

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (1_2)**
- Recertification Assessment (Choose an item.)**
- Extension of Scope**

<p>Client Company name (Parent Company): Carotino/JC Chang Group</p>
<p>Client company Address: Unit 30-01, Level 30, Menara Landmark No. 12, Jalan Ngee Heng 80000 Johor Bahru, Johor, Malaysia</p>
<p>Certification Unit: Melewar Palm Oil Mill and supply base (Melewar Production Unit)</p> <p>Location of Certification Unit: KM 45, Off Jalan Lahad Datu – Sandakan 91100 Lahad Datu, Sabah, Malaysia</p>
<p>Date of Final Report: 12/06/2021</p>

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Section 1: Scope of the Certification Assessment

1. Company Details			
Parent Company	Carotino / JC Chang Group		
RSPO Membership Number	2-0029-06-000-00	Membership Approval Date	10/5/2006
Address	Unit 30-01, Level 30, Menara Landmark, No. 12, Jalan Ngee Heng 80000 Johor Bahru, Johor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Melewar Palm Oil Mill (Melewar Production Unit)		
Location / Address	KM 45, Off Jalan Lahad Datu – Sandakan, 91100 Lahad Datu, Sabah, Malaysia		
Website	www.carotino.com		
Management Representative	Mr Seow Chee Chiang	E-mail	seowcc@jcc.com.my
Telephone	+607 2231633 (Head Office) +6016 772 7341 (Mill)	Facsimile	+607 224 1546 (Head Office)

2. Certification Information			
Certificate Number	RSPO 651276	Date of First Certification	07/02/2014
		Certificate Start Date	07/02/2019
		Certificate Expiry Date	06/02/2024
Scope of Certification	Palm oil and Palm Kernel Production		
Visit Objectives	The objective of the assessment was to conduct an annual surveillance assessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system.		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 1 ; ASA 2) <input type="checkbox"/> Scope Extension		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		
Supply Chain Module	<input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
50450565MSPO4	MS2530-4:2013 MSPO Part 4: General Principles for Palm Oil Mills	DQS Certification (M) Sdn Bhd	04/07/2025
50450559MSPO3	MS2530-3:2013 MSPO Part 3: General Principles for Oil Palm Plantations and Organized Smallholders	DQS Certification (M) Sdn Bhd	04/07/2025
EU-ISCC-CERT-US201-70600717	ISCC	SCS Global Services	02/05/2021

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)		GPS Coordinates	
		Latitude	Longitude
Melewar Palm Oil Mill	KM 45, Off Jalan Lahad Datu – Sandakan 91100 Lahad Datu, Sabah, Malaysia	5° 16' 21.50" N	118° 03' 12.4" E
Gerola Estates	KM 40, Off Jalan Lahad Datu – Sandakan 91100 Lahad Datu, Sabah, Malaysia	5° 12' 18.74" N	118° 2' 4.56" E
Tye Yang Estate	KM 45, Off Jalan Lahad Datu – Sandakan 91100 Lahad Datu, Sabah, Malaysia	5° 14' 33.03" N	117° 59' 58.59" E
Melewar Estate 1	KM 45, Off Jalan Lahad Datu – Sandakan 91100 Lahad Datu, Sabah, Malaysia	5° 15' 49.11" N	118° 3' 48.66" E
Pahang Oil Palm Estate Div 2	KM 45, Off Jalan Lahad Datu – Sandakan 91100 Lahad Datu, Sabah, Malaysia	5° 17' 37.88" N	118° 8' 21.87" E
Pahang Oil Palm Estate Div 3	KM 45, Off Jalan Lahad Datu – Sandakan 91100 Lahad Datu, Sabah, Malaysia	5° 22' 27.72" N	118° 8' 18.62" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Gerola Estates	1403.37	-	184.03	1587.40	88.41
Tye Yang Estate	3352.62	-	407.28	3759.90	89.17
Melewar Estate 1	1978.42	-	344.76	2323.18	85.16
Pahang Oil Palm Estate Div 2	2393.50	-	278.30	2671.80	89.58
Pahang Oil Palm Estate Div 3	2391.11	-	228.19	2619.30	91.29

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Total	11519.02	-	1442.56	12961.58	88.87
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6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Gerola Estates	148.78	724.55		345.99	184.05	1254.59	148.78
Tye Yang Estate	1096.05	793.45	510.16	677.38	275.58	2620.73	731.89
Melewar Estate 1	293.98	1136.73	139.88	-	407.83	1684.44	293.98
Pahang Oil Palm Estate Div 2	629.87	821.96	-	198.13	743.54	1763.63	629.87
Pahang Oil Palm Estate Div 3	707.95	-	-	1683.16	-	1867.97	523.14
Total (ha)	2876.63	3476.69	650.04	2904.66	1611.00	9191.36	2327.66

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (Feb 2020 - Jan 2021)	Actual (Dec 2019 – Mar 2021)		Forecast (Feb 2021 - Jan 2022)
		Previous license period (Dec 2019 - Jan 2020)	Current license period (Feb 2020 - Mar 2021)	
Gerola Estate	33730.33	3,187.84	25,572.86	26,811.00
Tye Yang Estate	65095.24	6,597.66	50,489.63	43,326.00
Melewar Estate 1	49049.56	4,073.51	34,784.44	26,830.00
Pahang Oil Palm Estate 2	37239.07	5,227.22	39,135.66	38,800.00
Pahang Oil Palm Estate 3	45846.93	3,017.03	19,998.01	36,469.00
TOTAL	230961.13	22,103.26	169,980.60	172,236.00
		192,083.86		

8. Certified Tonnage of FFB (from other certified unit(s))			
Estate	Tonnage / year		
	Estimated (Feb 2020 - Jan 2021)	Actual (Dec 2019 – Mar 2021)	Forecast (Feb 2021 - Jan 2022)

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		Previous license period (Dec 2019 - Jan 2020)	Current license period (Feb 2020 - Mar 2021)	
Hwa Li Estate 3		0	0	
Melewar Estate 2		0	4,608.38	
Asia Estate 2		0	0	
Total		4,608.38		

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			
	Estimated (Feb 2020 - Jan 2021)	Actual (Dec 2019 – Mar 2021)		Forecast (Feb 2021 - Jan 2022)
		Previous license period (Dec 2019 - Jan 2020)	Current license period (Feb 2020 - Mar 2021)	
All	0.00	1,074.03	18,684.60	0.00
Total	0.00	19,758.63		0.00

10. Certified Tonnage				
	Estimated (Feb 2020 - Jan 2021)	Actual (Dec 2019 – Feb 2021)		Forecast (Feb 2021 - Jan 2022)
	FFB	FFB		FFB
Mill Capacity: 60MT/hr	230,961.13	Previous license period (Dec 2019 - Jan 2020)	Current license period (Feb 2020 - Feb 2021)	172,236.00
		22,103.26	174,588.98	
SCC Model: MB		196,692.24		
	CPO (OER: 20.03%)	CPO (OER: 21.02%)	CPO (OER:21.30%)	CPO (OER: 19.95%)
	46,270.70	4645.25	37187.45	34,361.08
		41,832.70		
	PK (KER: 5.05%)	PK (KER: 4.05%)	PK (KER: 4.63%)	PK (KER:5.08 %)
	11,656.33	895.18	8081.33	8,749.59

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		8,976.51	
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11. Actual Sold Volume (CPO)					
Current License period (Feb 2020 - March 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	16,118.19	0.00	0.00	0.00	16,118.19
Previous License period (Dec 2019 - Jan 2020)					
CPO (MT)	0.00	0.00	0.00	0.00	0.00

Note: The extension was applied due to the mill received more Certified FFB from estimate. The mill have enough storage tanks to keep the certified CPO for future productions.

12. Actual Sold Volume (PK)					
Current License period (Feb 2020 - March 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	6,133.56	0.00	0.00	0.00	6,133.56
Previous License period (Dec 2019 - Jan 2020)					
PK (MT)	865.67	0.00	0.00	0.00	865.67
Total	6,999.23				6,999.23

13. Independent Smallholders Certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	0.00	0.00
IS-CSPKO	0.00	0.00
IS-CSPKE	0.00	0.00

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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BSI is a leading global provider of management systems assessment and certification, with more than 84,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **01/04/2021 – 02/04/2021**. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on **03/12/2020 – 04/12/2020**.

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

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil was used to guide the assessment 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 (and smallholders) of its supply base.

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

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

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

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workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re- Certification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Melewar Palm Oil Mill	X	X	X	X	X
Melewar Estate Div 1		X		X	X
Gerola Estate	X		X		
Pahang Oil Palm Estate 2		X			X
Pahang Oil Palm Estate 3			X		X
Tye Yang Estate	X			X	

Tentative Date of Next Visit: November 1, 2021 - November 4, 2021

Total No. of Mandays: 9 Mandays

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2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Muhammad Fadzli Masran	Team Leader	He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. Fluent in Bahasa Malaysia and English Language. During this assessment, he assessed on the aspects of legal, safety, environmental & biodiversity, and agriculture best practices
Hafriazhar Mohd Mokhtar	Team Member	He holds Bachelor Degree in Chemical Engineer. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands and Gabon. He is fluent in Bahasa Malaysia and English languages. During this assessment, he assessed on the aspects of social, legal, workers & stakeholders consultation and SCC for CPO mill.
Muhamad Naquiuddin Mazeli	Team Member	He hold Bachelor of Science Horticulture at University Putra Malaysia. He has 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained as Safety and Health Officer, Food Safety System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and already attend HCV training with Proforest. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, and workers and stakeholders consultation. He is fluent in Bahasa Malaysia and English languages.

Accompanying Persons:

Name	Role
N/A	N/A

2.3 Assessment Plan

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

On-site Assessment

Date	Time	Subjects	(MFM)	(MNM)	(HMM)
Sunday, 28/03/2021	PM	Audit Team Travelling	√	√	√
Thursday, 01/04/2021	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan 	√	√	√
Pahang Oil Palm 3 Estate	09.00 – 12.00	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.	√	√	√
		Document review P1 – P7: (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.)	√	√	√
	09.30 – 12.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)			√
	12.00 – 12.30	Lunch	√	√	√
	12.30 – 14.00	Document review P1 – P7: (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.)	√	√	√
	14.00 - 14.30	Interim Closing briefing.	√	√	√
	14.30 15.30	Travel to Gerola Estate			

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Date	Time	Subjects	(MFM)	(MNM)	(HMM)
Thursday, 01/04/2021 Gerola Estate	15.30 – 17.30	Document review P1 – P7: (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.)	√	√	√
Friday, 02/04/2021 Gerola Estate	15.30 – 17.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)			
	08.30 – 10.00	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. Document review P1 – P7: (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.)	√	√	√
	10.00 – 10.30	Travel to Melewar POM			
Friday 02/04/2021 Melewar Palm Oil Mill	10.30 – 12.30	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√
	10.30 – 12.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)			√
	12.30 – 13.30	Lunch	√	√	√

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	13.30 - 16.30	Lab, weighbridge and palm product storage area. Document Review P1 – P7: 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. RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√
	17.00 – 17.30	Preparation of audit report	√	√	√
	17.30 – 18.00	Closing Meeting	√	√	√
	PM	Audit Team Travelling	√	√	√

Remote Assessment

Date	Time	Subjects	MFM	HMM	ICT Planned
12/11/2020 Thursday	AM	Communication on remote audit document preparation	√		Email
13/11/2020 Friday	14.30 – 15.00	Online teleconference trial	√	√	Webex Teleconference
Thursday, 03/12/2020	09.00 – 09.15	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan 	√	√	Webex Teleconference, Email, WhatsApp Video call, Teleconference
Melewar POM 09.15 – 12.45	09.15 – 10.15	Assessment and documentation review on: <ul style="list-style-type: none"> Mill supply chain requirements 		√	Webex Teleconference, Email, WhatsApp Video call, Teleconference
	10.15 – 10.30	15 minutes break	√	√	

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Date	Time	Subjects	MFM	HMM	ICT Planned
	10.30 - 11.30	Assessment and documentation review on: <ul style="list-style-type: none"> • Mill best practice, legal requirements, OHS and continual improvement 	√		Webex Teleconference, Email, WhatsApp Video call, Teleconference
	11.30 - 11.45	15 minutes break	√	√	
	11.45 - 12.45	Assessment and documentation review on: <ul style="list-style-type: none"> • Social aspects, legal requirements, employees' welfare, stakeholder management and supply chain requirements 		√	Webex Teleconference, Email, WhatsApp Video call, Teleconference
	12.45 - 13.45	Lunch break	√	√	
Gerola Estate 13.45 - 17.15	13.45 - 14.45	Assessment and documentation review on: <ul style="list-style-type: none"> • Good agriculture practice, legal requirements, environment and HCV 	√		Webex Teleconference, Email, WhatsApp Video call, Teleconference
	14.45 - 15.00	15 minutes break	√	√	
	15.00 - 16.00	Assessment and documentation review on: <ul style="list-style-type: none"> • Legal requirements, OHS and continual improvement 	√		Webex Teleconference, Email, WhatsApp Video call, Teleconference
	16.00 - 16.15	15 minutes break	√	√	

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	16.15 – 17.15	Assessment and documentation review on: <ul style="list-style-type: none"> Social aspects, legal requirements, employees' welfare and stakeholder management 		✓	Webex Teleconference, Email, WhatsApp Video call, Teleconference
Friday, 04/12/2020 Melewar POM 09.15 – 12.45 Pahang Oil Palm Estate 3	09.00 – 10.00	Assessment and documentation review on: <ul style="list-style-type: none"> Good agriculture practice, legal requirements, environment and HCV 	✓		Webex Teleconference, Email, WhatsApp Video call, Teleconference
	10.00 – 10.15	15 minutes break	✓	✓	
	10.15 – 11.00	Assessment and documentation review on: <ul style="list-style-type: none"> Legal requirements, OHS and continual improvement 	✓		Webex Teleconference, Email, WhatsApp Video call, Teleconference
	11.00 – 11.15	15 minutes break	✓	✓	
	11.15 – 12.00	Assessment and documentation review on: <ul style="list-style-type: none"> Social aspects, legal requirements, employees' welfare and stakeholder management 		✓	Webex Teleconference, Email, WhatsApp Video call, Teleconference
	12.00 – 12.30	15 minutes break/Audit team discussion	✓	✓	
	12.30 – 13.00	<ul style="list-style-type: none"> Closing Meeting 	✓	✓	Webex Teleconference

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Carotino/JC Chang Group Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Malaysia National Interpretation 2019 for RSPO P&C 2018
- Independent Smallholder Standard 2019

3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes included.	Complied
Have all the estates and mills certified within five years after obtaining RSPO membership?	Yes. The Group has achieved 100% RSPO certification for all Operating Units under the management of JC Chang Group at ended year of 2019. The last Production Unit namely Takon Production Unit have undergone RSPO main assessment on 28/10 to 1/11/19 with a positive result and the CB have recommended Takon Production Unit for RSPO certification. However, the certificate is yet to be issued due to pending approval from RSPO on the RaCP concept note. RSPO agreed to hold the result of assessment for Takon Production Unit till Nov. 2020 but unfortunately, the Group can't achieved the deadline as RaCP concept note was yet to approved by RSPO. The Group will reconduct RSPO main assessment for Takon Production Unit without Takon Palm Oil Mill as soon as possible after obtained approval on RaCP concept note from RSPO. Takon Production Unit was restructure on Feb. 2021 as Takon Palm Oil Mill was sold to non-RSPO member on 22/01/21.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	Yes. There is a new acquisition namely Asia Ecogreen Sdn Bhd under Hwa Li Estate Div.3 management. This area to be certified for this year assessment.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.	Changes involved the restructure of Takon Production Unit due to selling of Takon Palm Oil Mill to non-RSPO member on 22/1/2021.	Complied

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Is this consistent with the ACOP reporting?	Hence, cancelling the certification as production unit but to certified the estates as supply base in existing certification unit. Changes not reflective yet in the existing submitted ACOP 2019 and to be submitted in ACOP 2020.	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses in implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failure in implementation of the plan.	Complied
Un-Certified Units or Holdings <i>(any non-compliance against the below shall be raised as Major Non-compliance)</i>		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	No replacement after dates defined in RSPO P&C MYNI 2019.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new development since 1 st January 2010	Complied
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. <i>Note:</i> <i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</i> <i>Please refer to BSI-RSPO Secretariat approval.</i>	Yes. The land conflict occurred in Takon Production Unit is on the process of authority application.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labour dispute occurred and reported since last audit.	Complied
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance occurred and reported since last audit.	Complied
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes. Internal audit conducted with findings highlighted for site further improvement.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Refer indicator 1.1.4 of the report for details.	Complied

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

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable.	N/A

3.4 Details of Nonconformities

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

During this Assessment there were no (0) Critical; one (1) Minor nonconformities and no Opportunity For Improvement raised. The Melewar Palm Oil Mill and Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2009200-202101-N1	Clause & Category (Critical / Minor)	7.3.2 minor
Date Issued	02/04/2021	Due Date	Next Assessment
Closed (Yes / No)	No	Date of nonconformity Closure	Next Assessment
Statement of Nonconformity:	Proper disposal of waste material is not effectively demonstrated.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	Reviewed the inventory records for SW 305, noted that disposal was done on 14/01/2020 for 3100 litre. First generation of SW 305 was recorded on 15/01/2020 for 400 litre. The disposal was conducted on 19/08/2020 which is more than 180 days from the first generation date without approval from DOE.		
Corrections:	<ol style="list-style-type: none"> Person in charge to always ensure the correct date of generation of each scheduled waste. Weekly inspection should be carried out properly to inspect the condition of the wastes, store and label of each scheduled wastes. 		

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	<p>3. Person in charge to properly arrange disposal with waste collector at least 3 months prior 180 days of storage limitation. Should the collector unable to perform such collection due to unavoidable circumstances, extension permit to store scheduled wastes for more than 180 days should be applied to Department of Environmental (DOE) at least 1 month before reaching 180 days limit.</p> <p>4. All guideline and law requirement related to scheduled wastes should be adhered accordingly.</p> <p>Person in-charge – Assistant manager in charge (Prakash Krishnan) – Admin officer (Muhammad Arzani Bin Mazelie)</p> <p>Time Frame – Continuous Practice</p>
Root Cause Analysis:	<p>Due to Movement control order, the scheduled waste collector unable to collect the waste material. Person in charge did not apply for extension permit to store the scheduled waste more than 180 days due to the person in charge did not properly monitor the first date of scheduled waste generation and inspection of scheduled waste was not performed accordingly.</p>
Corrective Actions:	<p>1. In house training to person in charge regarding the Standard Operating Procedure of handling storage and disposal scheduled waste was conducted (refer to the training evidence attached).</p> <p>Person in-charge – Assistant manager in charge (Prakash Krishnan) – Admin officer (Muhammad Arzani Bin Mazelie)</p> <p>Time Frame – Continuous Practice</p>
Assessment Conclusion:	<p>The effectiveness implementation of the Corrective Action Plan will be assess during next assessment</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good cooperation from the management.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1985154-202012-M1	Clause & Category (Critical / Minor)	2.3.1 (Critical)
Closed (Yes / No)	Yes	Date of nonconformity Closure	08/02/2021
Statement of Nonconformity:	Documentation for directly source FBB were not complete		
Requirement Reference:	(C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Proof of the ownership status or the right/claim to the land by the grower/smallholder • Where applicable, valid planting/operating/trading license, or is part of a cooperative which allows the buying and selling of FFB 		
Objective Evidence:	Information on geo-location, proof of ownership status or the right/claim such as land title etc. and valid planting/operating/trading license which allows the buying and selling of FFB such as MPOB license/trading license for directly source FFB were not available during the audit.		
Corrective Actions:	1) Management will consult further and brief to all smallholder the reason for management require the document. 2) All documents received will be mark with wording "Untuk kegunaan MPOM sahaja" to avoid any missuses issue 3) All documents that contain Land title number will be blurred and only the name of owner will be shown to avoid any miss uses issue. Person in-charge - Assistant manager in charge (Stephen Lee, Philip VA) - Admin officer (Muhammad Arzani Bin Mazelie) Time Frame – 31st January 2021		
Assessment Conclusion:	Major NC verification Evidence verified as follows: 1. Melewar production units have conducted briefing on the due diligence and sustainability contract to all the direct FFB suppliers on 21/12/2020. Reviewed the the briefing records for all 32 participants/attendees. 2. The mill has conducted due diligence for all the FFB suppliers. Among the items checked in the due diligence checklist such as FFB supplier name, address, estate/farm coordinate, contact person/number, MPOB license and valid ownership letter/land tittle. Reviewed the due diligence checklist for FFB supplier as follows:		

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	<p>a. Abdul Rahman b. Said, 7° 13' 04" E; 118° 11' 12" N. Letter conformation of land ownership for PT 97093xx from Village Head of Kampung Paris 3, MPOB License no. 276719 - 70100</p> <p>b. Alimin b. Mansur, 5° 15' 41" E; 118° 03' 10" N. Land title no. CL 09532xxxx, MPOB license no. 404407 - 801000</p> <p>The corrective action plan is effectively implemented. Thus, the NC is effectively closed on 08/02/2021.</p>
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Non-conformity			
NCR Ref #	1845994-201911-M1	Clause & Category (Critical (Major) / Minor)	4.7.2 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	19/12/2019
Statement of Nonconformity:	The hazard identification, risk rating and risk control measures details in certain HIRARC operations was not adequately addressed.		
Requirement Reference:	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.		
Objective Evidence:	<p>Melewar POM: Fire Hazard was not captured on following sampled HIRARC operations:</p> <ul style="list-style-type: none"> a) Diesel Gen-Set) Water Treatment Plant) Boiler House) Biogas Engine Plant <p>Melewar Estate Division 1: Harvesting operation: Hazard risk rating (likelihood x severity) on snake bite severity rating was not adequately captured as per risk rating matrix recommendation in Guideline on Hazard Assessment, Prevention and Control (Risk Management and Mitigation Plan), Doc. No. U/029-01/2019, dated 17/7/19.</p> <p>Pahang Oil Palm Estate 2: Manuring operation: The Hazard from Insect & Snake Bite was not identified. Selective Weeding & Harvesting operation: The Hazard risk rating (likelihood x severity) on snake bite severity rating was not adequately captured per risk rating matrix recommendation in Guideline on Hazard Assessment, Prevention and Control (Risk Management and Mitigation Plan), Doc. No. U/029-01/2019, dated 17/7/19.</p> <p>c) Transportation risk control measures on passengers sitting safety was not adequately yes as few passengers were seen hopping behind the pickup truck during the field visit.</p>		

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Corrective Actions:	<p>1) To retrain OSH Committee member on Guidelines U/029-01/2019 as to refresh on HIRARC establishment and review back the HIRARC amongst OSH member</p> <p>2) To review back the HIRARC through consultation with worker Person in-charge</p> <ul style="list-style-type: none"> – Person responsible for OSH at each operating unit <p>Time Frame</p> <ul style="list-style-type: none"> – 15th November 2019
Assessment Conclusion:	<p>Major NC verification visit:</p> <p><u>Melewar POM</u></p> <p>OSH Committee training on Guideline on Hazard Assessment, Prevention and Control (Risk Management and Mitigation Plan), U/029-01/2019 dated 15/08/2019 was conducted on 14/11/2019 conducted by the Admin Officer. Sighted the training records, attendances list and training material dated 14/11/2019.</p> <p>Consultation with workers on the HIRARC review for Diesel Gen-Set, Water Treatment Plant, Boiler House and Biogas Engine Plant was conducted on 13/11/2019. Sighted the attendances list for all workers involved in the consultation.</p> <p>Job hazard analysis for Diesel Gen-Set, Water Treatment Plant, Boiler House and Biogas Engine Plant was conducted on 13/11/2019.</p> <p>HIRARC review was conducted for Diesel Gen-Set, Water Treatment Plant, Boiler House and Biogas Engine Plant was conducted on 13/11/2019.</p> <p>Interview with sampled related personnel at each station show appropriate understanding and awareness on the hazard and existing risk control at their work station.</p> <p><u>Pahang Oil Palm Estate 2</u></p> <p>OSH Committee training on Guideline on Hazard Assessment, Prevention and Control (Risk Management and Mitigation Plan), U/029-01/2019 dated 15/08/2019 was conducted on 11/11/2019 conducted by the Sr. Asst. Manager. Sighted the training records, attendances list and training material dated 11/11/2019. Participant understanding on the training conducted has been assessed using 'Borang Penilaian Latihan'.</p> <p>Workers consultation on HIRARC review for harvesting, selective weeding, manuring and field checking has been conducted on 12 – 13/11/2019. Sighted the attendances list for all workers involved in the consultation.</p> <p>HIRARC review on harvesting, selective weeding, manuring and field checking has been conducted on 13/11/2019. Review was to include biological hazards such as insects/snake bite in the hazards identification and new process, field checking. iv. Sighted Internal Memo from the Estate Manager dated 13/11/2019 on Prohibition of hopping behind the pickup truck or vehicle not design for workers transportation during the field visit.</p> <p>v. Interview with sampled related personnel at each station show appropriate understanding and awareness on the hazard and existing risk control at their work station.</p> <p>Melewar Estate Division 1</p>

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	<p>OSH Committee training on Guideline on Hazard Assessment, Prevention and Control (Risk Management and Mitigation Plan), U/029-01/2019 dated 15/08/2019 was conducted on 13/11/2019 conducted by the Asst. Manager. Sighted the training records, attendances list and training material dated 13/11/2019. Evaluation on the participant understanding was conducted through Q & A form. 18 participant were evaluated and all shows appropriate understanding on the training provided.</p> <p>Workers consultation on HIRARC review for harvesting operation has been conducted on 13/11/2019. Sighted the attendances list for all workers involved in the consultation.</p> <p>Hazard risk rating (likelihood x severity) on biological hazard such as snake bite severity rating has been reviewed. The severity has been classified as severe with rating 5 and likelihood was classified under rare as there are no cases on biological hazard occur for the last 7 years. The risk rating was conducted as per Guideline on Hazard Assessment, Prevention and Control (Risk Management and Mitigation Plan), U/029-01/2019 dated 15/08/2019.</p> <p>All the corrective action and evidence of implementation were found to be adequate. The Major NC closed on 19/12/2019.</p> <p>Verified there is no recurrence of the non-conformity. Thus the non-conformity is effectively closed.</p>
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Non-conformity			
NCR Ref #	1845994-201911-N1	Clause & Category (Critical (Major) / Minor)	4.1.2 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	04/12/2020
Statement of Nonconformity:	A mechanism to check consistent implementation of procedures was not fully effective.		
Requirement Reference:	A mechanism to check consistent implementation of procedures shall be in place.		
Objective Evidence:	<p>1) Melewar POM: First aid kit inspection and First aid case investigation process was not adequately addressed according to internal procedure requirements:- First Aid cases (minor cut) dated 29/6/19, 10/7/19 and 20/10/19 recorded in the First Aid Log Book at Laboratory. However, no evidence available that the first aid injury cases has been investigated and reviewed accordingly in the OSH Meeting dated 11/10/19 & 12/7/19.</p> <p>e) First Aid Kit inspection sampled at Guard House and Grader Room found that the first aid kit was inspected on quarterly basis with sampled dated 1/6/19 & 14/9/19 respectively. However, according to JC Chang Group Guidelines of First Aid in the Workplace, Doc. No. M/025-02/2014, the frequency of the first aid kit inspection should be on monthly basis.</p>		
Corrective Actions:	<p>1) To retrain person involved on accident investigation (OSH committee member) on Guidelines M015-03/2018</p> <p>2) To appoint person responsible to do First Aid Kit monthly inspection</p>		

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	<p>3) To retrain person in charge for First Aid Kit inspection on Guidelines M/02502/2014</p> <p>Person in-charge</p> <ul style="list-style-type: none"> - Mohd Arzani Mazelie, AO MPOM, - Mr Chan Chor Laup, Manager MPOM <p>Time Frame</p> <ul style="list-style-type: none"> - 18th November 2019
Assessment Conclusion:	<p>The mill has appointed the AO as Person in Charge to conduct the First Aid Kit Inspection on Monthly basis.</p> <p>Verified there is no recurrence of the non-conformity. Thus the non-conformity is effectively closed.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	N/A

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1708986-201808-M1	Major	6.5.2	16/11/2018	Closed out on 08/02/2019
1708986-201808-M2	Major	6.12.3	16/11/2018	Closed out on 08/02/2019
1708986-201808-N1	Minor	5.1.2	16/11/2018	Closed out on 07/11/2019
1708986-201808-N2	Minor	6.5.3	16/11/2018	Closed out on 07/11/2019
1708986-201808-N3	Minor	4.6.10	16/11/2018	Closed out on 07/11/2019
1845994-201911-M1	Major	4.7.2	06/11/2019	Closed out on 19/12/2019
1845994-201911-N1	Minor	4.1.2	06/11/2019	Closed out on 04/12/2020
1985154-202012-M1	Critical	2.3.1	04/12/2020	Closed out on 08/02/2021
2009200-202101-N1	Minor	7.3.2	04/02/2021	Open

3.5 Stakeholders and previous land owner / user consultation

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

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each

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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	
Internal Stakeholders Field workers Mill workers JCC representative Gender committee General workers	Union/Contractors Kedai Runcit Ramlah Nor Trading Perdana Trading
Government Departments CLC	NGO Nil

Stakeholders comment	
1	Feedbacks: Grocery store operator: Had issues during Movement Control Order (MCO) and Conditional Movement Control Order (CMCO) period to buy shop's stock from wholesaler due to stringent enforcement by estate management that requires mandatory swab test every time out and come back in estate. Had discussion and allowed to conduct the swab test only if necessary i.e. if have symptoms.
	Management Responses: Management has to strictly follow company's directive in order to prevent occurrence of COVID-19 case. All companies operating palm oil mills and oil palm estates within Kinabatangan River Valley had implemented voluntary lockdown since October 2020 for at least 6 months to ensure sustainable operations together. Some company that ended its voluntary lockdown earlier had encountered positive COVID-19 cases within their operating units and has been mandatory lockdown by the authorities hence affected their operations badly.
	Audit Team Findings: No further issue.
2	Feedbacks: CLC teacher: Estate managements always visits and contributes to school programs and activities. 100% of children among estate workers are schooling at CLC including from neighbour estate. School facilities were well maintained by company.
	Management Responses: Positive comments noted.

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	<p>Audit Team Findings: No further issue.</p>
3	<p>Feedbacks: Local & foreign workers JCC representatives: Most of workers felt stressful for not being able to go out of estate and housing compound due to voluntary lockdown enforced by management since October 2020. However it is safer and whatsoever, estates management been very helpful to assist on workers needs including daily sundries.</p>
	<p>Management Responses: Positive comments noted.</p>
	<p>Audit Team Findings: No further issue.</p>
4	<p>Feedbacks: External FFB supplier: Daily transactions of FFB still continue with no issue although company had implemented voluntary lockdown. Payments still received on time.</p>
	<p>Management Responses: Positive comments noted.</p>
	<p>Audit Team Findings: No further issue.</p>
5	<p>Feedbacks: FFB Transporter: No issue in transportation contracts pricing and payment. Has long business relationship with company for more than 10 years.</p>
	<p>Management Responses: Positive comments noted.</p>
	<p>Audit Team Findings: No further issue.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Gerola Estate Sdn Bhd CL095310919	1979	400.73	NO	NO	Complied
Kinakulture Sdn Bhd CL095310928	1979	401.05	NO	NO	
Pekopa Enterprise Sdn Bhd CL095310900	1979	400.85	NO	NO	
Melewar Properties Sdn Bhd CL095310759	1977	384.78	NO	NO	

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Tye Yang Plantations Sdn Bhd CL095311407	1982	3038.00	NO	NO	Complied
RKKL Holdings Sdn Bhd CL095311710	1984	362.50	NO	NO	
Sri Mulia Sdn Bhd CL095311729	1984	359.40	NO	NO	
Melewar Properties Sdn Bhd CL095310400	1979	1998.38	NO	NO	Complied
Kemajuan Perusahaan Kayu Sdn Bhd CL095311185	1979	324.80	NO	NO	
Pahang Oil Palm Estate 2 CL095317285	1989	1996.72	NO	NO	Complied
Pahang Oil Palm Estate 2 CL095317490	1989	199.40	NO	NO	
Pahang Oil Palm Estate 2 CL095317516	1989	199.80	NO	NO	
Pahang Oil Palm Estate 2 CL095317507	1989	194.90	NO	NO	
Lawas Maju Sdn Bhd CL095321421	1993	80.98	NO	NO	
Pahang Enterprise Sdn Bhd CL095317285	1989	2050.30	NO	NO	Complied
Pahang Enterprise Sdn Bhd CL095317525	1992	358.70	NO	NO	
Pahang Enterprise Sdn Bhd CL095317534	1992	199.90	NO	NO	
Pahang Enterprise Sdn Bhd CL095325983	1999	10.40	NO	NO	

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

3.6 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Melewar Palm Oil Mill and Supply Base has complied with the Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil 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 Melewar Palm Oil Mill and Supply Base is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name: Muhammad Fadzli b. Masran	Name: Seow Chee Chiang
Company Name: BSI Services (M) Sdn. BHD	Company Name: Carotino/J.C. Chang Group
Title: Client Manager	Title: Senior Manager
Signature: 	Signature: <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> CAROTINO / J.C. CHANG GROUP 
Date: 12/05/2021	Date: Seow Chee Chiang Senior Manager 17/05/2021

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Appendix A: Summary of Findings *include the appropriate checklist used for assessment*

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Management documents specified in the RSPO P&C are made publicly available by all estates and mill within Melewar Production Unit (MPU) as per sample sighted as following:</p> <p>Social & Human Rights Policy; Date: 14/11/2019; Signed by both Plantation Director and Mill Director respectively.</p> <p>Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation; Doc. Ref. # E/002-05/2019; Date: 12/8/2019</p> <p>Melewar POM Environmental and Social Improvement Plan – Sabah; Review date: 2/3/2020; Next review date: 2/3/2022</p> <p>Gerola Estates Sdn. Bhd. Summary of Land Titles</p> <p>Gerola Estates Sdn Bhd High Conservation Value Management Plan Review; Date: 2/4/2020; Next review date: 1/4/2021</p> <p>Gerola Estates Sdn. Bhd CSR Summary (Records of Donation / Contribution)</p> <p>Pahang Oil Palm Estate Div. 3 Sustainability Improvement Plan FY 2020/2021</p> <p>Pahang Oil Palm Estate Div. 3 Sustainability Complaint/Suggestion/Grievance Monitoring Book</p>	Complied

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		Other public information relevant to sustainability also available from the company's website as per link http://www.carotino.com/group-mission-and-management-plan-16.aspx .	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Information provided in appropriate languages and accessible to relevant stakeholders in the mill and all estate within MPU. Other public information relevant to sustainability also available from the company's website as per link http://www.carotino.com/group-mission-and-management-plan-16.aspx .	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Request and response from internal & external stakeholders as per sample records sighted in the Sustainability Complaint/Suggestion/Grievance Monitoring Book. Sample requests made are as following: Pahang Oil Palm Estate Div. 2 requested Melewar POM to check quality of FFB from Block PR18A of DxP; Date: 19/11/2020 Kinabatangan Polis Station requested on station development contribution from Gerola Estate; Date: 18/6/2020 Kampung Paris request on signboard contribution from Gerola Estate; Date: 5/9/2020	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	The procedures available as per documented SOP on Mechanisms for Communication and Consultation; Doc. Ref. # E/004-08/2019; Date: 12/8/2019 which were implemented by all estates and mill within MPU. Various communications implemented through letters and emails of consultation in place of meeting that was unable to be conducted due to COVID-19 MCO as per sample sighted as following:	Complied

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		<p>External stakeholder consultation letter ref. # POP3/2020/465/Wk/Rohul by Pahang Oil Palm Estate Div. 3; Date: 31/10/2020</p> <p>External stakeholder briefing of company's communication procedures and sustainability policies; Date: 4/11/2020; Stakeholder name: Crop Master Sdn. Bhd. (FFB supplier)</p> <p>External stakeholder briefing of company's communication procedures and sustainability policies; Date: 13/11/2020; Stakeholder name: Hock Wah Auto Parts Sdn. Bhd. (Spare parts supplier)</p> <p>All estate managers and mill manager are responsible for the external stakeholder communication who were assisted by assistant managers in individual operating units. Sighted the appointment letter of Assistant Manager, Mr. Philipus P. Mosudim as person in-charge in Pahang Oil Palm Estate Div. 3 stakeholder communications to assist the Estate Manager, Mr. William Kok.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>There is a current list of contact and details of stakeholders and their nominated representatives as per sample sighted for Pahang Oil Palm Estate Div. 3 stakeholders list updated on 30/10/2020. The lists registered all relevant internal and external stakeholders among employees, authorities, local communities, vendors and neighbours etc.</p>	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>The ethical conduct policy in Jc Chang Group available under name Corruption Prevention Policy sign by Plantation Director Tee Swee Kee dated 4/9/2015. During recruitment the management give briefing to worker regarding to this policy.</p>	Complied

1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Monitoring conducted by the management of operating units with assistance from Internal Compliance Team (ICT) for the implementation of the policy and overall ethical business practice within Carotino/JC Chang group. Sighted the sample Questionnaire on Legal Compliance and Ethical Conduct; Doc. Ref. # E/024-02-2020; Date: 20/2/2020 filled in by Agensi Pekerjaan MNK Sdn. Bhd. on 5/8/2020.</p>	Complied
<p>Principle 2: Operate legally and respect rights</p>			
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>Melewar Production Unit have continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Asia Production Unit have obtained and renewed licenses and permits as required by the law. Sample of licenses and permit viewed were:</p> <p>Palm Oil Mill</p> <p>Trading license no. KBTG/2019/2010 valid till 31/12/2020</p> <p>MPOB License no. 500106704000 valid till 30/11/2020 (renewal has been applied)</p> <p>"Lesen menggaji pekerja bukan pemastautin" (JTK. H. KBN. 600-4/1/1/10401/0056 valid till 19/03/2021</p> <p>Diesel permit no. S0011895 valid till 13/11/2021</p> <p>CePSWaM certificate no. CePSWaM/198392</p> <p>CePPOME certificate no. CePPOME/184357</p>	Complied

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		<p>Estate</p> <p>Pahang Oil Palm Div. 3 MPOB License no. 616247011000 valid till 26/02/2021</p> <p>Gerola Estate Trading license no. LD/2020/1124 valid till 31/12/2020</p> <p>Pahang Oil Palm Div 3 Salary permit deduction no. 600-1/2/13/13(KBN/2019-0301) valid till 30/10/2021</p> <p>Pahang Oil Palm Div. 3 diesel permit no. S002472 valid till 25/02/2021</p> <p>Gerola Estate diesel permit no. S000988 valid till 16/02/2021</p> <p>Pahang Oil Palm Div. 3 Private Installation license no. 2020/01536 valid till 23/07/2021</p> <p>Gerola Estate Air Compressor certificate of fitness no. PMT-SB/2033422 valid till 28/09/2021</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>A list and copies of legal documents and international treaties and agreements were available for verification. Changes in law was normally tracked through www.lawnet.com.my. The person responsible for monitoring compliance to laws and regulations is formally identified in the guidelines. The Unit maintain copy of relevant laws and legislation relevant to palm oil mill and the plantation operation as per listed in the standard. Based on the SOP on Mechanism to Trace Changes in Legal Requirements (Doc. Ref. No.: E/005-06/2016; Subject Trace changes in legal requirements; Doc. date: 29/3/2016) through the Law Changes Register.</p>	Complied

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2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Legal boundaries were clearly demarcated with a few methods such as verified in field 96C and C09 with FGV Fico, also field G08 with Jaguh Harmoni estate, the boundaries using pegging system and trenches system. In Hwa Li estate verification the boundaries at field 89A08 with Haranky estate S/b & Hutan simpann Class2 Ulu Segama</p>	Complied
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>In Melewar POM the list of contractors was available in Mill. There are 1 contractor for Boiler partial retubing works (SCH Team Engineering Works Sdn Bhd) available under stakeholder list. The contract date 31/3/2021.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>All contractors including FFB suppliers are required to sign Sustainability Compliance Contract with Operating Unit under J.C Chang Group. In the contract stated that all contractors must comply as follows:</p> <p>Meeting applicable legal requirements, which can be demonstrated by contracted party in running the business activities on lawful way.</p> <p>Disallowing child labour, forced labour and trafficked labour in running contracted party's business activities. . If young workers are employed, protection clause should be made available for them in running contracted party's business activities</p>	Complied
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>As per contract agreement record 31/3/2021 already stated including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			

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<p>2.3.1</p>	<p>(C) For all directly sourced FFB, the mill requires:</p> <p>Information on geo-location of FFB origins</p> <p>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</p> <p>One or more supporting documents for claims</p> <p>Valid MPOB license</p> <p>- Critical (Major) compliance -</p>	<p>The mill has established geo-location information for all directly source of FFB documented in Stakeholder List (FFB Supplier). In the list contains information such as FFB supplier name, person responsible, address, contact no., MPOB License and expiry date and geo-location coordinate.</p> <p>The FFB supplier need to undergo due diligence before been accepted as supplier to the mill. Reviewed the due diligence for and document such as MPOB License, Trading License and proof of land ownership/land title as follows:</p> <table border="1" data-bbox="1137 686 1915 1228"> <thead> <tr> <th>FFB Supplier</th> <th>MPOB License</th> <th>Geo-Location</th> </tr> </thead> <tbody> <tr> <td>Bahtiar bin Abdullah</td> <td>279940-401000</td> <td>5° 12.0' 51.0" E; 118° 05.0' 21.0"N</td> </tr> <tr> <td>Jayatas Sdn. Bhd.</td> <td>502334602000</td> <td>5° 17.4' 29.5" E; 118° 11.5' 07.0"N</td> </tr> <tr> <td>Haslina binti Zulkifli</td> <td>599897-501000</td> <td>7° 22.0' 13.0" E; 21.0° 19.0' 01.0"N</td> </tr> <tr> <td>Rohani binti Salleh</td> <td>276740-101000</td> <td>5° 19.0' 01.0" E; 118° 07.0' 03.0"N</td> </tr> <tr> <td>Zulkifli binti Sarahintu</td> <td>276227-60100</td> <td>5° 14.0' 22.0" E; 118° 04.0' 03.0"N</td> </tr> </tbody> </table>	FFB Supplier	MPOB License	Geo-Location	Bahtiar bin Abdullah	279940-401000	5° 12.0' 51.0" E; 118° 05.0' 21.0"N	Jayatas Sdn. Bhd.	502334602000	5° 17.4' 29.5" E; 118° 11.5' 07.0"N	Haslina binti Zulkifli	599897-501000	7° 22.0' 13.0" E; 21.0° 19.0' 01.0"N	Rohani binti Salleh	276740-101000	5° 19.0' 01.0" E; 118° 07.0' 03.0"N	Zulkifli binti Sarahintu	276227-60100	5° 14.0' 22.0" E; 118° 04.0' 03.0"N	<p>Complied</p>
FFB Supplier	MPOB License	Geo-Location																			
Bahtiar bin Abdullah	279940-401000	5° 12.0' 51.0" E; 118° 05.0' 21.0"N																			
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<p>2.3.2</p>	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p>	<p>The mill only receive direct source FFB from plantation company and smallholders as reviewed in the FFB supplier list as at 01/04/2020.</p>	<p>Complied</p>																		

	- Minor compliance -		
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Melewar Production Unit has continued its commitment to long term sustainability and improvements through a capital expenditure program. The management has forecasted 3 years business plan from FY 2020/21 – 2022/23.</p> <p>Annual business plan in the form of annual budget and the projection for 3 years prepared as guidance for future planning. Sighted the annual budget FY 2022 and business plan FY 2020/21 – 2022/23</p> <p>In the 3 years business plan include items as follows:</p> <ul style="list-style-type: none"> FFB and Yield/Ha, OER and KER Mature upkeep and cultivation Cost Mature Harvesting Collection Cost Immature Cost General Charges Depreciation Cost Amortisation Charges 	Complied
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Long range replanting programme was established for JC Chang Group Estates, 25 years plan until 2041. The group has updated the Guideline On Group’s Long Term Replanting Planning, doc ref: A/016-05/2018 dated 20/6/2018.</p>	Complied

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		<p>Reviewed the replanting program for estate visited as follows:</p> <table border="1" data-bbox="1137 411 1883 624"> <thead> <tr> <th>Estate</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>Pahang Oil Palm Estate div. 3</td> <td>255.12</td> <td>218.65</td> <td>246.23</td> <td>292.40</td> <td>202.48</td> </tr> <tr> <td>Gerola</td> <td>0.00</td> <td>184.05</td> <td>0.00</td> <td>0.00</td> <td>198.50</td> </tr> </tbody> </table>	Estate	2020	2021	2022	2023	2024	Pahang Oil Palm Estate div. 3	255.12	218.65	246.23	292.40	202.48	Gerola	0.00	184.05	0.00	0.00	198.50	
Estate	2020	2021	2022	2023	2024																
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Gerola	0.00	184.05	0.00	0.00	198.50																
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Melewar production Unit conducted the management review meeting on annually basis. Latest MRM was conducted on 27/08/2020. Among the agenda discuss during the meeting as follows:</p> <p>Outstanding Issues</p> <p>Results of external assessment</p> <p>Results of Internal Assessment</p>	Complied																		
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>																					
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Initial Social & Environmental Impact Assessment which documented as a Preliminary Management Review for JC Chang’s Melewar and Asia Business Units, Sabah, Malaysia was conducted by Wild Asia on 26/5/2011. The subsequent Environmental and Social Improvement Plan Sabah was established and reviewed on biannual basis as per sample sighted for Melewar POM Environmental and Social Improvement Plan – Sabah; Review date: 2/3/2020; Next review date: 2/3/2022. Among aspects identified and implemented its management plan were as following:</p>	Complied																		

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		<p>Pay & Living Condition: Recruitment, Payment</p> <p>Communication & Consultation: Communication procedure, social conflict, land claim and conflicts</p> <p>Fair Pricing: Internal, External</p> <p>Training</p> <p>Compliance to law regulation</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The RSPO metrics template is not yet made available by the RSPO Secretariat at the time of remote audit. As a record, Carotino/JC Chang Group has submitted its RSPO Annual Communication of Progress 2019 as available in the RSPO website link as following: https://rspo.org/members/43/Carotino-JC-Chang-Group.</p>	Complied
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>Guidance:</p> <p>Mechanisms to check implementation could include documentation of management systems and internal control procedures (see Criterion 2.1).</p> <p>SOP and documentation for mills should include relevant supply chain requirements (see SCCS section under Principle 3).</p> <p>The unit of certification, while working with third party suppliers of FFB on traceability and legality, should use the opportunity to distribute suitable information on BMPs.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p>	<p>Estates and POM have maintained and revised if required, the Documented Standard Operating Procedures file that contains both</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>the safe operating procedures and the procedures to implement the various major field operations.</p> <p>The Standard Operation Procedure (SOP) for Melewar POM contains the procedures for all activities as below:</p> <ol style="list-style-type: none"> 1) Reception Station (Q/040-03/2015) 2) Grading Station (Q/041-03/2015) 3) Fruit Handling Station (Q/042-02/2015) 4) Sterilizer Station (Q/043-02/2015) 5) Threshing Station (Q/045-03/2015) 6) Press Station (Q/046-03/2015) 7) Clarification Station (Q/047-02/2015) 8) Depericarper Station (Q/048-02/2015) 9) Nut & Kernel Station (Q/049-02/2015) 10) Boiler Station (Q/050-02/2015) 11) Engine Room Station (Q/051-06/2015) 12) Water Treatment Plant (Q/052-02/2015) 13) Turner Station (compost plant) (Q/060-01/2014) 14) Digestion Station (Biogas Plant) (Q/202-01/2016) <p>Estates have adequate SOP documented. Sampled Estate SOP Manual/procedures category for the following operations:</p> <ol style="list-style-type: none"> a) Guidelines on Estate Vehicle Maintenance (G/001-01/2018) 	
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		<p>b) Guidelines on Fertilizer Receipts, Management and Application (H/001- 03/2016)</p> <p>c) Buffalo Management (K/001-01/2008)</p> <p>d) Guidelines on Integrated Pest and Disease Management of Oil Palm (L/001-06/2017)</p> <p>e) Rat control and baiting (L/002-07/2016)</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>In Gerola estate, latest visit by General Manager was on 14/12/2020 to ensure the implementation of procedure in place. As per remark for manuring was underspent on manuring due to 1 round of NK mix programme cancel by agronomist and for rat baiting programme, the rate baiting campaign will carry out on 2nd of financial year. For Mill, the GM visit report was available dated July 2019 until June 2020.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The operating units visited maintain all visit report for General Manager, Internal Control Team and Monthly performance reports and action taken for the reports. Reviewed the visit reports as follows:</p> <p>Mill controller visit report for period of FY July 2019 – June 2020 dated 28/08/2020</p> <p>Estate monthly performance reports to General manager for the month of October 2020 for Melewar 2 Estate</p> <p>Internal audit Reports from ICT conducted on 27/07/2020 (Asia Palm Oil Mill) and 24-25/07/2020 (Hwa Li 3 Estate)</p> <p>In Hwa Li 3 estate as per to check consistent implementation, sampling on IPM plan on Ganoderma census in Field 96A record show Dec 2020 infected palm was 3.27%. this same as per reported in GM report accordingly.</p>	Complied

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		<p>The monitoring in Melewar 2 estate, the rat damage census been conducted by management dated 4/11/2020 show result around 17% to 22%. The record was available in estate.</p>	
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting at the estate visited.</p> <p>Melewar production Unit has conducted Environmental Impact Assessment based on Initial assessment conducted by Wild Asia on 26/05/2011 Social & Environmental Impact Assessment and a 5-year Improvement Plan of Melewar Production Units (N005). The plan is subjected to review as minimum every 2 years or when required to reflect the the results of monitoring and where there are operational changes that may have positive and negative impact to environmental and social.</p> <p>Additionally, Asia production Unit has conducted the Environmental Impact Assessment for all estate involve in replanting and submitted the NREB through Proposal Mitigation Report as reviewed in Pahang Oil Palm 3 Estate and Gerola Estate</p> <p>The estates submitted Environmental Compliance Report to EPD twice a year. Reviewed the Environmental compliance report and both estate visited.</p> <p>External stakeholder consultation was implemented through letters and emails in place of meeting that was unable to be conducted due to COVID-19 MCO as per sample sighted as following:</p>	<p>Complied</p>

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		<p>External stakeholder consultation letter ref. # POP3/2020/465/Wk/Rohul by Pahang Oil Palm Estate Div. 3; Date: 31/10/2020</p> <p>External stakeholder briefing of company's communication procedures and sustainability policies; Date: 4/11/2020; Stakeholder name: Crop Master Sdn. Bhd. (FFB supplier)</p> <p>External stakeholder briefing of company's communication procedures and sustainability policies; Date: 13/11/2020; Stakeholder name: Hock Wah Auto Parts Sdn. Bhd. (Spare parts supplier)</p> <p>The documented Environmental and Social Improvement Plan Sabah was established and reviewed on biannual basis as per sample sighted for Melewar POM Environmental and Social Improvement Plan – Sabah; Review date: 2/3/2020; Next review date: 2/3/2022. Among aspects identified and implemented its management plan were as following:</p> <p>Pay & Living Condition: Recruitment, Payment</p> <p>Communication & Consultation: Communication procedure, social conflict, land claim and conflicts</p> <p>Fair Pricing: Internal, External</p> <p>Training</p> <p>Compliance to law regulation</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Melewar Production Unit has established environmental management plan base on the environmental aspect impact conducted and documented in Environmental and Social Improvement Plan. The plan is subjected to review as a minimum every two (2) years or when required to reflect the results of</p>	Complied

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		<p>monitoring and where there are operational changes that may have positive and negative impacts to environmental and social.</p> <p>External stakeholder consultation was implemented through letters and emails in place of meeting that was unable to be conducted due to COVID-19 MCO as per sample sighted as following:</p> <p>External stakeholder consultation letter ref. # POP3/2020/465/Wk/Rohul by Pahang Oil Palm Estate Div. 3; Date: 31/10/2020</p> <p>External stakeholder briefing of company's communication procedures and sustainability policies; Date: 4/11/2020; Stakeholder name: Crop Master Sdn. Bhd. (FFB supplier)</p> <p>External stakeholder briefing of company's communication procedures and sustainability policies; Date: 13/11/2020; Stakeholder name: Hock Wah Auto Parts Sdn. Bhd. (Spare parts supplier)</p> <p>The documented Environmental and Social Improvement Plan Sabah was established and reviewed on biannual basis as per sample sighted for Melewar POM Environmental and Social Improvement Plan – Sabah; Review date: 2/3/2020; Next review date: 2/3/2022.</p> <p>The Plan established covers on:</p> <ul style="list-style-type: none"> Pay and living conditions Communications and consultation Fair pricing Operational procedure Compliance with law regulation 	
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		<p>Local development</p> <p>Training</p> <p>Soil</p> <p>Water course and wetland</p> <p>Pollution</p> <p>Energy</p> <p>Waste</p> <p>HCV (Estate)</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Reviewed the sampled implementation of the management plan established as follows:</p> <p>The estate visited has conducted Environmental Compliance monitoring twice a year. The environmental compliance reports were submitted to EPD. Reviewed the ECR for both estate for the period of January – June 2020 and July – December 2020.</p> <p>Domestic waste at operating units visited were disposed at designated landfill. The area choose for landfill were far from housing area and water course. Sighted at all landfill visited, only domestic waste were disposed at the landfill. Reviewed the domestic collection records as follows:</p> <p>Pahang Oil Palm 3 Estate: 10/03/2021, 12/03/2021, 17/03/2021, 03/01/2021, 07/01/2021, 10/01/2021</p> <p>05/08/2020. 08/08/2020, 10/08/2020,05/10/2020, 09/10/2020, 13/10/2020 and 16/10/2020</p>	Complied

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		<p>Gerola Estate: 06/08/2020, 10/08/2020, 03/09/2020, 10/09/2020 and 14/09/2020. (01/02/2021, 24/02/2021, 26/02/2021, 19/03/2021 and 25/03/2021).</p> <p>Melewar POM:</p> <p>Estate visited has established riparian buffer zone for water course flow through the estate to the Main River. The riparian buffer zone were demarcated with yellow pole. Signboard on prohibition of chemical application, fishing, hunting and other activity were erected in the area. Sighted at the riparian buffer zone in field PM96C G08 in Pahang Oil Palm 3 Estate and PM16A04 in Gerola Estate, the vegetation along the area were well established and maintained. No evidence on chemical application along the area and the awareness on prohibition of chemical application along the buffer zone were satisfactory as noted during interview with workers at both estate visited.</p> <p>All operating units monitor the consumption of fuel per ton FFB produce/processed. Reviewed the monitoring records FY July 2019 – June 2020 and FY July 2020 – Todate February 2021</p> <p>The estates visited continuously conduct training and briefing on HCV and buffer zone to create awareness among the workers. Reviewed the training and briefing records as follows:</p> <p>Pahang Oil Palm3 Estate</p> <p>Bufferzone awareness training dated 20/05/2020</p> <p>RTE species and prohibition of hunting briefing dated 24/09/2020</p>	
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		<p>External stakeholder consultation was implemented through letters and emails in place of meeting that was unable to be conducted due to COVID-19 MCO as per sample sighted as following:</p> <p>External stakeholder consultation letter ref. # POP3/2020/465/Wk/Rohul by Pahang Oil Palm Estate Div. 3; Date: 31/10/2020</p> <p>External stakeholder briefing of company's communication procedures and sustainability policies; Date: 4/11/2020; Stakeholder name: Crop Master Sdn. Bhd. (FFB supplier)</p> <p>External stakeholder briefing of company's communication procedures and sustainability policies; Date: 13/11/2020; Stakeholder name: Hock Wah Auto Parts Sdn. Bhd. (Spare parts supplier)</p> <p>The documented Environmental and Social Improvement Plan Sabah was established and reviewed on biannual basis as per sample sighted for Melewar POM Environmental and Social Improvement Plan – Sabah; Review date: 2/3/2020; Next review date: 2/3/2022.</p> <p>Current aspects being implemented mainly involved the impacts of Movement Control Order (MCO) due to emergence of COVID-19 pandemic. Latest meeting was conducted among internal stakeholders as per sample sighted for Melewar POM on 10/11/2020.</p>	
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p>	<p>The procedure established as Guidelines on Procedure or System of Recruitment, Selection, Hiring, Promotion, Retirement and Termination; Doc. Ref. # E020-01/2019; Doc. Date: 12/8/2019. The procedure was briefed to all existing employees and new</p>	Complied

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	- Minor Compliance -	employees on periodical basis and made available to them upon requests.													
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Employment procedures are well implemented with records well maintained as per information reported in indicator 6.1.1 to 6.6.2 below.	Complied												
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.															
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	<p>Issues on Health and Safety have been assessed and documented in the HIRADC forms. The assessment includes all processing activities and support activities base on workstation this included clinic, harvesting, office, manuring, spraying and etc. All activities with significant risk have been listed and mitigation plan to improve the condition has been established and documented. The document was reviewed once every 3 year or if accident occur. Reviewed the latest review as follows:</p> <table border="1" style="width: 100%;"> <thead> <tr> <th>Operating Unit</th> <th>Date Review</th> <th>Review</th> </tr> </thead> <tbody> <tr> <td>Melewar Palm Oil Mill</td> <td>25/06/2020</td> <td>3 years once/accident</td> </tr> <tr> <td>Pahang Oil Palm Estate 3</td> <td>22/09/2020</td> <td>Annual Review</td> </tr> <tr> <td>Gerola Estate</td> <td>15/01/2020</td> <td>Accident occur on 06/0</td> </tr> </tbody> </table> <p>Other risk such as noise also been assessed by management sampling in Pahang Oil Palm estate Div 3, As per Noise Risk Assessment (SSS/NOISE – 0169/19) dated 12/10/2019 by Sherman Services & Supply (HQ/14/PEB/00/125). For chemical hazard, Chemical Hazard Risk Assessment (CHRA) conducted by En Mohd Amin Bin Adrah (JKKP KIM127/453/6(30) from Pahang</p>	Operating Unit	Date Review	Review	Melewar Palm Oil Mill	25/06/2020	3 years once/accident	Pahang Oil Palm Estate 3	22/09/2020	Annual Review	Gerola Estate	15/01/2020	Accident occur on 06/0	Complied
Operating Unit	Date Review	Review													
Melewar Palm Oil Mill	25/06/2020	3 years once/accident													
Pahang Oil Palm Estate 3	22/09/2020	Annual Review													
Gerola Estate	15/01/2020	Accident occur on 06/0													

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		Enterprise Sdn Bhd dated 19 Oct 2018. All verified as per chemical register dated 1/4/2021	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The effectiveness of H&S plan to address health and safety risks was available in estate as per sampling below:-</p> <p>Pahang Oil Palm Estate Div 3</p> <p>As per Noise Risk Assessment (SSS/NOISE – 0169/19) dated 12/10/2019 by Sherman Services & Supply (HQ/14/PEB/00/125). Refer as H&S plan (reviewed 1/2/2021) the audiometric test already been conducted on 13/3/2020, record evidence to screening programmed available as per letter from Klinik Mabello (Paris) Sdn Bhd. Result showed workers who work with Genset, Backhoe operator, Ramp attendant and Gate keeper was no hearing impairment record. As per OSH plan also, they conduct the hearing conservation training dated 20/4/2020 to impact workers.</p> <p>Melewar Pom</p> <p>In Mil the H&S plan available dated 15/1/2020. Sampling on LEV monitoring conducted by DYNAKEY Laboratories Sdn Bhd referred letter IHT(II)/2019/1001/MPOM dated 15/10/2019, from comment the average face for fume hoods were met the recommended value by ACGIH. For year 2020, the Hygiene tech already conducted the assessment on 25/3/2021 by DYNKIMIA Sdn Bhd cause by Covid 19 Issue. Monthly inspection done by Mr Prakash, latest inspection as on 8/3/2021 and previously on 9/2/2021.</p> <p>Another monitoring of H&S plan, as per CHRA (Ref no. DOSH/HIE/127/171/2(289)) dated 11/12/2016 by Klinik Mansor recommendation, the management already conduct the medical surveillance on 2/9/2020. The result for all workers was fit to work with registered chemical.</p>	Complied

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		Gerola estate From OSH plan recorded 23/1/2021 sampling on workplace inspection at chemical store (23/1/2021), the reporting in OSH meeting 19/2/2021 was same as per workplace implementation reporting.	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Training methodology given to workers are commonly On-The-Job Training, Coaching/Mentoring and Hands-on Practical Session with plenty of Graphical/Pictorial illustration than wordings as these approaches get their attention and better understanding.</p> <p>Formal training program for the year 2021 was established and made available at the beginning of each Financial Year and implemented accordingly. Training identification and needs analysis were applied to recognize the staff, workers and contractor’s deficient skills or knowledge gaps, particularly, in aspects of RSPO P&C and the Supply Chain Certification System. There were no associated smallholders at this Certification Unit and thus no training given to them.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The operating units maintain the records of training conducted. Among the training conducted as follows:</p> <p>Melewar Palm Oil Mill</p> <p>Boiler station SOP and Safety training dated 21/07/2020</p> <p>Engine room station SOP, safety and fuel efficiency training dated 21/07/2020</p> <p>Grading station SOP and safety training dated 11/05/2020</p> <p>Waste disposal and waste segregation training dated 21/07/2020</p>	Complied

		<p>Weighbridge station SOP nd safety training dated 03/08/2020</p> <p>Pahang Oil Palm div. 3</p> <p>OSH awareness training dated 20/04/2020</p> <p>Environmental training dated 20/05/2020</p> <p>Drivers SOP training dated 02/07/2020</p> <p>Emergency Response Plan training dated 19/08/2020</p> <p>Gerola Estate</p> <p>Pest and disease management training dated 08/05/2020</p> <p>Chemical handling and PPE usage training dated 13/02/2020</p> <p>Prohibition of open burning training dated 18/05/2020</p> <p>Triple rinsing SOP training dated 26/08/2020</p> <p>ERP and fire drill training dated 05/10/2020</p>	
<p>3.7.3</p>	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>There were three trainings conducted related to RSPO SC since the last assessment, i.e.:</p> <p>i) Sustainability briefing certification & supply chain by SPO Dept., conducted on 21/1/2021, attended by 13 participants from the mill</p> <p>ii) Assistant give briefing & supply chain Certification Standard with Transporter & Contractor by the Assistant Mill Manager, conducted on 17/2/2020, attended by 12 participants included Pengangkutan Dagang Tera</p>	<p>Complied</p>
<p>Criterion 3.8: Supply chain requirement for mills</p>			

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(note: All supply chain requirements are considered as Critical (C) . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Melewar POM receives and process both certified and non-certified FFB. Hence it uses the Mass Balance supply chain system and module. During the remote assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>	Complied
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Melewar POM receives and process both certified and non-certified FFB. Hence it uses the Mass Balance supply chain system and module. During the remote assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products produced by Melewar was recorded in the documents as following:</p> <p>MOM – Sustainable CPO Mass Balance – Quarterly; To-date records - CPO produced October 2020: 3,625.0640 mt</p> <p>MOM – Sustainable PK Mass Balance – Quarterly; To-date records - PK produced October 2020: 811.6470 mt</p>	Complied

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3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>Melewar POM meet all registration and reporting requirements for MB supply chain through the RSPO IT platform as per sighted latest records as following:</p> <p>Product: CSPO; SC Model: MB; Certified volume: 36,970.70 mt; Volume sold: 9,503.00 mt</p> <p>Product: CSPK; SC Model: MB; Certified volume: 9,256.53 mt; Volume sold: 6,199.23 mt</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <p>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>Written procedures established as Melewar Palm Oil Mill Standard Operation Procedure - Standard Operation Procedure for SCC Standard Mass Balance Calculation; Doc. Ref. # SC/MBC-07/2019-MOM; Doc. Date: 30/4/2019</p> <p>Complete and up to date records and reports demonstrated compliance including daily production reports, mass balance records and SCCS training (latest conducted date: 12/7/2020) etc.</p> <p>Identified person in-charge was Muhd. Arzani Mazelie, Admin Officer of Melewar POM as per letter of appointment dated 2/1/2018.</p> <p>Melewar POM certified as MB for its SCC. The mill has a documented procedure of Mechanism for Receiving and Processing Certified & Non-certified FFB; Doc. Ref. # SC/MEC-05/2018-MOM; Doc. Date: 14/9/2018.</p>	Complied
3.8.6	<p>Internal Audit</p> <p>The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p>	<p>SOP for Internal audit written as Guideline for Internal Auditing and Management Review of The Sustainability and Supply Chain System; Doc. Ref. # T001-03/2018; Doc. Date: 3/6/2018 was established. Latest internal audit was conducted on 24 26/08/2020 by ICT personnel.</p>	Complied

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	<p>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>Effectively implements and maintains the standard requirements within its organisation.</p> <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>A total of 5 Major CARs were raised by the internal auditors have been addressed accordingly through identification of root cause and implementation of corrective actions. All Major CARs were verified closed by internal auditors on 30/9/2020.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Melewar POM certified as MB for its SCC. The mill has a documented procedure of Mechanism for Receiving and Processing Certified & Non-certified FFB; Doc. Ref. # SC/MEC-05/2018-MOM; Doc. Date: 14/9/2018 for mechanism in place to handle non-conforming FFB and/or documents.</p> <p>Verification of the certified and non-certified tonnage will be determined from weighbridge ticket of FFB suppliers which already categorized in the computer database system. Furthermore, all FFB weighbridge tickets were stamped and ticked its category of either sustainable (certified) FFB or non-sustainable (non-certified) FFB source. Sighted sample of uncertified FFB weighbridge tickets as following:</p> <p>Ticket # FFB20004144W; Date: 19/3/2020; Supplier: M/S Ishar Bin Bacho; Net weight: 5.30 mt</p> <p>Ticket # FFB20004157W; Date: 20/3/2020; Supplier: M/S Yanong Binti Latuka; Net weight: 1.79mt</p> <p>The procedure also specified that the mill Admin Officer shall inform CB immediately if there is a projected overproduction.</p>	<p>Complied</p>

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<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <p>The name and address of the buyer;</p> <p>The name and address of the seller;</p> <p>The loading or shipment / delivery date;</p> <p>The date on which the documents were issued;</p> <p>RSPO certificate number;</p> <p>A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>The quantity of the products delivered;</p> <p>Any related transport documentation;</p> <p>A unique identification number.</p>	<p>Melewar POM ensured all minimum information for RSPO certified products is made available in set of documents of all products deliveries as per sample sighted as following:</p> <p>Certified product delivery:</p> <p>Despatch slip ticket # CPORS20000272W; Date: 27/10/2020; Buyer: Lahad Datu Edible Oils Sdn. Bhd. (LDEO); Product code: CPO/RSPO MB; DO # 44783; Net weight: 33.210 mt</p> <p>Non-Certified product delivery:</p> <p>Despatch slip ticket # PK20000229W; Date: 26/10/2020; Buyer: Lahad Datu Edible Oils Sdn. Bhd. (LDEO); Product code: PK; DO # 13620; Net weight: 28.700 mt</p>	<p>Complied</p>
<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>The mill shall ensure the following:</p>	<p>Outsource only involved transportation of products, i.e. CSPO and CSPK, subjected to the buyers' contractual requirements either ex-mill or delivered. Mostly delivered contracts involved CSPO and and ex-mill involved CSPK. Implementation was based on the procedure: Melewar Palm Oil Mill Standard Operation Procedure; Doc. Ref. # SC/07-06/2019-MOM; Critical Control Point 7: CPO & PK Despatch and Transportation; Date: 30/9/2019.</p> <p>The mill trades CSPO and CSPK with its buyers among refineries and/or oleochemical plants. Based on agreements, transporter has</p>	<p>Complied</p>

	<p>The mill has legal ownership of all input material to be included in outsourced processes</p> <p>The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>no ownership of transported products. Sighted the recent contract for both CSPO and CSPK were delivered, hence requiring outsource process i.e. transportation. The recent outsourcing of CSPO and CSPK transport as per following:</p> <p>Palm Kernel & Crude Palm Oil Transportation Agreement between Melewar Properties Sdn. Bhd. Melewar Palm Oil Mill and Pengangkutan Dagang Tera Sdn. Bhd.; Dated 4/9/2019; Renewal of Palm Kernel Transport Agreement to continue the service from 01/10/2019 – 30/09/2022.</p> <p>Documented control system established as per CCP 7. Sample MPOM Security Checklist CPO Despatch; 15/11/2018; Arif ST891E/ST412H (Pengangkutan Tera).</p>	
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system and stakeholder list i.e. MPOM - List of Contractor; Last updated 27/11/2020.</p>	Complied
3.8.11	<p>The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.</p>	<p>Names and contact details of any new transporter used for the physical handling of RSPO certified oil palm products to be informed by mill supply chain PIC upon available.</p>	Complied
3.8.12	<p>Record keeping</p> <p>The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements</p>	<p>Melewar POM kept the records such as SOP, training, despatch note as per RSPO SCCS requirements as per sample sighted in indicator 3.8.3 to 3.8.10 above.</p> <p>The records are kept for 7 years as per own established SOP, Standard Operation Procedure for SCC Standard Mass Balance Calculation, Clause 6: Record keeping (SC/MBC-07/2019-MOM) dated 30/4/2019.</p>	Complied

	<p>and be able to confirm the certified status of raw materials or products held in stock.</p> <p>For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>For Mass Balance Module, the mill:</p> <p>Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>Melewar POM receives and process both certified and non-certified FFB. Hence it uses the Mass Balance supply chain system and module.</p> <p>The estimated tonnage of CPO and PK products produced by Melewar was recorded in the documents as following:</p> <p>MOM – Sustainable CPO Mass Balance – Quarterly; To-date records - CPO produced October 2020: 3,625.0640 mt</p> <p>MOM – Sustainable PK Mass Balance – Quarterly; To-date records - PK produced October 2020: 811.6470 mt</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The OER and KER are measured on daily basis, aggregated and reported on daily, weekly, monthly and annually basis through the mill production report. Based on the sample production report i.e. Lintramax Mill Director Melewar Properties Sdn. Bhd. (Melewar Palm Oil Mill) Theoretical OER & KER Distribution for The Month of October 2020 the actual OER and KER for the month of October 2020 are as following:</p> <p>Actual OER: 21.19 %</p> <p>Actual KER: 4.74 %</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The OER and KER are measured on daily basis, aggregated and reported on daily, weekly, monthly and annually basis through the</p>	Complied

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		<p>mill production report. Based on the sample production report i.e. Lintramax Mill Director Melewar Properties Sdn. Bhd. (Melewar Palm Oil Mill) Theoretical OER & KER Distribution for The Month of October 2020 the actual OER and KER for the month of October 2020 are as following:</p> <p>Actual OER: 21.19 %</p> <p>Actual KER: 4.74 %</p>	
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Melewar POM receives and process both certified and non-certified FFB. Hence it uses the Mass Balance supply chain system and module.</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Shipping Announcement available in the RSPO IT platform as per sample records sighted for delivery sample as following:</p> <p>CSPO Shipping Announcement:</p> <p>Seller: Member Name Carotino/JC Chang Group - Melewar Production Unit; Member ID # RSPO_PO1000000527; Buyer: Member Name Lahad Datu Edible Oils Sdn. Bhd.; Member ID # RSPO_PO1000000071; Seller Contract Number: MP/A0708/11/20; Product Name CSPO; Supply Chain Model: Mass Balance; Volume: 500 mt; Transaction ID TR-a3917b7b-edad; Transaction Status: Announced; Last Updated: 30-11-2020</p> <p>CSPK Shipping Announcement:</p> <p>Seller: Member Name Carotino/JC Chang Group - Melewar Production Unit; Member ID # RSPO_PO1000000527; Buyer: Member Name Lahad Datu Edible Oils Sdn. Bhd. (KCP); Member ID # RSPO_PO1000006525; Seller Contract Number:</p>	Complied

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		MP/2461/10/20; Product Name CSPK; Supply Chain Model: Mass Balance; Volume: 614.8 mt; Transaction ID TR-f77d4886-ae99; Transaction Status: Announced; Last Updated: 30-11-2020	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	Based on the established SOP for SCC Standard Mass Balance Calculation, Clause 10: The mill should only make claims regarding the use of or support of RSPO certified oil Palm products that are in compliance with RSPO Rules on Market Communications and Claims and on the products that contains MSPO certified oil palm planted areas which have been certified for the oil palm management certification standard as being sustainably managed.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <p>Display its RSPO membership status</p> <p>Display the RSPO web address (www.rspo.org)</p> <p>State that the member supports the work of the RSPO</p> <p>State the member's history with regard to the RSPO.</p> <p>Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable

4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
Business to consumer communication			

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6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified	Melewar POM has not made any claims for its sustainable products. Hence, this requirement is not applicable.	Not Applicable

	<p>supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rsपो.org.</p>		
<p>MODULE B – MASS BALANCE SPECIFIC RULES (delete if not applicable)</p>			
<p>Minimum Mass Balance content</p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>The CPO & PK produced from Melewar POM is 100% RSPO MB certified.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>The CPO & PK produced from Melewar POM is 100% RSPO MB certified.</p>	<p>Complied</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways: Surrounded by the text: 'Certified sustainable palm oil'.</p> <p>The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</p>	<p>Melewar POM is not using or claim RSPO Label and Trademark for MB.</p>	<p>Complied</p>

	<p>The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</p> <p>Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</p> <p>In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document.</p>		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <p>[Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.</p> <p>The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</p> <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <p>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p>	<p>Melewar POM is not using or claim RSPO Label and Trademark for MB.</p>	<p>Complied</p>

Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Carotino/JC Chang Group has established the Social & Human Rights Policy; Date: 14/11/2019; Signed by both Plantation Director and Mill Director respectively. The policy include prohibiting retaliation against HRD was documented and communicated as per sample records of policy briefing to all Melewar POM employees from 25/2/2020 to 7/9/2020.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the mill and estates within MPU do not instigate violence or use any form of harassment in their operations.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the records of complaints and grievances no issue of whistle-blowing that requires anonymity of complainants and/or grievance parties. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed the information.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The procedures available as per documented SOP on Mechanisms for Communication and Consultation; Doc. Ref. # E/004-08/2019; Date: 12/8/2019 which were implemented by all estates and mill within MPU. Various communications implemented through letters and emails of consultation in place of meeting that was unable to be conducted due to COVID-19 MCO as per sample sighted as following:</p>	Complied

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		<p>External stakeholder consultation letter ref. # POP3/2020/465/Wk/Rohul by Pahang Oil Palm Estate Div. 3; Date: 31/10/2020</p> <p>External stakeholder briefing of company's communication procedures and sustainability policies; Date: 4/11/2020; Stakeholder name: Crop Master Sdn. Bhd. (FFB supplier)</p> <p>External stakeholder briefing of company's communication procedures and sustainability policies; Date: 13/11/2020; Stakeholder name: Hock Wah Auto Parts Sdn. Bhd. (Spare parts supplier)</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Request and response from internal & external stakeholders as per sample records sighted in the Sustainability Complaint/Suggestion/Grievance Monitoring Book. Sample requests made are as following:</p> <p>Pahang Oil Palm Estate Div. 2 requested Melewar POM to check quality of FFB from Block PR18A of DxP; Date: 19/11/2020</p> <p>Kinabatangan Polis Station requested on station development contribution from Gerola Estate; Date: 18/6/2020</p> <p>Kampung Paris request on signboard contribution from Gerola Estate; Date: 5/9/2020</p> <p>All requests were responded back to grievance parties within agreed timeframe as acknowledge in the records.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>All operating units within MPU implemented the conflict resolution mechanism based on the established SOP on Mechanism for Complaints and Grievances; Doc. Ref. # E/00107/2019; Doc. Date: 12/8/2019. The SOP stated that further arrangements to go for the independent arbitration will include the option of access to independent legal and technical advice, the ability for complainants</p>	Complied

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		to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Based on the interview of internal stakeholders among workers and relevant external stakeholders, contributions to community development are demonstrated. As per sample feedbacks from CLC teacher, estate managements always visit and contributes to school programs and activities. 100% of children among estate workers are schooling at CLC including from neighbour estate. School facilities were well maintained by company. As per Melewar POM records of Summary Corporate Social Responsibility to Public as per sample sighted as following: Staff and workers children education aid contribution; Date: 26/2/2021 Contribution of Sekolah Menengah Kebangsaan Paris SPM Student accommodation in school due to COVID-19 Pandemic; Date: 30/1/2021 Donation to Kinabatangan COVID-19 Quarantine Centre; Date: 31/10/2020	Complied
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available. - Critical (Major) compliance -	MPU implemented the company's Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents; Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 in case of land dispute issue occurs. Documents showing legal ownership available as per sample land titles sighted as following:	Complied

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		<p>Melewar POM sample Land title # CL 095310400; Owner: Melewar Properties Sdn. Bhd.; Leasing period: 1/1/1979 – 31/12/2077; Area: 4,938 acres</p> <p>Gerola Estate sample Land title # CL 095310919; Owner: Gerola Estates Sdn. Bhd.; Leasing period: 1/1/1979 – 31/12/2077; Area: 990.2 acres</p> <p>Pahang Oil Palm Estate Div. 3 sample Land title # CL 095317285; Owner: Pahang Enterprise Sdn. Bhd.; Leasing period: 1/1/1989 – 31/12/2087; Area: 4,047 ha</p> <p>No issues of land dispute issue occur in all estates within MPU since the last audit.</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues of land dispute issue occur in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities’ and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	No issues of land dispute issue occur in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.2b	Evidence that the unit of certification has respected communities’ decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	No issues of land dispute issue occur in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied

4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	No issues of land dispute issue occur in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Land maps for the sampled Gerola Estate and Pahang Oil Palm Estate Div. 3 with appropriate scales showing estate's boundaries with neighbours. The maps in-line with area specified in individual land titles.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	No issues of land dispute issue occur in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	No issues of land dispute issue occur in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No issues of land dispute issue occur in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	No new planting and issues of customary land occurs in all estates within MPU that requires FPIC process since the last audit.	Complied

	- Critical (Major) compliance -	Consultation with relevant stakeholders conducted on-site confirmed the information.	
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	No new planting and issues of customary land occurs in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	No new planting and issues of customary land occurs in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	No new planting and issues of customary land occurs in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	No new planting and issues of customary land occurs in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied

	- Minor compliance -		
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new planting and issues of customary land occurs in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new planting and issues of customary land occurs in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within MPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	No new planting and issues of customary land occur in all estates within MPU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	No new planting and issues of customary land occur in all estates within MPU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied

4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	No new planting and issues of customary land occur in all estates within MPU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	No new planting and issues of customary land occur in all estates within MPU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	No new planting and issues of customary land occur in all estates within MPU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	No new planting and issues of customary land occur in all estates within MPU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	No new planting and issues of customary land occur in all estates within MPU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
Criterion 4.8: 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.			

4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occur in all estates within MPU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and issues of customary land occur in all estates within MPU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occur in all estates within MPU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occur in all estates within MPU that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
<p>Principle 5: Support smallholder inclusion</p>			
<p>Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			

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5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>Melewar POM displayed the current and previous period prices paid for FFB in front of the weighbridge counter on a white board. Sighted records of current and previous FFB prices displayed as following:</p> <p>Date: 26/11/2020; FFB price: RM 686. 88/mt FFB; RM 33.36/mt CPO</p> <p>Date: 26/10/2020; FFB price: RM 655. 33/mt FFB; RM 31.79/mt CPO</p>	Complied
5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>Evidence available that the FFB pricing explained to smallholders in Fresh Fruit Bunches Sales and Purchase Agreement; Date: 1/3/2017 Melewar POM & Abdul Rahman Bin Said; MPOB license # 276719-701000; Validity period: 1/5/2017 – 30/4/2022; Second Schedule (Jadual Kedua) Formula for FFB Price Determination (Formula untuk penentuan Harga BTS):</p> <p>FFB Price = [(A - B) x C] + [(D - E) x F] + [(D - E) x F] – G, Where:</p> <p>A: Current Month Average CPO price minus Sabah’s CPO Discount of RM40/mt</p> <p>B: MPOB CPO related cess, Sabah’s Government Sales Tax on “MPOB Sabah CPO Price” and on other taxes that might be levied</p>	Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>FFB pricing and calculation was included in the FFB Sales and Purchase Agreement which was based on the MPOB prices as well as the FFB grading quality. Latest explanation to all FFB suppliers including smallholders was done through letters and emails of consultation in place of meeting that was unable to be conducted due to COVID-19 MCO as per sample sighted for letter dated on 4/12/2020.</p>	Complied
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the</p>	<p>Continuous Improvement Plan for Melewar Palm Oil Mill FY 2020/2021; Social Impacts – Support Smallholder Program; Budgeted rate to engaged qualified trainer to teach smallholder on</p>	Complied

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	<p>contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>implementing good safety practice e.g. spraying, manuring and harvesting etc.</p> <p>As per records Maklum Balas Isu Yang Dibangkitkan received on 4/10/2020; two smallholders requested information on latest FFB prices – immediate action through phone call by weighbridge clerk to notify requested information on 5/10/2020.</p>	
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Contracts are fair, legal and transparent and have an agreed timeframe as per sample sighted for Melewar POM FFB Sales and Purchase Agreement between Melewar Properties Sdn. Bhd. (Buyer) and Alimin Bin Mansur (Seller) – MPOB License # 404407801000; Date: 1/5/2017.</p>	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the agreements, full payment shall be made by Buyer to Seller for the whole month’s deliveries not later than ten (10) working days after the official announcement of the MPOB Crude Palm Oil and Palm Kernel prices. Records shown all payments were made on time.</p>	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Melewar POM verified its weighing equipment as per mandatory requirements of Weights and Measures Act 1972 as per latest records of stamping by Metrology Corporation Malaysia Sdn. Bhd. as following:</p> <p>Weighbridge stamp # Q022199-2.1K; Serial # 163650129; Model: 60,000 kg Avery ZM 305; Calibration date: 12/8/2020</p> <p>Weighbridge stamp # Q022095-2.1K; Serial # 153250276; Model: 60,000 kg Avery ZM 305; Calibration date: 24/6/2020</p>	Complied
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control</p>	<p>The mill supports the FFB Suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders confirmed that they were provided with information of sustainable</p>	Complied

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	<p>system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>certifications mainly in MSPO since it is mandatory for the smallholders. Consulted smallholders however refused to enter the mutual agreements on RSPO certifications for the time being although support made ready by the company.</p>	
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>Melewar POM established its own Complaint Grievance Procedure based on the company's documented SOP on Mechanisms for Communication and Consultation; Doc. Ref. # E/004-08/2019; Date: 12/8/2019. Grievance from internal & external stakeholders as per sample records sighted in the Sustainability Complaint/Suggestion/Grievance Monitoring Book. No grievance recorded since last audit except for sample requests made as per sample as following:</p> <p>Pahang Oil Palm Estate Div. 2 requested Melewar POM to check quality of FFB from Block PR18A of DxP; Date: 19/11/2020</p> <p>Kinabatangan Polis Station requested on station development contribution from Gerola Estate; Date: 18/6/2020</p>	Complied
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>The mill supports the FFB Suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders confirmed that they were provided with information of sustainable certifications mainly in MSPO since it is mandatory for the smallholders. Consulted smallholders however refused to enter the mutual agreements on RSPO certifications for the time being although support made ready by the company.</p>	Complied
5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial</p>	<p>The mill supports the FFB Suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders confirmed that they were provided with information of sustainable</p>	Complied

	<p>competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	<p>certifications mainly in MSPO since it is mandatory for the smallholders. Consulted smallholders however refused to enter the mutual agreements on RSPO certifications for the time being although support made ready by the company.</p>	
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>The mill supports the FFB Suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders confirmed that they were provided with information of sustainable certifications mainly in MSPO since it is mandatory for the smallholders. Consulted smallholders however refused to enter the mutual agreements on RSPO certifications for the time being although support made ready by the company.</p>	Complied
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>The mill supports the FFB Suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders confirmed that they were provided with information of sustainable certifications mainly in MSPO since it is mandatory for the smallholders. Consulted smallholders however refused to enter the mutual agreements on RSPO certifications for the time being although support made ready by the company.</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>The mill supports the FFB Suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders confirmed that they were provided with information of sustainable certifications mainly in MSPO since it is mandatory for the smallholders. Consulted smallholders however refused to enter the mutual agreements on RSPO certifications for the time being although support made ready by the company.</p>	Complied

Principle 6: Respect workers' rights and conditions

Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>MPU implemented the company’s Equal Opportunity Policy; Date: 12/8/2019; Signed by both Plantation Director and Mill Director respectively. Regular briefing also conducted to all employees as per sample sighted for Sustainability awareness – Company Policy (OSH, Social & Human Right, Equal Opportunity, Environmental, Corruption Prevention, Sexual Harassment, Reproductive Right; Date: 30/10/2020.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>MPU implemented its recruitment based on the company’s Guidelines on Procedure of Recruitment, Selection, Hiring, Promotion, Retirement and Termination; Doc. Ref. # E020-01/2019; Doc. Date: 12/08/2019. Sighted sample advertisements and records of new employee’s recruitments as well as promotion of exiting employees confirmed that it was based on skills, capabilities, qualities and medical fitness necessary.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Pregnancy testing was conducted only for women employee involved in chemical handling work to ensure no pregnant women working with the risk of chemical exposure. All women employees involved in chemical handling work within Melewar Production Unit (MPU) underwent Urine Pregnancy Test (UPT) conducted by Hospital Assistant on monthly basis as per sample sighted as following:</p> <p>Pahang Oil Palm Estate Div. 3: Total women employee handling chemical = 4 (Manuring); 10 (Spraying); 1 (Store Clerk) & 5</p>	Complied

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		<p>(Nursery); Total = 20; Latest test date: 29/3/2021; Result: 20 negatives; 0 positive</p> <p>Melewar POM: Total women employee in mill = 12; Latest test date: 4/3/2021; Result: 12 negatives; 0 positive</p> <p>Gerola Estate. 2; UPT for Female workers; Date: 22/3/2021; Total woman employee = 20; Result: 20 -ve; 0 +ve</p>	
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender committee available in all operating units within MPU where the committee members responsible to raise awareness, identify and address issues of concern as well as opportunities and improvements for women through various activities and events. Sighted sample minutes of meeting records for gender committee meeting conducted on 20/11/2020 at Melewar POM, 10/6/2020 at Gerola Estate and at Pahang Oil Palm Estate Div. 3</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Evidence of equal pay for the same work scope available as per sample sighted as following:</p> <p>Pahang Oil Palm Estate Div. 3:</p> <p>Female employee ID # PE300098; Gang: R07; Post: Field Worker; March 2020 salary: RM 1,182.45</p> <p>Male employee ID # PTG0522; Gang: R07; Post: Field Worker; March 2020 salary: RM 1,245.25</p> <p>Gerola Estate:</p> <p>Female employee ID # GE100197; Gang: G05; Post: Field Worker; March 2020 salary: RM 1,187.32</p> <p>Male employee ID # GER1115; Gang: G05; Post: Field Worker; March 2020 salary: RM 1,143.67</p> <p>Melewar POM:</p>	Complied

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		Female employee ID # G0288; Gang: G41; Post: Process Operator; March 2020 salary: RM 1,245.50 Male employee ID # G0413; Gang: G05; Post: Process Operator; March 2020 salary: RM 1,311.75	
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Collective agreements and documentations of pay and conditions available to the workers for sample employees sighted as per indicator 6.1.6 above. Explanation made from time to time upon updates of salary related changes mainly the Minimum Wages Order as per sample sighted for Melewar POM briefing of Minimum Wages and Method of Wages Payment dated on 9/3/2020 by the Admin Officer. Also sighted a sample permit obtained by MPU i.e. Permit Potongan Daripada Gaji Pekerja; Seksyen 113(4), Ordinan Buruh (Sabah Bab 67); Serial # 600-1/2/13/53(11/KBN/2020-0174); Validity period: 23/6/2020-22/6/2022	Complied
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members. - Critical (Major) compliance -	Employment contracts detailing payments and conditions of employment available to the workers for sample employees sighted as per indicator 6.1.6 above. Regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with Sabah Labour Ordinance and Minimum Wages Order. Checkroll system used is LintraMax Plantation Director; Worker Payslip Listing (Detail payslip with piece-rate work price).	Complied
6.2.3	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave,	Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.1.6 above shown evidence of legal compliance for regular working hours,	Complied

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	<p>reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements, as well as for other samples as following:</p> <p>Melewar POM samples:</p> <p>Employee # G0350; Post: Security Guard; Date joined: 11/4/2016; Nationality: Malaysia</p> <p>Employee # G0441; Post: Kernel Plant Operator; Date joined: 4/9/2018; Nationality: Philippine</p> <p>Employee # G0067; Post: Biogas Plant Operator; Date joined: 1/6/2017; Nationality: Indonesia</p> <p>Employee # G0227; Post: Shift Operator; Date joined: 4/8/2017; Nationality: Malaysia</p> <p>Employee # G0440; Post: Nut Plant Operator; Date joined: 4/9/2018; Nationality: Philippine</p> <p>Employee # G0006; Post: USB Sorter Attendant; Date joined: 1/6/2017; Nationality: Indonesia</p> <p>Based on <i>Pahang Oil Palm Estate Div. 3 Harga Bayaran (RM) Pelbagai Jenis Operasi Ladang FY 2020/2021</i>; Effective date: 1/7/2020), Pahang Oil Palm Estate Div. 3 samples:</p> <p>Employee # PTG0663; Post: Night Watchman; Date joined: 1/6/2018; Nationality: Philippine</p> <p>Employee # PE300445; Post: Loose Fruit Picker; Date joined: 1/6/2018; Nationality: Indonesia</p>	
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		<p>Employee # PTG0324; Post: Harvester; Date joined: 1/6/2018; Nationality: Philippine</p> <p>Employee # PE300018; Post: Loose Fruit Picker; Date joined: 16/6/2020; Nationality: Indonesia</p> <p>Employee # PE300508; Post: General Worker; Date joined: 1/6/2019; Nationality: Indonesia</p> <p>Employee # PTG0995; Post: Nursery; Date joined: 1/12/2019; Nationality: Indonesia</p> <p>Based on Particulars of Workers; Month as at February 2021, Gerola Estate samples:</p> <p>Employee # GE100345; Post: Driver; Date joined: 29/10/2020; Nationality: Malaysia</p> <p>Employee # GE100265; Post: Harvester; Date joined: 1/10/2018; Nationality: Indonesia</p> <p>Employee # GE100223; Post: Foreman; Date joined: 1/8/2010; Nationality: Philippine</p> <p>Employee # GE100283; Post: Loose Fruit Picker; Date joined: 1/6/2019; Nationality: Indonesia</p> <p>Employee # GE100295; Post: General Worker; Date joined: 2/5/2019; Nationality: Indonesia</p> <p>Employee # GE100263; Post: Harvester; Date joined: 1/10/2018; Nationality: Indonesia</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available</p>	<p>Adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities in compliance with the Workers Minimum Housing and Amenities Standard Act 1990 provided by the</p>	Complied

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	<p>or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>company as evidence from the site visit. Regular monitoring also conducted as per sample records of following:</p> <p>Latest VMO visit Pahang Oil Palm Estate Div. 3; Date: 17/3/2020, previous visit by VMO conducted line site inspection dated 4/3/2021 by Dr. Mohamad Fikri Bin Zanal Abidin; OHD DOSH Reg. # HQ/16/DOC/00/557; Mabello Group of Clinics.</p> <p>Melewar POM latest housing inspection records i.e. Checklist Inspection of Labour Line conducted on 26/3/2021. Latest VMO visit Melewar POM; Date: 17/3/2020, previous visit by VMO conducted line site inspection dated 4/3/2021 by Dr. Mohamad Fikri Bin Zanal Abidin; OHD DOSH Reg. # HQ/16/DOC/00/557; Mabello Group of Clinics.</p> <p>Fogging was conducted as part of identified social aspects from SIA reports conducted by Wild Asia. Latest fogging conducted was conducted on 15/3/2021 as per Melewar POM Fogging Schedule Records.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Based on the sample records, Melewar POM monitored through records of price comparison in sundry shop available within Melewar POM workers housing area i.e. Mahee Trading sundry shop price list. Sighted price comparison made for the month of Sep-20, Oct-20, Nov-20, Dec-20, Jan-21 & Feb-21.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and</p>	<p>All MPU employees received decent living wages based on the company’s (Carotino/JC Chang) group documents of Implementation Plan for Decent Living Wage (DLW); Doc. Ref. # E/027-01/2019; Doc. Date: 29/11/2019. The DLW assessment in the plan covers whole operating units in Sabah and Peninsular Malaysia. As an average, the DLW for MPU is RM 1,971.63/month which is far higher than the mandatory Minimum Wages Order 2020.</p>	Complied

	<p>for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <p>Updated assessment on prevailing wages and in-kind benefits</p> <p>There is annual progress on the implementation of living wages</p>		
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	<p>Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</p> <p>The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</p> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within MPU.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>A statement on recognising freedom of association was published in the Social & Human Rights Policy; Date: 14/11/2019; Signed by both Plantation Director and Mill Director respectively. The policy stated that the management will respect the right of employees to join any association freely. Regular briefing also conducted to all employees as per sample sighted for Sustainability awareness – Company Policy (OSH, Social & Human Right, Equal Opportunity, Environmental, Corruption Prevention, Sexual Harassment, Reproductive Right; Date: 30/10/2020.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Minutes of meetings available as per sample sighted as following: Gerola Estates Minutes of Meeting records of Mesyuarat Ahli Jawatankuasa Perundingan Bersama Majikan; Date: 20/2/2021; Venue Gerola Estate Meeting Room.</p>	Complied

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		<p>Melewar POM Minit Mesyuarat Joint Consultative Committee Kali Ke-36; Date: 14/1/2021; Venue: MPOM meeting room</p> <p>Pahang Oil Palm Estate Div. 3 Minit Mesyuarat Jawatankuasa Perundingan Bersama Joint Consultative Committee (JCC) Kali Pertama 2021; Date: 10/3/2021</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on the interview conducted with the workers' representatives and records of JCC election at all operating units within MPU, it was confirmed that management does not interfere with the formation or operation of the workers committee. Sighted as sample the gender committee chairperson as per appointment letter dated 2/1/2021 is Maimunah Didin for Gerola Estate.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>A formal policy for the protection of children, including prohibition of child labour was in place as Children Protection Policy; Date: 20/2/2020; Signed by both Plantation Director and Mill Director respectively. Children Protection Policy also extended to all external stakeholders mainly among vendors of MPU. Sighted sample records of Sustainability Compliance Contract with Operating Unit; Doc. Ref. # E023-01/2019; Doc. Date: 12/8/2019; undertaken by recruitment agency of MPU i.e. Agensi Pekerjaan MNK Sdn. Bhd. who signed on 30/8/2020.</p>	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>Records of employee master lists for sampled estates and mill within MPU shown the birth date of them that indicated the minimum age requirements are met. The documented Guidelines on Procedure of Recruitment, Selection, Hiring, Promotion, Retirement and Termination has specified the screening verification procedure which able to be done via HR computer system which will trigger alarm if underage worker data keyed-in the database.</p>	Complied

6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	Based on the interview and employees master lists data, no young person below 18 years old employed within all operating units within MPU.	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them. Records of communication also available as per sample sighted for FFB supplier of Melewar POM i.e. Meran Sdn. Bhd./Kebaco Sdn. Bhd. that was signed on 28/7/2020.	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	MPU implemented the company's Sexual Harassment Policy; Date: 1/7/2012; Signed by both Plantation Director and Mill Director respectively. Latest internal communication was done during Sustainability awareness – Company Policy (OSH, Social & Human Right, Equal Opportunity, Environmental, Corruption Prevention, Sexual Harassment, Reproductive Right; Date: 30/10/2020.	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	MPU implemented the company's Guideline on Reproductive Rights; Doc. Ref. # E/015-02/2015; Doc. Date: 5/11/2015 established by Plantation Department, Head Office. Latest internal communication was done during Sustainability awareness – Company Policy (OSH, Social & Human Right, Equal Opportunity, Environmental, Corruption Prevention, Sexual Harassment, Reproductive Right; Date: 30/10/2020.	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	New mothers' assessment was undertaken by gender committee representatives as per records of gender committee meeting conducted on 15/7/2020 at Melewar POM, 24/8/2020 at Gerola Estate and on 20/8/2020 at Pahang Oil Palm Estate Div. 3. No new	Complied

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		mother as per discussion in gender meeting in Gerola Estate conducted on 16/12/2020.	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established and communicated to them.</p> <p>No grievance issues that requires the implementation of the mechanism occurs in all operating units within MPU since the last audit.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <p>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</p> <p>Charging the workers for recruitment fees.</p> <p>Contract substitution</p> <p>Involuntary overtime</p> <p>Lack of freedom of workers to resign</p> <p>Penalty for termination of employment</p> <p>Debt bondage</p> <p>Withholding of wages</p> <p>- Critical (Major) compliance -</p>	<p>Employment contracts detailing payments and conditions of employment available to the workers for sample employees sighted as per indicator 6.1.6 above. Each employment contracts were agreed and signed by both employee and employer which confirmed that all work is voluntary and force labour are prohibited.</p>	Complied
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p>	<p>MPU implemented the Guidelines on Workers Employment for Casual or Temporary Employee; Doc. Ref. # E/021-01/2018; Doc. Date: 15/11/2018 in case of any temporary or migrant workers are</p>	Complied

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	- Critical (Major) compliance -	employed. Records of employment shown no temporary or migrant recruitment take place since last audit.	
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The Mill/Estate manager has appointed the Asst. Mill/Estate Manager as person responsible for safety and health cum secretary for safety and health committee. The mill management has appointed several staff and workers as OSH Committee.</p> <p>All safety, health and welfare issue been discussed during OSH committee meeting such as accident report from other group mill. The meeting was on quarterly basis. Reviewed the minutes meeting for OSH committee for FY 2020.</p> <p>Regular OSH Meetings were conducted by the respective units. Records of OSH Meeting Minutes was available for verification during the assessment. The sampled OSH Meeting Minutes were as below.</p> <p>Melewar POM:-</p> <p>14/1/2021 – OSH Meeting – 87</p> <p>15/10/2020 – OSH Meeting – 86</p> <p>17/7/2020 – OSH Meeting – 85</p> <p>Appointment letter for OSH communities in Melewar POM available dated 15/12/2020 for Manager and for secretary was on 26/1/2018.</p>	Complied
6.7.2	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained	<p>Emergency response plan and procedure established by management for;</p> <p>i) SOP and ERP for flood, doc. ref. U/007-01/2015 dated 28/1/15</p>	Complied

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	<p>in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>ii) SOP and ERP for chemical spillage, doc. ref. U/006-01/2015 dated 28/1/15</p> <p>iii) SOP and ERP for typhoon, doc. ref. U/005-01/2015 dated 28/1/15</p> <p>iv) SOP and ERP for building evacuation, doc. ref. U/002-01/2015 dated 28/1/15.</p> <p>v) Guidelines for accident reporting and investigation is documented under doc. ref. .no. M/015-03/2018 dated 12/12/18. Classification of accidents, investigation and reporting requirements were included in the guidelines.</p> <p>Pahang Oil Palm estate Div 3</p> <p>The workers been training by Dr Mohamad Fikri on First aid dated 17/7/2020 attended by 21 persons. Based on verification in field C07 (oil palm nursery) and interview with nursery workers and first aider showed that they understand SOP M/025-02/2014 (First Aid Guidelines Doc dated 21/9/2014. Last First aid box been inspected was on 29 & 30 March 2021. Fire extinguisher also available at store and other area, last inspection was on March 2021. The record of accident available in estate, based on JKKP 8/69656/2020 there only accident without lost time injury. The HIRARC already been review on 23/3/2020.</p> <p>Gerola estate</p> <p>In Gerola estate, there 1 accident happen in year 2020 as per JKKP 8 (JKKP 8/70653/2020 dated 10/1/2021. The accident with total 3</p>	
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		<p>MC been sampling in this audit, the MC been pay by employer verified as per payslip (employee no: GER0031) and check roll book. The investigation conducted on 6/7/2020 same date with accident happen. The HIRARC reviewed for this accident on 7/7/2020</p>																															
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The workers was given with appropriate personal protective equipment (PPE), this PPE provided with free of charge to all workers according to their nature job and also according to HIRARC recommendation. The Shower room and changeroom also available in sampling estate, the spraying and manuring worker also aware regarding to ensure change the cloth before going home and keep their PPE in closet that management have prepared.</p> <p>For Pahang Oil Palm estate Div 3, PPE issuance as per below: -</p> <table border="1" data-bbox="1137 847 1924 1098"> <thead> <tr> <th>Type of PPE</th> <th>Date</th> <th>Work station</th> </tr> </thead> <tbody> <tr> <td>Hard Hat</td> <td>6/7/2020</td> <td>Nursery</td> </tr> <tr> <td>Apron</td> <td>6/7/2020</td> <td>Nursery</td> </tr> <tr> <td>Safety boot</td> <td>6/7/2020</td> <td>Nursery</td> </tr> <tr> <td>Respirator mask</td> <td>6/7/2020</td> <td>Nursery</td> </tr> </tbody> </table> <p>For Melewar POM, PPE issuance as per below:-</p> <table border="1" data-bbox="1137 1147 1924 1394"> <thead> <tr> <th>Type of PPE</th> <th>Date</th> <th>Work station</th> </tr> </thead> <tbody> <tr> <td>Earmuff</td> <td>14/10/2019</td> <td>Boiler man</td> </tr> <tr> <td>Ear plug</td> <td>3/1/2021</td> <td>Boiler man</td> </tr> <tr> <td>Semi Leather glove</td> <td>17/1/2019</td> <td>Boiler man</td> </tr> <tr> <td>Dust mask</td> <td>3/9/2019</td> <td>Boiler man</td> </tr> </tbody> </table>	Type of PPE	Date	Work station	Hard Hat	6/7/2020	Nursery	Apron	6/7/2020	Nursery	Safety boot	6/7/2020	Nursery	Respirator mask	6/7/2020	Nursery	Type of PPE	Date	Work station	Earmuff	14/10/2019	Boiler man	Ear plug	3/1/2021	Boiler man	Semi Leather glove	17/1/2019	Boiler man	Dust mask	3/9/2019	Boiler man	<p>Complied</p>
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		Half face respirator	3/10/2020	Lab operator		
		Rubber hand glove	3/10/2020	Lab operator		
		Ear plug	17/10/2020	Lab operator		
		Gerola Estate:-				
		Type of PPE	Date	Work station		
		Safety boot	24/3/2021	Sprayer		
		Nitril glove	22/6/2020	Sprayer		
		Respirator	26/7/2020	Sprayer		
		Apron	9/11/2018	Sprayer		
		Goggles	27/3/2021	Sprayer		
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>The coverage of insurance provision in accordance with Malaysia law through SOCSO contribution evident for the workers as following:</p> <p>Employee # PE300076; for Month of Dec 2020</p> <p>Employee # PE300179; for Month of Nov 2020</p> <p>Employee # PTG0651; for Month of Nov 2020</p> <p>Employee # PE300455; for Month of Dec 2020</p> <p>In Gerola Estate</p> <p>Employee # GER100132; for Month of Dec 2020</p> <p>Employee # CWG048; for Month of Nov 2020</p> <p>Employee # GE100197; for Month of Nov 2020</p>			Complied	

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		<p>Employee # GER4025; for Month of Dec 2020</p> <p>Employee # GER100295; for Month of Dec 2020</p> <p>Employee # GER1115; for Month of Dec 2020</p> <p>Verification all new join worker been covered by Insurance as per below:</p> <p>Melewar mill</p> <p>Employee # G0475; SOCSO paid for month Feb 2021; Date of Join; 25/2/2021</p> <p>As per interview with workers, the employer will pay the cost incurred from work related incident leading to injury or sickness, this also been stated under employment contract agreement. The agreement available in estate for review.</p>													
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>As per JKPP 8 report the occurrence of accidents recorded for YTD December 2020 is as shown below:</p> <table border="1" data-bbox="1137 944 1928 1137"> <thead> <tr> <th>Operating Unit</th> <th>Days Lost (LTA)</th> <th>Total Cases</th> </tr> </thead> <tbody> <tr> <td>Pahang estate Div 3</td> <td>3.79</td> <td>0</td> </tr> <tr> <td>Melewar POM</td> <td>34.72</td> <td>5</td> </tr> <tr> <td>Gerola estate</td> <td>7.35</td> <td>1</td> </tr> </tbody> </table>	Operating Unit	Days Lost (LTA)	Total Cases	Pahang estate Div 3	3.79	0	Melewar POM	34.72	5	Gerola estate	7.35	1	Complied
Operating Unit	Days Lost (LTA)	Total Cases													
Pahang estate Div 3	3.79	0													
Melewar POM	34.72	5													
Gerola estate	7.35	1													
<p>Principle 7: Protect, conserve and enhance ecosystems and the environment</p>															
<p>Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>															
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The estates visited has established IPM List and Treatment management plan. The plan is reviewed on annually basis. The plan covers on possible pest outbreaks such as:</p>	Complied												

		<p>Rat attack</p> <p>Rat attack – immature area</p> <p>Leaf eating caterpillar</p> <p>Leaf eating insects</p> <p>Ganoderma</p> <p>Rhinoceros beetle attack</p> <p>The plan covers on census, planting of beneficial plant and chemical treatment. Reviewed the implementation of the management plan as follows:</p> <p>Rat damage census was conducted at interval of 6 months. Census was conducted to determine the attack threshold level. If the census recorded above 5% damage threshold level, rat baiting campaign will be conducted. Reviewed census records in Pahang Oil Palm 3 Estate conducted in February 2021 recoded damage level at 3.57% and Gerola Estate conducted in February 2021 recorded damage level at 14.70%</p> <p>Rat baiting was conducted base on the results of rat damage census. Reviewed the rat baiting records as follows:</p> <p>Pahang Oil Palm 3 Estate</p> <p>Field: PR19A</p> <p>Round: 1</p> <p>Acceptance level: 11.76%</p> <p>Gerola Estate</p> <p>Field:P96d3</p>	
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		Round:2 Acceptance level: 9.91%	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. In JC Chang Group estates, 3 plant species were used for IPM such as <i>Tunera subulata</i> , <i>Cassia cobanensis</i> , and <i>Antigonan leptopus</i> .	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	No evidence and records of fire usage for pest control at all estate visited. Asia Production Unit has committed to Zero Burning compliance as spelt out in the JC Chang Group Environmental Policy dated 01/01/2008.	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	Estates have maintained and revised if required, the Documented Standard Operating Procedures file that contains in the safe operating procedures and the procedures to implement the various major field operations. For example, among others, the Estate SOP Manual has procedures category for the following operations: Justifications for Pesticide Usage under IPM (Insecticide, Fungicide & Rodenticide) (B/008-14/2016) Justifications for Pesticide Usage under IPM (Weedicides) (B/009-10/2015) Weeding Regime & Practices (B/004-01/2008)	Complied

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<p>7.2.2</p>	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) were established and monitored. The records of weeding programme and herbicide master list was sighted for year 2020 as per below. No Class 1 chemical been using as per sample estate verification.</p> <table border="1" data-bbox="1137 619 1917 1169"> <thead> <tr> <th>Estate</th> <th>Type of chemical</th> <th>a.I per ha</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Pahang Oil Palm Estate Div 3</td> <td>Monex</td> <td>0.518</td> </tr> <tr> <td>Ally</td> <td>0.0646</td> </tr> <tr> <td>Sentry</td> <td>0.244</td> </tr> <tr> <td>Imas Thiram</td> <td>0.24</td> </tr> <tr> <td rowspan="6">Gerola Estate</td> <td>Glyphosate</td> <td>1.194</td> </tr> <tr> <td>Cypermethrin</td> <td>0</td> </tr> <tr> <td>Ally 20DF</td> <td>0.032</td> </tr> <tr> <td>Icon 2.8</td> <td>0.005</td> </tr> <tr> <td>Amine</td> <td>0.893</td> </tr> <tr> <td>Garlon 250</td> <td>0.17</td> </tr> </tbody> </table>	Estate	Type of chemical	a.I per ha	Pahang Oil Palm Estate Div 3	Monex	0.518	Ally	0.0646	Sentry	0.244	Imas Thiram	0.24	Gerola Estate	Glyphosate	1.194	Cypermethrin	0	Ally 20DF	0.032	Icon 2.8	0.005	Amine	0.893	Garlon 250	0.17	<p>Complied</p>
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<p>7.2.3</p>	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The management encourage establishing biological control as per IPM plan. The implementation in the field is consistent with the JC Chang's Group SOP. No prophylactic use of pesticides found at visited operating units.</p> <p>SOP for IPM</p>	<p>Complied</p>																									

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		<p>Guidelines on Integrated Pest and Disease Management of oil palm (Doc Ref. No. L/001-07/2019 dated 13/8/2019)</p> <p>Census record</p> <p>As per implementation Pest Damage Census Form on Rat baiting dated 25/2/2021 in field PM17A8 showed result 6.02%</p> <p>In Gerola Estate, September 2020 in field 89A block A08 result 19.89%</p>	
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	No prophylactic use of pesticides found at visited operating units.	Choose an item.
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <p>Judgment of the threat and verify why this is a major threat</p> <p>Why there is no other alternative which can be used</p> <p>Which process was applied to verify why there is no other less hazardous alternative</p> <p>What is the process to limit the negative impacts of the application</p> <p>Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>	<p>JC Chang only purchase chemicals that are registered under the Malaysian Pesticides Act 1974 (Act 149) and Regulations. Sighting of the Chemical Register at sampling estates showed that only class II, III & IV chemicals were used. There were no Class 1A and Class 1B agrochemicals used. Paraquat was eliminated totally. In its place, alternatives such as Glyphosate were used instead.</p> <p>As per Chemical register in Melewar 2 estate dated 11/3/2021, no chemical under class 1A or 1B or that listed by the Stockholm or Rotterdam Conventions, and paraquat.</p>	Complied

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7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were handled, used or applied by trained workers in accordance with the product label. In addition to the product label, Safety Data Sheets were used and explained to the participants with emphasis on PPE, health and environmental risks of pesticide exposure; recognition of acute and long-term exposure; ways to minimize exposure to workers and their families; and international and national instruments or regulations that protect workers' health.</p> <p>Training for pesticides handler are as shown in the table below:</p> <p>Melewar estate:</p> <p>SOP for spraying training dated 11/03/2020</p> <p>Briefing on Buffer Zone dated 3/9/2020</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (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 noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. Based on CHRA assessor's store assessment recommendation, the below action was taken for improvement as such;</p> <p>i) Ventilation system for adequate air flow</p> <p>ii) No workstation placed in the chemical storage</p> <p>iii) DOSH approved PPE is recommended.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>For pesticide container were been triple rinse and puncture. This empty container been dispose as recycle waste and store in recycle waste store</p> <p>Pahang Oil Palm estate Div 3</p>	Complied

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		<p>Empty pesticides containers in Pahang Oil Palm estate Div 3 were triple rinsed, its bottom perforated to render it useless, inventoried and stored. This empty chemical container was been store at estate and disposed as Recycle waste. Latest disposal was on 26/3/2021 with total 650Kg (Ref weighbridge ticket: W02100003W) at Newgates Industries (Borneo) Sdn Bhd.</p> <p>Gerola estate</p> <p>As per receipt dated 26/3/2021 Gerola estate already disposed the empty container at Newgates Industries (Borneo) Sdn Bhd with total 170kg (021000004W).</p>									
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>If any aerial spraying applied, please provide the evidence of authority approval and relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p>	Complied								
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Following the CHRA conducted at each Operating Unit Annual medical surveillance has been carried out for all pesticide operators at the said estates as recommended by the CHRA Assessor.</p> <p>Medical surveillance record of those operators was examined and all of them were certified fit with no detrimental to health by registered Occupational Health Doctor as per below:</p> <table border="1" data-bbox="1137 1286 1928 1364"> <thead> <tr> <th>Operating Unit</th> <th>Date of assessment</th> <th>No employee</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Operating Unit	Date of assessment	No employee	Results					Complied
Operating Unit	Date of assessment	No employee	Results								

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		<table border="1"> <tr> <td>Pahang Oil Palm Estate Div 3</td> <td>2/9/2020</td> <td>74</td> <td>Fit</td> </tr> <tr> <td>Melewar 2</td> <td>22/9/2020</td> <td>34</td> <td>Fit</td> </tr> <tr> <td>Gerola estate</td> <td>7/8/2020</td> <td>31</td> <td>Fit</td> </tr> </table>	Pahang Oil Palm Estate Div 3	2/9/2020	74	Fit	Melewar 2	22/9/2020	34	Fit	Gerola estate	7/8/2020	31	Fit	
Pahang Oil Palm Estate Div 3	2/9/2020	74	Fit												
Melewar 2	22/9/2020	34	Fit												
Gerola estate	7/8/2020	31	Fit												
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Pregnant and breast-feeding women, under-age person and other people that have medical restrictions working with pesticides are strictly prohibited to work with pesticides. Noted, there were women working as sprayers. Verified that the female workers were checked for pregnancy test at three-month interval by the on-site Estate Hospital Assistant. All results showed negative findings. Also, verified master list of workers and interview with management and workers found no record of workers under the of 18 in all estate.</p>	Complied												
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>															
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Melewar production unit has identified waste generated from the mill and estates operation and documented Waste Management Plan. The waste identified has been categorized in recycle waste, non-recycle waste and scheduled waste. In the plan established stated the aspect identified, impact identified, action plan (solution and method), action done, further action required after review, time frame and person responsible.</p>	Complied												
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Pahang Oil Palm 3 Estate</p> <p>Domestic waste at operating units visited were disposed at designated landfill. The area choose for landfill were far from housing area and water course. Sighted at all landfill visited, only domestic waste were disposed at the landfill. Reviewed the domestic collection records as dated Pahang Oil Palm 3 Estate: 10/03/2021, 12/03/2021, 17/03/2021, 03/01/2021, 07/01/2021,</p>	Non-compliance												

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		<p>10/01/2021 (05/08/2020, 08/08/2020, 10/08/2020,05/10/2020, 09/10/2020, 13/10/2020 and 16/10/2020)</p> <p>The Estate maintain the inventory records for Scheduled Waste generated recorded in Scheduled Waste inventory Card/Record Book. Reviewed the inventory records for the month of June, July, August, September and October 2020. November 2020, December 2020, January 2021 and February 2021.</p> <p>The scheduled waste were stored in designated scheduled waste store before disposed through licensed contractors. Reviewed the disposal records as follows:</p> <p>Disposal date: 22/02/2021</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Waste Code</th> <th>Consignment Note No.</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>SW 305</td> <td>2021031001GN71I</td> </tr> <tr> <td>2.</td> <td>SW 410</td> <td>2021031023NGI4O</td> </tr> <tr> <td>3.</td> <td>SW 409</td> <td>2021031023ZXQM72</td> </tr> </tbody> </table> <p>Disposal date: 19/08/2020</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Waste Code</th> <th>Consignment Note No.</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>SW 410</td> <td>2020091422GAC9P</td> </tr> <tr> <td>2.</td> <td>SW 305</td> <td>2020091422IKO6B</td> </tr> </tbody> </table> <p>Gerola Estate</p> <p>The estate collected and maintain the records of recycle waste inventory and sold them to appointed recycler. Reviewed the</p>	No.	Waste Code	Consignment Note No.	1.	SW 305	2021031001GN71I	2.	SW 410	2021031023NGI4O	3.	SW 409	2021031023ZXQM72	No.	Waste Code	Consignment Note No.	1.	SW 410	2020091422GAC9P	2.	SW 305	2020091422IKO6B	
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1.	SW 410	2020091422GAC9P																						
2.	SW 305	2020091422IKO6B																						

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		<p>inventory and sales records dated 13/12/2020, 11/01/2021 and 26/03/2021 with total of 530 kg of recycle sold.</p> <p>Domestic waste were collected twice a week and disposed in designated landfill located in field PM12B03. Reviewed the domestic waste collection records and weighbridge ticket dated 06/08/2020, 10/08/2020, 03/09/2020, 10/09/2020 and 14/09/2020. (01/02/2021, 24/02/2021, 26/02/2021, 19/03/2021 and 25/03/2021).</p> <p>The estate maintain the inventory of scheduled waste in SW inventory records book and reported to DOE through ESWISS. Reviewed the inventory records dated for SW 410 used filter and SW 409 Used lubricant container dated 28/09/2020 and 28/10/2020 (30/11/2020, 31/12/2020 and 27/01/2021) and ESWISS inventory reports for the month of September, October, November, (December 2020 and January 2021).</p> <p>The scheduled waste were stored in designated scheduled waste store before disposed through licensed contractors. Reviewed the disposal records as follows:</p> <p>Disposal date: 18/08/2020</p> <table border="1" data-bbox="1137 1056 1823 1257"> <thead> <tr> <th>No.</th> <th>Waste Code</th> <th>Consignment Note No.</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>SW 305</td> <td>3934</td> </tr> <tr> <td>2.</td> <td>SW 410</td> <td>3937</td> </tr> <tr> <td>3.</td> <td>SW 409</td> <td>3938</td> </tr> </tbody> </table> <p>Disposal date: 22/02/2021</p> <table border="1" data-bbox="1137 1305 1823 1353"> <thead> <tr> <th>No.</th> <th>Waste Code</th> <th>Consignment Note No.</th> </tr> </thead> <tbody> </tbody> </table>	No.	Waste Code	Consignment Note No.	1.	SW 305	3934	2.	SW 410	3937	3.	SW 409	3938	No.	Waste Code	Consignment Note No.	
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1.	SW 305	3934																
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		1.	SW 305	2021022209XNW5HB		
		2.	SW 409	2021022208KOIVZ3		
		Melewar POM				
		Fibre and shell were used as boiler fuel. Reviewed the records of shell and fibre as FY 2020/21 as to date February 2021 recorded as follows:				
				Diesel	Shell	F
		FY 2019/20		191620.00	10123.20	2
		FY2020/21 Nov		92991	5024.82	1
		FY2020/21 Feb		166145	6991.09	1
		The scheduled waste were stored in designated scheduled waste store before disposed through licensed contractors. Reviewed the disposal records as follows:				
		Disposal date: 19/08/2020				
		No.	Waste Code	Consignment Note No.		
		1.	SW 305	3939		
		2.	SW 305	3943		
		3.	SW 410	3930		
		4.	SW 410	3941		
		5	SW 409	3942		
		6.	SW 409	3944		

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		<p>Disposal date: 14/01/2020</p> <table border="1" data-bbox="1137 411 1825 659"> <thead> <tr> <th>No.</th> <th>Waste Code</th> <th>Consignment Note No.</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>SW 305</td> <td>3798</td> </tr> <tr> <td>2.</td> <td>SW 410</td> <td>3799</td> </tr> <tr> <td>3.</td> <td>SW 409</td> <td>3801</td> </tr> <tr> <td>4.</td> <td>SW 410</td> <td>3800</td> </tr> </tbody> </table> <p>The mill maintain the inventory records for Scheduled Waste generated recorded in Scheduled Waste inventory Record Book. Reviewed the inventory records for the month of June, July, August, September and October 2020. November 2020, December 2020, January 2021 and February 2021.</p> <p>Reviewed the inventory records for SW 305, noted that disposal was done on 14/01/2020 for 3100 litre. First generation of SW 305 was recorded on 15/01/2020 for 400 litre. The disposal was conducted on 19/08/2020 which is more than 180 days from the first generation date without approval from DOE. Thus non-conformity were raised.</p>	No.	Waste Code	Consignment Note No.	1.	SW 305	3798	2.	SW 410	3799	3.	SW 409	3801	4.	SW 410	3800	
No.	Waste Code	Consignment Note No.																
1.	SW 305	3798																
2.	SW 410	3799																
3.	SW 409	3801																
4.	SW 410	3800																
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>No evidence of fire use in waste disposal as sighted during site visit in the housing area. Domestic waste were put in dustbin and collected twice a week and disposed in designated landfill. Noted during interview with workers shows awareness on prohibition of using fire for waste disposal.</p>	Complied															
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>																		

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7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>JC Chang Group has established SOPs of good agricultural practices to manage soil fertility to optimise yield and minimise environmental impacts documented in Guideline on Soil and Water Conversation, refer document no. C/002-01/2008 dated on 10/11/2018 and Fertilizer Recommendation, refer document no. B/015-01/2013 dated on 19/07/2013. These guideline has outlined the method to ensure palm oil produce optimal and sustained yield.</p>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>JC Chang group has established Guidelines for Soil Sampling, refer document no. C/027-01/2017 and Guidelines for Foliar Sampling, refer document no. C/026-01/2017 dated 31/05/2017. The objective of the sampling conducted as follows:</p> <p>To determine soil fertility status and fertiliser requirement To assist with the preparation of annual fertiliser program</p> <p>Reviewed the sampling records as follows:</p> <p>Pahang Oil Palm 3 Estate</p> <p>Latest Foliar and Soil Sampling was conducted on 17/03/2021. The results are yet to be received by the estate during the audit.</p> <p>FY 2020, Foliar and soil analysis was conducted on 24/02/2020 as per foliar analysis report ref. no R20/2/386 dated 21/03/2020 and Soil analysis report ref no. R20/3/29 dated 07/04/2020.</p> <p>Gerola Estate</p> <p>Latest Foliar and Soil Sampling was conducted on 10/03/2021. The results are yet to be received by the estate during the audit.</p>	Complied

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		FY 2020, Foliar and soil analysis was conducted on 12/02/2020 as per foliar analysis report ref. no R20/2/153 dated 26/02/2020 and Soil analysis report ref no. R20/3/159 dated 25/02/2020.																	
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. As at March 2021, EFB dispatch to estates recorded at 8020.38 tons.	Complied																
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	<p>Fertiliser application was conducted as per SOP established and recommendation by the Agronomist.</p> <p>The estate maintained the fertiliser application records in Daily Cost Book. Reviewed the application records as follows:</p> <p>Pahang Oil Palm 3 Estate</p> <table border="1"> <tr> <td>Field/Block:PM96C</td> <td>Field/Block:PR18</td> </tr> <tr> <td>Program: Feb – Mar 2021</td> <td>Program: Feb – Mar 2021</td> </tr> <tr> <td>Fertiliser: NK Mix</td> <td>Fertiliser: NK Mix</td> </tr> <tr> <td>Application date: 01 – 06/3/2021</td> <td>Application date: 19 – 27/02/2020</td> </tr> </table> <p>Gerola Estate</p> <table border="1"> <tr> <td>Field/Block:PM13A3</td> <td>Field/Block:PM11B4</td> </tr> <tr> <td>Program: August 2020</td> <td>Program: Feb – Mar 2021</td> </tr> <tr> <td>Fertiliser: NK Mix</td> <td>Fertiliser: NK Mix</td> </tr> <tr> <td>Application date: 30/07/2020 – 02/08/2021</td> <td>Application date: 24 – 25/03/2021</td> </tr> </table>	Field/Block:PM96C	Field/Block:PR18	Program: Feb – Mar 2021	Program: Feb – Mar 2021	Fertiliser: NK Mix	Fertiliser: NK Mix	Application date: 01 – 06/3/2021	Application date: 19 – 27/02/2020	Field/Block:PM13A3	Field/Block:PM11B4	Program: August 2020	Program: Feb – Mar 2021	Fertiliser: NK Mix	Fertiliser: NK Mix	Application date: 30/07/2020 – 02/08/2021	Application date: 24 – 25/03/2021	Complied
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Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps identifying marginal and fragile soil, including steep terrain were available for verification. No fragile soil identified in the estate. No fragile soil identified in the estate sampled. Most of the soil series identified were Kretam Series and Kinabatangan Series.</p>	Complied
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Soil series and topography map available for estate visited. No fragile soil categorized in the estates visited as per soil map.</p> <p>As per topography map established, the slope in all 3 sampled estate were at average of 0° to 20°.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No new planting in estates visited</p>	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Soil series and topography map available for estate visited. No fragile soil categorized in the estates visited as per soil map.</p> <p>As per topography map established, the slope in all 3 sampled estate were at average of 0° to 20°.</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Soil series and topography map available for estate visited. No fragile soil categorized in the estates visited as per soil map.</p>	Complied

7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Soil series and topography map available for estate visited. No fragile soil categorized in the estates visited as per soil map.</p> <p>As per topography map established, the slope in all 3 sampled estate were at average of 0° to 20°.</p> <p>Pahang Oil palm estate Div 3</p> <p>No new planting in sampling estate, the topography map was available in estate referred under Proposal Of Mitigation Measures report by Pahang Enterprise Sdn Bhd. The elevation was around 0-16.</p> <p>Gerola Estate</p> <p>Propose for mitigation measures replanting by Kiwiheng Environmental Consultant Sdn Bhd dated 14/2/2020</p>	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Complied
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	<p>No peat soil identified at all estates visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Complied

7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Complied
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Complied
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification</p>	<p>No peat soil identified at all estates visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Complied

	<p>on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>		
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
<p>7.8.1</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>JC Chang Group has established the Guideline on Water Management Plan – Sabah. Refer document no. C/004-01/2008 dated 12/11/2008. The objective of this guideline is to aim for better water conservation, utilization and control of water pollution in the estate.</p> <p>SOP of Water Management Plan – Sabah covers;</p> <ol style="list-style-type: none"> 1. Riparian Buffer Zone 2. Demarcation of Wetland Area 3. Soil and Water Conservation Measures 4. No Construction of Bunds / Weirs / Dams Across Main Rivers 5. Monitoring of Water in Main River 6. Monitoring of Water for Household Consumption <p>The Asia Production Unit has established Water Management Plan. The plan focus on the method to conserve and minimise pollution of water through implementation of various methods such as best practice of raw water & effluent treatment, maintaining riparian zone, management of land irrigation, maintaining soft vegetation in the field, regular education to employees on conserving water and water pollution preventions.</p>	<p>Complied</p>

		<p>The operating units visited provide the workers with adequate clean water through treated water at water treatment plant. Drinking water analysis was conducted once per year.</p> <p>Pahang Oil Palm 3 Estate</p> <p>FY 2019, the drinking water analysis was conducted on 18/10/2019 as per certificate of analysis no. W191018-01-0 dated 04/11/2019.</p> <p>Latest drinking water analysis was conducted on 02/11/2020 as per certificate of analysis no. W201102-05-0 dated 30/11/2020.</p> <p>The results for water analysis after treatment was found conform to National Standard for Drinking Water Quality.</p> <p>Gerola Estate</p> <p>FY 2019, the drinking water analysis was conducted on 22/04/2019 by Kinabatangan Health Office. The analysis found that the chorine use was low and advice to be increase. The estate has taken necessary action as per resampling results dated 23/12/2019.</p> <p>Latest drinking water analysis was conducted on 10/12/2020 as per certificate of analysis no. W201210-02-0 dated 05/01/2021.</p> <p>The results for water analysis after treatment was found conform to National Standard for Drinking Water Quality.</p> <p>Melewar POM</p> <p>FY 2020, the drinking water analysis was conducted on 24/06/2020 as per certificate of analysis no. W200624-02-0 dated 24/07/2020</p>	
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		<p>Latest drinking water analysis was conducted on 02/11/2020 as per certificate of analysis no. W201230-04-0 dated 29/01/2021.</p> <p>The results for water analysis after treatment was found conform to National Standard for Drinking Water Quality</p>	
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>The Melewar Production Unit has established Water Management Plan. The plan focus on the method to conserve and minimise pollution of water through implementation of various methods such as best practice of maintaining riparian zone, and regular education to employees on conserving water and water pollution preventions.</p> <p>The estate visited has established riparian buffer zone.</p> <p>Sighted during site visit at riparian buffer zone at field PM96CG08 in Pahang Oil Palm 3 Estate and PM16A05 in Gerola Estate, the area was demarcated with yellow pole and yellow ring at the palm trunk. No evidence of chemical application is allowed at the area as sighted during site visit. The vegetation along the buffer zone is well maintained.</p> <p>Signboard on prohibition of chemical application, cutting trees, hunting, fishing and burning was erected at the buffer zone.</p> <p>River water sampling was conducted once a year. Reviewed the river water sampling report no R20/11/27 dated 06/11/2020 at Pahang Oil Palm 3 Estate and R20/12/117 dated 19/12/2020 at Gerola Estate. The result was conform to NWQI Class III.</p> <p>For estate with replanting, Environmental Compliance report was submitted twice a year to EPD. Reviewed the report for Pahang Oil Palm 3 Estate. The river water analysis was conform to NWQI Class III except for Dissolve Oxygen. The high concentration of oxygen is considered acceptable as unpolluted watercourses are usually</p>	<p>Complied</p>

		saturated with oxygen as stated in the Proposal for Mitigation Measures.																			
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The mill applies the biological system equipped with ponds in series for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Based on the independent lab report, the mill has maintained below 20 ppm of BOD for the last 12 months.</p> <p>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. reviewed the Quarterly Return Form to DOE FY 2020 as follows:</p> <p>4th quarter</p> <table border="1" data-bbox="1137 815 1693 1305"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Oct</td> <td>BOD</td> <td>15.00</td> </tr> <tr> <td>pH</td> <td>8.20</td> </tr> <tr> <td rowspan="2">Nov</td> <td>BOD</td> <td>18.00</td> </tr> <tr> <td>pH</td> <td>7.60</td> </tr> <tr> <td rowspan="2">Dec</td> <td>BOD</td> <td>18.00</td> </tr> <tr> <td>pH</td> <td>8.40</td> </tr> </tbody> </table> <p>3rd quarter</p>	Month	Parameter	Results	Oct	BOD	15.00	pH	8.20	Nov	BOD	18.00	pH	7.60	Dec	BOD	18.00	pH	8.40	Complied
Month	Parameter	Results																			
Oct	BOD	15.00																			
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	pH	8.40																			

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Month	Parameter	Results
Jul	BOD	18.00
	pH	8.30
Aug	BOD	18.00
	pH	8.70
Sep	BOD	19.00
	pH	8.60
2 nd quarter		
Month	Parameter	Results
Apr	BOD	19.00
	pH	8.90
May	BOD	19.00
	pH	8.70
	BOD	19.00

		<table border="1"> <tr> <td></td> <td>pH</td> <td>8.60</td> </tr> </table> <p>1st quarter</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Jan</td> <td>BOD</td> <td>19.00</td> </tr> <tr> <td>pH</td> <td>8.60</td> </tr> <tr> <td rowspan="2">Feb</td> <td>BOD</td> <td>15.00</td> </tr> <tr> <td>pH</td> <td>8.80</td> </tr> <tr> <td rowspan="2">Mar</td> <td>BOD</td> <td>19.00</td> </tr> <tr> <td>pH</td> <td>8.30</td> </tr> </tbody> </table>		pH	8.60	Month	Parameter	Results	Jan	BOD	19.00	pH	8.60	Feb	BOD	15.00	pH	8.80	Mar	BOD	19.00	pH	8.30	
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Mar	BOD	19.00																						
	pH	8.30																						
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from water pond. Reviewed the water monitoring records as todate February 2021.	Complied																					
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																								
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	Plan to improve efficiency of fossil fuel was documented in Energy Management Plan. Among the plan established as follows: Optimising the usage of fuel through awareness briefing	Complied																					

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		<p>Service engine to optimal performance thus reduce fuel consumption</p> <p>Monitoring of fuel consumption</p> <p>Provide schedule of road maintenance</p> <p>Reviewed the implementation of the management plan as follows:</p> <p>The estate monitor the fuel usage on monthly basis. Reviewed the records of diesel and petrol consumption per ton FFB as follows:</p> <table border="1" data-bbox="1137 667 1937 997"> <thead> <tr> <th></th> <th>Melewar POM</th> <th>Pahang Oil Palm 3 Estate</th> <th>Gerola Estate</th> </tr> </thead> <tbody> <tr> <td>Jul 2019 – Jun 2020</td> <td>1.34</td> <td>8.20</td> <td>7.44</td> </tr> <tr> <td>Jul 2020 – Nov - 2020</td> <td>0.89</td> <td>12.91</td> <td>7.61</td> </tr> <tr> <td>Jul 2020 – Feb - 2021</td> <td>1.18</td> <td>11.74</td> <td>7.69</td> </tr> </tbody> </table> <p>Fibre and shell were used as boiler fuel. Reviewed the records of shell and fibre as FY 2020/21 as todate February 2021 recorded as follows:</p> <table border="1" data-bbox="1137 1161 1937 1353"> <thead> <tr> <th></th> <th>Diesel</th> <th>Shell</th> <th>F</th> </tr> </thead> <tbody> <tr> <td>FY 2019/20</td> <td>191620.00</td> <td>10123.20</td> <td>2</td> </tr> <tr> <td>FY2020/21 Nov</td> <td>92991</td> <td>5024.82</td> <td>1</td> </tr> <tr> <td>FY2020/21 Feb</td> <td>166145</td> <td>6991.09</td> <td>1</td> </tr> </tbody> </table>		Melewar POM	Pahang Oil Palm 3 Estate	Gerola Estate	Jul 2019 – Jun 2020	1.34	8.20	7.44	Jul 2020 – Nov - 2020	0.89	12.91	7.61	Jul 2020 – Feb - 2021	1.18	11.74	7.69		Diesel	Shell	F	FY 2019/20	191620.00	10123.20	2	FY2020/21 Nov	92991	5024.82	1	FY2020/21 Feb	166145	6991.09	1	
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Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Plan to reduce or minimize the GHG was spelt out in Energy Management and Pollution Prevention Plan under emission.</p> <p>Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.</p> <p>Melewar Production Unit had used RSPO Palm GHG v4.0 calculator as a tool. Records were maintained individually in the respective office. Reviewed the data submitted to PalmGHG found consistent with data in the individual operating unit.</p>	Complied
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The Identification of Potential Source of GHG Emission and GHG Reduction Plan is used to identify the waste products and sources of pollution is in place and is being reviewed accordingly. Among the Potential Source of GHG Emission identified such as Palm Oil Mill Effluent (POME), Diesel Usage, Electricity Usage, Chemical Usage and Generator Set.</p> <p>Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.</p>	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>RSPO has made a compulsory for submitting GHG beginning 1/1/2017. Melewar Production Unit had used RSPO Palm GHG v4.0 calculator as a tool. Records were maintained individually in the respective office.</p>	Complied

Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group has established Guideline on Group's Long Term Replanting Planning. Refer document no. A/016-07/2020. In the guideline stated the company prohibited the form of replanting by using fire as part of field preparation.</p> <p>All old palms standing will be felled, chipped, stalked and decomposed naturally.</p> <p>The group is committed in implementation of "Zero Burning Policy" in the event of replanting.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>JC Chang Group has established Guidelines on Fire Prevention, Control and Stakeholders Engagement. Refer document no. M/017-03/2020 dated 17/10/2020.</p> <p>The guidelines includes of selection, placement, use, maintenance and inspection of fire extinguisher; fire drill training and stakeholder engagement to reduce the fire risks to minimal level.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Engagement with adjacent stakeholders on the fire prevention was communicated through stakeholder meeting/phonecall and correspondent email. Reviewed the engagement records for Pahang Oil Palm Estate 3 recorded in Correspondent letter to stakeholders dated 12/11/2020, Minutes meeting with Jayatas Sdn. Bhd. dated 12/10/2020 and Minutes meeting with Sentra Bayu Estate dated 05/10/2020.</p> <p>Gerola Estate has communicate with adjacent stakeholder through correspondent email send to the stakeholders as per email dated 10/10/2020. Reviewed the respond from the stakeholders through due diligence form attached together with the email.</p>	Complied

Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.		
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>No new land clearing conducted in Melewar Production Unit since 15/11/2018</p> <p>Complied</p>
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE:</p> <p>Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>No new land clearing conducted in Asia Production Unit since 15/11/2018.</p> <p>Asia Production Unit conducted the HCV assessment report conducted on 03 -10/04/2011 and 07 – 08/06/2011 as per Social & Environmental Assessment including a preliminary Management Review, JC Chang group’s Asia and Melewar Production Units, Sabah, Malaysia dated 13/07/2011.</p> <p>No HCV identified within Melewar Production Unit as per assessment conducted.</p> <p>Complied</p>
7.12.3	<p><i>Indicator is not applicable in Malaysia context</i></p>	<p>Not Applicable</p>
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or</p>	<p>No new planting and land clearing since 15 November 2018.</p> <p>Complied</p>

	<p>enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>		
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	No new planting and land clearing since 15 November 2018.	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>No new land clearing conducted in Asia Production Unit since 15/11/2018.</p> <p>Melewar Production Unit conducted the HCV assessment report conducted on 03 -10/04/2011 and 07 – 08/06/2011 as per Social & Environmental Assessment including a preliminary Management Review, JC Chang group’s Asia and Melewar Production Units, Sabah, Malaysia dated 13/07/2011.</p> <p>No rare, threatened or endangered (RTE) species are protected identified within Asia Production Unit as per assessment conducted.</p> <p>Even though no HCV or RTE species identified during the HCV assessment conducted, the MPU has established HCV management plan.</p>	Complied

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		<p>Among the plan as follows:</p> <ul style="list-style-type: none"> Briefing to workers to provide information for any sighted animal Briefing awareness to educate on protection of animals To communicate with all peripheral stakeholders to increase their impact on illegal hunting and RTE protection To apply suitable IPM techniques Erected signboard on prohibition of hunting and fishing <p>Reviewed the implementation of the management plan as follows:</p> <p>The estate visited conducted animal sighting on monthly basis.</p> <p>Reviewed the animal sighting records dated for the month of September, October, November and December dated 2020 at Pahang Oil Palm 3 estate. No RTE species were sighted at the estate.</p> <p>Reviewed animal sighting records dated at Gerola Estate dated 03/09/2020, 06/10/2020, 15/11/2020, 26/11/2020 and 01/03/2021. Among the animal sighted such as Civet, Egret, Hornbill, tortoise and pangolin.</p> <p>Estate continuously provided awareness on HCV and RTE to the workers. Latest awareness and refresher training was conducted as per criteria 3.7.2</p> <p>Engagement with adjacent stakeholders on the environmental issue such as HCV, RTE, and river buffer zone was communicate through stakeholder meeting and correspondent email. Reviewed the correspondent email submitted to the stakeholders as per email dated 08/10/2020 from Pahang Oil Palm 3 Estaet and 10/10/2020</p>	
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		<p>from Gerola Estate and respond from the stakeholders Genting Bahagia Estate dated 25/11/2020 and G-Planter dated 14/10/2020.</p> <p>All estates visited continuously provided awareness on the stakeholder and workers on the HCV and RTE. Sighted the signboard on prohibition of illegal hunting, collection of RTE species, fishing, chemical application at buffer zone area and cutting of trees erected at strategic places in the estate such as estate entrances, riparian buffer zone and conservation area.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	No new planting and land clearing since 15 November 2018	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	No land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Melewar Production Unit. Thus, this indicator is not available.	Not Applicable

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Appendix B: Approved Time Bound Plan

SUSTAINABILITY ASSESSMENT PROGRAMME (TIME BOUND PLAN) FOR FINACIAL YEAR 2020/21.

Production Unit	Type of Certification Obtained	Type of Sustainability Assessment / Date Planned For Audit		
		RSPO	ISCC	MSPO
<u>Carotino Production Unit</u> Carotino Palm Oil Mill Asia Oil Palm Estate 1 Pahang Oil Palm Estate 1 Maran Estate Hwa Li Estate 1 Hwa Li Estate 2	RSPO, ISCC, MSPO	11-15/01/2021	03-07/08/2020	03-07/08/2020
<u>Asia Production Unit</u> Asia Palm Oil Mill Asia Oil Palm Estate 2 Melewar Estate 2 Hwa Li Estate 3	RSPO, ISCC, MSPO	30/11-01/12/2020 (Remote audit)	19-23/10/2020	19-23/10/2020
<u>Melewar Production Unit</u> Melewar Palm Oil Mill Gerola Estate Tye Yang Estate Melewar Estate 1 Pahang Oil Palm Estate 2 Pahang Oil Palm Estate 3	RSPO, ISCC, MSPO	03-04/12/2020 (Remote audit)	08/03-12/03/2021	08/03-12/03/2021
<u>Takon Production Unit</u> Takon Palm Oil Mill Takon Estate Pelita Estate Muis Melewar Plantation 1 Muis Melewar Plantation 2	RSPO (PRE), MSPO	-	-	08/03-12/03/2021

Remarks,

The Group target to achieve 100% RSPO certification for all Operating Units under the management of JC Chang Group by end of 2019. The last Production Unit namely Takon Production Unit have be scheduled for RSPO main assessment from 9/3-13/3/2020. The RSPO assessment done and resulted positive, RSPO certificate was issued for Takon Production Unit on 8/5/2020 but it was withdrawn by BSI as RSPO refused to give approval as the RaCp plan yet to be approved by RSPO. RSPO agreed to hold Takon's assessment result till 01/11/2020 but unfortunately, the group can't obtain approval from RSPO on RaCp plan before the expiry date. The RaCp plan was submitted and rejected by RSPO on 28/08/2020, the group are in the progress to ratify all comments pointed. The plan of 100% RSPO certification to be postponed to year 2023 as the group expected the RaCp plan to be endorsed by RSPO by year end of 2022 or first quarter of 2023.

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in [2019] for [Melewar Palm Oil Mill] and supply base was calculated using the PalmGHG Calculator version 4. 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 [2019] for [Melewar Palm Oil Mill] and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.72
PKO	0.72

Extraction	%
OER	20.72
KER	4.73

Production	t/yr
FFB Process	
CPO Produced	
PKO Produced	

Land Use	Ha
OP Planted Area	23181.26
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	379.20
Total	23,560.46

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	80614.95	0.42	2819.22	0.48	0.00	0.00	83434.17	14.21
CO ₂ Emission from fertilizer	14176.95	0.07	200.5	0.03	0.00	0.00	14377.45	2.45
NO ₂ Emission	16045.93	0.08	199.98	0.03	0.00	0.00	16245.91	2.77
Fuel Consumption	3508.25	0.02	111.35	0.02	0.00	0.00	3619.6	0.62
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-79154.45	-0.41	-2615.57	-0.44	0.00	0.00	-81770.02	-13.92

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Conservation Sequestration	0	0	-58.02	-0.01	0.00	0.00	-58.02	-0.01
Total	35191.68	0.18	657.46	0.12	0.00	0.00	35849.14	6.10

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	2601.85	0.01
Fuel Consumption	827.54	0.00
Grid Electricity Utilization	1768.07	0.01
Credit		
Export of Grid Electricity	-179.38	0.00
Sales of PKS	-4267.05	-0.02
Sales of EFB	0.00	0.00
Total	751.03	0.00

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	7277.23
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	0.00

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0.00
Divert to methane captured (flaring) (%)	5
Divert to methane captured (energy generation) (%)	95

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month – Year (Dec 2019 – Mar 2021)	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1.	Dec-19	12,108.25	-	12,108.25
2.	Jan-20	9,995.01	1,074.03	11,069.04
3.	Feb-20	11,976.95	1,073.01	13,049.96
4.	Mar-20	11,010.43	911.38	11,921.81
5.	Apr-20	10,475.06	130.26	10,605.32
6.	May-20	14,085.32	1,166.97	15,252.29
7.	Jun-20	12,669.85	1,987.72	14,657.57
8.	Jul-20	12,618.02	2,387.13	15,005.15
9.	Aug-20	15,335.19	1,295.78	16,630.97
10.	Sep-20	17,762.74	1,446.56	19,209.30
11.	Oct-20	15,715.40	1,392.42	17,107.82
12.	Nov-20	13,130.31	1,290.48	14,420.79
13.	Dec-20	10,368.69	1,107.48	11,476.17
14.	Jan-21	9,970.95	1,608.64	11,579.59
15.	Feb-21	8,441.84	736.4	9,178.24
16.	Mar-21	11,028.23	2,150.37	13,178.60
	Total	196,692.24	19,758.63	216,450.87

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month – Year (Dec 2019 – Mar 2021)	Certified CPO (mt)	Certified PK (mt)
1.	Dec-19	2,545.15	490.38
2.	Jan-20	2,100.10	404.8
3.	Feb-20	2,551.09	552.14
4.	Mar-20	2,345.22	455.77
5.	Apr-20	2,231.19	546.15
6.	May-20	3,000.17	502.08
7.	Jun-20	2,698.68	477.66

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8.	Jul-20	2,687.64	642.29
9.	Aug-20	3,266.40	577.75
10.	Sep-20	3,783.46	575.38
11.	Oct-20	3,347.38	699.28
12.	Nov-20	2,796.76	809.98
13.	Dec-20	2208.53	716.62
14.	Jan-21	2,123.81	598.74
15.	Feb-21	1,798.11	472.81
16.	Mar-21	2,349.01	454.68
Total		41,832.70	8,976.51

Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) Month – Year (Dec 2019 – Mar 2021)

No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		185.77
2	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		114.23
3	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		221.44
4	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		78.56
5	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		191.17
6	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		8.83
7	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		614.8
8	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		385.2
9	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		477.02
10	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		22.98
11	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		650.00
12	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		107.59
13	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		342.41
14	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		164.42
15	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		235.58
16	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		399.13
17	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		350.87
18	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		339.30
19	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		360.70

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20	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		230.90
21	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		19.10
22	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		242.36
23	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		207.64
24	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		159.84
25	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		190.16
26	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		214.76
27	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		135.24
28	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		300.00
29	Lahad Datu Edible Oil Sdn. Bhd.	CB97362		49.23
30	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	685.70	
35	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	712.94	
31	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	1,000.00	
32	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	69.22	
33	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	430.78	
34	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	500.00	
35	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	1,257.65	
36	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	42.35	
37	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	500.00	
38	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	1,699.39	
39	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	500.00	
40	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	3,400.61	
41	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	350.00	
42	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	794.58	
43	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	24.97	
44	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	1.03	
45	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	534.07	
46	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	1,765.93	
47	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	250.00	
48	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	400.00	
49	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	550.00	
50	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	160.97	
51	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	88.00	
52	Lahad Datu Edible Oil Sdn. Bhd.	CB97362	400.00	

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	Total	16118.19	6,999.23
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A. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	N/A			
Note: No certified CP/PK sold as other scheme				

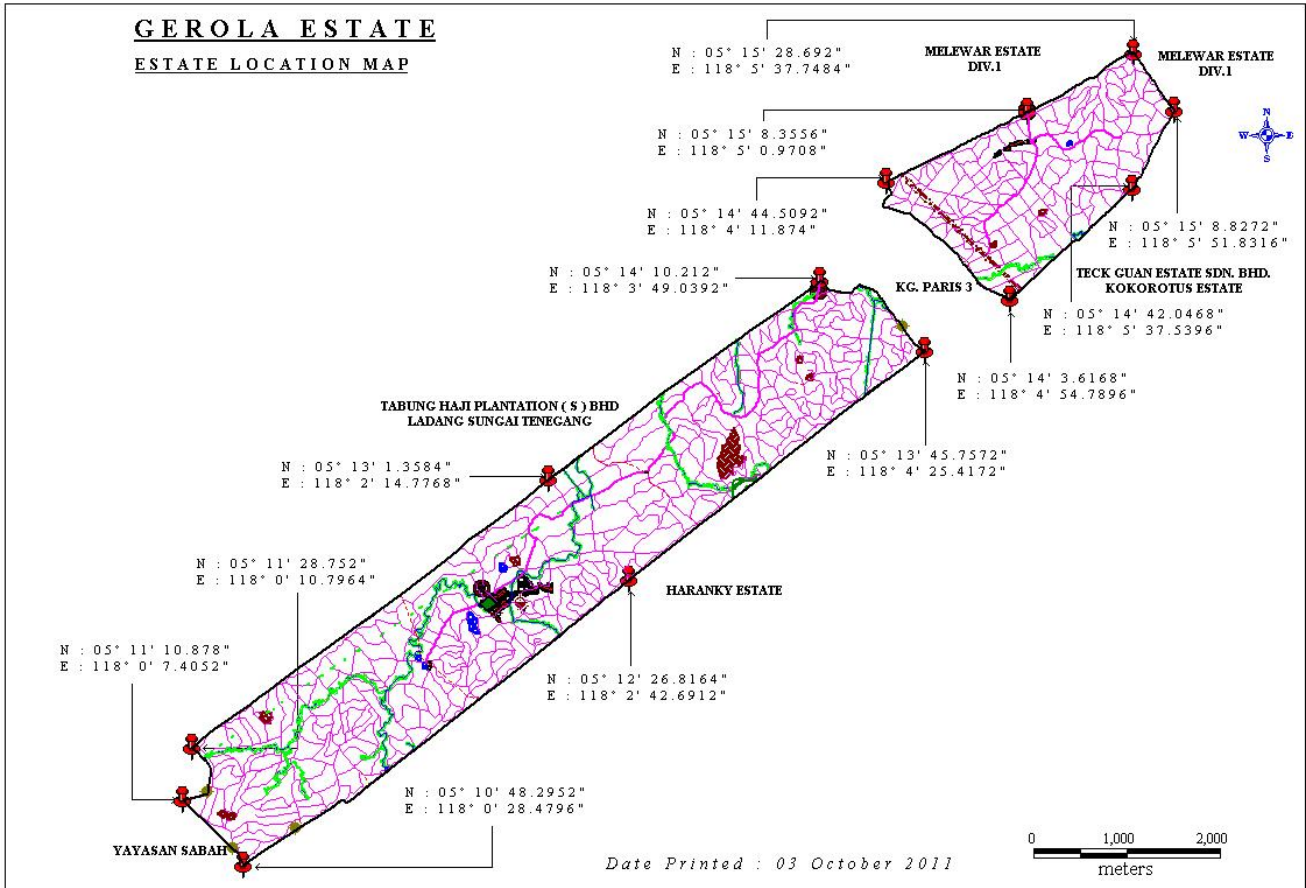
B. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1.	N/A			
Note: No certified CP/PK sold as conventional CPO/PK				

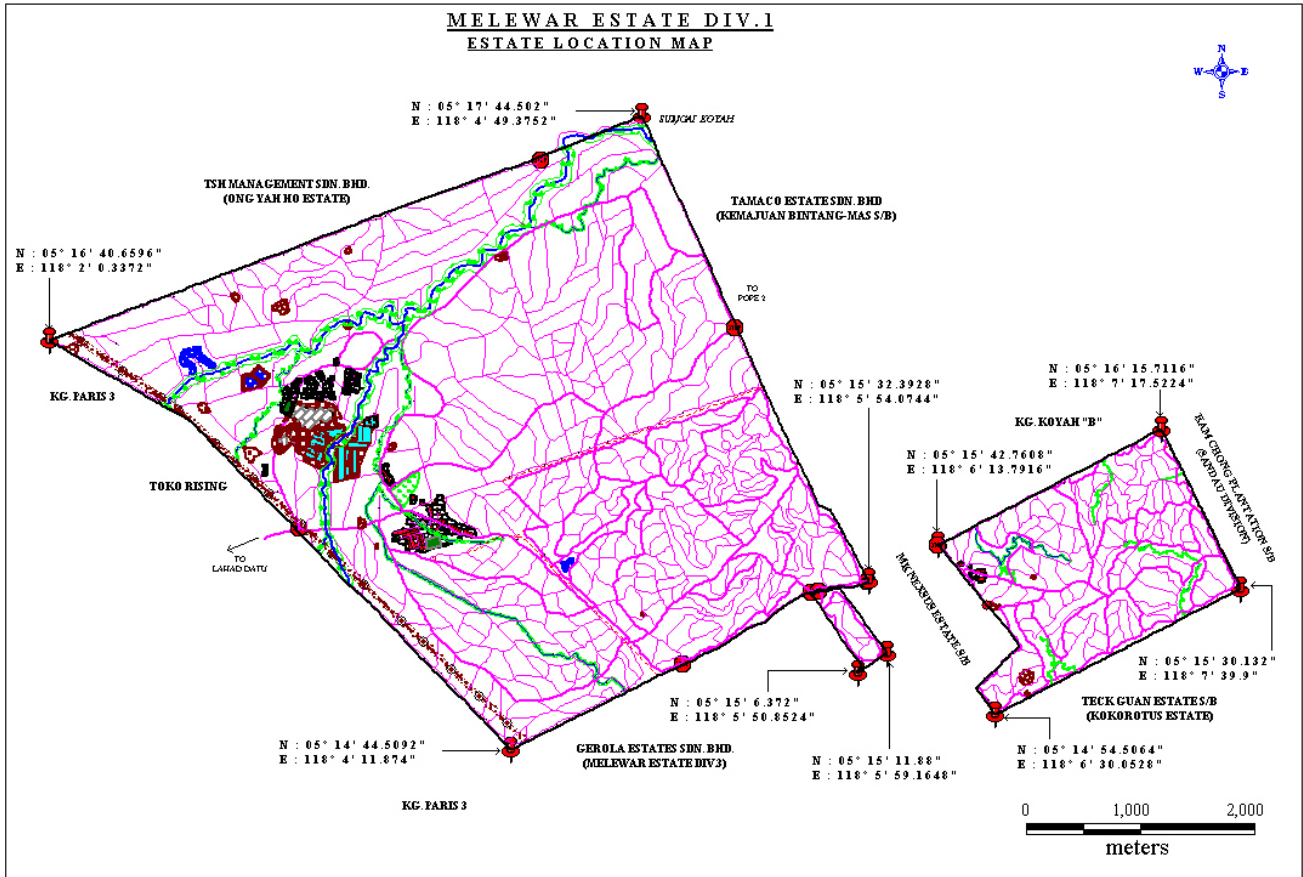
C. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)	
	N/A			
Note: No certified CP/PK sold as credits				

Appendix E: Location Map of Certification Unit and Supply bases

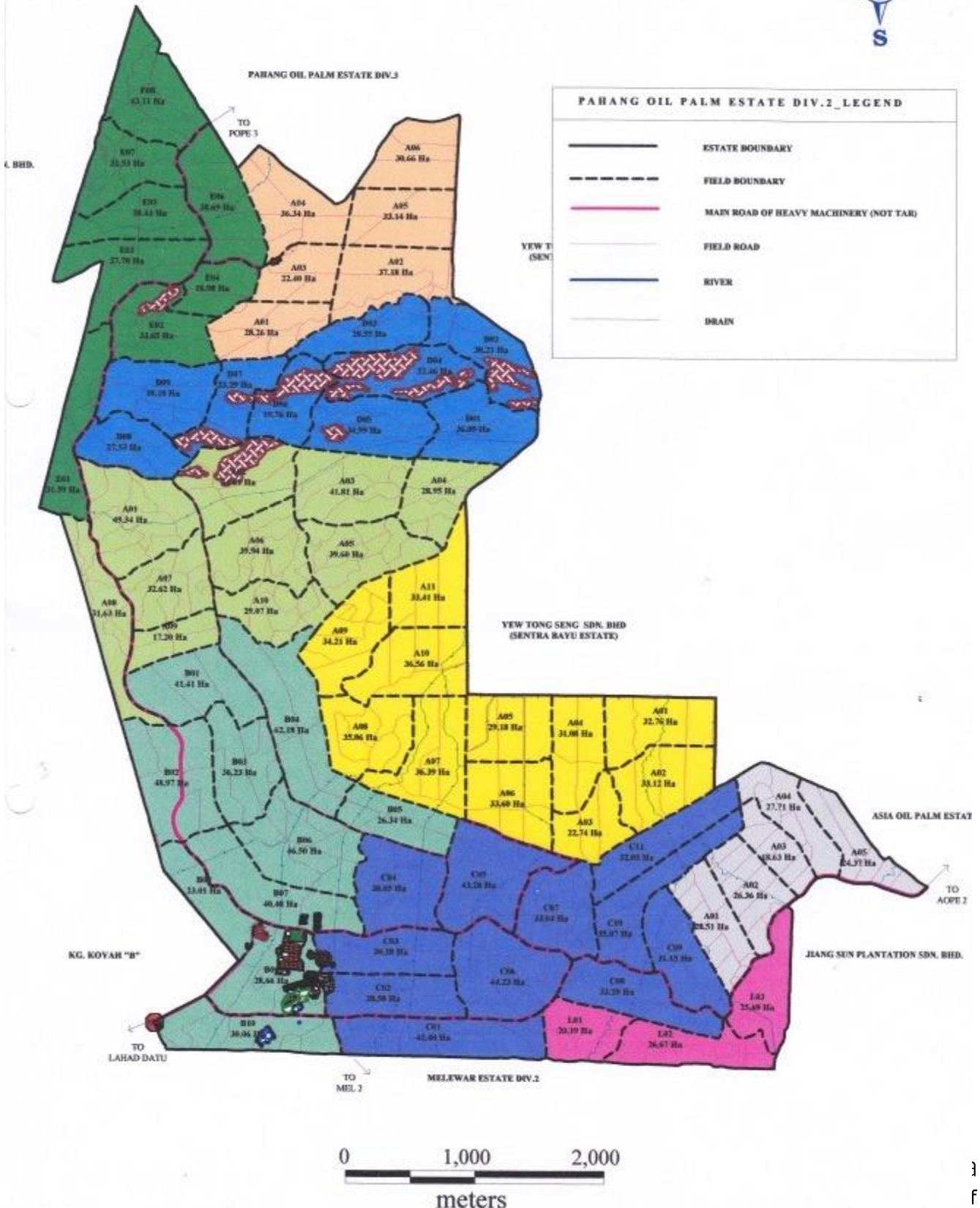


Appendix F: Estate Field Map

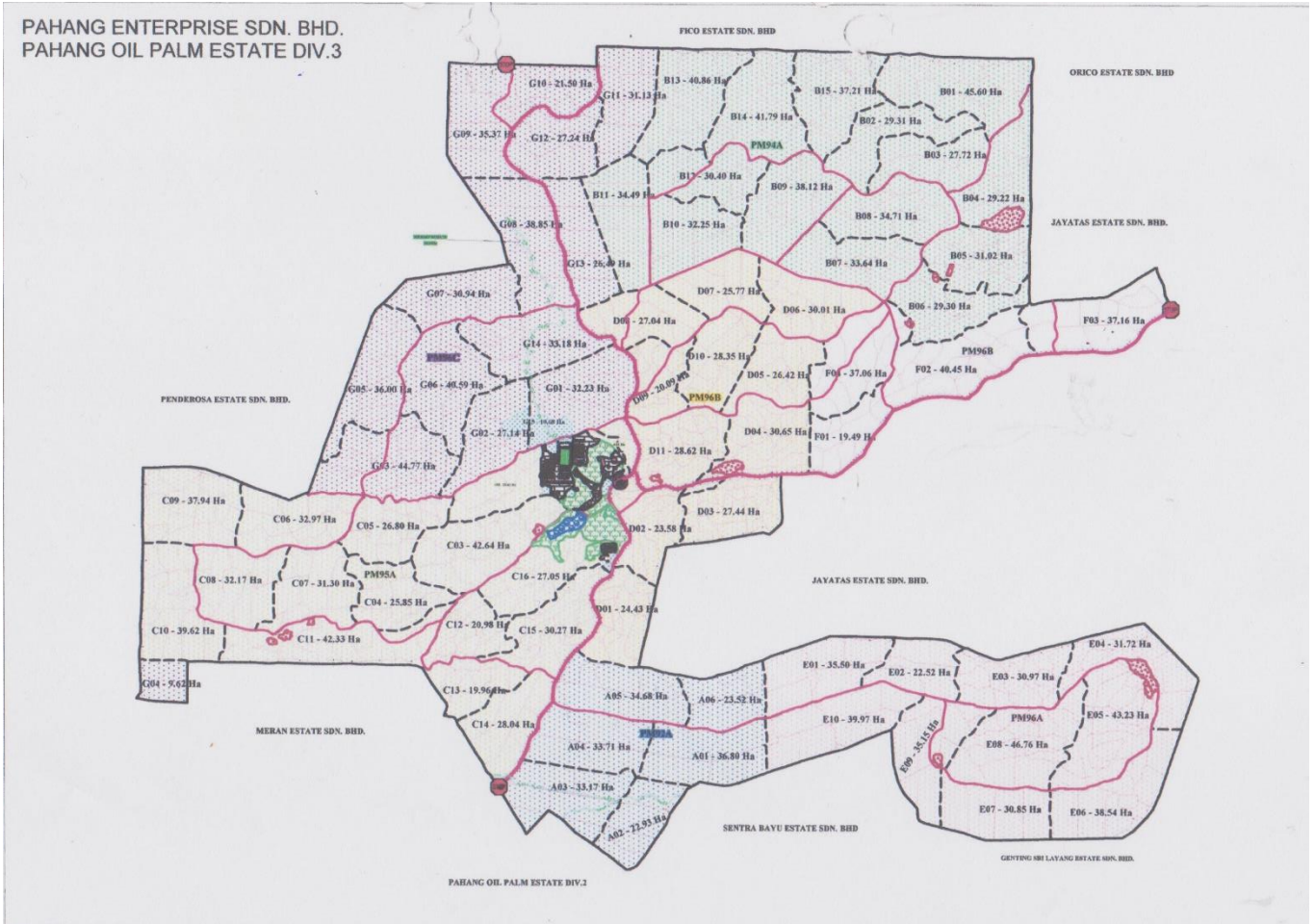




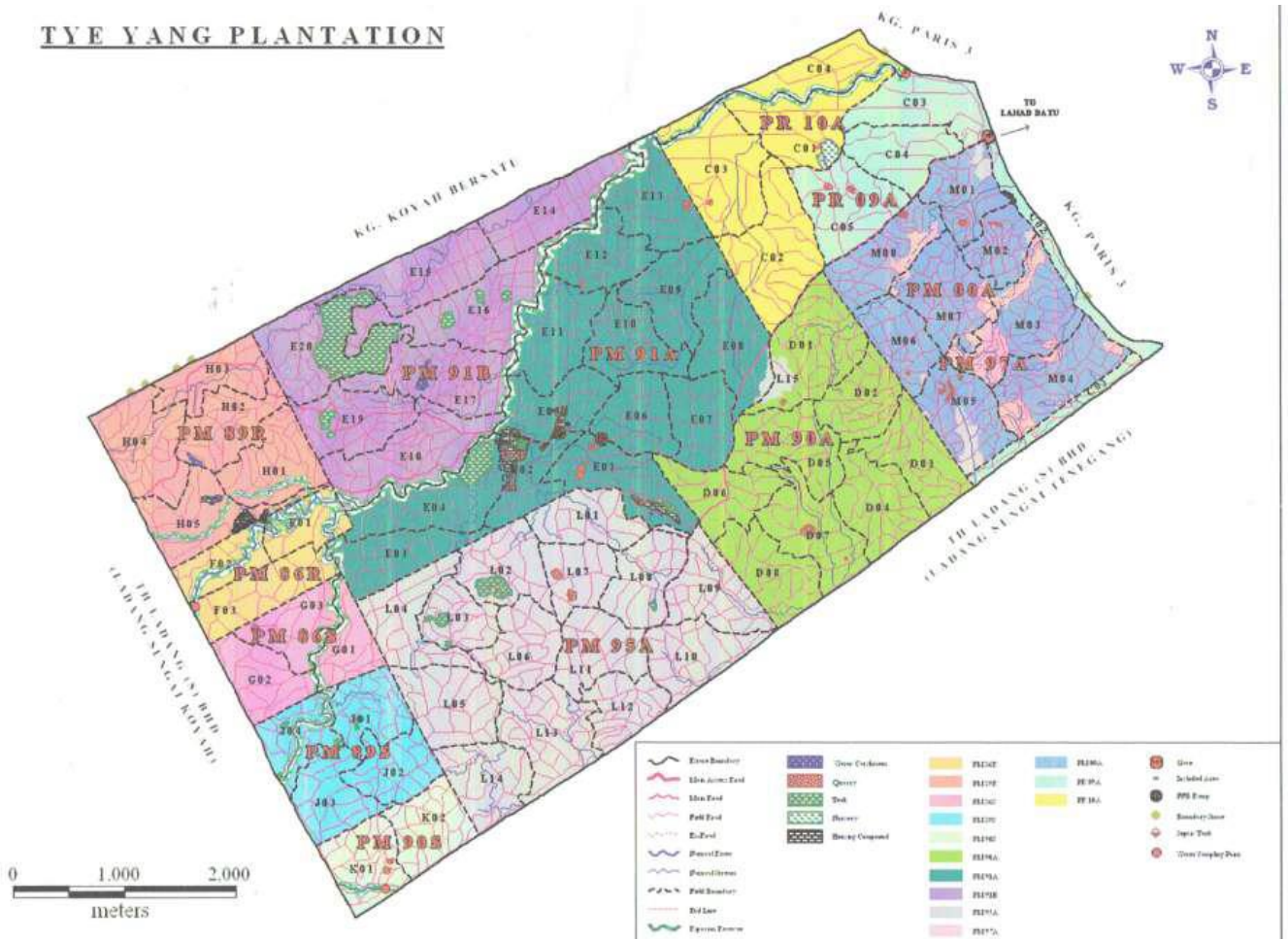
PAHANG OIL PALM ESTATE DIV.2



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TYE YANG PLANTATION



Appendix G: List of Smallholder Sampled

N/A

Appendix H: List of Abbreviations

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