between bin-card and scheduled wastes record book showed that there were issuance of 4 containers of rat bait on 22/3/2018 and 3 containers on 27/3/2018 and no record to show that the 7 containers have been return to SW store. However, there was no action taken to trace the missing containers.</p>		
<b>Corrections:</b>	For immediate action, the affected house no.143 has been warned and the containers has been collected and returned to SW store.		
<b>Root Cause Analysis:</b>	<p>As per best practice guidelines, the explanation regarding the chemicals and its usage already done to the workers. The information includes of health risk, storage and risk to the environmental.</p> <p>However, we have found that, the storekeeper make a mistake which did not trace the missing containers.</p>		
<b>Corrective Actions:</b>	<p>i) To perform the inspection for housing covering outside and inside house.</p> <p>ii) The storekeeper to make sure that no containers will be take out from store. All containers have been punched for proper disposal.</p> <p>iii) To perform refreshment training on scheduled waste disposal system</p>		
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>i) Based on the house inspection records and verification at house no# 143, no evidence of used chemical container found at the visited line site.</p> <p>ii) Records of rat bait issuance and returned container checked and found to be tally.</p> <p>iii) Verified at scheduled waste store, the chemical container are properly stored and labeled with SW 409.</p> <p>iv) Briefing was given to the P&amp;D operator (rat baiting) on 3/9/18 to remind on the SOP of rat baiting and handling of empty container. Further interview with the workers found that the aware on the SOP and memo given by the management on handling of empty oil and chemical container.</p> <p>v) A memo issued by management, ref: PLT/MEMO/2018 dated 1/10/18 was verified. Based on the interview with workers at line site, they are aware on the memo and prohibition of empty chemical and oil container to be brought back home.</p> <p>Corrective action is found to be effective, thus the major NC was closed on 18/10/18 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment</p>		

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<b>NCR Ref #</b>	1664201-201807-M4	<b>Clause &amp; Category (Major / Minor)</b>	SCCS 5.3.2 Major
<b>Date Issued</b>	26/07/2018	<b>Due Date</b>	23/10/2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/10/2018
<b>Statement of Nonconformity:</b>	The procedure was not adequately implemented.		
<b>Requirement Reference:</b>	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. ii) Effectively implements and maintains the standard requirements within its organization.		
<b>Objective Evidence:</b>	Internal audit for supply chain at Kemaman POM yet to be carried out.		
<b>Corrections:</b>	To prepare procedure for any requirement in RSPO Supply Chain Certification Standard and include the procedure to conduct annual internal audit		
<b>Root Cause Analysis:</b>	Additional clause based on the RSPO Supply Chain Certification June 2017		
<b>Corrective Actions:</b>	An annual audit plan/ schedule will be provided and implemented		
<b>Assessment Conclusion:</b>	Major NC close out verification: i) SOP for RSPO Supply Chain Standard Operating Procedure, IP and MB Module, TDM/MILLS/02, rev: MILL-01/2018 dated 1 July 2018 was verified. All pertinent elements under new RSPO SCC Standard June 2017 are incorporated in the SOP. ii) Internal audit for RSPO SCC was carried out on 20/8/18 and report is available for review.  Corrective action is found to be effective, thus the major NC was closed on 18/10/18 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment		

<b>NCR Ref #</b>	1664201-201807-M5	<b>Clause &amp; Category (Major / Minor)</b>	SCCS 5.13.1 Major
<b>Date Issued</b>	26/07/2018	<b>Due Date</b>	23/10/2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/10/2018
<b>Statement of Nonconformity:</b>	Management review on RSPO supply chain implementation has yet to be conducted.		
<b>Requirement Reference:</b>	The organization is required to hold management reviews annually at planned intervals appropriate to the scale and nature of the activities undertaken		
<b>Objective Evidence:</b>	There is no evidence that management review has been conducted which contains the input and output according to the RSPO SCCS standard.		
<b>Corrections:</b>	The management review will be conducted annually		
<b>Root Cause Analysis:</b>	Additional clause based on the RSPO Supply Chain Certification June 2017		

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<b>Corrective Actions:</b>	The management review will be implemented and the contains will discussed such as the findings from internal audit, input and output according to the RSPO SCCS standard
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>i) Management review meeting for RSPO SCC was carried out on 23/9/18. Minutes of meeting was evident and available for review. All pertinent agenda as per the requirement were discussed and presented to management. Decision and action reported in the minute for further improvement.</p> <p>ii) Verified MSPO/RSPO Compliance Plan for 2018. The next sustainability meeting will be carried out on November 2018.</p> <p>Corrective action is found to be effective, thus the major NC was closed on 18/10/18 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment</p>

<b>NCR Ref #</b>	1664201-201807-M6	<b>Clause &amp; Category (Major / Minor)</b>	SCCS 5.13.2 Major
<b>Date Issued</b>	26/07/2018	<b>Due Date</b>	23/10/2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/10/2018
<b>Statement of Nonconformity:</b>	Management review on RSPO supply chain implementation has yet to be conducted.		
<b>Requirement Reference:</b>	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>		
<b>Objective Evidence:</b>	There is no evidence that management review has been conducted which contains the input and output according to the RSPO SCCS standard.		
<b>Corrections:</b>	The management review will be conducted annually		
<b>Root Cause Analysis:</b>	Additional clause based on the RSPO Supply Chain Certification June 2017		
<b>Corrective Actions:</b>	The management review will be implemented and the contains will discussed such as the findings from internal audit, input and output according to the RSPO SCCS standard.		
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>i) Management review meeting for RSPO SCC was carried out on 23/9/18. Minutes of meeting was evident and available for review. All pertinent agenda as per the requirement were discussed and presented to management. Decision and action reported in the minute for further improvement. ii) Verified MSPO/RSPO Compliance Plan for 2018. The next sustainability meeting will be carried out on November 2018.</p> <p>Corrective action is found to be effective, thus the major NC was closed on 18/10/18 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment.</p> <p>Closed</p>		

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<b>NCR Ref #</b>	1664201-201807-M7	<b>Clause &amp; Category (Major / Minor)</b>	SCCS 5.13.3 Major
<b>Date Issued</b>	26/07/2018	<b>Due Date</b>	23/10/2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	18/10/2018
<b>Statement of Nonconformity:</b>	Management review on RSPO supply chain implementation has yet to be conducted.		
<b>Requirement Reference:</b>	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes</li> <li>• Resource needs.</li> </ul>		
<b>Objective Evidence:</b>	There is no evidence that management review has been conducted which contains the input and output according to the RSPO SCCS standard.		
<b>Corrections:</b>	The management review will be conducted annually		
<b>Root Cause Analysis:</b>	Additional clause based on the RSPO Supply Chain Certification June 2017		
<b>Corrective Actions:</b>	The management review will be implemented and the contains will discussed such as the findings from internal audit, input and output according to the RSPO SCCS standard		
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>i) Management review meeting for RSPO SCC was carried out on 23/9/18. Minutes of meeting was evident and available for review. All pertinent agenda as per the requirement were discussed and presented to management. Decision and action reported in the minute for further improvement.</p> <p>ii) Verified MSPO/RSPO Compliance Plan for 2018. The next sustainability meeting will be carried out on November 2018.</p> <p>Corrective action is found to be effective, thus the major NC was closed on 18/10/18 based on-site verification and supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment</p>		

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI</b>	<b>Nil</b>

<b>Positive Findings</b>	
<b>PF #</b>	<b>Description</b>
<b>PF</b>	<b>Nil</b>

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

Non-Conformity			
<b>NCR Ref #</b>	1510086-201707-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.2.2 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	25/09/2017
<b>Statement of Nonconformity:</b>	HCV management plan is not available in the estate		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	No HCV management plan available for Air Putih and MAIDAM estate although different type of wild life being sighted within the estate vicinity according to the animal sighting record and interview with the workers.		
<b>Corrective Actions:</b>	<p><u>Root Cause:</u> The document was already recorded based on Bio-Diversity Assessment (report November 2011). However the management did not include and implement the plan where monitoring of the document was insufficient.</p> <p><u>Correction:</u> The Management plan will be updated and distributed and implemented accordingly in all operating units.</p> <p><u>Corrective Action:</u> A monitoring form to monitor the RTE and the schedule to inspect the HCV area are available. Assessment team conclusion: An NCR close out assessment has been conducted to ensure the effectiveness of this closure. During the assessment, the assessment team had reviewed the management plan and confirmed it is as per the recommendation provided in the BioDiversity Report. The monitoring template developed by TDM is as per the management plan and is available at all sampled site - Gajah Mati Estate, Tebak Estate and MAIDAM Estate. The monitoring template has been in used and records are kept in each of the operating units.</p> <p>A flow process was also been developed for HCV monitoring. Interview was conducted with the Assistant manager and "Mandos" regarding the monitoring of RTE and it is according to the standard practice of TDM Plantations SdnBhd method. With the available inspection schedule, process flow and monitoring elements, the assessment team deemed that the certification holder can eliminate the root cause. The continuous implementation will be verified in the next assessment.</p>		
<b>Assessment Conclusion:</b>	<p>Verification during Recertification Audit:</p> <p><u>Tebak:</u> The management plan for 2018 was established. The monitoring records of HCV area was also up-to-date until 20/7/2017. The report contains the information about time, monitored by, area and observations remarks. It was also acknowledged by the Estate Manager. Thus, the implementation of the corrective action found to be effective.</p>		

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<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1510086-201707-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.1.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	25/9/2017
<b>Statement of Nonconformity:</b>	The vehicle maintenance activities were not documented in the Aspect/impact list identification and evaluation.		
<b>Requirement Reference:</b>	An environmental impact assessment (EIA) shall be documented.		
<b>Objective Evidence:</b>	The facilities for vehicles at the MAIDAM Estate-Site office was lacking on the following: 1) There is no proper location for Tractor cleaning. And oil trap was not available. 2) The Oil Change /top up /Lubricating/small repair, and overnight parking for the vehicles without proper location.		
<b>Corrective Actions:</b>	<p><u>Root Cause:</u> No environmental impact assessment was conducted for outsourcing to third party to perform maintenance, service and cleaning or any related jobs.</p> <p><u>Correction:</u> An environmental aspect and impact assessment was completed for the onsite maintenance and crashing. A new workshop for the outsourcing has been constructed.</p> <p><u>Corrective Action:</u> The monitoring of any new activities which requires environmental aspect and impact assessment has been established. Assessment team conclusion: The onsite NCR close out assessment was conducted to verify on the correction taken by the certification holder. The environmental aspect and impact assessment and evaluation was reviewed by the assessment team prior the onsite NCR close out was deemed sufficient to address the NCR raised. During the onsite assessment, interviewed with the estates assistant manager had confirmed their understanding if there are any new activities which may cause environmental impact will be registered and evaluated.</p>		
<b>Assessment Conclusion:</b>	<p>Verification during Recertification Audit:</p> <p>The documented evaluation of environmental aspect and impact was available at all the visited operating units. They also have been updated accordingly and no observation of uncovered activity. Thus, the implementation of the corrective action found to be effective.</p>		

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Non-Conformity			
<b>NCR Ref #</b>	1510086-201707-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.6.2 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	26/07/2018
<b>Statement of Nonconformity:</b>	Meeting with main trade unions or workers representatives has yet to be conducted.		
<b>Requirement Reference:</b>	Minutes of meetings with main trade unions or workers representatives shall be documented.		
<b>Objective Evidence:</b>	Kemaman POM, Air Putih Estate and MAIDAM Estate: Meeting with main trade unions or workers representatives has yet to be conducted.		
<b>Corrective Actions:</b>	Internal briefing was provided to all operating units that the meeting minutes with the union/workers representative including supporting document and photos shall be kept. The SIA will be updated against any issue raised.		
<b>Assessment Conclusion:</b>	Verification during Recertification Audit: In KPOM, the minutes of meeting for trade union 01/2018 available on 15.05.2018. In Tebak Estate, the meeting has been conducted on 13.08.17 and in Pelantoh Estate the meeting was conducted on 06.05.2018. Among issued captured are safety shoes distribution, bat feces on house ceiling, fasting month evening shift and others. All the issues also updated in the SIA accordingly. Therefore, the minor non-compliance was closed on 26/7/2018.		

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)
1510086-201707-M1 – 5.2.2	Major	03/08/2017	Closed out on 25/9/2017
1510086-201707-M2 – 5.1.1	Major	03/08/2017	Closed out on 25/9/2017
1510086-201707-N1 – 6.6.2	Minor	03/08/2017	Closed out on 26/07/2018
1664201-201807-M1 – 6.5.1	Major	26/07/2018	Closed out on 18/10/2018
1664201-201807-M2 – 4.4.2	Major	26/07/2018	Closed out on 18/10/2018
1664201-201807-M3 – 5.3.2	Major	26/07/2018	Closed out on 18/10/2018
1664201-201807-M4 – SC 5.3.2	Major	26/07/2018	Closed out on 18/10/2018
1664201-201807-M5 – SC 5.13.1	Major	26/07/2018	Closed out on 18/10/2018
1664201-201807-M6 – SC 5.13.2	Major	26/07/2018	Closed out on 18/10/2018
1664201-201807-M7 – SC 5.13.3	Major	26/07/2018	Closed out on 18/10/2018



### 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 Kemaman 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	
<b>Internal Stakeholders</b>  Gender Committee Mill Operators Sprayer Harvester	<b>Union/Contractors/Local Communities</b>  Contractor Representative, Lubuk Lesung Representative, Sungai Mas
<b>Government Departments</b>  SK Air Putih	<b>NGO</b>  No complaint by NGO for TDM Kemaman POM. Stakeholder Consultation Invitation was sent on 20/7/2018

IS #	Description
1	<b>Feedbacks</b> <u>JKKK Lubuk Lesung</u> The head of village shared their concern if the management can give advice or guide to the villager on how to manage the oil palm.
	<b>Management Responses</b> Management noted on the request and will discuss this issue to the top management.
	<b>Audit Team Findings</b> No further issue.
2	<b>Feedbacks</b> <u>Headmaster- SK Air Putih</u> So far, the management has keep good relationship with school management.
	<b>Management Responses</b> Management will continue to support the school management.
	<b>Audit Team Findings</b> No further issue.

<p>3</p>	<p><b>Feedbacks</b>  <u>Contractors:</u>            1. The workshop is located in the flood prone area where it is difficult to do works since the flood can reach 2 days especially in monsoon season (November-December every year).            Cheap price for the work done (backhoe) compared to outside.</p> <p><b>Management Responses</b>            1. The workshop and its neighbourhood are in the low lying area since before and estate will consider if the workshop would like to move to other place.            The jobs given were in long term run and daily basis so the agreed price is reasonable. The outside price may be more expensive but it's just for a short time period.</p> <p><b>Audit Team Findings</b>            Noted.</p>
<p>4</p>	<p><b>Feedbacks</b>  <u>JKKK Sungai Mas/Representative for Ladang Jerneh</u>            There is confusion between who is the responsible party for the bad road condition from main road to the village area at Sungai Mas.</p> <p><b>Management Responses</b>            Management respond that the village is under estate area and the houses are belong to estate, therefore tar road is not built, but the road condition will be repaired progressively.</p> <p><b>Audit Team Findings</b>            No further issue.</p>
<p>5</p>	<p><b>Feedbacks</b>  <u>Gender Committee</u>            So far, there is no critical or any sexual harassment reported.</p> <p><b>Management Responses</b>            Management will continue to maintain the mechanism in grievance and complaint regarding sexual harassment.</p> <p><b>Audit Team Findings</b>            No further issue.</p>

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<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Kemaman Palm Oil Mill Certification Unit has complied with the RSPO P&amp;C MYNI 2014, RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Kemaman Palm Oil Mill is approved and/or continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Mohd Hafiz Mat Hussain	<b>Name:</b> TN.HJ SHAHBUDIN USOP
<b>Company Name:</b> BSI Services Malaysia SdnBhd	<b>Company Name:</b> TDM Plantation SdnBhd
<b>Title:</b> Lead Auditor	<b>Title:</b> Mill Manager
<b>Signature:</b> 	<p><b>Signature:</b></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><b>TDM PLANTATION SDN. BHD.</b>  <b>(A Member of TDM Berhad Group)</b>  <b>Kemaman Palm Oil Mill</b>  <b>(Company No. 10679-W)</b></p> <p>  <b>(TN. HJ. SHAHBUDIN BIN USOP)</b></p>
<b>Date: 07/11/2018</b>	<b>Date: 08/11/2018</b> <i>Pengurus Kilang</i>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Commitment to Transparency</b>			
<b>Criterion 1.1:</b>			
Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSP0 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 RSP0 Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	TDM Plantation Sdn. Bhd. has developed a Social Issue Communication Flowchart dated 01/06/2016. Information covering on environmental, social and legal issues which are relevant to RSP0 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	All operating units maintain records of information request and response. Request for information are attended promptly and confirmed by stakeholders interviewed.	Complied
<b>Criterion 1.2:</b>			
Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			
1.2.1	Publicly available documents shall include, but are not necessary limited to: • 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.  Documents that publicly available are such as social and environment impact assessment, action plan, meeting minutes and audit reports.  Besides, policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.	Complied
<b>Criteria 1.3:</b>			
Growers and millers commit to ethical conduct in all business operations and transactions.			

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1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	TDM Plantation SdnBhd has implemented Code of Ethical Policy dated 1/8/2017. The policy has been displayed at the notice board in front of office and canteen area for communication to the workers. The workers also been briefed on the policy during morning muster for every Tuesday. Sampled seen is the latest training been conducted on 24.07.2018 and kept in Weekly Briefing file in KPOM.	Complied
<b>Principle 2: Compliance with applicable laws and regulations</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	Evidence of compliance with relevant legal requirements shall be available. - Major compliance -	TDM Kemaman Certification Unit continued to implement its compliance with legal requirements. Among the evidence of compliance verified were: <ul style="list-style-type: none"> <li>DOE's License No. 004055 for Kemaman POM, validity 1/7/2018 to 30/6/2019</li> <li>Tebak Estate: TDM Plantation Sdn Bhd - Diesel permit - #T010033, 29/11/2017 to 28/11/2018, 22,000 lt</li> <li>Tebak Estate: MPOB License #501373102000 – TDM BHD. (Ladang Tebak), <i>Menjual &amp; Mengalih FFB</i>, 2,720.25 Ha, 1/4/2018 to 31/3/2019</li> <li>Pelantoh Estate: Certificate of permit for air compressor - #PMT-TG/17 07822, valid until 27/3/2019</li> </ul>	Complied
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	List of applicable laws registered in a document called "Mill/Estate Legal Requirement" and 2018 version was available. Among the Acts and their sub-regulations available were OSHA, FMA, Pesticide Act, Electrical Supply Act, Petroleum (Safety Measure) Act, EQA, Code of Practice for Safe Working in a Confined Space, Local Government Act, Employment Act.	Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	The mechanism for ensuring compliance for both mill and estates was done through evaluation of compliance. The status of compliance was reported in the legal register itself. Based on the report, all requirements were complied with.	Complied
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Changes in law can be detected by both plantation or HQ levels. Either one detected the change, communication about the change must be made to each other. (ref.: " <i>Prosedur Undang-undang dan Lain-lain Keperluan</i> "). Ever since the last assessment, there has been no change of the applicable legal requirements.	Complied
<b>Criterion 2.2:</b> The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			
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 -	The estates were able to demonstrate their right to use land by possessing land titles. At Tebak Estate, there were 3 land titles i.e. #Q.T.(R) Kemaman 11, #Q.T.(R) Kemaman 12 and #HS(D)1779. The total titled area is 3,299.23 Ha where 5.60 Ha is utilised by Ladang Jernih. For Pelantoh Estate, there were 8 land titles.	Complied
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	During the field visit at both estate, it was noted that legal boundaries are clearly demarcated and visibly maintained using peg.	Complied

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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 Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified. Interviewed with the local communities confirmed that no land dispute case been reported.	Complied
2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified. Interviewed with the local communities confirmed that no land dispute case been reported.	Complied
2.2.5 For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified. Interviewed with the local communities confirmed that no land dispute case been reported.	Complied
2.2.6 To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute in the Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified. Interviewed with the local communities confirmed that no land dispute case been reported.	Complied
<b>Criterion 2.3:</b> Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.		
2.3.1 Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	There is no land dispute in the Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified. Interviewed with the local communities confirmed that no land dispute case been reported.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities’ decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company’s title, concession or lease on the land. - Minor compliance -	There is no land dispute in the Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified. Interviewed with the local communities confirmed that no land dispute case been reported.	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	There is no land dispute in the Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified. Interviewed with the local communities confirmed that no land dispute case been reported.	Complied
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There is no land dispute in the Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified. Interviewed with the local communities confirmed that no land dispute case been reported.	Complied
<b>Principle 3: Commitment to long-term economic and financial viability</b>			
<b>Criterion 3.1:</b>			
There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Kemaman POM and estates had established an annual budget for 2018.  The palm oil mill budget includes the projected FFB processed, CPO and PK production which projected for five years. CAPEX included for machinery equipment to improve process efficiency.  Sighted for business plan for all estates visited from the 2018 until 2022 to include upkeep mature cost, oil palm harvesting and collection cost, oil palm transport cost, oil palm manuring cost.	Complied

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3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	Annual replanting programme projected for a minimum of five years (2018-2022) and yearly review conducted at the respective estate. <table border="1"> <thead> <tr> <th>Year</th> <th>Ha</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>138.91</td> <td rowspan="3">Tebak Estate</td> </tr> <tr> <td>2019</td> <td>219.90</td> </tr> <tr> <td>2020</td> <td>355.10</td> </tr> <tr> <td>2018</td> <td>484.06</td> <td rowspan="3">Pelantoh Estate</td> </tr> <tr> <td>2019</td> <td>613.20</td> </tr> <tr> <td>2020</td> <td>755.45</td> </tr> </tbody> </table>	Year	Ha	Estate	2018	138.91	Tebak Estate	2019	219.90	2020	355.10	2018	484.06	Pelantoh Estate	2019	613.20	2020	755.45	Complied
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<b>Principle 4: Use of appropriate best practices by growers and millers</b>																				
<b>Criterion 4.1:</b> Operating procedures are appropriately documented, consistently implemented and monitored.																				
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	For Kemaman POM, the Standard Operating Procedure & Operation Manual updated on November 2012 (TDM/KPOM/01 dated 1 May 2011) as a guidance document to operate the mill. There were total 25 SOP has been established and documented.  For estate, the SOP which revised on May 2017 has 2 section: a. Section A- Total 19 SOP which cover all the operations such as boundary, muster, nursery, soil conservation, mature/immature upkeep, p&d, harvesting and census. b. Section B- Total 9 SOP which cover mainly on workshop, clinic, childcare centre, generator set, foreign workers, land dispute and waste.  Work Instructions in Bahasa Malaysia have been derived from SOPs and are posted at work stations at the mill and at certain locations at the estates, such as the Muster Notice Boards.	Complied																	



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Criterion / Indicator	Assessment Findings	Compliance
4.1.2 A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	<p>External Mill Advisor and a Planting Advisor inspect and report on the operations on annual basis.</p> <p>Mill Advisor’s latest visit was on 28-29 April 2018 by Sime Darby Seeds &amp; Agricultural Services SdnBhd for the period of FY2017. Report includes monitoring of all activities in the mill covering:</p> <ul style="list-style-type: none"> <li>a. Manpower deployment</li> <li>b. Production Performance</li> <li>c. Quality of Input FFB</li> <li>d. Quality of Palm Products and etc.</li> </ul> <p>In Tebak estate, the external planting advisor visited on 19-20 November 2017 for reviewing the performance of January to October 2017 of the estate. The report has been prepared by Sime Darby &amp; Agricultural Services and encompassed the current agricultural condition crop production and financial status of the estate.</p> <p>In Pelantoh estate, the external planting advisor visited on 21-22 November 2017 for reviewing the performance of January to October 2017 of the estate. The report has been prepared by Sime Darby &amp; Agricultural Services and encompassed the current agricultural condition crop production and financial status of the estate.</p>	Complied
4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	All the records of monitoring including action plans were maintained and available at estate and mill office.	Complied
4.1.4 The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	No third party sourced FFB at Kemaman POM	Complied
<b>Criterion 4.2:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.		
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 -	<p>TDM Plantation Sdn Bhd-Standard Operating Procedure has established covers mature upkeep (water management, weeding, bunch census, thinning, P&amp;D, pruning, raking), Immature upkeep, , manuring mature and immature oil palm, harvesting and collection, workshop, roads bridges and culverts, chemical control of common oil palm, use of beneficial plants, use of barn owls and etc. The SOP covering all aspects of oil palm management including safety. The related SOP, namely Leaf and Soil Sampling Notes procedure was sighted.</p> <p>All estates operate in accordance with the standard operating procedures. The practices consistently monitored by estate operation management and estate inspectorate. The recommendations for improvements are given to maintain the sustainable practices.</p> <p>The specific SOP on managing soil fertility was describe in the SOP-Mature Upkeep, page 38.The foliar analysis was conducted to determine the nutrient level of the palm and subsequently formulate an integrated manuring programme.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance												
4.2.2 Records of fertiliser inputs shall be maintained. - Minor compliance -	<p>Tebak Estate:            The records of agronomic and fertilizer recommendation report by agronomist shown application date, block number, dosage applied per palm, type of fertilizer. Sampled monthly manuring report dated June 2018, block PM97A3 the application of AC NK 1 (3.50kg/palm) was completed on March 2018.</p> <p>Pelantoh Estate:            The records of agronomic and fertilizer recommendation report by agronomist shown application date, block number, dosage applied per palm, type of fertilizer. Sampled monthly manuring application report dated June 2018, block PM93B2 the application of AC NK 1 (3.00kg/palm) was completed on March 2018.</p>	Complied												
4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>Tebak Estate:            Latest foliar analysis was done on 10/6/2018 by UTCL Laboratory. The report (LE/1708/1283-1287) dated 5/7/2018 was sighted.            Soil sampling and analysis was last done on 13/11/2017. Sighted Soil Analysis Test Report dated 23/3/2018.</p> <p>Pelantoh Estate:            Latest foliar analysis was done on 31/5/18 by UTCL Laboratory. The report (LE/1907/1233-1237) dated 5/7/2018 was sighted.            Soil sampling and analysis was last done on 13/11/2017. Sighted Soil Analysis Test Report dated 23/3/2018</p>	Complied												
4.2.4 A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	<p>The estates were used Bio organic bulk (compost).</p> <table border="1" data-bbox="660 1626 1305 1720"> <thead> <tr> <th>Tonnage</th> <th>Type</th> <th>Month</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>762.85 mt</td> <td>Compost</td> <td>June 18</td> <td>Tebak Estate</td> </tr> <tr> <td>2711.70 mt</td> <td>Compost</td> <td>May 18</td> <td>Pelantoh Estate</td> </tr> </tbody> </table>	Tonnage	Type	Month	Estate	762.85 mt	Compost	June 18	Tebak Estate	2711.70 mt	Compost	May 18	Pelantoh Estate	Complied
Tonnage	Type	Month	Estate											
762.85 mt	Compost	June 18	Tebak Estate											
2711.70 mt	Compost	May 18	Pelantoh Estate											
<b>Criterion 4.3:</b> Practices minimise and control erosion and degradation of soils.														

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Criterion / Indicator	Assessment Findings	Compliance																									
4.3.1 Maps of any fragile soils shall be available. - Major compliance -	Soil series map available for both estates visited. No other soil categorised as problematic or fragile soil. Sighted the type of soil available at Tebak Estate and Pelantoh Estate. <table border="1" data-bbox="660 477 1193 1137"> <thead> <tr> <th>Type of Soil</th> <th>Estate</th> </tr> </thead> <tbody> <tr><td>Awang</td><td rowspan="7">Tebak Estate</td></tr> <tr><td>Bungor</td></tr> <tr><td>Bukit Tuku</td></tr> <tr><td>Gong Chenak</td></tr> <tr><td>Siri Penambang</td></tr> <tr><td>Rengam-Tai Tak</td></tr> <tr><td>Rengam</td></tr> <tr><td>Awang</td><td rowspan="11">Pelantoh Estate</td></tr> <tr><td>Bungor</td></tr> <tr><td>Atang Merbau</td></tr> <tr><td>Bukit Tuku</td></tr> <tr><td>Chempaka</td></tr> <tr><td>Gong Chenak</td></tr> <tr><td>Gali</td></tr> <tr><td>Kuala Brang</td></tr> <tr><td>LubokItek</td></tr> <tr><td>Penambang</td></tr> <tr><td>Rengam-Tai Tak</td></tr> <tr><td>Rengam</td></tr> <tr><td>Telemong</td></tr> <tr><td>KesatuanTepus-Jabil</td></tr> </tbody> </table>	Type of Soil	Estate	Awang	Tebak Estate	Bungor	Bukit Tuku	Gong Chenak	Siri Penambang	Rengam-Tai Tak	Rengam	Awang	Pelantoh Estate	Bungor	Atang Merbau	Bukit Tuku	Chempaka	Gong Chenak	Gali	Kuala Brang	LubokItek	Penambang	Rengam-Tai Tak	Rengam	Telemong	KesatuanTepus-Jabil	Complied
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4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	The management has identified steep areas (>25°: 97Ha- Tebak Estate and 53ha-Pelantoh Estate) for setting aside as conservation areas. Inspection of field conditions at estate showed well established and maintained groundcover vegetation.	Complied																									
4.3.3 A road maintenance programme shall be in place. - Minor compliance -	Road maintenance program for Tebak Estate 2018 and Pelantoh Estate 2018 was sighted. For example for the mature area: a. Road Grading- 387.01 chain b. Resurfacing with crusher run- 103.30 Ha	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 -	No peat soil at the visited estates.	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 -	No peat soil at the visited estates.	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 -	There were no problematic soils at both visited estates.	Complied																									
<b>Criterion 4.4:</b> Practices maintain the quality and availability of surface and ground water.																											

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Criterion / Indicator	Assessment Findings	Compliance
4.4.1 An implemented water management plan shall be in place. - Minor compliance -	In POM, the following aspects have been incorporated in the water management plan 2018: <ul style="list-style-type: none"> <li>Action plan to reduce fresh water usage – rainwater collection, replacement of old pipeline (completed in March 2014) to reduce leakage, upgrade front end of the mill therefore less washing at ramp, marshalling yard &amp; capstan area (completed in May 2016), install additional decanter therefore avoiding the usage of separator which use water a lot</li> <li>Contingency plan during water shortage 2018 – to purchase water from SATU (Terengganu Water Company), to obtain water supply from nearby estaes, to train staff/workers to save water usage</li> </ul> Monsoon drain water discharge quality was also checked once a year to monitor the pollutant from the mill escape through the monsoon drain. Last analysis was done in March 2018. Among the parameters tested were pH, COD, TSS, O&G, Ammonia TN  For estate, the water management plan focusing in the water reduction plan and contingency plan during water shortage.	Complied
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 -	TDM has guideline to protect the water course including maintaining and restoring appropriate riparian zone. However, at both estates visited, riparian zones at Sg Mas, Tebak Estate (Block 95B2, 92A1) and Sg Tebak, Pelantoh Estate (Block 93B), it was found that traces of herbicides spraying on palm circles near to the rivers were observed. There was also no clear demarcation to indicate the boundary of the buffer zones. Thus a non-conformity was assigned due to this lapse.	Major nonconformance
4.4.3 Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	Mill effluent is treated through biological system with several ponds in series. Quality of discharged effluent to water ways was analysed every month. Among the parameters analysed were T, pH, BOD, COD, TS, SS, O&G, AN and TN. Verification of the last 12 months results showed that the highest BOD=69 ppm and lowest BOD=28 ppm. The results complied with the regulated requirement i.e. 100 ppm.	Complied
4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	The mill has been monitoring its consumption of water on daily basis. The water was sourced from nearby water ways. Based on the daily records, the consumption in 2017 was 2.27 m <sup>3</sup> /mt FFB, whereas for 2018, 2.34 m <sup>3</sup> /mt FFB as at June 2018.	Complied
<b>Criterion 4.5:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.		

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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 Manual includes the planting of beneficial plants and control of damage by rodents, leaf-eaters, oryctes and natural enemies. Beneficial plants such as Turnerasubulata, Antigonon Leptopus and Cassia Cobanensis are grown in the estates although there is no outbreak of pest. Records of planting of new areas and maintenance of existing areas of beneficial plants, location maps and barn owl census are available.</p> <p>The occupancy rate for Barn owl box on June 2018.</p> <table border="1"> <thead> <tr> <th></th> <th>Occupancy rate</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>Barn owl</td> <td>62.50%</td> <td>Tebak Estate</td> </tr> <tr> <td></td> <td>32%</td> <td>Pelantoh Estate</td> </tr> </tbody> </table>		Occupancy rate	Estate	Barn owl	62.50%	Tebak Estate		32%	Pelantoh Estate	Complied											
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Barn owl	62.50%	Tebak Estate																					
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4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>IPM training was conducted accordingly by the management.</p> <p>#cross refer with indicator 4.8.2</p>	Complied																				
<b>Criterion 4.6:</b>																							
Pesticides are used in ways that do not endanger health or the environment																							
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	Justification of pesticides applied is available in the TDM agriculture policy. Refer to agriculture policy no 05.02-05.03:weed control for immature & mature oil palm. For pest and disease control, refer to 09.01 – 09.08. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species.	Complied																				
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	<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.</p> <table border="1"> <thead> <tr> <th>Chemical Name</th> <th>Active Ingredient (a.i)</th> </tr> </thead> <tbody> <tr> <td>Ally 20DF</td> <td>Metsulfuron methyl 20%</td> </tr> <tr> <td>Kennly 20 DF</td> <td>Metsulfuron methyl 20%</td> </tr> <tr> <td>Foxil</td> <td>Triclopyrbutotyl 13.50%</td> </tr> <tr> <td>Glyphosate</td> <td>Glyphosate isopropylamine 41%</td> </tr> <tr> <td>Storm</td> <td>Flocoumafen 0.005%</td> </tr> <tr> <td>Arakus</td> <td>Brodifacum 0.005%</td> </tr> </tbody> </table> <p>The record of pesticides used was sighted.</p> <table border="1"> <thead> <tr> <th></th> <th>June 18</th> </tr> </thead> <tbody> <tr> <td>Tebak Estate</td> <td>0.05 % a.i/ha</td> </tr> <tr> <td>Pelantoh Estate</td> <td>0.03 % a.i/ha</td> </tr> </tbody> </table>	Chemical Name	Active Ingredient (a.i)	Ally 20DF	Metsulfuron methyl 20%	Kennly 20 DF	Metsulfuron methyl 20%	Foxil	Triclopyrbutotyl 13.50%	Glyphosate	Glyphosate isopropylamine 41%	Storm	Flocoumafen 0.005%	Arakus	Brodifacum 0.005%		June 18	Tebak Estate	0.05 % a.i/ha	Pelantoh Estate	0.03 % a.i/ha	Complied
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4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	<p>Use of pesticide is minimized and part of the IPM programme. To reduce chemical use the following is implemented in Tebak Estate and Pelantoh Estate:</p> <p>a) Planting of beneficial plant b) Barn Owls</p>	Complied																				

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Criterion / Indicator	Assessment Findings	Compliance	
4.6.4	<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>Based on chemical register dated 5/3/17 and on site visit at chemical store, noted the use of class IB chemical- paraquat as to control cover crop in the immature field and methamidophos as to control bagworm.</p> <p>Chemical register dated 4 March 2018 was sighted. Refer to Permit to buy class IB. Refer to the permit as follow:</p> <ol style="list-style-type: none"> <li>1. TRG/2018/PARA/020(GL) valid until 6/3/2018 for total of 200 litres.</li> <li>2. TRG/2018/METHA/044(GL) valid until 29/4/2018 for total of 300 litres.</li> </ol>	Complied
4.6.5	<p>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).</p> <p>- Major compliance -</p>	<p>Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment's 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 the sprayer at field PM92A (Tebak Estate) and field PM93E (Pelantoh Estate).</p> <p>#cross refer with indicator 4.8.2</p>	Complied
4.6.6	<p>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).</p> <p>- Major compliance -</p>	<p>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 found that no stock of pesticides in the store. The chemical stores was securely locked and comply with regulation.</p>	Complied
4.6.7	<p>Application of pesticides shall be by proven methods that minimise risk and impacts.</p> <p>- Minor compliance -</p>	<p>Pesticides had been applied using the Best Management Practices that minimize risk and impacts. The pesticide operators found to understand the use of the right nozzle, spray drift, spray quality and run-off.</p>	Complied
4.6.8	<p>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.</p> <p>- Major compliance -</p>	<p>No aerial spraying at Kemaman Certification unit.</p>	Complied
4.6.9	<p>Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8).</p> <p>- Minor compliance -</p>	<p>No associated smallholders. Employees handling pesticide given knowledge and skill required by the Assistant Manager to cover safe handling practices and standard operating procedures.</p> <p>#cross refer with indicator 4.8.2</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																											
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 -	The disposal of all wastes material (domestic, recyclable and toxic) was done in accordance to their established SOP (B8: Domestic Waste and B9: Schedule Waste, ver. May 2017). Based on interviews with the workers, their understandings on proper disposal of wastes were satisfactory.	Complied																											
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	Annual medical surveillance for sprayers and pesticide operators were demonstrated.  Medical examination programme established for sprayer team which conducted by Poliklinik Ibnu Sina (HQ/08/DOC/00/601)-Tebak Estate and Klinik Bestari (HQ/08/DOC/00/352)-Pelantoh Estate.	Complied																											
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4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	There was no female pesticide operator at Tebak Estate. At Pelantoh Estate, based on interview with female sprayers confirmed knowledge of the policy of transfer to alternative duties if they wished to continue working when pregnancy was confirmed or breast-feeding. All the female sprayers interviewed were not pregnant.	Complied																											
<b>Criterion 4.7:</b> An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:																														

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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>Safety and Health Policy was established where the policy was signed by CEO of TDM Plantations Sdn Bhd on 1/6/2017. OHS plan for 2018 was established to cover all activities involved in the estate and mill.</p> <p><u>CHRA</u> CHRA was conducted at Kemaman POM on 17/5/2015 by a competent assessor (JKKP HIE 127/171-2(259)). The plan was established through the recommendation by the assessor.</p> <p>CHRA was conducted at Tebak Estate on 8-23/6/2016 by Occumed Consultancy &amp; Services SdnBhd (JKKP IH 127/171-2(08)).</p> <p>CHRA was conducted at Pelantoh Estate on 7-23/6/2016 by Occumed Consultancy &amp; Services SdnBhd (JKKP IH 127/171-2(08)).</p> <p><u>Medical Surveillance</u> Medical surveillance was conducted by Klinik Nabilah (HQ/08/DOC/00/547) on 28/2/2018. Based on the report, all workers were found fit to work (eg: ID No-KM1400200, KM00057, KM05325, KM00075)</p> <p><u>Chemical Exposure Monitoring</u> The monitoring was done on 9/11/16 &amp; 20/12/16 by AnjungSeni Advert. From the report, the exposure to n-hexane was below the permissible exposure limit as stipulated under USECHH Regulations 2000.</p> <p><u>Local Exhaust Ventilation Inspection</u> LEV inspection was done on 12/4/2018 by ZABSI. From the report, the LEV systems are working in good operating condition. The management has established the plan through the recommendation by the assessor.</p> <p><u>Exhaust Fan Monthly Inspection</u> Visual inspection by lab operator was done on monthly basis. The latest was done on 1/7/2018.</p> <p><u>Audiometric Test Report</u> The audiometric test was last done on 23/2/2018 for 94 operators at Kemaman POM by SI Energy Sdn Bhd. From the report, 2 out of 94 were identified with standard threshold shift (ID: KM00103 and KM00022). The retest was done accordingly and found no threshold shift. The retest was done by Klinik Ramli &amp; Adibah (HQ/08/DOC/00/292).</p>	<p>Complied</p>



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4.7.2	<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>Pelantoh Estate            All HIRARC review on 7/1/2018. The HIRARC related to the harvesting, weeding, pruning &amp; sanitation, road &amp; bridges, transporting workers, workshop were reviewed.</p> <p>Tebak Estate            All HIRARC review on 7/1/2018. The HIRARC related to the harvesting, weeding, pruning &amp; sanitation, road &amp; bridges, transporting workers, workshop, rat baiting, trunk injection were reviewed.</p>	Complied
4.7.3	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Minor compliance -</p> <p>Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE.</p> <p>Suitable PPE has been provided to the workers based on the information in the MSDS and CHRA assessor's recommendation.</p> <p>During the site visit, the PPE were adequately implemented. Eg: Sterilizer Station, Press Station, Oil Room, harvesting and spraying.</p> <p>The chemical store was found to be adequately organized, properly labelled, secured and person in charge understands the OSH procedures. CSDS was placed at the chemical stores and is available. The person in charge understands the information written in CSDS.</p>	Complied
4.7.4	<p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p> <p>The person in-charge for safety and health was established at mill and estate. Sighted the OHS organization chart for 2018.</p> <p><b><u>Kemaman POM</u></b>            OSH meeting was conducted on quarterly. OSH meeting minutes dated 8/5/2018 and 6/3/2018 were sighted.</p> <p><b><u>Tebak Estate</u></b>            OSH meeting was conducted on quarterly. OSH meeting minutes dated 17/7/18 and 2/4/2018 were sighted.</p> <p><b><u>Pelantoh Estate</u></b>            OSH meeting was conducted on quarterly. OSH meeting minutes dated 16/4/2018 and 20/6/2018 were sighted.</p>	Complied

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<p>4.7.5</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors. Emergency response Team organization chart for 2018 available. ERT Training schedule 2018 sighted.</p> <p>Records on all accidents had been verified to be maintained satisfactorily. Quarterly review on accident cases had been carried out during quarterly meeting of Safety &amp; Health (OSH).</p> <p><u>KPOM:</u>            Fire drill was last conducted with BOMBA on 5/7/2017 to all workers, staff and executive. First aid boxes were available at worksite. First aid training was last conducted on 13/3/2018 by hospital assistant, Air Putih Estate Clinic.</p> <p><u>Tebak Estate:</u>            Fire drill was last conducted with BOMBA on 10/7/2018 to all workers, staff and executive. First aid boxes were available at worksite (office, harvesting area, spraying area). First aid training was last conducted on 14/8/2017 by medical assistant.</p> <p><u>Pelantoh Estate:</u>            Fire drill was last conducted with BOMBA on 5/7/2017 to all workers, staff and executive. First aid boxes were available at worksite (office, harvesting area, spraying area). First aid training was last conducted on 17/2/2018 by medical assistant.</p>	<p>Complied</p>																								
<p>4.7.6</p> <p>All workers shall be provided with medical care, and covered by accident insurance.</p> <p>- Minor compliance -</p>	<p>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.</p> <table border="1" data-bbox="662 1379 1303 1955"> <thead> <tr> <th>Type</th> <th>Estate/Mill</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>SOCSO</td> <td>Kemaman POM</td> <td>May 18 and June 18 (ID No:KM00036, KM00027, KM0900163)</td> </tr> <tr> <td>SOCSO</td> <td>Tebak Estate</td> <td>May 18 and June 18 (ID No:TB0800315, TB1100619, TB1701057)</td> </tr> <tr> <td>FWCS</td> <td>Tebak Estate</td> <td>Policy No: MW253789 valid until 15/7/19 (ID No:TB1000449)</td> </tr> <tr> <td>FWCS</td> <td>Tebak Estate</td> <td>Policy No: MW238824 valid until 29/5/19 (ID No: TB0900381)</td> </tr> <tr> <td>SOCSO</td> <td>Pelantoh Estate</td> <td>May 18 and June 18 (ID No:PT00232, PT1601062)</td> </tr> <tr> <td>FWCS</td> <td>Pelantoh Estate</td> <td>Policy No: MW225891 valid until 7/5/2019 (ID No:PT1400885)</td> </tr> <tr> <td>FWCS</td> <td>Pelantoh Estate</td> <td>Policy No: MW185126 valid until 8/9/2018 (ID No: PT1400913)</td> </tr> </tbody> </table>	Type	Estate/Mill	Remark	SOCSO	Kemaman POM	May 18 and June 18 (ID No:KM00036, KM00027, KM0900163)	SOCSO	Tebak Estate	May 18 and June 18 (ID No:TB0800315, TB1100619, TB1701057)	FWCS	Tebak Estate	Policy No: MW253789 valid until 15/7/19 (ID No:TB1000449)	FWCS	Tebak Estate	Policy No: MW238824 valid until 29/5/19 (ID No: TB0900381)	SOCSO	Pelantoh Estate	May 18 and June 18 (ID No:PT00232, PT1601062)	FWCS	Pelantoh Estate	Policy No: MW225891 valid until 7/5/2019 (ID No:PT1400885)	FWCS	Pelantoh Estate	Policy No: MW185126 valid until 8/9/2018 (ID No: PT1400913)	<p>Complied</p>
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4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained and based on JKKP 6, 7 & 8. Sample of accident statistic as shown below :  <table border="1"> <thead> <tr> <th>Year</th> <th>Kemaman POM</th> <th>Tebak Estate</th> <th>Pelantoh Estate</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>4</td> <td>71</td> <td>23</td> </tr> </tbody> </table> *LTA is equivalent to lost man days	Year	Kemaman POM	Tebak Estate	Pelantoh Estate	2017	4	71	23	Complied
Year	Kemaman POM	Tebak Estate	Pelantoh Estate							
2017	4	71	23							

**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 -	Kemaman POM and supply base has established an annual training program that covers all aspects of the RSPO Principles and Criteria. The training need and program was made available for verification at all visited sites.	Complied
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4.8.2 Records of training for each employee shall be maintained. - Minor compliance -	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.  <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>12/3/18</td> <td>S/Waste management</td> <td rowspan="5">Kemaman POM</td> </tr> <tr> <td>18/7/18</td> <td>Maintenance of boiler</td> </tr> <tr> <td>5/6/18</td> <td>Station Nut Plant</td> </tr> <tr> <td>3/7/18</td> <td>FFB Grading</td> </tr> <tr> <td>22/4/18</td> <td>Electrical</td> </tr> <tr> <td>4/7/18</td> <td>Harvesting</td> <td rowspan="5">Tebak Estate</td> </tr> <tr> <td>30/5/18</td> <td>Loading of FFB</td> </tr> <tr> <td>28/5/18</td> <td>Manuring</td> </tr> <tr> <td>26/5/18</td> <td>P&amp;D (<i>Kumbangbadak</i>)</td> </tr> <tr> <td>7/4/18</td> <td>Pruning</td> </tr> <tr> <td>7/3/18</td> <td>P&amp;D (Trunk injection)</td> <td rowspan="5">Pelantoh Estate</td> </tr> <tr> <td>28/1/18</td> <td>Spraying</td> </tr> <tr> <td>19/7/18</td> <td>FFB Grading</td> </tr> <tr> <td>10/5/18</td> <td>Harvesting</td> </tr> <tr> <td>17/4/18</td> <td>IPM</td> </tr> <tr> <td>3/4/18</td> <td>Manuring</td> <td rowspan="3">Pelantoh Estate</td> </tr> <tr> <td>18/3/18</td> <td>Triple rinsing</td> </tr> <tr> <td>18/3/18</td> <td>Spraying</td> </tr> </tbody> </table>	Date	Training	Remark	12/3/18	S/Waste management	Kemaman POM	18/7/18	Maintenance of boiler	5/6/18	Station Nut Plant	3/7/18	FFB Grading	22/4/18	Electrical	4/7/18	Harvesting	Tebak Estate	30/5/18	Loading of FFB	28/5/18	Manuring	26/5/18	P&D ( <i>Kumbangbadak</i> )	7/4/18	Pruning	7/3/18	P&D (Trunk injection)	Pelantoh Estate	28/1/18	Spraying	19/7/18	FFB Grading	10/5/18	Harvesting	17/4/18	IPM	3/4/18	Manuring	Pelantoh Estate	18/3/18	Triple rinsing	18/3/18	Spraying	Complied
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**Principle 5: Environmental responsibility and conservation of natural resources and biodiversity**

<b>Criterion 5.1:</b> Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.
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<p>5.1.1</p> <p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p><u>Kemaman Palm Oil Mill</u> The mill had established Environmental Impact Assessment (EIA) procedure and has been documented as per KPOM Environmental Aspect and Impact Identification (TDM/KPOM/01 rev. KPOM-01-2011). All significant impacts have been determined and mitigation plan was developed thereafter as per document KPOM Environmental Improvement Plan/Pollution Prevention Plan reviewed in January 2018.</p> <p><u>Pelantoh Estate</u> The Estate has established Environmental Impact Assessment (EIA) procedure and has been documented as per LadangPelantoh Environmental Aspect/Impacts Evaluation procedure version 1 dated 12 Jan 2018. All aspect and impacts have been evaluated and recorded in Environmental Aspect and Impact Evaluation Form as observed in sampled documents: Environmental Aspect and Impact Evaluation Form - Serial No: EAI/2018-LPT/PD/03 - Area/Field: Pest And Disease Control Environmental Impact Evaluation Form - Serial No: EIE/2018/-LPT/PD/PCS01 - Ref No: EAI/2018-LPT/PD/03 - Activity: Pesticide and Chemical Spraying - Score: 220</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance																
<p>5.1.2</p> <p>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.</p> <p>- Minor compliance -</p>	<p><u>Kemaman Palm Oil Mill</u> The mill has established Environmental management plan as per document KPOM Environmental Improvement Plan/Pollution Prevention Plan reviewed in January 2018. The management plan was established and updated from time to time, e.g. of excerpt:</p> <table border="1" data-bbox="660 591 1305 981"> <thead> <tr> <th>No</th> <th>Environmental Issue</th> <th>Mitigating Measures</th> <th>Action By</th> </tr> </thead> <tbody> <tr> <td>17</td> <td>New Compliance Schedule `-Particulate and smoke emission from boiler</td> <td>To install particulate scrubber for the boiler and hire competent person in compliance with the new law</td> <td>Mill manager</td> </tr> <tr> <td colspan="2">Time Frame</td> <td colspan="2">Status</td> </tr> <tr> <td colspan="2">2019</td> <td colspan="2">2017 – to appoint consultant to study the most effective system</td> </tr> </tbody> </table> <p>The mill was still in the process of finalizing which consultant to be appointed.</p> <p><u>Pelantoh Estate</u> The estate has established Environmental management plan as per document Environmental Management Plan and Pollution Prevention Plan reviewed on 1 April 2018. The management plan has identified the mitigation plan for negative impacts, time plan and the responsible personnel as per document, e.g.:</p> <p>Pollution Prevention Plan          ` Issue: Water – Buffer Zone          ` Mitigation measure: No chemical spraying application near river buffer zone or water source          Action by: Borhanudin b. Idris          Time frame: January 2018          Status: Done</p>	No	Environmental Issue	Mitigating Measures	Action By	17	New Compliance Schedule `-Particulate and smoke emission from boiler	To install particulate scrubber for the boiler and hire competent person in compliance with the new law	Mill manager	Time Frame		Status		2019		2017 – to appoint consultant to study the most effective system		<p>Complied</p>
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<p>5.1.3</p> <p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p><u>Kemaman Palm Oil Mill</u> The environmental management plan has been reviewed annually as stated in KPOM Environmental Aspect and Impact Identification (TDM/KPOM/01 rev. KPOM-01-2011). The latest document review for KPOM Environmental Improvement Plan/Pollution Prevention Plan in January 2018, 6 months since last reviewed in June 2017.</p> <p><u>Pelantoh Estate</u> The environmental management plan has been reviewed annually as per document Environmental Management Plan and Pollution Prevention Plan. The latest document review for Environmental Management Plan and Pollution Prevention Plan in 1 April 2018, 11 months since last reviewed on 10 May 2017.</p>	<p>Complied</p>																

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<p><b>Criterion 5.2:</b> The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>			
<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). - Major compliance -</p>	<p>Information was collated in a Bio-Diversity Assessment by SRA Consultancy in 2011 (report dated Nov 2011) which had covered all estates under Kemaman POM certification unit, including the POM. HCV Toolkit for Malaysia by WWF – Malaysia was used. There were appropriate consultation processes as per the HCV Toolkit-Malaysia which covers the three main components of identification, management and monitoring.  RTE by IUCN was recorded in the report i.e. elephant (<i>Elephas maximus</i>), Malayan tiger (<i>Panthera tigris corbetti</i>), Malayan tapir (<i>Tapirus indicus</i>) and boar.</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. - Major compliance -</p>	<p>HCV Management and Monitoring plan for 2018 has been established and divided into 2 sections i.e. Section A: Recommendation by HCV Consultant and Section B: Estate Initiatives to Maintain or Enhance HCV Areas. Among the action plans implemented were continuous education to employees and surrounding communities about bio-diversity through explanation of company’s policy, meetings, erection of signage about HCV area, restriction of any development activity at the area which has been identified as HCV and monitoring of water quality coming out from the estates through water analysis.</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. - Minor compliance -</p>	<p>Continuous education to the workforce was done through muster call briefing, which last conducted on 14/9/2017. Among the topics covered were buffer zone, HCV area and RTE species. Apart from that, signage of no hunting and pictures of RTE species were also displayed at various strategic places such as points of entry of the estates.</p>	<p>Complied</p>
<p>5.2.4</p>	<p>Where a management plan has been created there shall be ongoing monitoring: • 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 -</p>	<p>Ongoing monitoring of HCV and RTE status recorded in “Rekod Lawatan HCV Area”. The report was maintained by the field staff and acknowledged by the management.</p>	<p>Complied</p>

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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-asides with existing rights of local communities have been identified at both visited estates.	Complied
<b>Criterion 5.3:</b> Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Generally, the identification of waste products was done through EAI evaluation as mentioned in Indicator 5.1.1. Scheduled wastes were registered through DOE's eswis which include the notification of type of scheduled wastes generated, inventory and disposal. Other waste products were domestic wastes from line-sites and office and recyclable wastes such as plastic and metal.	Complied
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	<u>Tebak Estate</u> Disposed through authorised vendors – seen 6 <sup>th</sup> schedule for SW 410, 409, 305 – taken by Pentas Flora, Kelantan on 17/7/2018 – transaction registered in eswis.  Pelantoh Estate Disposed through authorised vendors – seen 6 <sup>th</sup> schedule for SW 410, 409, 305 – taken by Pentas Flora, Kelantan on 17/7/2018 – transaction registered in eswis (re.: same date as Tebak).  However, the following lapses were found: <ul style="list-style-type: none"> <li>• Rat bait (Storm) container was used by a worker for keeping rice. This was found at Pelantoh line-site, house no. 143.</li> <li>• Glyphosate containers used to keep petrol and rubbish by a couple of workers at line-site.</li> <li>• Cross checking between bin-card and scheduled wastes record book showed that there were issuance of 4 containers of rat bait on 22/3/2018 and 3 containers on 27/3/2018 and no record to show that the 7 containers have been return to SW store. However, there was no action taken to trace the missing containers.</li> </ul> Thus a non-conformity report was assigned.	Major nonconformance
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	Waste management and disposal plan has been documented and implemented. Basically the type of wastes generated were scheduled wastes, recyclable and non-recyclable wastes. For the scheduled wastes, the method of disposal is by delivering the wastes to authorised collector according to EQA regulations. The non-recyclable wastes are disposed through landfill and recyclable wastes are disposed through recycle wastes collectors.	Complied
<b>Criterion 5.4:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised.			

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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 -	Recording of fossil fuel consumption was continuously practiced to monitor the efficiency of usage. Diesel usage at KPOM in 2017 was 1.15 lt/mt FFB whereas in 2018 as at June was 1.40 lt/mt FFB. The plan to improve the efficiency of consumption mainly focussing of regular maintenance of vehicles and machinery and continuous education to the operators.	Complied
<b>Criterion 5.5:</b> Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
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 -	There was no use of fire for land preparation for replanting.	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 -	Not applicable as no fire was used in preparing land for replanting.	Not applicable
<b>Criterion 5.6:</b> Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Monitoring of air pollutants was continued being implemented by Kemaman certification unit. E.g.: Stack samplings in 2017 and 2018 details for both chimneys #1 and #2 are as follows: #1 on 6/11/2017 [report ref.: L-GB-TC1711CTP-0096] – result: 0.2336 at 12% CO <sub>2</sub> and on 31/5/2018 [report ref.: L-GB-TC1805CTP-0507] – result: 0.0050 at 12% CO <sub>2</sub> #2 on 31/5/2017 [report ref.: L-GB-TC1705CTP-0541] – result: 0.2336 at 12% CO <sub>2</sub>	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH) emission through POME treatment as well as boiler stack from the mill. Other less significant GHG emissions identified including COX, SOX and NOX from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.  Biogas project has been budgeted and planned to commission in April 2019.	Complied



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5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Calculation of GHG emission was done using the RSPO GHG calculator. The CU has reported its GHG emission to RSPO on 24/07/2018 for 2017 performance. Verification of the data keyed-in into the RSPO calculator such as diesel consumption against relevant documents such as Daily Diesel Consumption, monthly fertiliser monitoring report, store requisition sheet and the company's plantware system (which generates the Stock Issue Slip) showed that the keyed-in data in RSPO calculator was authentic. 715, 117 bags).	Complied
<b>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</b>			
<b>Criterion 6.1:</b> Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	SIA was conducted on 23/10-1/11/2011 by SRA Consultancy. The assessment was covered the whole Kemaman Complex which included Kemaman POM, Pelantoh Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, MAIDAM Estate and Tebak Estate. The assessment team has interviewed with the relevant stakeholders such as contractors, local communities, internal workers included local and foreign and etc.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	The attendance list of stakeholders interviewed during SIA was sighted. The assessment team has interviewed about 300 of relevant stakeholders. Interviewed with the stakeholder during recertification assessment confirmed that they had attended the assessment meeting before.	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	The mill and estates have developed SIA Action Plan for Year 2017/2018 which covered the social profile such as safety & health, education, housing & infrastructure and etc. The plan was developed through the issues raised during SIA and stakeholder meetings. The plan has incorporated the specific time frame with the person in charge to solve the issue. The SIA plan was updated by each SOU accordingly. The updated SIA plan for each issues raised in the stakeholder meeting was verified.	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The plan was reviewed on yearly basis and the last review was conducted on 1/2/2018 for mill, 8/1/2018 for Tebak Estate and 18/4/2018 for Pelantoh Estate.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	There was no scheme smallholders involved in the certification unit.	Not applicable

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<b>Criterion 6.2:</b> There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	TDM Plantation Sdn Bhd has established Flowchart for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	Mill manager was appointed as officer to handle social issue by Human Resource Department. Letter of appointment dated 18/9/2017 was sighted. In Tebak Estate, Estate Manager is in charge for social issue and the letter of appointment sighted effective from 18.09.17 while in Pelantoh Estate, the social officer is Estate Manager as per letter dated 18.09.2017.	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 -	Records of communication with stakeholders were sighted. Most of them are related to request for assistance such as donation for sports day, Raya celebration, transportation, and netball pole. The management has responded and provided with assistance.  The mill and estates have developed the stakeholder list which included all relevant stakeholders such as local communities, government authorities, contractors and suppliers and etc.  Stakeholder meeting was conducted on 23/6/2018 for whole Kemaman Complex with stakeholders such as local communities, managers from other estates, workers' representatives, school representatives and etc. Issues raised during the stakeholders was explained in the meeting and unresolved issue has incorporated into the Social Action Plan to monitor.	Complied
<b>Criterion 6.3:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	TDM Plantation Sdn Bhd has established a flowchart on handling social issue. Two way communication was the method been utilized by the management. The management has to discuss the issue raised by stakeholders within 2 weeks for the first meeting.	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 Pemeriksaan Bangunan Awam dan Perumahan KPOM Tahun 2018 to record any complaints related to housing by the workers. For eg: roof was leaking, water pipe broken and etc. The management has taken action to rectify the problem. Interviewed with the workers' representatives confirmed that the management has repaired the issues raised by them. KPOM, Tebak Estate and Pelantoh Estate have implemented Complaint Form for external and internal to report if there is any issues. Also, there is Permohonan Membaiki Kerosakan Rumah form to records all the housing complaints.	Complied

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<b>Criterion 6.4:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	TDM Plantation Sdn Bhd has established Procedures for Handling Boundaries Disputes and Procedures for Handling Squatters Disputes. 'Prosedur Penyelesaian Pertikaian Tanah dan Carta, Dated 09.01.18 was established by the Head Office. The objectives of the procedure is to provide guideline to SOU on how to compensate any land disputes and ensure proper practices of compensation. The compensation can be settled by mutual agreement or refer to District Land Department to value the land on dispute. If the consultation process failed, higher authority and resurvey shall be conducted. 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 is as per in 6.4.1 above.	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 through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land between the local communities.	Complied
<b>Criterion 6.5:</b> Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			

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<p>6.5.1  Documentation of pay and conditions shall be available.  - Major compliance -</p>	<p>Mill and estate have employed local and foreign workers. All the mill and estates workers are under direct and contract employment. The payslip has included basic wage, allowances, normal working days, medical leave, holiday pay, deduction of salary such as NUPW, electricity, EPF and etc. Payslip for January 2018, Mar 2018 and June 2018 summary was sampled as below:</p> <ul style="list-style-type: none"> <li>a. Employee No.: KM0900160 (KPOM)</li> <li>b. Employee No.: KM0900130 (KPOM)</li> <li>c. Employee No.: KM00034 (KPOM)</li> <li>d. Employee No.: TB1701035 (TE)</li> <li>e. Employee No.: TB1300806 (TE)</li> <li>f. Employee No.: TB1701061 (TE)</li> <li>g. Passport No.: PT1100622 (PE's Contract Worker)</li> <li>h. Employee No.: PT1701152 (PE)</li> <li>i. Employee No.: PT1701187 (PE)</li> <li>j. Employee No.: PT1701152 (PE)</li> </ul> <p>All the sampled workers have achieved the Minimum Wage Order 2016 of RM 1000/ month or RM 38.46/day. The NUPW subscription fees was RM 8 by the workers and RM 3 subsidized by the management. The mill management has applied permit for deduction of water and electricity from the salary. The permit with Series No.: PMT.2010/020 which valid from 15/6/2010 is sighted.</p> <p>The mill workers have signed on the acknowledgement letter in order to work overtime more than 104 hours as requested by Labour Department Kemaman. Seen the NUPW/Great Eastern Life Assurance – MAPA Circular No 32/2011 mentioned that TDM Plantation agreed to contribute RM10/worker for NUPM.</p> <p>However in Tebak &amp; Pelantoh Estate, there is no approval from Labour Department on the salary deduction for electric and water bill, insurance, union, etc. Thus, major non-compliance was raised.</p>	<p>Major nonconformance</p>

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<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>The mill and estates have employed local and foreign workers under direct and contract employment. Employment contract and offer letters 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, period of notice and etc. All the terms and conditions stated in the contract and offer letters were standardized among local and foreign workers. Sampled of the workers' employment contracts and offer letters as below:</p> <p>a. Employee No.: KM0900160 (KPOM)  b. Employee No.: KM0900130 (KPOM)  c. Employee No.: KM00034 (KPOM)  d. Employee No.: TB1701035 (TE)  e. Employee No.: TB1300806 (TE)  f. Employee No.: TB1701061 (TE)  g. Passport No.: PT1100622 (PE's Contract Worker)  h. Employee No.: PT1701152 (PE)  i. Employee No.: PT1701187 (PE)  j. Employee No.: PT1701152 (PE)</p> <p>The mill workers have signed on the acknowledgement letter in order to work overtime more than 104 hours as requested by Labour Department Kemaman.</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>Linesite inspection was carried out on weekly basis by HA (Hashidah) and Assistant Manager in the mill and estates. Weekly Linesite Inspection form was utilized during linesite inspection. Medical facilities were provided for the workers and the dependents without any charges. Transportation to send children to neighbouring school was provided as well. Subsidy of RM 6 for water and RM 5 for electricity was given by the management.</p>	<p>Complied</p>
<p>6.5.4</p> <p>Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p>Accesses to food for the workers are considered adequately and sufficiently. There are sundry shops and restaurants within the vicinity and access to the nearby township is available.</p>	<p>Complied</p>
<p><b>Criterion 6.6:</b>  The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>		
<p>6.6.1</p> <p>A published statement in local languages recognising freedom of association shall be available.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has implemented Freedom of Association Policy dated 1/6/2017. The workers were able to join or form any association according to the Employment Act without any restriction. Besides, they also implemented Social Policy dated 1/6/2017 where they workers are allowed to join and form association freely. Interviewed with the workers confirmed that they are allowed to join NUPW without any restriction.</p>	<p>Complied</p>

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6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	In KPOM, the minutes of meeting for trade union 01/2018 available on 15.05.2018. In Tebak Estate, the meeting been conducted on 13.08.17 and in Pelantoh Estate the meeting was conducted on 06.05.2018. Among issued captured are safety shoes distribution, bat feces on house ceiling, fasting month evening shift and others.	Complied
<b>Criterion 6.7:</b> Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	TDM Plantation Sdn Bhd has developed Protection of Children Policy dated 1/6/2017. They are committed not to exploit or recruit any individual less than 16 years old in the plantations. Through document reviewed on the Employee Listing confirmed that the workers recruited are above 18 years old.	Complied
<b>Criterion 6.8:</b> Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	TDM Plantation Sdn Bhd has developed Social Policy dated 1/6/2017 where they are committed to treat all the workers equally during the recruitment and promotion process without discrimination based on nationality, race, ethnic, religion, sexual orientation, age and etc.	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 -	Through document reviewed on the list of employees found that the workers consisted of local and foreign workers, male and female workers. The management treated all the workers fairly and equally without any discrimination. No discrimination was sighted based on interview with the workers. Through interviewed with the head of local village (Kg Lubuk Lesung and Kg Sungai Mas) confirmed that the management has recruited local workers as employees.	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 -	TDM Plantation Sdn Bhd has developed a Procedure on Foreign Workers Recruitment, revision May 2017. The procedure has detailed the process of recruitment was conducted by Human Resource Department of TDM Berhad. Only workers with valid legal documentation will be recruited.	Complied
<b>Criterion 6.9:</b> There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	TDM Plantation Sdn Bhd has developed Gender Policy dated 1/6/2017 where they are responsible to ensure the workplaces are free from any harassment related to sexual, religion, nationality and etc. The policy has been displayed at the notice board in front of office. The policy training also been conducted on weekly basis which is every Tuesday. Seen the training record on 24/7/2018, 12/6/2018 & 26/5/2018.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	TDM Plantation Sdn Bhd has implemented Reproductive Policy dated 1/6/2017. The management will not control on the reproductive rights of women and they are allowed to seek for advice from any parties for the planning of give birth. The policy has been displayed at the notice board in front of estate and mill office visited.	Complied

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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 -	TDM Plantation Sdn Bhd has established flowchart for handling Sexual Harassment complaint in workplace. The management is required to investigate within 2 days from the date of receiving the complaints. Gender Committee was established to monitor any issues related to women in workplace. Meeting was conducted to discuss issues and the last meeting was conducted on 10/4/2018 and 13/3/2018 in Mill, 10/6/2018 and 25/2/2018 in Tebak Estate and 19/06/2018 and 19/03/2018 in Pelantoh Estate. No case of sexual harassment or violence was reported. Interviewed with the female workers confirmed that no case was reported. The committee has conducted activities such as bowling padang, blood pressure reading, etc.	Complied
<b>Criterion 6.10:</b> 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 -	Kemaman palm oil mill 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 -	Kemaman palm oil mill process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	Complied
6.10.3 Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Contractors' agreement were sampled as below: a. Contractor: Kluang Practical Engineering Sdn Bhd b. Berjaya Part Supply & Enterprise  Terms and conditions were clearly stated in the agreement.	Complied
6.10.4 Agreed payments shall be made in a timely manner. - Minor compliance -	The payment terms were clearly stated in the agreement and TDM Plantation Sdn Bhd made payment as per the agreement. Seen the <b>Surat Penyelesaian Kerja-Kerja Pemborong</b> and tax invoice No I-1802010, date 20.02.2018 for Kluang Pratical Engineering Sdn Bhd and <b>Surat Penyelesaian Kerja-Kerja Pemborong</b> and tax invoice No 0233, date 21.01.2018 for Berjaya Part Supply & Enterprise. Interviewed with contractors confirmed that the payment was made promptly.	Complied
<b>Criterion 6.11:</b> Growers and millers contribute to local sustainable development where appropriate.		
6.11.1 Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance -	The mill and estates have made contribution to the stakeholders such as donation of sports day SKPK 2018, Raya celebration 2018, request to borrow netball pole and transportation. Besides, the estates have subsidized RM 6 for water bill and RM 5 for electricity bill for the workers. In Tebak Estate, there is request to join the visits at Cameron Highland, transportation to attend PIBG, Sports Day at SK Padang Kubu, etc. In Pelantoh Estate, seen the records of PIBG meeting invitation from SK Padang Kubu on 31.1.18, donation por lucky draw from SMK Ayer Puteh on 24.01.18, etc.	Complied

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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 –	No scheme smallholder involved in the Kemaman Certification Unit.	Not applicable
<b>Criterion 6.12:</b> No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	TDM Plantation Sdn Bhd has developed Social Policy dated 1/6/2017 where they are committed to confront to forced labour and child labour.  TDM Plantation Sdn Bhd has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers. Contract of employment was signed by the workers prior to work.  Consent letter of passport retention acknowledged by the workers also sighted as per workers sampled in 6.5.1.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	Interviewed with the foreign workers confirmed that no contract substitution has occurred. The terms and condition of contract they have signed prior to Malaysia and signed in the plantations were same as no contradiction of contract happened.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	TDM Plantation Sdn Bhd has developed Code of Ethical Conduct Policy dated 1/8/2017. The policy has stated the following criteria as below: a. Recruit the suitable workers. No child labour or forced labour being practice. b. Provide decent living conditions and working condition. c. Provide induction training prior work. d. Equal opportunity to all the workers. e. Freedom to form or join any association. f. No contract substitution for the workers g. And etc.	Complied
<b>Criterion 6.13:</b> Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	TDM Plantation Sdn Bhd has implemented Human Rights Policy dated 1/6/2017. The management is committed to support the principle of Universal Declaration of Human Rights and ILO Core Convention on Labour Standards. They evaluated and managed the human rights activities parallel to the policy such as workers, contractors and suppliers, local communities and etc. The policy was displayed at the notice board in front of office and canteen area. Also, the policy training been conducted on weekly basis which is every Tuesday.	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.	Not applicable for Kemaman Certification Unit.	Not applicable



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Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 7: Responsible development of new plantings</b>			
<b>Kemaman Palm Oil Mill</b> Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this recertification assessment. The immature areas are replanted area.			
<b>Principle 8: Commitment to continual improvement in key areas of activity</b>			
<b>Criterion 8.1:</b> Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			
8.1.1	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);               <ul style="list-style-type: none"> <li>• Optimising the yield of the supply base.</li> </ul> </li> </ul> <p>- Major compliance -</p>	<p>Continuous improvement plan FY 2017/2018 was established at Kemaman POM and all estates visited.</p> <ol style="list-style-type: none"> <li>1. Improve the drainage system at oil room</li> <li>2. Geotube installation to improve effluent system</li> <li>3. Install scrubber plant</li> <li>4. To build a new Biogas Plant</li> <li>5. To reroute the blow pipe which will reduce the impact of noise pollution</li> <li>6. Triple rinsing</li> <li>7. Recycle programme</li> <li>8. Integrated Pest Management (planting of beneficial plant and barn owl box)</li> </ol>	Complied

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**Appendix B: Approved Time Bound Plan**

No	Name of the Estate and Mills	TBP for certification	Status as Aug, 2016	Any unresolved (Labour Disputes/Land conflicts/Legal Non-Compliance etc.)	
1	TDM Plantation Sdn. Bhd. Tebak Estate , Kemaman, Terengganu, Malaysia	Supply base for TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill, Kemaman, Terengganu, Malaysia.	Nov, 2013	Certified	None
2	TDM Plantation Sdn. Bhd. Pelantoh Estate , Kemaman, Terengganu, Malaysia		Nov, 2013	Certified	None
3	TDM Plantation Sdn. Bhd. Jernih Estate , Kemaman, Terengganu, Malaysia		Nov, 2013	Certified	None
4	TDM Plantation Sdn. Bhd. Air Putih Estate , Kemaman, Terengganu, Malaysia		Nov, 2013	Certified	None
5	TDM Plantation Sdn. Bhd. Gajah Mati Estate, Dungun, Terengganu, Malaysia		Nov, 2013	Certified	None
6	TDM Plantation Sdn. Bhd. MAIDAM Estate, Dungun, Terengganu, Malaysia		Nov, 2013	Certified	None
1	TDM Plantation Sdn. Bhd. Tayor Estate, Setiu, Terengganu, Malaysia	Supply base for TDM Plantation Sdn. Bhd. Sungai Tong Palm Oil Mill, Setiu, Terengganu, Malaysia.	Dec, 2013	Certified	None
2	TDM Plantation Sdn. Bhd. Pelong Estate , Setiu, Terengganu, Malaysia		Dec, 2013	Certified	None
3	TDM Plantation Sdn. Bhd. Jaya Estate , Setiu, Terengganu, Malaysia		Dec, 2013	Certified	None
4	TDM Plantation Sdn. Bhd. Fikri Estate , Setiu, Terengganu, Malaysia		Dec, 2013	Certified	None
5	TDM Plantation Sdn. Bhd. Pinang Emas Estate, Dungun, Terengganu, Malaysia		Dec, 2013	Certified	None
6	TDM Plantation Sdn. Bhd. Jerangau Estate, Ajil, Terengganu, Malaysia		Dec, 2013	Certified	None

**Appendix C: GHG Reporting Executive Summary**

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

Emission per product	tCO <sub>2</sub> e/tProduct	Extraction	%
CPO	0.1	OER	21.80
PK	0.1	KER	5.79

Production	t/yr	Land Use	Ha
FFB Process	203,249.42	OP Planted Area	17171.26
CPO Produced	44,315.19	OP Planted on peat	0
PK Produced	11,768.84	Conservation (forested)	0
		Conservation (non-forested)	554.92
		<b>Total</b>	<b>17,726.18</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	74,984.69	0.37	0	0	0	0	74,984.69	0.37
CO <sub>2</sub> Emission from fertilizer	3130.29	0.02	0	0	0	0	3130.29	0.02
NO <sub>2</sub> Emmision	1710.29	0	0	0	0	0	1710.29	0
Fuel Consumption	951.49	0	0	0	0	0	951.49	0
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-72614.52	-0.36	0	0	0	0	-72614.52	-0.36
Conservation Sequestration	-2544.31	-0.01	0	0	0	0	-2544.31	-0.01
<b>Total</b>	<b>5617.93</b>	<b>0.02</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>5617.93</b>	<b>0.02</b>

\*Note: Includes all estates

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	176.55	0
Fuel Consumption	84.03	0
Grid Electricity Utilisation	0	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>260.58</b>	<b>0</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	1233.56
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

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

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

<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>			
	<b>Requirement</b>	<b>Evidence</b>	<b>Compliance (Yes / No or N/A) For any N/A raised, justification is required.</b>
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Kemaman POM takes the legal ownership and physically handles RSPO certified FFB from the estates and produce CPO and PK.	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Kemaman POM is not a trader or distributor.	Yes
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	The Palmtrace ID for Kemaman Palm Oil Mill: RSPO_PO1000001053	Yes
5.1.4	Processing aids do not need to be included within an organization's scope of certification.	There was no processing aid used.	Yes
<b>5.2 Supply chain model</b>			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Kemaman POM is using the IP supply chain model since it received the FFB from own certified estate only.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Kemaman POM is using IP supply chain model since it receive the FFB from own certified estate.	Yes
<b>5.3. Documented Procedures</b>			

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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"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	<p>SOP RSPO Supply Chain – Identity Preserved Module, dated 1/8/2017 was established however some element in the Supply Chain Standard 2017 was not mentioned in the procedure. Please refer to the indicator 5.3.2.</p>	Yes
	<ul style="list-style-type: none"> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	<p>SOP RSPO Supply Chain – Identity Preserved Module, dated 1/8/2017 was mentioned about frequency of training for RSPO at least one time a year. The training for supply chain has been conducted on 20.02.2018 at 10.30 am on the Awareness RSPO Supply Chain Certification Standard 2017, internal audit RSPO SCC and RSPO SCC filing, attended by 13 attendants from various position such as clerk, weighbridge, laboratory assistant and others. Further records verified as per 5.4.1 and 5.6.1.</p>	Yes
	<ul style="list-style-type: none"> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard.</li> </ul>	<p>The person having overall responsibility for and authority over the implementation is Plant Manager. Through the interview with Plant Manager, he can demonstrate awareness of the established procedure.</p>	Yes
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>SOP RSPO Supply Chain – Identity Preserved Module, dated 1/8/2017 was not mentioned about the internal audit. Thus, a nonconformity was raised.</p>	No  (Major non-conformance)
	<p>ii)effectively implements and maintains the standard requirements within its organization</p>	<p>Internal audit yet to be carried out.</p>	No
<b>5.4. Purchasing and goods in</b>			
5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p>	<p>The daily records are prepared at the entry point at the weighbridge. Daily summary report and monthly summary report documented for all the certified FFB. Records verified by internal and external audit.</p>	Yes

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<ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>Supplier: Air Putih Estate Date: 26/6/18 Despatch No:06511 Description: FFB Certified Quantity: 4990 kg Transport: TBT7884</p> <p>Supplier: Pelantoh Estate Date: 26/6/18 Despatch No:23660 Description: FFB Certified Quantity: 8600 kg Transport: TBE3054</p> <p>Supplier: Tebak Estate Date: 26/6/18 Despatch No:11269 Description: FFB Certified Quantity: 7930 kg Transport: TBD1755</p> <p>Supplier: Jernih Estate Date: 26/6/18 Despatch No:28593 Description: FFB Certified Quantity: 7470 kg Transport: TBH3495</p> <p>Supplier: Gajah Mati Estate Date: 26/6/18 Despatch No:43896 Description: FFB Certified Quantity: 32940 kg Transport: JDY3458</p> <p>Supplier: MAIDAM Estate Date: 26/6/18 Despatch No:01967 Description: FFB Certified Quantity: 34980 kg Transport: TBE1377</p> <p>From other certified estate under Sg Tong Certification Unit: Supplier: Pinang Emas Estate Date: 26/6/18 Despatch No:20645 Description: FFB Certified Quantity: 7740 kg Transport: TAQ5052 Certificate No: RSPO595564</p>	
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	<ul style="list-style-type: none"> <li>Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	Information gathered through multiple records as per 5.4.1 above.	Yes
	<ul style="list-style-type: none"> <li>The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	<p>Kemaman POM only receive the FFB from own estates and outside certified suppliers under Sg Tong certification unit and the mechanism to check the validity of supply chain certification is as per SOP for other RSPO certified unit.</p> <p>Shipping announcement has been made by TDM Trading.</p>	Yes
	<ul style="list-style-type: none"> <li>A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>	Kemaman POM only receive the FFB from own estates and outside certified suppliers under Sg Tong certification unit and the mechanism to check the validity of supply chain certification is as per SOP for other RSPO certified unit.	Yes
	<ul style="list-style-type: none"> <li>The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements/announcements.</li> </ul>	N/A	N/A
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	<p>KPOM has the non-conformance material procedure in the SOP FGVM-RSPO SCC 3.0 Version 3.0 dated 11/6/18 which stated below:</p> <ul style="list-style-type: none"> <li>No short sales.</li> <li>Downgrade sustainable CPO/PK to non-sustainable product.</li> </ul>	Yes
<b>5.5. Outsourcing activities</b>			
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 is no outsourcing activity in Kemaman POM.	N/A



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	<p>independment 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 is no outsourcing activity in Kemaman POM.	N/A
	<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 is no outsourcing activity in Kemaman POM.	N/A
	<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 is no outsourcing activity in Kemaman POM.	N/A
	<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 is no outsourcing activity in Kemaman POM.	N/A
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 is no outsourcing activity in Kemaman POM.	N/A
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 is no outsourcing activity in Kemaman POM.	N/A

**5.6. Sales and goods out**

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5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>Sampled contract SGPO-180505 (CPO) and SGPK-180501 (PK). Verification of shipping documents confirmed that all the required information by the standard was available.</p>	Yes
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	<p>The above information can be seen across a range of documents such as weighbridge tickets, Despatch Delivery Advice, transporter's collection order, delivery notes, MPB form and buyers' weighbridge tickets.</p>	Yes
	<ul style="list-style-type: none"> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	<p>Verification of Transaction Report in RSPO Palmtrace confirmed that the facility has made announcements of all its CPO and PK trading.</p>	Yes
<b>5.7. Registration of transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>• are mills, traders, crushers and refineries and;</li> <li>• take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	<p>Kemaman POM is a mill and takes legal ownership and/or physically handle RSPO CSPO/CSPK.</p> <p>Kemaman POM has the Palmtrace id: RSPO_PO1000001053</p>	Yes

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5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> </ul>	Shipping announcement has been made by TDM Trading accordingly.	Yes
	<ul style="list-style-type: none"> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> </ul>	The volume for RSPO certified is monitored through the continuous account system and palmtrace transaction id.	Yes
	<ul style="list-style-type: none"> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>	There was no volume sold for other scheme and conventional.	Yes
	<ul style="list-style-type: none"> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	Sampled of shipping announcement documents and found that the management done the shipping announcement accordingly.	Yes
<b>5.8. Training</b>			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	The training plan was include supply Chain training which has been conducted on 21/3/2018, attended by 9 attendants from various position such as clerk, weighbridge, laboratory assistant and others.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	Training related to supply chain was conducted on 21/3/2018 to all operators and staff at Kemaman POM.	Yes
<b>5.9. Record Keeping</b>			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Kemaman POMhas keep the records such as SOP, training, despatch notes as per RSPO SCC Standard 2017 requirement. Sampled seen as per 5.4.1, 5.6.1.	Yes

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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.	The records are kept for minimum 5 years as per own established SOP. All records kept in the weighbridge office.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	The forecast volume for Nov 2018 – Oct 2019: CSPO= 44, 201.00 MT CSPK= 10,780.73 MT	Yes
<b>5.10. Conversion factors</b>			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website( <a href="http://www.rspo.org">www.rspo.org</a> );RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	This is Palm Oil Mill, so no conversion rate is used. The CPO and PK was extracted based on past actual rate.	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	This is Palm Oil Mill, so no conversion rate is used. The CPO and PK was extracted based on past actual rate.	Yes
<b>5.11. Claims</b>			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	Not applicable	N/A
<b>5.12. Complaints</b>			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	The complaint are regarding quality of FFB sent to mills received so far, no other issue captured. The records are available since 2016.  The procedure available as per complaint flow chart. The complaints shall resolved within 14 days.	Yes
<b>5.13. Management Review</b>			
5.13.1	The organization is required to hold management reviews annually at planned	MRM yet to be conducted. Thus, a nonconformity was raised.	No

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	intervals, appropriate to the scale and nature of the activities undertaken.		
5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	MRM yet to be conducted. Thus, a nonconformity was raised.	No
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"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>	MRM yet to be conducted. Thus, a nonconformity was raised.	No

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

Requirements	Compliance
<b>D.1 Definition</b>	
<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&amp;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>Kemaman Palm Oil Mill only accepts certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&amp;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>
<b>D.2 Explanation</b>	
<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&amp;C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>D.2.2The 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 estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<b>D.3 Documented procedures</b>	
<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 procedure (No. TDM/KPOM/01Rev.01/2017, 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 noncertified FFB. The procedure was updated based on latest version of on the RSPO SCCS July 2017. 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 Kemaman Palm Oil Mill.</p>
<p>b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable</p>	<p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation</p>

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requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.	of these requirements and compliance with all applicable requirements.
D.3.2 The site shall have documented procedures for receiving and processing certified FFBs.	Kemaman Palm Oil mill has documented procedures (as mentioned in D 3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing certified FFBs.
<b>D.4 Purchasing and goods in</b>	
D.4.1 The site shall verify and document the tonnage and sources of certified FFBs received.	When FFB delivered to the mill from the estates, the transporters presented delivery order (docket) to the mill weighbridge clerk in order the FFB to be received by the mill. The docket has the information of supplier ID (which indicates the supplying estate), docket number, date of delivery, field number (which indicates the origin of the FFB), vehicle registration number and weight.
D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	There was no projected overproduction of certified tonnage. Nonetheless, the facility is aware of the requirement of informing the CB should there be any.
<b>D.5 Record keeping</b>	
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.	Records and balance of all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK in " <i>Laporan Proses Harian</i> " (Daily Process Report) which data sourced from weighbridge system. Verification of the records shows that the mill was able to record on real-time basis.
<b>D.6 Processing</b>	
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.	The mill does not accept any FFB from non-RSPO certified estates and this can be seen in their daily process report and monthly summary. Therefore, the 100% separation from non-certified is achievable by the facility.

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**Supply Chain Declaration** *(Applicable For Appendix E)*

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (MT)</b>	<b>Volume of FFB from uncertified supply bases (MT)</b>	<b>Total FFB/Month (mt)</b>
1	Aug-17	17,387.38	-	17,387.38
2	Sep-17	17,156.73	-	17,156.73
3	Oct-17	21,599.53	-	21,599.53
4	Nov-17	19,325.23	-	19,325.23
5	Dec-17	17,870.88	-	17,870.88
6	Jan-18	14,079.42	-	14,079.42
7	Feb-18	16,550.10	-	16,550.10
8	Mar-18	17,379.55	-	17,379.55
9	Apr-18	17,610.52	-	17,610.52
10	May-18	15,140.24	-	15,140.24
11	Jun-18	10,269.94	-	10,269.94
<b>Total</b>		<b>184,369.52</b>		<b>184,369.52</b>

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	Aug-17	3,905.27	1,040.71
2	Sep-17	3,763.71	963.84
3	Oct-17	4,914.37	1,332.39
4	Nov-17	4,376.44	1,200.06
5	Dec-17	3,878.79	1,105.77
6	Jan-18	3,004.26	848.16
7	Feb-18	3,810.14	1,039.56
8	Mar-18	3,859.44	984.10
9	Apr-18	4,031.11	1,019.53
10	May-18	3,216.85	757.27
11	Jun-18	2,477.68	526.25
<b>Total</b>		<b>41,238.06</b>	<b>10,817.64</b>



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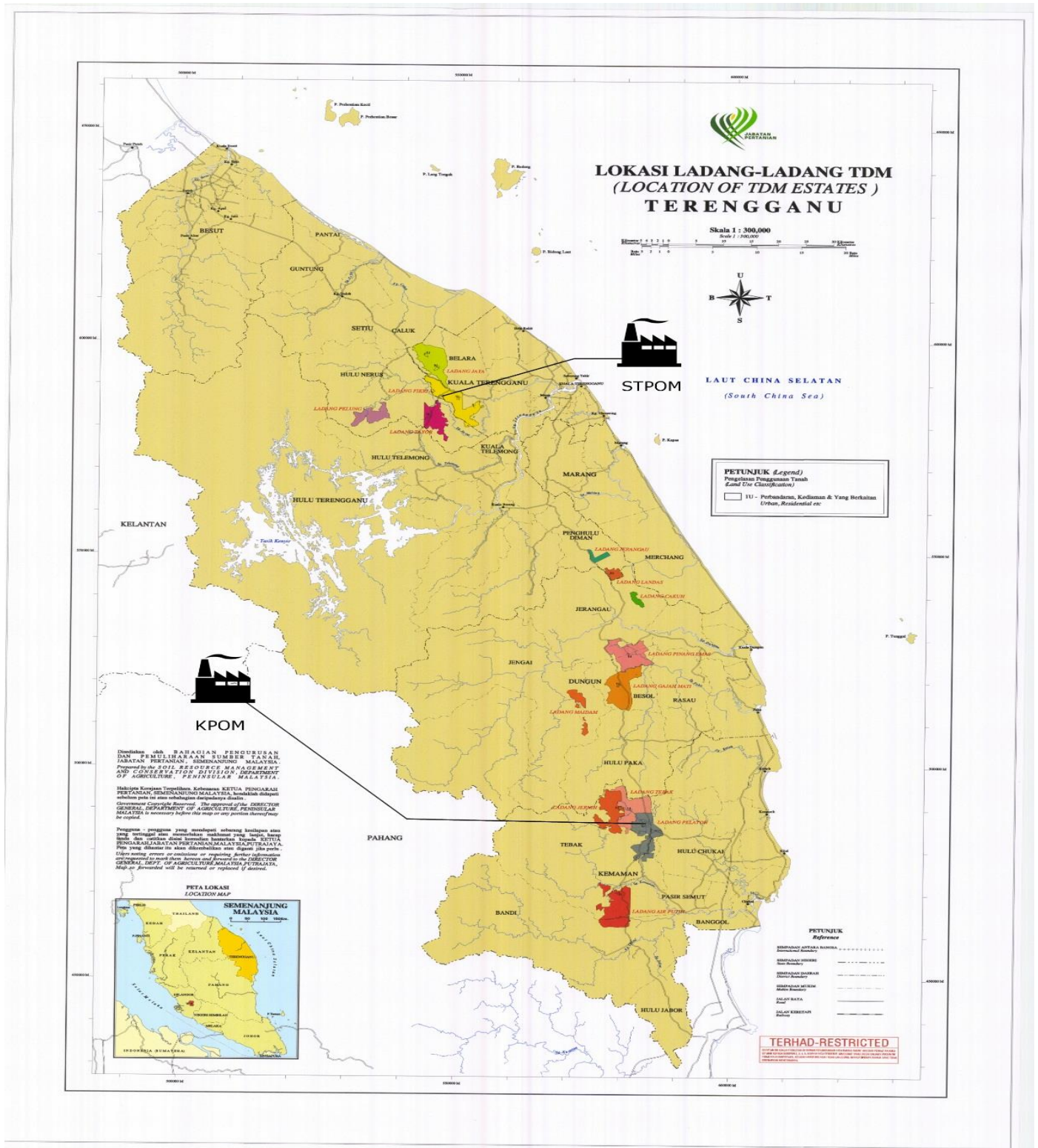
<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading No	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Buyer A	xxxx	9,708.01	-
2	Buyer B	xxxx	1,917.94	-
3	Buyer C	xxxx	2,545.50	-
4	Buyer D	xxxx	2,752.99	-
5	Buyer E	xxxx	2,473.08	-
6	Buyer F	xxxx	3,969.72	-
7	Buyer G	xxxx	2,549.55	-
8	Buyer H	xxxx	203.29	-
9	Buyer I	xxxx	13,439.67	-
10	Buyer J	xxxx	815.23	-
11	Buyer K	xxxx	451.54	-
12	Buyer L	xxxx	303.92	-
13	Buyer M	xxxx		10,640.20
<b>Total</b>			<b>41,130.44</b>	<b>10,640.20</b>

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

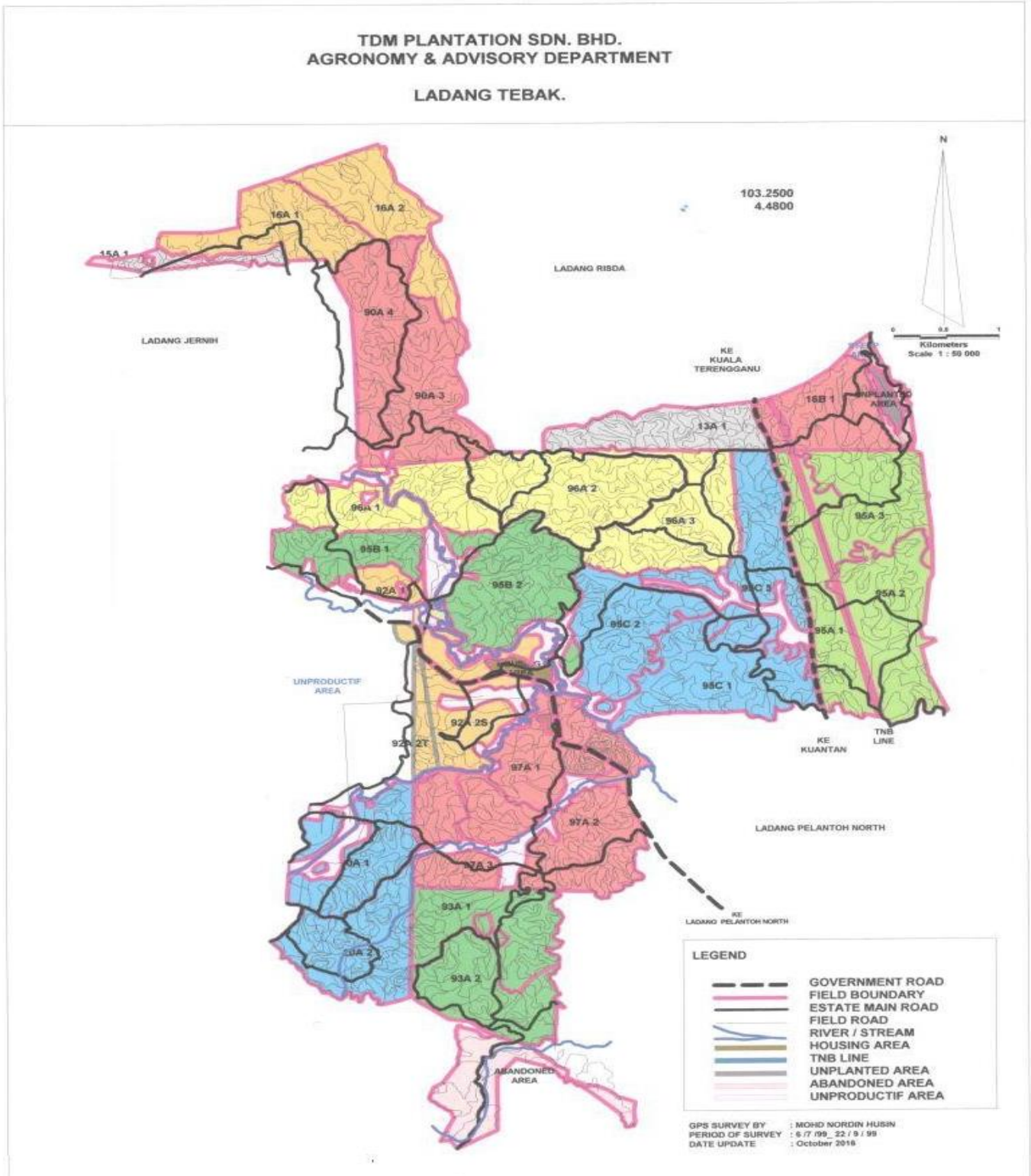
<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>				
No.	Buyers Name	CPOSold (MT)	PK Sold (MT)	
N/A				

<b>F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading No	RSPO Credits of Certified CPOSold (MT)
N/A			

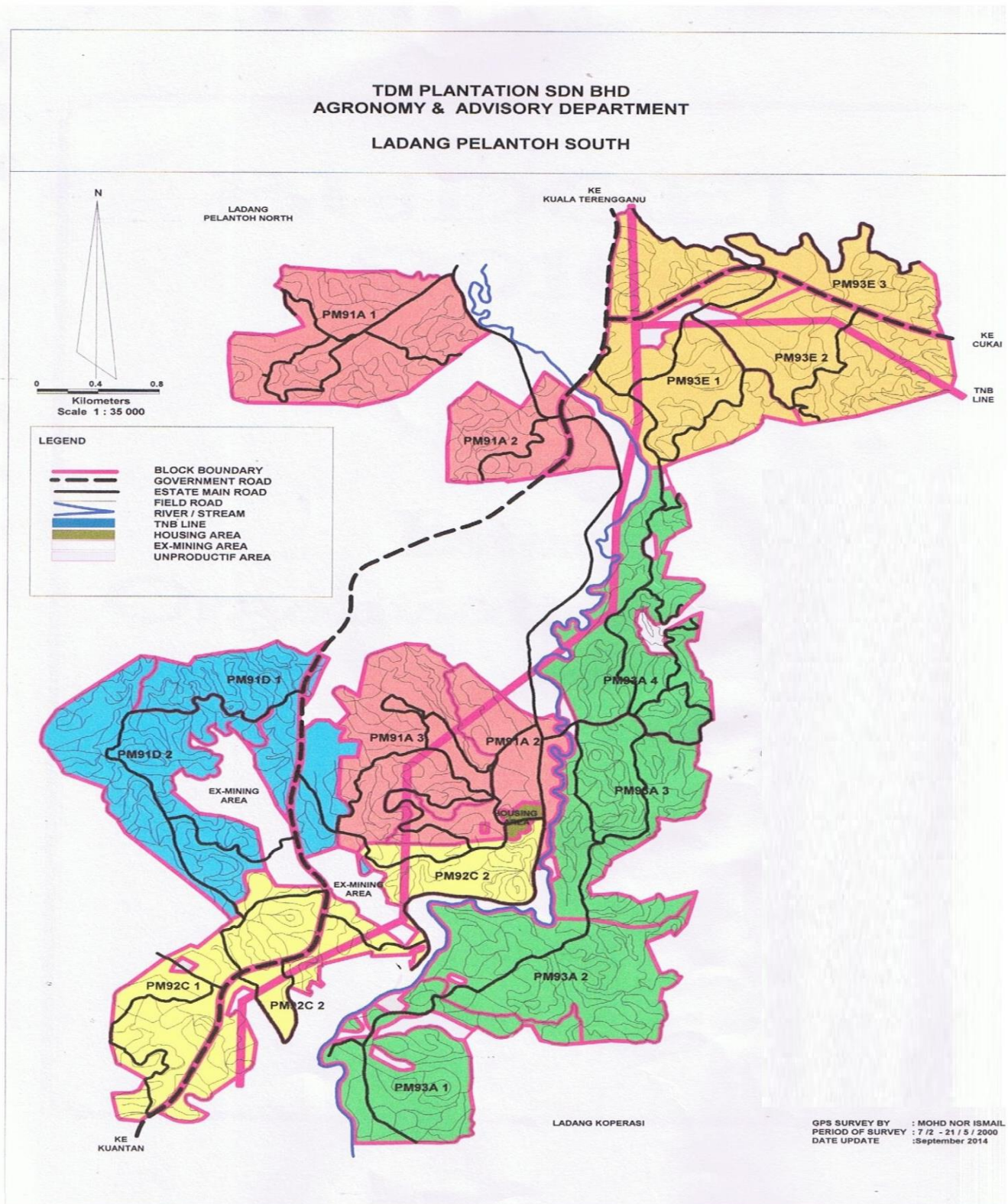
**Appendix F: Location Map of Kemaman Palm Oil Mill Certification Unit and Supply bases**



**Appendix G: Tebak Estate Field Map**



**Appendix H: Pelantoh Estate Field Map**



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

-Not applicable-

## Appendix J: 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
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
LORR	
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PE	Pelantoh Estate
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
TE	Tebak Estate