

**RSPO PRINCIPLE AND CRITERIA –
ANNUAL SURVEILLANCE ASSESSMENT (ASA) 1_4
Public Summary Report**

Client Company name (Parent Company): SIPEF Group
Client company Address: Forum Nine Building, 10th Floor, Suite 1-11 Jl. Imam Bonjol No.9, Medan - 20112 Sumatra Utara Province Indonesia
Certification Unit: PT Agro Muko – Mukomuko Palm Oil Mill Location of Certification Unit: Teruntung Village, Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0021-05-000-00	Membership Approval Date	7 th December 2005
Parent Company Name	SIPEF Group		
Address	Head Office: Forum Nine Building, 10 th Floor, Suite 1-11 Jl. Imam Bonjol No.9, Medan - 20112 Sumatra Utara Province Indonesia Plantation Location: Teruntung Village, Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia		
Subsidiary (Certification Unit Name)	PT. Agro Muko – Mukomuko Palm Oil Mill		
Address	Teruntung Village, Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia		
Contact Name	Mr. Sander Van den Ende		
Website	www.tolantiga.co.id	E-mail	svdende@sipef.com
Telephone	+62 61 415 2043	Facsimile	+62 61 452 0908

2. Certification Information			
Certificate Number	RSPO 556402	Date of First Certification	22 February 2011
		Certificate Start Date	22 February 2016
		Certificate Expiry Date	21 February 2021
Scope of Certification	Production of CPO and PK at Mukomuko palm oil mill and Marketing Activities through SIPEF N.V., with supply base comprise of six (6) company-owned estate: Mukomuko estate, Sei Betung estate, Tanah Rekah estate, Talang Petai estate, Sei Kiang estate, Air Manjuntio estate; cooperative: Koperasi Serba Usaha PT. Agro Muko, Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera; and thirty-nine (39) Kebun Masyarakat Desa/KMD. Mill capacity is 60 tonnes FFB/hour.		
Applicable Standards	RSPO P&C Generic 2018		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
10105654	ISO 9001:2015	Lloyd's Register Indonesia	3 July 2018 – 2 July 2021

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Mukomuko POM	Teruntung Village, Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2°36'05.76" S	101°16'43.50" E
Mukomuko Estate*	Air Dikit Village, Pondok Lunang Village, Air Kasai Village, Dusun Baru Village, Sari Bulan Village, Sumber Village, Teruntung Village, Talang Kuning Village, Air Dikit District and Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 39' 28.44" S	101° 12' 57.48" E
Sei Betung Estate*	Sidomulyo Village, Penarik Village, Lubuk Sahung Village, Talang Medan Village, Surian Bungkal Village, Sei Jerinjing Village, Talang Bungkal Village, Penarik District and Selagan Raya District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 1.59" S	101° 22' 12.79" E
Tanah Rekah Estate*	Tanah Harapan Village, Tanah Rekah Village, Air Dikit Village, Setia Budi/SP-IV Village, Kota Mukomuko District, Air Dikit District and Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 44.61" S	101° 10' 48.52" E
Talang Petai Estate*	Talang Petai Village, Talang Sepakat Village, Talang Sakti Village, Sungai Lintang Village, Sungai Rengas Village, Tunggal Jaya Village, V-Koto District and Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 28' 24.42" S	101° 16' 33.09" E
Sei Kiang Estate*	Lubuk Cabau Village, V-Koto District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 24' 41.18" S	101° 14' 19.71" E
Air Manjuntio Estate*	Talang Petai Village and Talang Sepakat Village, V-Koto District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 24' 41.18" S	101° 14' 19.71" E

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Kebun Masyarakat Desa/KMD and Koperasi Serba Usaha/KSU*	Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 25.05" S	101° 16' 40.26" E
Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera	Talang Petai Village, V-Koto District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 25.05" S	101° 16' 40.26" E

*) Kebun Masyarakat Desa/KMD and Koperasi Serba Usaha/KSU are fully managed by PT. Agro Muko, under each estate.

5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Mukomuko Estate	3,670.84	185.24	245.12	4,101.20	89.51
Sei Betung Estate	1,292.16	308.76	9.20	1,610.12	80.25
Tanah Rekah Estate	3,037.58	620.37	213.77	3,849.00	78.92
Talang Petai Estate	2,111.71	48.41	109.88	2,270.00	93.03
Sei Kiang Estate	1,942.06	78.71	150.26	2,171.03	89.45
Air Majunto Estate	971.52	143.82	684.66	1,800.00	53.97
Kebun Masyarakat Desa/KMD and Koperasi Serba Usaha/KSU	441.80	0	0	441.80	100
Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera	87.20	0	52.80	140.00	62.29
Total	13,555.18	1,370.75	1,457.22	16,383.15	82.74

6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 – 3*	4 - 10	11 - 20	21 - 25	26 - 30		
Mukomuko Estate	1,270.39	2,400.45	0	0	0	2,810.52	860.32
Sei Betung Estate	0	813.92	478.24	0	0	1,292.16	0
Tanah Rekah Estate	931.46	309.69	0	420.78	1,375.65	2,106.12	931.46
Talang Petai Estate	396.28	558.53	1,104.29	52.61	0	1,715.43	396.28
Sei Kiang Estate	295.96	177.49	965.33	503.28	0	1,646.10	295.96

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Air Majunto Estate	89.92	881.6	0	0	0	881.6	89.92
Kebun Masyarakat Desa/KMD and Koperasi Serba Usaha/KSU	15.06	171.42	255.00	0	0	426.42	15.06
Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera	31.02	56.18	0	0	0	56.18	31.02
Total (ha)	3,030.09	5,369.28	2,802.86	976.67	1,375.65	10,934.53	2,620.02

Note:

*Replanting

**Only Mature area is considered as production area

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated <i>(Feb 2019-Jan 2020)</i>	Actual <i>(Nov 2018-Oct 2019)</i>		Forecast <i>(Feb 2020-Jan 2021)</i>
		<i>Previous license period (Nov 2018-Feb 2019)</i>	<i>Current license period (Mar 2019-Oct 2019)</i>	
Mukomuko Estate	67,555.10	17,072.63	49,617.88	84,267.10
Sei Betung Estate	32,621.90	8,615.27	20,960.49	32,140.00
Tanah Rekah Estate	56,628.70	18,153.28	38,989.57	49,009.58
Talang Petai Estate	42,809.20	12,105.39	24,200.02	38,001.00
Sei Kiang Estate	37,013.60	9,372.47	19,558.26	35,086.99
Air Majunto Estate	18,832.80	2,819.81	7,317.32	14,326.00
Kebun Masyarakat Desa/KMD and Koperasi Serba Usaha/KSU	6,544.90	1,376.35	3,417.63	7,408.00
Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera	514.72	17.98	107.07	505.00
Total	262,520.92	233,701.42		260,743.67

Note:

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8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *				
Estate	Tonnage / year			
	Estimated (Feb 2019-Jan 2020)	Actual (Nov 2018-Oct 2019)		Forecast (Feb 2020-Jan 2021)
	N/A	<i>Previous license period</i> (Nov 2018-Feb 2019)	<i>Current license period</i> (Mar 2019-Oct 2019)	N/A
0		0	0	
Total		0		

Note:

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable				
Independent FFB Supplier	Tonnage / year			
	Estimated (Feb 2019-Jan 2020)	Actual (Nov 2018-Oct 2019)		Forecast (Feb 2020-Jan 2021)
		<i>Previous license period</i> (Nov 2018-Feb 2019)	<i>Current license period</i> (Mar 2019-Oct 2019)	
0		0	0	
Total	0	0		0

Note:

10. Certified Tonnage				
	Estimated (Feb 2019-Jan 2020)	Actual (Nov 2018-Oct 2019)		Forecast (Feb 2020-Jan 2021)
	Mill Capacity: 60 MT/hr SCC Model: IP	FFB	FFB	
263,520.92		<i>Previous license period</i> (Nov 2018-Feb 2019)	<i>Current license period</i> (Mar 2019-Oct 2019)	260,743.67
		69,533.18	164,168.24	
CPO (OER: 23.00%)		CPO (OER: 24.10%)		CPO (OER: 23.30%)
60,609.81		56,325.85		60,753.28
PK (KER: 5.10%)		PK (KER: 4.72%)		PK (KER: 4.70%)
	13,439.57	11,026.20		12,254.95

Note:

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	6,999.80	39,999.662	0	5,999.875	52,999.337

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	5,300.00	0	0	5,560.64	10,860.64

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	0	0
IS-CSPKO	0	0
IS-CSPKE	0	0

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 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 and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The fourth annual surveillance assessment of second cycle was conducted from 18 to 22 November 2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criterias Generic November 2018 was used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- 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.

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Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as 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 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)
Mukomuko POM	X	X	X	X	X
Mukomuko Estate	X	X		X	X
Sei Betung Estate	X	X		X	
Tanah Rekah Estate	X	X	X		X
Talang Petai Estate			X		X
Sei Kiang Estate				X	X
Air Majunto Estate				X	
Kebun Masyarakat Desa/KMD and Koperasi Serba Usaha/KSU	X	X	X	X	X
Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera				X	X

Tentative Date of Next Visit: November 1, 2020 - November 8, 2020

Total No. of Mandays: 20

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>
Eko Purwanto	Team Leader	Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB) in 2001. He has working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implementing good agricultural practice including integrated pest management and limited pesticides uses. He has completed lead auditor training courses for RSPO P&C (2013), RSPO SCC (2012), ISPO (2012), LAC ISO 9001 (2012), ISO 14001 (2013) and ISO 45001 (2019). Refreshment training have been completed for RSPO P&C in May 2018, RSPO SCC in March 2018. He has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in RSPO and ISPO audit for several plantations and mills since October 2012. During this assessment, he assessed on the aspects of best management practice in palm oil mill and estate, Occupational Health and Safety Management System, Environmental Management System. He is fluent in both verbal/written in English.
Pratama A. Sedayu	Team Member	Graduated from University of Jenderal Soedirman on 2008, majoring in Social Economic of Agriculture. He involved in RSPO certification since 2009 as a team member subsequently as a Lead Auditor, covering assessment against RSPO P&C in Indonesia, Malaysia, Thailand, Papua New Guinea, and Liberia. He completed the ISO 9001, ISO 14001, OHSAS 18001 Lead Auditor Course, HCV Identification and Management; ISPO Lead Auditor endorsed Course and RSPO P&C and RSPO SCCS Lead Auditor endorsed Courses. During this assessment, he assessed on the aspects of legal, supply chain for CPO Mills, environment management system, HCV, smallholder audits and stakeholder consultation. He is fluent in both verbal/written in English.
Imam Fakhrurozi	Team Member	Imam holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta on 2011. He had 2 (two) years working experience related to oil palm industry, as a sustainability and HSE officer in oil palm Plantation Company in Indonesia. Imam has completed a number of relevant trainings, the training includes ISO 9001:2008 and EMS 14001:2004 Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed course. Currently he works for BSI Group based in Jakarta office. He is one of the BSI qualified RSPO auditor. He had been involved in RSPO auditing since 2015. During this assessment, he assessed on the aspects of Social Aspect, Environmental aspect-impacts, Occupational Health and Safety.
Nanang Muallib	Team Member	He holds a Bachelor degree in Forestry Technology from Bogor Agriculture University, 1999. He has 4 years experience worked in the Forest plantation company in Indonesia, and has experiences involves in the several RSPO certification audits as team member. He has passed 5 days ISO 9001 auditor training on 2009. He has been approved as an HCV Assessor under RSPO Scheme. He has been involved in many assessment related to the Forestry and Sustainable oil palm certification in Indonesia. He has experienced involves in RSPO certification

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		assessments more than 15 different oil palm organizations (including mills and estates) in Indonesia. He has passed the RSPO Lead Auditor Training in 2017. During this assessment, he assessed on the aspect of Legal, HCV identification and management, and also social community engagement and stakeholder consultation as well as smallholder audits.
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Accompanying Persons:

No.	Name	Role
	Nil	

2.3 Assessment Plan

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

Date	Time	Subjects	EP	IF	NM	PS
			PRSPOLA, EMS, OHS, SA, SCC	PRSPO-EMS, OHS, SA, SCC	PRSPO-SA	PRSPO-EMS, OHS, SA, SCC
Monday, 18/11/2019	08.00-09.00	Opening Meeting <ul style="list-style-type: none"> Presentation by client (Overview of PT Agro Muko – Mukomuko Palm Oil Mill and its supply base); Presentation by BSI team (Objective, scope, audit plan, etc.) 	√	√	√	√
	09.00-12.00	Document Review in Mukomuko POM : <ul style="list-style-type: none"> Verification of Basic Information (Mill and supply bases) General information, Time bound plan, partial certification verification RSPO P&C (Best management practices Mill and Estate, OHS, EMS, Social and Labour, Continual improvement, etc.) Review of previous assessment findings. 	√	√	√	-
	09.00-12.00	Document Review in Mukomuko POM : RSPO Supply Chain Certification	-	-	-	√
	09.00-12.00	Stakeholder Consultation: Interview with Stakeholders from Kabupaten Mukomuko: BPN, BLH, Dinas Tenaga Kerja, Dinas Perkebunan.	-	-	√	-
	12.00-14.00	Break/Lunch	√	√	√	√
	14.00-17.00	Field Visit and Document Review in Mukomuko POM : <ul style="list-style-type: none"> RSPO P&C (Health and Safety, Environmental Management System, Waste management system, Continual Improvement, Use of Renewable Energy, GHG Calculation) 	√	√	-	-
		Field Visit and Document Review in Mukomuko POM : <ul style="list-style-type: none"> RSPO Supply Chain Certification (Weighbridge, Supply Chain Certification for CPO Mill Model IP) 	-	-	-	√
	Stakeholder Consultation and Document review: Mukomuko POM Interview with Gender Committee, Labour Union, worker representative, FFB Supplier, Local Contractor (employment, welfare) RSPO P&C (Social policy and implementation).	-	-	√	-	
Tuesday, 19/11/2019	08.00-12.00	Field visit: Tanah Rekah Estate Harvesting, transport of FFB, spraying, fertilizer regime, IPM implementation and worker interview (best management practices).	√	-	-	-

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Date	Time	Subjects	EP	IF	NM	PS
			PRSPOLA, EMS, OHS, SA, SCC	PRSPO-EMS, OHS, SA, SCC	PRSPO-SA	PRSPO-EMS, OHS, SA, SCC
		Field Visit: Tanah Rekah Estate pesticide and agrochemical storage, equipment and PPE storage, diesel fuel storage, workshop and; Interview with Workers (welfare, environmental, health and safety)	-	√	-	-
		Field Visit: Tanah Rekah Estate HGU pegs maintenance, HCV area, river buffer zone, and stakeholder interview (with surrounding village)	-	-	-	√
		Field visit and Interview: KMD Tanah Rekah, KMD Pondok Batu, KMD Pasar Mukomuko, KMD Ujung Padang (Tanah Rekah Estate)	-	-	√	-
	12.00-14.00	Break/Lunch	√	√	√	√
	14.00-17.00	Document Review: Tanah Rekah Estate and KMD RSPO P&C	√	√	√	√
Wednesday, 20/11/2019	08.00-12.00	Field visit: Talang Petai Estate Harvesting, transport of FFB, spraying, fertilizer regime, IPM implementation and worker interview (best management practices).	√	-	-	-
		Field Visit: Talang Petai Estate pesticide and agrochemical storage, equipment and PPE storage, diesel fuel storage, workshop and; Interview with Workers (welfare, environmental, health and safety)	-	√	-	-
		Field Visit: Talang Petai Estate HGU pegs maintenance, HCV area, river buffer zone, and stakeholder interview (with surrounding village)	-	-	-	√
		Field visit and Interview: KMD Tunggal Jaya, KMD Sungai Lintang, KMD Sungai Gading, KMD Talang Petai, KMD Pondok Lunang 2, KMD Tunas Muda - Tunggal Jaya (Talang Petai Estate)	-	-	√	-
	12.00-14.00	Break/Lunch	√	√	√	√
14.00-17.00	Document Review: Talang Petai Estate and KMD RSPO P&C	√	√	√	√	
Thursday, 21/11/2019	08.00-12.00	Field visit: Sungai Kiang Estate Harvesting, transport of FFB, spraying, fertilizer regime, IPM implementation and worker interview (best management practices).	√	-	-	-
		Field Visit: Sungai Kiang Estate pesticide and agrochemical storage, equipment and PPE storage, diesel fuel storage, workshop and; Interview with Workers (welfare, environmental, health and safety)	-	√	-	-
		Field Visit: Sungai Kiang Estate HGU pegs maintenance, HCV area, river buffer zone, and stakeholder interview (with surrounding village)	-	-	-	√
		Field visit and Interview: KMD Lubuk Pinang, KMD Lalang Luas, KSU Sei Kiang (Sungai Kiang Estate) and Koperasi Produksi Plasma Sungai Tenang Sejahtera.	-	-	√	-
	12.00-14.00	Break	√	√	√	√
14.00-17.00	Document Review: Sungai Kiang Estate and KMD RSPO P&C	√	√	√	√	

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			PRSPOLA, EMS, OHS, SA, SCC	PRSPO-EMS, OHS, SA, SCC	PRSPO-SA	PRSPO-EMS, OHS, SA, SCC
Friday, 22/11/2019	08.00-12.00	Field visit & Document Review: Mukomuko Estate Harvesting, transport of FFB, spraying, fertilizer regime, IPM implementation and worker interview (best management practices).	√	-	-	-
		Field Visit & Document Review: Mukomuko Estate pesticide and agrochemical storage, equipment and PPE storage, diesel fuel storage, workshop and; Interview with Workers (welfare, environmental, health and safety)	-	√	-	-
		Field Visit & Document Review: Mukomuko Estate HGU pegs maintenance, HCV area, river buffer zone, and stakeholder interview (with surrounding village)	-	-	-	√
		Field visit, Document Review and Interview: KMD Penarik, KMD Sei Jerinjing, KMD Teras Terunjam, KMD Lubuk Sahung, KMD Bumi Mulya, KMD Suka Maju, KMD Bukit Makmur (Sei Jerinjing).	-	-	√	-
	12.00-14.00	Break/Lunch	√	√	√	√
	14.00-15.00	Auditor Discussion	√	√	√	√
	15.00-16.00	Closing Meeting	√	√	√	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- SIPEF Group Multiple Management Units / Time Bound Plan
- RSPO P&C Generic November 2018
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	PT Agro Muko – Mukomuko Palm Oil Mill is a subsidiary of SIPEF Group. SIPEF Group has disclose all of its companies, mills and estates. The timebound plan including un-certified units/companies.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	No. Not all the estates and mills certified within five years after obtaining RSPO membership. New estates and mills are under progress to be RSPO certified after RSPO NPP carried out in 2014.	Yes
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.	The latest acquisition noted for PT. Asri Rimba Wirabhakti in Bengkulu, announced end of 2018. Certification plan have been prepared, awaiting for RSPO LUC, RSPO RACP and RSPO NPP.	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, there is changes from the last audit to include PT. Asri Rimba into timebound plan. Waiting for HCV ALS review, LUC review for preparation into RSPO NPP.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapse. SIPEF is able to demonstrate adequate evidence related to changes in implementation of the plan.	Yes
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	The delay of not able to certify all the estate within the 5 years period from the day of RSPO membership is accepted by the assessment team.	Yes
Un-Certified Units or Holdings		
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 	Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and found note "The compensation plans for PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the	Yes

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<p>accordance with RSPO P&C criterion 7.3.</p>	<p>Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015”.</p>	
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>All new planting after January 1st, 2010 have undergone and complies with RSPO New Planting Procedure.</p>	<p>Yes</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>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.</p>	<p>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint.</p> <p>On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company.</p> <p>On 28 August 2017 - Secretariat received response from the company.</p> <p>On 5 September 2017 - Complainant failed to provide the document.</p> <p>On 11 September 2017 - Secretariat has sent an email to SIPEF.</p> <p>On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter.</p> <p>On 18 June 2018 – Complaint Panel to deliver a decision.</p> <p>On 25 July 2018 – Complaint Panel to deliver a decision.</p> <p>On 23 August 2018 – Draft decision letter to be reformatted.</p> <p>On 19 September 2018 – Decision Letter – Complaints Panel.</p> <p>On 26 September 2018 – The decision letter finalised and to be delivered to Parties.</p> <p>On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018.</p> <p>On 20 December 2018 – The complaint is officially closed.</p>	<p>Yes</p>

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	The case tracker available on link https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labor dispute noted. The assessment team has conducted a search in internet to confirm that there is no new comments or dispute raised by the communities on those units that have not been certified.	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified.	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	The internal audit against the uncertified management units requirement has been conducted for all uncertified units: <ul style="list-style-type: none"> • PT. Agro Rawas Ulu was conducted on 20-21 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; • PT. Agro Kati Lama was conducted on 4-6 March 2019 assessing criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; • PT. Agro Muara Rupit was conducted on 18-20 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; Each Management Unit has provide correction and corrective action to ensure all RSPO P&C and partial certification requirements are implemented.	Yes
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Stakeholder comments are noted. The assessment team has conducted a search in internet to confirm that there is a comment that was recorded as complaint under RSPO Case Tracker; raised by the individual on those units that have not been certified. RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker: On 25 July 2017 - Secretariat to write to the company and inform them on the complaint.	Yes

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	<p>On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company. On 28 August 2017 - Secretariat received response from the company. On 5 September 2017 - Complainant failed to provide the document. On 11 September 2017 - Secretariat has sent an email to SIPEF. On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter. On 18 June 2018 – Complaint Panel to deliver a decision. On 25 July 2018 – Complaint Panel to deliver a decision. On 23 August 2018 – Draft decision letter to be reformatted. On 19 September 2018 – Decision Letter – Complaints Panel. On 26 September 2018 – The decision letter finalised and to be delivered to Parties. On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018. On 20 December 2018 – The complaint is officially closed. The case tracker available on link https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</p>	
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3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill’s initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>Yes. PT Agro Muko – Mukomuko POM put all of the smallholder into certification.</p>	<p>Comply</p>

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3.4 Details of findings

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

During the Annual Surveillance Assessment (ASA) 1_4 there were no Major & two (2) Minor nonconformities raised. PT Agro Muko – Mukomuko POM 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. Below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	1844987-201911-N1	Clause & Category (Major / Minor)	RSPO P&C Generic Nov 2018 indicator 2.2.2 (Minor)
Date Issued	22 November 2019	Due Date	Next Audit
Closed (Yes / No)	No	Date of nonconformity Closure	Next Audit
Statement of Nonconformity:	The contracts between PT. Agro Muko and the KMD (scheme smallholder), and CPO transporters have not contain specific clauses on meeting applicable legal requirements.		
Requirement Reference:	RSPO P&C Generic Nov 2018 indicator 2.2.2 (minor) All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.		
Objective Evidence:	Based on document review upon contracts for KMD (scheme smallholder as FFB supplier): KMD Lalang Luas, KMD Lubuk Pinang, KSU Sei Kiang - there was no specific clauses on meeting applicable legal requirements. Based on document review upon contracts for CPO transporters: CV. Usaha Jaya, PT. Genta Perdana Diandra, PT. Bersama Sejahtera Mandiri and PT. Mutia Mulia - there was no specific clauses on meeting applicable legal requirements.		
Corrections:	<ul style="list-style-type: none"> - Put the specific clauses on meeting applicable legal requirements into all contracts. - Carried out contract addendum to all contract that has not included specific clauses on meeting applicable legal requirements. 		
Root Cause Analysis:	Indicator that specified requirement to include specific clauses on meeting applicable legal requirements was a new indicator, therefore the Operation Unit does not aware yet.		
Corrective Actions:	Management of PT Agro Muko through RMO issues a circular to ensure that specific clauses on meeting applicable legal requirements are included into all contracts, including but not limited to KMDs contract and transport contract. Target date:		

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	<ul style="list-style-type: none"> - For new contract, the specific clauses on meeting applicable legal requirements included during contract drafting. - For existing contract, addendum of contract completed not later than 1st Semester of 2020. <p>PIC: All OU Head.</p>		
Assessment Conclusion:	Audit team has reviewed and accepted the corrective action plan prepared by the Unit of Certification. The effectiveness of corrective actions will be verified during next surveillance assessment.		
Non-conformity			
NCR Ref #	1844987-201911-N2	Clause & Category (Major / Minor)	RSPO P&C Generic Nov 2018 indicator 2.2.3 (Minor)
Date Issued	22 November 2019	Due Date	Next Audit
Closed (Yes / No)	No	Date of nonconformity Closure	Next Audit
Statement of Nonconformity:	The contracts between PT. Agro Muko and KMD (scheme smallholder as FFB supplier), and CPO transporters have not contain clauses disallowing child, forced and trafficked labour.		
Requirement Reference:	RSPO P&C Generic Nov 2018 indicator 2.2.3 (minor) 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.		
Objective Evidence:	Based on document review upon contracts for KMD (scheme smallholder): KMD Lalang Luas, KMD Lubuk Pinang, KSU Sei Kiang - there was no clauses disallowing child, forced and trafficked labour. Based on document review upon contracts for CPO transporters: CV. Usaha Jaya, PT. Genta Perdana Diandra, PT. Bersama Sejahtera Mandiri and PT. Mutia Mulia - there was no clauses disallowing child, forced and trafficked labour.		
Corrections:	<ul style="list-style-type: none"> - Put the clauses on disallowing child, forced and trafficked labour into all contracts. - Carried out contract addendum to all contract that has not included clauses on disallowing child, forced and trafficked labour. 		
Root Cause Analysis:	Indicator that specified requirement to include clauses on disallowing child, forced and trafficked labour was a new indicator, therefore the Operation Unit does not aware yet.		
Corrective Actions:	Management of PT Agro Muko through RMO issues a circular to ensure that specific clauses on meeting applicable legal requirements are included into all contracts, including but not limited to KMDs contract and transport contract. Target date: <ul style="list-style-type: none"> - For new contract, the clauses on disallowing child, forced and trafficked labour included during contract drafting. 		

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	- For existing contract, addendum of contract completed not later than 1 st Semester of 2020. PIC: All OU Head.
Assessment Conclusion:	Audit team has reviewed and accepted the corrective action plan prepared by the Unit of Certification. The effectiveness of corrective actions will be verified during next surveillance assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	The Certification Unit has done periodic inspection in monthly basis regarding employee housing using Form ENC/CHK/06 (Emplasmnt Inspection Checklist), consist of inspection to the Building, Facility, Cleanliness and Prevention of Pollution), House Keeping, Health and Safety, Emergency First Responde dan Electricity Equipment. Point of consideration on coverage of points recommended in ILO Guidance on Workers' Housing Recommendation No 115 in the form ENC/CHK/06 (Emplasmnt Inspection Checklist).
OFI 2	Based on interview with Gender Committee and female worker, stated that the certification unit has policy to give opportunities to the breastfeeding woman to breastfeed their child during working hour at 10.00, this policy has been included in Collective Labour Agreement 2018-2020 as well. Based in interview, the policy regarding breastfeeding time has been implemented. Point of consideration on policy evaluation taking into account voice from new mothers and breastfeeding women by involving Gender Committee.
OFI 3	The Unit of Certification has completed Emergency Response Facility for land fire provided per 2 (two) estates. Point of consideration on improved the emergency response team's (Satgas Pengendalian Kebakaran Lahan Perkebunan) understanding on instruction to use emergency response equipment.

Positive Findings	
PF #	Description
PF 1	Good hospitality during stay in PT Agro Muko's Guest House.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	Nil	Clause & Category (Major / Minor)	
Closed (Yes / No)		Date of nonconformity Closure	
Statement of Nonconformity:			
Requirement Reference:			

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Objective Evidence:	
Corrective Actions:	
Assessment Conclusion:	

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
CR01	Minor		01/10/2010	10/02/2012
CR02	Minor		01/10/2010	10/02/2012
A675812/1	Major		10/02/2012	10/02/2012
A675812/1	Minor		10/02/2012	01/02/2013
A675812/2	Minor		10/02/2012	01/02/2013
A675812/3	Minor		10/02/2012	01/02/2013
A675812/4	Minor		10/02/2012	01/02/2013
A675812/5	Minor		10/02/2012	01/02/2013
463917-1	Minor	RSPO P&C INA-WG 2008 4.7.7	01/02/2013	08/01/2014
463917-2	Minor	RSPO P&C INA-WG 2008 6.5.3	01/02/2013	08/01/2014
1010903M3	Major	RSPO P&C INA-WG 2008 2.1.1	08/01/2014	06/03/2014
1010903M7	Major	RSPO P&C INA-WG 2008 4.7.1	08/01/2014	06/03/2014
1010903M10	Major	RSPO P&C INA-WG 2008 4.8.2	08/01/2014	06/03/2014
1010903M16	Major	RSPO P&C INA-WG 2008 6.10.1	08/01/2014	06/03/2014
1010903M18	Major	RSPO SCCS 2011 D.3.4	08/01/2014	06/03/2014
1010903N1	Minor	RSPO P&C INA-WG 2008 2.1.4	08/01/2014	25/11/2014
1010903N6	Minor	RSPO P&C INA-WG 2008 4.6.5	08/01/2014	25/11/2014
1010903N8	Minor	RSPO P&C INA-WG 2008 4.7.5	08/01/2014	25/11/2014
1010903N9	Minor	RSPO P&C INA-WG 2008 4.7.10	08/01/2014	25/11/2014
1010903N13	Minor	RSPO P&C INA-WG 2008 5.3.4	08/01/2014	25/11/2014
1010903N15	Minor	RSPO P&C INA-WG 2008 5.5.4	08/01/2014	25/11/2014
1420737M1	Major	RSPO P&C INA-NI 2016 4.7.1	17/12/2016	02/02/2016
1420737N1	Minor	RSPO P&C INA-NI 2016 4.4.1	17/12/2016	07/12/2017
1420737N2	Minor	RSPO P&C INA-NI 2016 5.1.3	17/12/2016	07/12/2017
1563161-201711-M1	Major	RSPO P&C INA-NI 2016 1.2.1	07/12/2017	Closed on 22/01/2018
1563161-201711-M2	Major	RSPO P&C INA-NI 2016 2.1.1	07/12/2017	Closed on 22/01/2018
1563161-201711-M3	Major	RSPO P&C INA-NI 2016 4.7.1	07/12/2017	Closed on 22/01/2018
1563161-201711-M4	Major	RSPO P&C INA-NI 2016 5.1.1	07/12/2017	Closed on 22/01/2018
1563161-201711-M5	Major	RSPO P&C INA-NI 2016 6.2.1	07/12/2017	Closed on 22/01/2018
1563161-201711-M6	Major	RSPO P&C INA-NI 2016 6.3.1	07/12/2017	Closed on 22/01/2018
1563161-201711-M7	Major	RSPO P&C INA-NI 2016 6.4.1	07/12/2017	Closed on 22/01/2018
1563161-201711-M8	Major	RSPO P&C INA-NI 2016 6.8.1	07/12/2017	Closed on 22/01/2018

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1563161-201711-M9	Major	RSPO P&C INA-NI 2016 6.9.1	07/12/2017	Closed on 22/01/2018
1563161-201711-M10	Major	RSPO P&C INA-NI 2016 6.9.2	07/12/2017	Closed on 22/01/2018
1563161-201711-M11	Major	RSPO P&C INA-NI 2016 6.13.1	07/12/2017	Closed on 22/01/2018
1563161-201711-M12	Major	RSPO P&C INA-NI 2016 7.6.2	07/12/2017	Closed on 22/01/2018
1563161-201711-N1	Minor	RSPO P&C INA-NI 2016 1.1.1	07/12/2017	Closed on 06/12/2018
1563161-201711-N2	Minor	RSPO P&C INA-NI 2016 1.3.1	07/12/2017	Closed on 06/12/2018
1563161-201711-N3	Minor	RSPO P&C INA-NI 2016 2.1.2	07/12/2017	Closed on 06/12/2018
1563161-201711-N4	Minor	RSPO P&C INA-NI 2016 2.1.3	07/12/2017	Closed on 06/12/2018
1563161-201711-N5	Minor	RSPO P&C INA-NI 2016 2.1.4	07/12/2017	Closed on 06/12/2018
1563161-201711-N6	Minor	RSPO P&C INA-NI 2016 5.1.2	07/12/2017	Closed on 06/12/2018
1563161-201711-N7	Minor	RSPO P&C INA-NI 2016 5.1.3	07/12/2017	Closed on 06/12/2018
1563161-201711-N8	Minor	RSPO P&C INA-NI 2016 6.2.2	07/12/2017	Closed on 06/12/2018
1563161-201711-N9	Minor	RSPO P&C INA-NI 2016 6.2.3	07/12/2017	Closed on 06/12/2018
1563161-201711-N10	Minor	RSPO P&C INA-NI 2016 6.4.2	07/12/2017	Closed on 06/12/2018
1563161-201711-N11	Minor	RSPO P&C INA-NI 2016 6.9.3	07/12/2017	Closed on 06/12/2018
1844987-201911-N1	Minor	RSPO P&C Generic 2018 2.2.2	22/11/2019	Open
1844987-201911-N2	Minor	RSPO P&C Generic 2018 2.2.3	22/11/2019	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 PT Agro Muko – Mukomuko POM’s environmental and social performance, legal and any known dispute issues.

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

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

List of Stakeholders contacted	
<p>Internal Stakeholders</p> <ul style="list-style-type: none"> - Workers of Mukomuko POM, Mukomuko Estate, Tanah Rekah Estate, Talang Petai Estate and Sungai Kiang Estate. - Gender Committee of PT Agro Muko 	<p>Union/Contractors</p> <ul style="list-style-type: none"> - PT MPUM (Land Clearing Contractor) Tanah Rekah Estate - PT SSI – Security Contractor - Village Head of Desa Tanah Rekah, Desa Lubuk Pinang, Desa Setia Budi, Desa Tunggal Jaya. - Customary member of Desa Air Dikit - Labor Union (SPAM)
<p>Government Departments</p>	<p>NGO</p> <p>Jaringan Pendamping Kebijakan Pembangunan (JPKP)</p>

<ul style="list-style-type: none"> - Dinas Pertanian, Bidang Perkebunan - Kabupaten Mukomuko (Plantation Office) - Dinas Lingkungan Hidup – Kabupaten Mukomuko (Environmental Office) - Kantor Pertanahan, Badan Pertanahan Nasional – Kabupaten Mukomuko (Land Office) - Dinas Penanaman Modal, Pelayanan Terpadu Satu Pintu dan Tenaga Kerja – Kabupaten Mukomuko (Manpower Office) 	
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No.	Stakeholders comment
<p>1</p>	<p>Feedbacks:</p> <p>Erry Siagian – Kepala Bidang Perkebunan, Dinas Pertanian - Kabupaten Mukomuko (Plantation Office)</p> <ul style="list-style-type: none"> - PT Agro Muko and PT Mukomuko Agro Sejahtera have comply to all permit requirements. - PT Agro Muko and PT Mukomuko Agro Sejahtera have been cooperative in providing of data and information requested, communication has been running well. - Agriculture – Plantation Office has receive routine reports from PT Agro Muko and PT Mukomuko Agro Sejahtera related “Laporan Perkembangan Usaha Perkebunan” (Plantation Business Development Report) in 3 monthly basis. - PT Agro Muko and PT Mukomuko Agro Sejahtera helped the government to improve the community’s social and economic level, one of which is the use of KMD. - STD-B registration for KMD is a government obligation. The registration requirements have been fulfilled by KMD, assisted by PT Agro Muko. At present it is still in the processing stage, and field verification will soon be carried out - with the target of issuance before 2019 ends. - PT Agro Muko is active in attending the meeting of FFB purchase pricing. The FFB purchase price applied by PT Agro Muko is above the government stipulated price. - Purchase result and value are delivered by PT Agro Muko in mass media. - As far as the Agriculture Office is concerned - the HGU of PT Agro Muko in process. There was input from the community to request a portion of the land and be excluded from the scope of the HGU. The Department of Agriculture has provided dissemination (in its capacity as regulator) that in accordance with the Minister of Agriculture Regulation, the company’s obligation is to facilitate plasma (smallholder) development for the community. <p>Management Responses:</p> <ul style="list-style-type: none"> - Thank you for the confirmation from the Mukomuko Regency Agriculture Office regarding all licensing requirements of PT Agro Muko and PT Mukomuko Agro Sejahtera have all been fulfilled. - Thank you for the confirmation from the Mukomuko Regency Agriculture Office that stated PT Agro Muko and PT Mukomuko Agro Sejahtera Sejahterah were cooperative in providing the requested data and information and communication went well. - Thank you for the confirmation from the Mukomuko Regency Agriculture Office regarding submission of Plantation Business Development Report in 3 monthly basis. - Thank you for the confirmation from the Mukomuko Regency Agriculture Office regarding PT Agro Muko dan PT Mukomuko Agro Sejahtera have helped the government to improve the community’s social and economic level, one of which is the use of KMD. - PT Agro Muko will follow up to Agriculature Agency of Mukomuko Regency regarding field verification related to registration of STD-B KMD.

	<ul style="list-style-type: none"> - PT Agro Muko receives invitation from the Bengkulu Provincial Plantation Office for the meeting of FFB Purchase Determination and PT Agro Muko is always present to attend the meeting of FFB Purchase Determination in Bengkulu Province. - It is true that PT Agro Muko has proposed an extension for the HGU which expires in 2019, that is HGU No.31/HGU/BPN/89 dated 27 June 1989. Covers area of 10,000 ha consisting of 2 HGU certificates: Certificate No.2/MU covering 2,270 Ha and Certificate No.03 covering 7,730 Ha. There are several groups from the community asking for a portion of the land to be excluded from the scope of the HGU, it has been disseminated that the company's obligation is to facilitate plasma (smallholder) development for the community rather than give away the portion of HGU. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team noted the positive comments from Mukomuko Regency Agriculture – Plantation Office for PT Agro Muko. - Audit team noted that PT Agro Muko was in process of for HGU extension.
<p>2</p>	<p>Feedbacks:</p> <p>Fernandi Stefano – Kepala Bidang Penataan, Penataan Lingkungan Hidup, Dinas Lingkungan Hidup – Kabupaten Mukomuko (Environment Office)</p> <ul style="list-style-type: none"> - Communication between Environmental Office and PT Agro Muko / PT Mukomuko Agro Sejahtera are running well. - PT Agro Muko has fulfilled the Environmental Permit requirements. - PT Mukomuko Agro Sejahtera has fulfilled the requirements of the Environmental Permit in the framework of plans to increase the scope (accommodate the acquisition of PT Asri Rimba). - Environmental reports of PT Agro Muko and PT Mukomuko Agro Sejahtera are routinely delivered. Data, information and results of measurement parameters and quality standards have been met. - Based on compliance review, the company fulfills the specified parameters and environmental quality standards. - PT Agro Muko already has a Liquid Waste Disposal Permit; permit reports are submitted periodically. - PT Agro Muko already has a Hazardous Waste temporary storage permit for 10 points; reports on the permit, management and documentation of the Hazardous Waste temporary storage permit are submitted periodically. - Meeting environmental requirements for outpatient clinics at PT Agro Muko works well, according to environmental requirements. - PT Agro Muko and PT Mukomuko Agro Sejahtera has registered for a Domestic Waste Permit covering 12 locations. - PT Agro Muko and PT Mukomuko Agro Sejahtera reports the status of forest and land fire patrol periodically. - Related to the availability and quality of water (effect of long drought); Until now the Environment Office has not received a request for Temporary Water Taking Permit from PT Agro Muko. - For KMD and Plasma, PT Agro Muko and PT Mukomuko Agro Sejahtera has reported environmental performance, according to SPPL. <p>Management Responses:</p> <ul style="list-style-type: none"> - Confirm that communication between Environmental Office and PT Agro Muko / PT Mukomuko Agro Sejahtera are running well. - Confirm that PT Agro Muko has fulfilled the Environmental Permit requirements. - Confirm that PT Mukomuko Agro Sejahtera has fulfilled the requirements of the Environmental Permit in the framework of plans to increase the scope (accommodate the acquisition of PT Asri Rimba). - Confirm that environmental reports of PT Agro Muko and PT Mukomuko Agro Sejahtera are routinely delivered. Data, information and results of measurement parameters and quality standards have been met. - Confirm that the company fulfills the specified parameters and environmental quality standards.

	<ul style="list-style-type: none"> - Confirm that PT Agro Muko already has a Liquid Waste Disposal Permit; permit reports are submitted periodically. - Confirm that PT Agro Muko already has a Hazardous Waste temporary storage permit for 10 points; reports on the permit, management and documentation of the Hazardous Waste temporary storage permit are submitted periodically. - Confirm that the company has meeting environmental requirements for outpatient clinics at PT Agro Muko works well, according to environmental requirements. - Confirm that PT Agro Muko and PT Mukomuko Agro Sejahtera has registered for a Domestic Waste Permit covering 12 locations. - Confirm that PT Agro Muko and PT Mukomuko Agro Sejahtera reports the status of forest and land fire patrol periodically. - Confirm that until now PT Agro Muko has not propose request for Temporary Water Taking Permit to the Environment Office. - Confirm that for KMD and Plasma, PT Agro Muko and PT Mukomuko Agro Sejahtera has reported environmental performance, according to SPPL. - Management of PT Agro Muko appreciates the acknowledgement/positive comments from Environmental Office related to environmental performance of the company. - PT Agro Muko thanks the Environmental Office for the supervision. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team noted the positive comments from Mukomuko Regency Environment Office for PT Agro Muko. - Audit team noted that information request from Mukomuko Regency Environment Office have been fulfilled.
<p>3</p>	<p>Feedbacks: Nur Huda A, Roni H., Asrofi – Kantor Badan Pertanahan Nasional – Kabupaten Mukomuko (Land Office)</p> <ul style="list-style-type: none"> - PT Agro Muko is in the process of HGU extension - based on monitoring in the system, the process is in Committee B. - Decree of HGU of PT Mukomuko Agro Sejahtera has been issued by the Central BPN, a certificate of HGU has been issued. - BPN received information on public complaints in 2017 from the community of Air Dikit District related to the allegation that the village treasury land was included in the HGU and the community requested that 20% of the HGU be excluded for the benefit of the community. The complaint information was forwarded to the BPN Regional Office, Bengkulu Province. - BPN received information indicating the presence of HGU land occupation in Danau Lebar, adjacent to Setia Budi Village. - Some time ago there was an audiency with the community, where BPN received community input to be submitted to the company to build a Palm Oil Mill in the Air Rami / Malin Deman area, so that the community did not sell FFB too far. This is also taken into consideration for the BPN to consider changes, and wait for a decision regarding the Mukomuko Regency Spatial Palnning (RTRW). - KMD Bukit Harapan has submitted requirements for registration of land rights (certificate) No.13057/2019 - The BPN team conducted a field verification on 11 November 2019, in the review process (routine PTSL). - KMD Tanjung Harapan has submitted requirements for registration of land rights (certificate) No.13056/2019 - The BPN team conducted a field verification on 11 November 2019, in the review process (routine PTSL). - KMD Mundam Marap has submitted requirements for registration of land rights (certificate) No.13104/2019 - The BPN team conducted a field verification on 11 November 2019, in the review process (routine PTSL).

- BPN asks PT Agro Muko and PT Mukomuko Agro Sejahtera to submitted a report on the use of HGU (production area, infrastructure area, conservation area, area occupied by the community) - no specific format, can be submitted through the Plantation Business Development Report to the Agriculture Office. BPN should be provided 2 copies of the report.
- BPN asks PT Agro Muko and PT Mukomuko Agro Sejahtera to provides reports and information on companies that are 1 group; further requires the company to provide SHP files for the purpose of measurement, monitoring and prevention - if there is a registration of user rights / ownership rights for land that has been charged with land rights / HGU (preventing overlapping / land grabbing).

Management Responses:

- Confirm that PT Agro Muko has proposed an extension for the HGU which expires in 2019, that is HGU No.31/HGU/BPN/89, dated 27 June 1989. The HGU area covers 10,000 Ha consist of 2 HGU certificates: Certificate No.2/MU covering 2,270 Ha and Certificate No.03 covering 7,730 Ha.
- Confirm that HGU Decree of PT Mukomuko Agro Sejahtera has been issued by the Central BPN, a HGU certificate has been issued.
- Information from a group of Air Dikit Districts communities related to the allegation that the village treasury land is included in the company's HGU are incorrect. Related to the community requesting 20% of the HGU be excluded for the benefit of the community, the Company applies the Plasma (Smallholder) scheme that in accordance with the applicable rules and regulations, which is comply to Permentan No.98/2013 concerning Plantation Business Licensing (IUP). The company has fulfilled the obligation to facilitate the construction of community plantations of at least 20% of the IUP-B or IUP area, stated in Article 15 Paragraph (2) that the community planttaion that facilitated by the company shall be outside of the IUP-B or IUP area. So there is no provision that requires companies to give away 20% of the HGU area to the community. At present the company has managed a lot of land that is provided by the community to be used as a Plasma (smallholder) plantation.
- The company willing to communicates to LCA and GIS regarding land occupation in HGU area at Danau Lebar, near Setia Budi Village.
- Currently PT Agro Muko has 2 (two) Palm Oil Mills located in Teras Terunjam District and Teramang Jaya District which have covered all PT Agro Muko area, so that input from the community to build a Palm Oil Mill in Air Rami / Malin Deman area cannot be programmed by the company.
- Confirm that KMD Bukit Harapan has submitted requirements for registration of land rights (certificates) No.13057/2019 - The BPN team conducted a field verification on 11 November 2019, in the review process (routine PTSL).
- Confirm that KMD Tanjung Harapan has submitted requirements for registration of land rights (certificate) No.13056/2019 - The BPN team conducted a field verification on 11 November 2019, in the review process (routine PTSL).
- Confirm that KMD Mundam Marap has submitted requirements for registration of land rights (certificate) No.13104/2019 - The BPN team conducted a field verification on 11 November 2019, in the review process (routine PTSL).
- The company regularly send the Plantation Business Development Report to the Agriculture Service to the Provincial and District Agriculture Services and the company will forward it to the BPN in the next reporting period.
- The entire area of PT Agro Muko and PT Mukomuko Agro Sejahtera has been measured by the Central BPN Team by issuing a Land Plane Map, so that the SHP file should already be available at BPN for measurement, monitoring and prevention purposes - if there is a registration of a usufruct / ownership rights for land that has been charged with land rights / HGU (preventing overlapping / land grabbing).

Audit Team Findings:

- Audit team noted the positive comments from Mukomuko Regency Land Office for PT Agro Muko and PT Mukomuko Agro Sejahtera.
- The process of HGU extension has been performed by the company and accepted by Land Office of Mukomuko Regency. Field verification has been done in 2017. Land Office of Mukomuko Regency has

	<p>submit letter to the Land Office of Bengkulu Province No.405/100-17.16/IX/2019 dated 20 September 2019, regarding proposal for extension of HGU No.02/MU covers 2,269.3205 Ha located in District of V Koto, Teras Terunjam and Selagan Raya; and letter No.450/100-17.16/X/2019 dated 23 October 2019, regarding proposal for extension of HGU No.03 covers 7,730 Ha located in District of Air Dikit, Teras Terunjam, Penarik and Selagan Raya. It also available letter from Land Office of Bengkulu Province to Miniters of Agraria and Spatial (Chairman of National Land Office) No.1363/SP-300.HP.01/X/2019 dated 31 October 2019, comprise all required document for HGU extension. Regarding this HGU extension which is still in process, the Company has obtained recommendation letter from Regent of Mukomuko Regency to continue investment and operational activities, based on letter No.750/389/A.1/XII/2019 dated 14 December 2019.</p> <ul style="list-style-type: none"> - Auditor noted that the unit of certification will forward Plantation Business Development Report to the BPN in the next reporting period.
4	<p>Feedbacks: Edi Kasman – Dinas Penanaman Modal, Pelayanan Satu Pintu dan Tenaga Kerja – Kabupaten Mukomuko</p> <ul style="list-style-type: none"> - PT Agro Muko and PT Mukomuko Agro Sejahtera has paid wages according to the minimum wage regulations. - Representative of PT Agro Muko actively participates in the activities of the Provincial Wages Council. - PT Agro Muko and PT Mukomuko Agro Sejahtera has provided facilities to accommodate employees' normative rights: housing, health clinics and medical personnel, houses of worship, aid for teaching staff, and sports facilities. - PT Agro Muko and PT Mukomuko Agro Sejahtera has registered workers with the BPJS (medical and social insurance). - Manpower Office confirms based on reports that there is no use of child labor. - Implementation of occupational health and safety (K3) regulations in PT Agro Muko and PT Mukomuko Agro Sejahtera is going well. - Regarding the inspection/supervision of OHS norms, registration of OHS licenses and permits, registration of the OHS supervisory committee and reporting of OHS performance is carried out by the Bengkulu Province Manpower Office. - PT Agro Muko has registered the SPAM (Workers Union) to the Mukomuko Regency Manpower Office. - The Manpower Office had received complaints regarding industrial relations cases in Tanah Rekah Estate. The case related termination of industrial relations was reported to the National Human Rights Commission. - The Manpower Office suggest that PT Agro Muko can provide additional School Bus fleet so that school children do not crammed into the Bus, which can increase the risk of traffic accidents. <p>Management Responses:</p> <ul style="list-style-type: none"> - Confirm that PT Agro Muko and PT Mukomuko Agro Sejahtera has paid wages according to the minimum wage regulations - Confirm that PT Agro Muko actively participates in the activities of the Provincial Wages Council. - Confirm that PT Agro Muko and PT Mukomuko Agro Sejahtera has provided facilities to accommodate employees' normative rights: housing, health clinics and medical personnel, houses of worship, aid for teaching staff, and sports facilities. - PT Agro Muko and PT Mukomuko Agro Sejahtera has registered workers with the BPJS (medical and social insurance). - Confirm that PT Agro Muko does not use child labor - Confirm that the implementation of occupational health and safety (K3) regulations in PT Agro Muko and PT Mukomuko Agro Sejahtera is going well. - Confirm that inspection/supervision of OHS norms, registration of OHS licenses and permits, registration of the OHS supervisory committee and reporting of OHS performance is carried out by the Bengkulu Province Manpower Office.

	<ul style="list-style-type: none"> - Confirm that PT Agro Muko has registered SPAM (Workers Union) to the Manpower Office. - Complaints related to industrial relations cases in Tanah Rekah Estate have been resolved through mediation with Bengkulu Province Manpower Office and Komnasham (National Human Rights Commission) in August 2019, in accordance with the Deed of Evidence of Registering a Collective Agreement through the Bipartite that was signed by the Registrar of PHI at District Court of Bengkulu on 25 August 2019 - In 2019, PT Agro Muko has provided additional School Bus fleet 2 (two) units for Mukomuko Estate and 1 (one) unit for Tanah Rekah Estate, so that school children are not crammed into the Bus. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team noted the positive comments from Mukomuko Regency Manpower Office for PT Agro Muko and PT Mukomuko Agro Sejahtera. - Audit team noted that the unit of certification has solved issues related industrial relations. - Audit team noted that the unit of certification has receive and implemented suggestion from Manpower Office, especially related School Bus provision.
<p>5</p>	<p>Feedbacks: PT. MPUM, Land Clearing Contractor – Tanah Rekah Estate</p> <ul style="list-style-type: none"> - PT MPUM complies to regulations and legislation related to labor relations. - PT MPUM does not allow workers under 18 years old; the two workers interviewed were 27 years and 35 years old. - Workers of PT MPUM gets a salary in accordance with the minimum wage, the salary calculation is explained based on the workload calculation (based on meters and/or hours worked/hour meters). - PT MPUM provides personal protective equipment for working excavator operators (helmets, gloves, safety shoes) and first aid kits. - PT MPUM has included its employees to completed lift and lift aircraft training. - PT MPUM has registered its workers with BPJS Ketenagakerjaan (social insurance). - PT Agro Muko provides decent housing, electricity and water to contractor workers. <p>Management Responses:</p> <ul style="list-style-type: none"> - Thanks to PT MPUM which complies to regulations and legislation related to labor relations. - Thanks to PT MPUM which does not allow workers under 18 years old. - Thanks to PT MPUM for giving salaries to its workers according to the minimum wage, the salary calculation is explained based on the piece rate calculation (based on meters and / or hours worked / hour meters). - Thanks to PT MPUM that has provided personal protective equipment for working excavator operators (helmets, gloves, safety shoes) and first aid kits. - Thanks to PT MPUM that has included its employees to get lift and lift aircraft training. - Thanks to PT MPUM that has registered its workers to BPJS Ketenagakerjaan (social insurance). - Confirm that PT Agro Muko has provided decent housing, electricity and water to contractor workers. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team noted the positive comments from PT MPUM to the unit of certification. - Audit team noted that the unit of certification has solved issues related industrial relations with PT MPUM.
<p>6</p>	<p>Feedbacks: NGO Jaringan Pendamping Kebijakan Pembangunan (JPKP)-Mukomuko (Yon Saputra – Ketua DPD JPKP) and Customary Leader of Air Dikit Village (Mr. Samsuar)</p> <ul style="list-style-type: none"> - The process of extending HGU has not yet ask for approval from the surrounding community. - The community of 4 villages (Air Dikit, Pondok Lunang, Dusun V Koto and Sari Bulan) requested that the company allocate 20% of the HGU area extended to be to be given to the community for plasma (smallholder) plantation.

- JPKP has sent a letter to the President of Republic of Indonesia regarding objections to the extension of one of PT Agro Muko's HGUs which will expire on 31 December 2019.
- Air Dikit Village already has a Village Community Plantation (KMD) where the land used as KMD is provided by the Village.
- Replanting work in PT Agro Muko is indicated using contractors from Mukomuko Regency officials.
- The company must immediately carry out an action plan for the management of HCV.
- There are indications of HCV management that is not in accordance with conservation concepts such as the construction of roads at riparian and planting oil palm in areas that have been designated as HCV such as the coastline of Tanah Rekah Estate.
- The company does not want to receive FFB yields from community plantations.
- Absorption of local labor is felt to be very lacking.
- There is a report on a piece rate system where wages are paid based on workforce performance and if the achievement is less than the target due to natural constraints (rain etc.) the company does not pay the workforce based on daily wages.

Management Responses:

- The process of extending the HGU of PT Agro Muko has followed the regulations and requirements set by the Government of the Republic of Indonesia, namely Permen ATR/BPN No. 7/2017 concerning Regulations and Procedures for Establishing Concession Rights. According to Permen ATR/BPN No. 7/2017 Part Two regarding Procedures for Extending the HGU Period, and Annex 1, is not required a surrounding community approval for Extension or Renewal of HGU Period. The company has also received a statement from the Village Head and/or Sub-District Head that the HGU area to be extended is not in cross-dispute and is physically controlled by the company continuously.
- The company's program of Plasma (smallholder scheme) is in accordance with the applicable rules and regulations, Permentan No. 98/2013 concerning Plantation Business Licensing (IUP). The Company has been comply to facilitate the construction of smallholder plantations at least 20% from the IUP-B or IUP area; and stated in Article 15 Paragraph (2) that the facilitation of development of community plantation are outside the IUP-B or IUP area. There is no obligation that 20% of the HGU area is for the community. Currently, the company has facilitate a lot of area that is provided by the community to be used as plasma (smallholder) plantations.
- The company has completed and complied to all processes and completion of requirements related the extension of HGU that will end on 31 December 2019.
- The Village Community Plantation (KMD) land, which build by the company, are mostly owned by the Village Government and some is directly owned by the individual.
- There is no replanting work in PT Agro Muko that uses contractor from Mukomuko Regency officials.
- The company has carried out HCV management and monitoring. Monitoring of HCV are performed by assigned Ranger and making reports to the BKSDA (Conservation Office) if necessary action needed related protected wildlife.
- The management of HCV is in accordance to the concept of conservation such as the construction of river border roads and planting oil palm in areas that have been designated as HCV such as on the coast border.
- The company has RSPO standards that must be complied. The company will receive community FFB if the management of community plantation meets the RSPO certification standards.
- Absorption of local labor in the company is above 40%.
- Salary for casual workers in the company are in accordance with the provisions of the Bengkulu Province Minimum Sector Wage (UMSP).

Audit Team Findings:

- The process of HGU extension has been performed by the company and accepted by Land Office of Mukomuko Regency. Field verification has been done in 2017. Land Office of Mukomuko Regency has submit letter to the Land Office of Bengkulu Province No.405/100-17.16/IX/2019 dated 20 September 2019, regarding proposal for extension of HGU No.02/MU covers 2,269.3205 Ha located in District of

	<p>V Koto, Teras Terunjam and Selagan Raya; and letter No.450/100-17.16/X/2019 dated 23 October 2019, regarding proposal for extension of HGU No.03 covers 7,730 Ha located in District of Air Dikit, Teras Terunjam, Penarik and Selagan Raya. It also available letter from Land Office of Bengkulu Province to Miniters of Agraria and Spatial (Chairman of National Land Office) No.1363/SP-300.HP.01/X/2019 dated 31 October 2019, comprise all required document for HGU extension. Regarding this HGU extension which is still in process, the Company has obtained recommendation letter from Regent of Mukomuko Regency to continue investment and operational activities, based on letter No.750/389/A.1/XII/2019 dated 14 December 2019.</p> <ul style="list-style-type: none"> - Audit team has conducted verification to the HCV area stated by JPKP, founded that the HCV management riparian area and coast border area of Tanah Rekah Estate are in accordance to the concepts of conservation.
<p>7</p>	<p>Feedbacks: Village Head of Tanah Rekah and Lubuk Pinang (Mr. Masruf dan Armadi)</p> <ul style="list-style-type: none"> - Was greatly helped by the existence of a village community plantation (KMD). - There were no land disputes between the company and the villagers of Tanah Rekah/Lubuk Pinang villagers during 2019. - The relationship between Tanah Rekah/Lubuk Pinang village apparatus and the company is going well. - At the moment, KMD that has been realized is 15 hectares, but there is a reduction because some of the land is used for football fields of 1.5 hectares. There is a plan to add another 10 hectare of plantation area that located adjacent to the existing KMD. - There are no issues regarding environmental pollution caused by company operations. - In the context of the management of the Danau Lebar conservation area, it has been understood by the people of Tanah Rekah Village. <p>Management Responses:</p> <ul style="list-style-type: none"> - Thank you for the statement from Mr. Masruf and Mr. Armadi who stated that it was greatly helped by the existence of a village community plantation (KMD) and the Company hopes that this can be a good communication and relationship between the Company and the communities around the Company. - Confirm that there were no land disputes between the company and the villagers of Tanah Rekah/Lubuk Pinang during 2019. - Thank you for the statement from Mr. Masruf and Mr. Armadi who stated that the relationship between the village apparatus of Tanah Rekah/Lubuk Pinang and the company went well and we will continue to maintain this. - Tanah Rekah Village has submitted an application for an additional 10 Ha area partnership to the Company and the Company is currently still in the stage of submitting studies and evaluations for the additional KMD Tanah Rekah. - Thank you for declaring that there are no issues regarding environmental pollution caused by the company's operations. - Thank you for the statement from Mr. Masruf for the statement of the context of the management of the Danau Lebar conservation area that has been understood by the people of Tanah Rekah Village. <p>Audit Team Findings: Audit team noted the statement from villages and response from PT Agro Muko.</p>
<p>8</p>	<p>Feedbacks: Village Head of Setia Budi (Mr. Jumadi)</p> <ul style="list-style-type: none"> - Setia Budi Village is an Ex Transmigration Village which territory is surrounded by PT Agromuko's HGU. - Relations with the company (Tanah Rekah Estate) are going well and the company has implemented a social program in accordance with the proposal sent by the village government. - The public already knows the boundaries of the company's HGU in the form of a HGU Marker installed along the HGU boundary.

	<ul style="list-style-type: none"> - There was a request from the village community for the company to help repair the road from Setia Budi Village - Tanah Harapan to facilitate road access, which so far was using the company's roads. Many complaints are related to the use of company's road, especially at night, which has to go through an inspection by the company's security unit. - The relationship with Mukomuko Estate is actually not harmonious, where several times there are reports that villagers are prohibited from going through the company's road at night. - Setia Budi Village has a 12 hectare of KMD, but the results are less successful because the KMD location is in Ipuh, which is very far from Setia Budi Village. Coordination with the parent KMD committee is not going well, information about the development of the KMD including its financial condition is unknown to the village government which is its owner.
	<p>Management Responses:</p> <ul style="list-style-type: none"> - Confirm that Setia Budi Village is a former Transmigration Village which territory is mostly surrounded by PT Agro Muko's HGU. - Thank you for the statement from Mr. Jumadi stating that the relationship with the company (Tanah Rekah Estate) is going well and the company has implemented a social program in accordance with the proposal sent by the village government. - Confirm that the public already knows the boundaries of the company's HGU in the form of a HGU stake that is installed along the HGU boundary. - The company will make a program to repair roads from Setia Budi Village - Tanah Harapan to facilitate road access, which so far has been using the company's access and security checks are still carried out in accordance with the Company's SOP. - The company will conduct an evaluation related to reports that villagers are prohibited from going through the company's road at night in the Mukumuko Estate area. - The company, through the smallholder manager, will disseminate the Management of KMD Setia Budi regarding the development of the KMD including its financial condition which is not yet known by the village government.
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team noted that the company will make a program to repair roads from Setia Budi Village to Tanah Harapan to provide better access. - Audit team noted that the company will conduct an evaluation on relationship between Setia Budi Village and Mukumuko Estate management. - Audit team noted that the smallholder manager will disseminate the development progress of KMD Setia Budi to the village government.
<p>9</p>	<p>Feedbacks:</p> <p>Village Head of Tunggal Jaya (Mr. Rismanaji SIP)</p> <ul style="list-style-type: none"> - Tunggal Jaya Village is a former transmigration village. - The impact of Village Community Garden (KMD) development is very positive for the villagers. - There were no land disputes between the company and the people of Tunggal Jaya Village during 2019. - The relationship between the Tunggal Jaya Village apparatus and the company is going well. - At present, KMD Tunggal Jaya has been realized an area of 15 Ha and an additional area of 7.8 Ha in 2017. Next year there are plans to add another 20 hectares for KMD Tunggal Jaya. - There are no issues regarding environmental pollution caused by company operations. - KMD land comes from villagers' land which was bought by the village government to be used as KMD. <p>Management Responses:</p> <ul style="list-style-type: none"> - Confirm that Tunggal Jaya Village is a former transmigration village. - Thank you for the statement from Mr. Rismanaji SIP who stated that the impact of KMD development was very positive for the villagers of Tunggal Jaya.

	<ul style="list-style-type: none"> - Confirm that there were no land disputes between the company and the Tunggal Jaya Village community in 2019. - Thank you for the statement from Mr. Rismanaji SIP that the relationship between the Tunggal Jaya Village apparatus and the company is going well and this will continue to be maintained. - Confirm that currently KMD Tunggal Jaya has been realized covering an area of 15 hectares and an additional of 7.8 hectares addition in 2017. If there is a plan for KMD area addition, the Company will conduct a study and evaluation of proposed land. - Thank you for the statement from Mr. Rismanaji SIP that there were no issues regarding environmental pollution caused by the company's operations. - Confirm that KMD land came from villagers' land which was bought by the village government to be used as KMD. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team noted the statement from villages and response from PT Agro Muko.
<p>10</p>	<p>Feedbacks:</p> <p>Gender Committee (Mrs. Mariana)</p> <ul style="list-style-type: none"> - There is no complaints from member related to sexual harassment/violence during 2019 received by the Gender Committee. - The company regularly carries out pregnancy checks to female workers who work at high risk stations such as chemical sprayers and fertilizer applicators. - The company has provided breastfeeding time for female workers who are in the period of breastfeeding, which is at 10:00 to 11:00 and 15:00 to 15:30. - The company policies have been disseminated in relation to the prohibition of sexual harassment/violence and the protection of reproductive rights to employees. - There is no indication of discrimination in employment based on gender, religion, age, ethnicity, race, political affiliation, etc. - The company has realized the protection of women's reproductive rights such as providing complete PPE for sprayers and fertilizers, conducting health checks (General Check-up) every 6 months for spray and fertilizer workers, transferring female workers who work at high-risk stations (Spraying and Fertilizing) to other types of work that are not at high risk, if indicated pregnant after pregnancy test. - The company gives maternity leave rights for 90 days and period leave 2 days. - The mechanism for submitting complaints related to sexual harassment/violence are using SOP Grievance, and Wistleblower is protected by the Wistleblowing Policy. <p>Management Responses:</p> <ul style="list-style-type: none"> - Thank you for the confirmation from Mrs. Mariana regarding there were no complaints from members about sexual harassment/violence during 2019 and we will continue to maintain this. - Confirm that the Company regularly carries out pregnancy checks to female workers who work at high-risk stations such as chemical sprayers and fertilizers, so that the health of the Company's employees is well maintained. - Confirm that the company has provided breastfeeding time for female workers who are currently breastfeeding, which is at 10:00 to 11:00 and 15:00 to 15:30. - Confirm that dissemination of company policy has been carried out in relation to the prohibition of sexual harassment/violence and the protection of reproductive rights to employees during Morning Briefing. - Confirm that there are no indications of discrimination in employment based on Gender, Religion, Age, Ethnicity, Race, Political Affiliation, etc. and this is supported by Company Policy. - Confirm that the Company has realized the protection of women's reproductive rights such as providing PPE for sprayers and fertilizers, conducting health checks (General Check-up) every 6 months for spray and fertilizer workers, transferring female workers who work at high risk (Spraying and Fertilization) to other types of work that are not at high risk, if indicated pregnant after a pregnancy test. The Company grants 90 days maternity leave and 2 days of period leave.

	<ul style="list-style-type: none"> - The company has a complaint mechanism related to sexual harassment/violence using the SOP of Grievance and the Wistleblower is protected by the Wistleblowing Policy. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team note positive comment from Gender Committee. - Audit team noted the PT Agro Muko performance and provision of normative rights for employees. - Audit team have noted PT Agro Muko statement related to protection reproductive rights.
<p>11</p>	<p>Feedbacks:</p> <p>Labor Union, SPAM (Mr. Abdul Said)</p> <ul style="list-style-type: none"> - There are no issues related to employment. - All levels of the workforce have been registered in BPJS-Kesehatan (medical insurance) and BPJS-Ketenagakerjaan (social insurance). - Meetings with management are held every 2 months, but it is possible to conduct meeting incidently if there are problems occur. - Collective Labor Agreement (PKB) is still valid until 2020. - There are no indications of discrimination, forced labor, use of child labor, intimidation of workers by the company. - The company has implemented policies as regulated in the Collective Labor Agreement, including the provision of PPE, employee housing and other facilities, wages in accordance with the agreement that was signed together. <p>Management Responses:</p> <ul style="list-style-type: none"> - Thank you for the statement of Mr. Abdul Said that there were no issues related to employment. - Confirm that that all Company employees have been registered in the BPJS-Kesehatan (medical insurance) and BPJS-Ketenagakerjaan (social insurance). - Confirm that the meeting with management program is conducted every 2 months, but it is possible to conduct meeting incidently if there are problems occur. - Confirm that the Collective Labor Agreement (PKB) is still valid until 2020 and has been ratified by the Manpower Office of Mukomuko Regency. - Confirm that there are no indications of discrimination, forced labor, use of child labor, intimidation of workers by the company in accordance with Company policies that have been applied. - Confirm that the Company has implemented policies as regulated in the Collective Labor Agreement, including the provision of PPE, employee housing and other facilities, wages in accordance with the agreement that signed together. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team noted the PT Agro Muko performance and provision of normative rights for employees. - Audit team have noted PT Agro Muko's policy and implementation related to no discrimination.
<p>12</p>	<p>Feedbacks:</p> <p>PT SSI, outsourced Security (Bambang Irawan)</p> <ul style="list-style-type: none"> - At the beginning of work, they have received basic security training. - Works based on the Access Control SOP that has been referred by PT SSI. - Not equipped with firearms. - Dissemination has been carried out by PT Agromuko related to the Commitment to Enforcement of Human Rights. - Identification of security vulnerable points has been carried out - Wages are in accordance with the Mukomuko Regency Minimum Wage (UMR) and have been registered in the BPJS-Kesehatan and BPJS-Ketenagakerjaan. - All work equipment is provided by PT SSI.

	<ul style="list-style-type: none"> - Some of the workers come from the surrounding community, for example there are 3 people who come from Sari Bulan Village. - Has understood the prohibition of intimidation to the surrounding community.
	<p>Management Responses:</p> <ul style="list-style-type: none"> - Confirm that PT SSI has conducted basic security training for new security personnel recruited prior to start working at the Company. - Confirm that PT SSI has been working based on the Access Control SOP that has been referred by PT SSI. - In accordance with SOP, PT SSI is not equipped with firearms. - Confirm that PT PT Agro Muko has conducted dissemination related to the Commitment of Enforcement of Human Rights. - Confirm that the Company and PT SSI have identified security vulnerable points. - PT SSI has been following Bengkulu Province minimum wage (UMP) and has been registered in the BPJS-Kesehatan and BPJS-Ketenagakerjaan. - It is true that all work equipment provided by PT SSI. - Recruitment of PT SSI security personnel prioritizes local residents who meet the requirements in accordance with PT SSI SOP. - PT SSI security personnel have understood the prohibition of intimidation to the surrounding community.
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team noted that PT Agro Muko has contracted PT SSI for security services. - Audit team noted that recruitment of PT SSI security personnel prioritizes local residents who meet the requirements in accordance with PT SSI SOP.

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
Mr. Razak (Air Dikit Village)	Hereditary	1 Ha	Yes	No	Comply
Mr. Kadri (Bantal Village)	Hereditary	4 Ha	Yes	No	Comply
Mr. Syahril (Bantal Village)	Hereditary	7 Ha	Yes	No	Comply
Mr. Bustami (Air Bikuk Village)	Hereditary	4 Ha	Yes	No	Comply
Mr. Abdul Latif (Air Bikuk Village)	Hereditary	3 Ha	Yes	No	Comply
Mr. Syahril (Air Bikuk Village)	Hereditary	2 Ha	Yes	No	Comply
Note:					

Agreement of land compensation of Mr. Razak was in 1987; Mr. Kadri and Mr. Syahril was in 1996; Mr. Bustami, Mr. Abdul Latif and Mr. Syahril was in 1991 during that time there was no guidance for FPIC yet, however the land used for the development of PT Agromuko's oil palm plantations were through the process of mediation, dissemination and mapping of cultivated land controlled by the community that has been compensated without any compulsion. The process of mediation and dissemination is carried out at the Village Hall by gathering all villagers who owned land above the company's HGU for an inventory. The process of compensation for land is not forced, but given the option of acquisition.


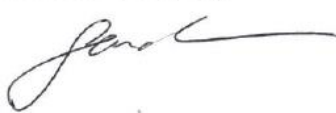
Previous land owner / user comment	
1	<p>Feedbacks: Previous Land Owner of Air Dikit Village (Mr. Razak) and Community Leader of Air Dikit Village (Mr. Samsuar)</p> <ul style="list-style-type: none"> - Some of the land used for the development of PT Agro Muko's oil palm plantations is agricultural/plantation land that is controlled by the community, which is planned by the government to be built a rubber plantation on it. However the project is not being carried out by the government. - Communities who have arable land in the area that will be built oil palm plantations by PT Agro Muko are get compensation with amount Rp. 87,000/Ha in 1987. - At first time, the community did not want to relinquish their land rights, however because the government's rubber plantation development project did not happen, the community finally give their land to the company. - With the increase of village population, the community is now lacking land for cultivation, so they are asking the company to build a smallholder plantation from the HGU area for the village community. <p>Management Responses:</p> <ul style="list-style-type: none"> - The land used for the development of PT Agro Muko's oil palm plantations were through the process of mediation, dissemination and mapping of agricultural/plantation land controlled by the community that has been compensated without any compulsion. - Planting compensation are according to the Joint Agreement and the market price for the year and without any coercive element from any Party. - The arable land that has been released by the cultivators has been compensated for planting in accordance with an agreement that has been signed by both parties. - Regarding Plasma (Smallholder Scheme), PT Agro Muko follows the regulations applicable in the Republic of Indonesia, Permentan No.98/2013 concerning Plantation Business Licensing (IUP). <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team noted that land compensation has been made through the process of mediation, dissemination and mapping of cultivated land controlled by the community. Planting compensation are according to the Joint Agreement and the market price applicable. The process of mediation and dissemination and land mapping is carried out at the Village Hall by gathering all villagers who owned land above the company's HGU for an inventory. The process of compensation for land is not forced, but given the option of acquisition.
2	<p>Feedbacks: Previous Land Owner of Bantal Village (Mr. Kadri and Mr. Syahril)</p> <ul style="list-style-type: none"> - Previously, their land consisted of paddy fields, coffee, cinnamon and rubber with shifting cultivation patterns. In 1996-1997, the company conducted a mediation and disseminate program to develop an oil palm plantation.

	<ul style="list-style-type: none"> - Due to the poor economic condition of the community at the time, the community welcomed that if plantations were opened, the community could work in the company and be able to improve their economy. Thus, the community agreed their land for compensation. - The process of compensation for land is not forced, but given the option of acquisition. At the time of the handover, there was an integrated team consist of representatives of sub-districts, villages, districts and companies. The compensation land of Mr. Kadri is ± 4 Ha, while the land of Mr. Syahril is ± 7 Ha, where the land is currently in Division 2 Bunga Tanjung Estate. - Local wisdom and local culture of the people in Bantal Village at that time were still very strong, so that the land compensation process followed the advice of the local customary leader. <p>Management Responses:</p> <ul style="list-style-type: none"> - Thank you for the confirmation from Mr. Kadri and Mr. Syahril who stated that the company conducted a mediation and disseminate program to develop an oil palm plantation. - Thank you for the confirmation from Mr. Kadri and Mr. Syahril who stated that the community agreed their land for compensation. - Thank you for the confirmation from Mr Kadri and Mr Syahril stating that the land compensation process was not forced, but was given the free option. - Thank you for the confirmation from Mr. Kadri and Mr. Syahril who stated that the local wisdom and local culture of the people of Bantal Village were still very strong, so the land compensation process followed the advice of the local customary leader. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team noted that land compensation has been made through the process of mediation, dissemination and mapping of cultivated land controlled by the community. Planting compensation are according to the Joint Agreement and the market price applicable. The process of mediation and dissemination and land mapping is carried out at the Village Hall by gathering all villagers who owned land above the company's HGU for an inventory. The process of compensation for land is not forced, but given the option of acquisition.
<p>3</p>	<p>Feedbacks:</p> <p>Previous Land Owner of Air Bikuk Village (Mr. Bustami, Mr. Abdul Latif and Mr. Syahril)</p> <ul style="list-style-type: none"> - Previously, their land consisted of paddy fields, jengkol, coffee, cinnamon and rubber with shifting cultivation patterns. In 1991, the company incorporation with an integrated team conducted a mediation and dissemination to develop an oil palm plantation. - The process of mediation, dissemination and land mapping is carried out at the Village Hall by gathering all villagers who own land above the company's HGU for an inventory. As many as ± 50 people were gathered for the process of land acquisition. - The process of compensation for land is not forced, but given the option of acquisition. The compensated land belongs to Mr. Bustami is ± 4 Ha, Mr. A. Latif is ± 3 Ha, while Mr. Syahril is ± 2 Ha, where the current land position is in Air Bikuk Estate. - There have been no complaints or land disputes between the community and the company up to date, because the company has added contributions to the related village. <p>Management Responses:</p> <ul style="list-style-type: none"> - Thank you for the confirmation from Mr. Bustami, Mr. Abdul Latif and Mr. Syahril who stated that the company with integrated team conducting mediation and dissemination regarding program to develop an oil palm plantation. - Thank you for the confirmation from Mr. Bustami, Mr. Abdul Latif and Mr. Syahril who stated that the mediation, dissemination and land mapping process was carried out at the Village Hall by gathering all villagers who owned land in the company's HGU to carry out an inventory. - Thank you for the confirmation from Mr. Bustami, Mr. Abdul Latif and Mr. Syahril who stated that the compensation process was not forced, but had the right to choose for release.

	<ul style="list-style-type: none"> - Thank you for the confirmation from Mr. Bustami, Mr. Abdul Latif and Mr. Syahril who stated that there were no complaints or disputes between the community and the company to date, because the company has added contributions to the village.
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team noted that land compensation has been made through the process of mediation, dissemination and mapping of cultivated land controlled by the community. Planting compensation are according to the Joint Agreement and the market price applicable. The process of mediation and dissemination and land mapping is carried out at the Village Hall by gathering all villagers who owned land above the company's HGU for an inventory. The process of compensation for land is not forced, but given the option of acquisition.

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.

Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that PT Agro Muko – Mukomuko POM has complied with the Generic RSPO P&C Nov 2018 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 PT Agro Muko – Mukomuko POM is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Eko Purwanto	Name: Sander Van den Ende
Company Name: on behalf of BSI Services Malaysia Sdn Bhd	Company Name: PT Agro Muko – Mukomuko POM
Title: Lead Assessor	Title: Regional Director Sustainability
Signature: 	Signature: <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
Date: 9 January 2020	Date: 10/01/2020

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently</p> <p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1</p> <p>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.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p>	<p>Based on the verification of documents, it shows that every Estate that becomes the supply base of Mukomuko POM has issued a document list of Publicly Available Document, for example:</p> <ol style="list-style-type: none"> 1. Mukomuko Estate has issued a policy related to Publicly Available Documents on 1 October 2019 signed by the Estate Manager. Consist of 17 types of documents such as: Plantation Business Permit, Internal Social Impact Report, HCV Assessment, Environment Management and Monitoring Reports (RKI-RPL) every semester, Continuous Improvement Plan, Records of internal and external complaints, Public Summary of RSPO Certification Assessment Reports, etc. These documents have included appointed person responsible for responding to information requests, namely Estate Manager and Office Assistant. 2. Mukomuko POM has issued a policy related to Publicly Available Documents Type on 10 September 2019 which was signed by Mill Manager. Consist of 18 types of documents such as: Permanent Business Permit, Plantation Business Permit, Social Impact Report Internal, HCV Assessment, Environment Management and Monitoring Reports (RKI-RPL) every semester, Continuous Improvement Plan, Records of internal and external complaints, Permit for Discharge of Wastewater into the River, Public Summary of RSPO Certification Assessment Report, etc. These documents has included the responsible person for responding to requests for information, it is the Mill Manager and Office Assistant. 3. Talang Petai Estate has issued a policy related to Publicly Available Documents on 10 October 2019 signed by the Estate Manager. Consist of 16 types of documents such as: Plantation Business Permit, Internal Social Impact Report, HCV Assessment, Environment Management and Monitoring Reports (RKI-RPL) each 	<p>Comply</p>

		<p>semester, Continuous Improvement Plans, Records of internal and external complaints, Public Summary of RSPO Certification Assessment Reports, etc. These documents has included the Officers responsible for responding to requests for information, it is the Estate Manager and Office Assistant.</p> <p>4. Tanah Rekah Estate has issued a policy related to Publicly Available Documents on 24 September 2019 which was signed by the Estate Manager. Consist of 23 types of documents such as: Company Establishment Deed, Plantation Business Permit, Internal Social Impact Report, HCV Assessment, Management Report of RKL-RPL every semester, Continuous Improvement Plan, Records of internal and external complaints, Public Summary of RSPO Certification Assessment Report, Company Policy, etc. These documents has include the Officers responsible for responding to requests for information, it is the Estate Manager and Office Assistant.</p>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>All Estate and Mill: Based on document verification, it shows that:</p> <ul style="list-style-type: none"> • There are types of information provision documents available in Bahasa Indonesia, such as the RKL-RPL Implementation Report, CD / CSR Program Report, HGU Permit, Plantation Business License. • Types of documents available in English, such as the RSPO Public Summary Report from PT BSI. • Documents made using 2 languages, Indonesian and English, such as Company policy documents. 	Comply
1.1.3	(C) Records of requests for information and responses are maintained.	<p>Records of information requests are documented in the "Information and Response Request Book" available at each Estate or Mill, for example:</p> <p>1. Based on document verification, it shows that Records of information requests in Mukomuko POM are documented in the " Buku Permintaan Informasi dan Jawaban Eksternal", which during 2019, there were 12 types of information requests, such as:</p> <ul style="list-style-type: none"> • Application for Industrial Work Practice permit, submitted by Mukomuko 01 Vocational High School on 4 October 2019 through letter No. 420/168/D.6/SMKN01/MM/2019; have been responded to by the company through Letter No. 87/RMO-PH3/X/19 dated 9 October 2019. • Application for Research Permit, submitted by Bengkulu University on 29 August 2019 through Letter No.2047/UN30.11/PI/2019 and has been responded to by the company through Letter No.74/RMO-PH3/IX/2019 dated 10 September, 2019. 	Comply

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		<ul style="list-style-type: none"> • Application for a permit for technical internship, submitted by the University of Bengkulu on 28 March 2019 through Letter No. 507/UN30.11/PI/2019 and has been responded to by the company through Letter No.27/RMO-PH3/IV/2019 dated 6 April 2019. <p>2. Based on document verification, it shows that Records of information requests at Mukomuko Estate are documented in the "Buku Informasi dan Jawaban" where during 2019, there were 5 types of information requests, such as:</p> <ul style="list-style-type: none"> • Request for a copy of KMD Dusun Baru invoice for the period January 2019 - June 2019 submitted by the Chairman of the KMD Dusun Baru on 17 July 2019 through letter No.07/MME-KMDDB/17/VII/2019 and has been responded directly by Mukomuko Estate Management by providing a copy of the invoice as intended. • Requests for a copy of KMD Sari Bulan invoice for the period April 2019 - June 2019 submitted by the Chairman of the KMD Sari Bulan on 27 July 2019 through letter No.09/MME-KMDSB/27/VII/2019 and has been responded directly by Mukomuko Estate Management by providing a copy of the invoice as intended. • Requests for copies of KMD Sari Bulan invoice for the period March 2019 - April 2019 submitted by the Chairperson of KMD Sari Bulan on 29 May 2019 through letter No.06/MME-KMDSB/27/V/2019 and has been responded directly by Mukomuko Estate Management by providing a copy of the invoice as intended. <p>3. Based on document verification, it shows that Records of information requests in Talang Petai Estate are documented in the "Buku Informasi dan Jawaban", where during the 2019 period, there were no requests for information from stakeholders.</p> <p>4. Based on document verification, it shows that Records of information requests in Tanah Rekah Estate are documented in the "Buku Informasi dan Jawaban", where during 2019, there were 3 types of requests for information, namely:</p> <ul style="list-style-type: none"> • Requests for information related to job vacancies which were submitted verbally by Mr. Warno on 13 January 2019 and had been responded directly by Tanah Rekah Estate Management by providing information that there was no additional work at the Tanah Rekah Estate Office and were asked to make a report to Worker Union. • Requests for information related to job vacancies which were submitted verbally by Mr Novri on 16 May 2019 and had been responded directly by the Tanah Rekah Estate Management by providing information that there had been no additional work at the Tanah Rekah Estate Office and were asked to make a 	
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		<p>report to Worker Union.</p> <ul style="list-style-type: none"> Request for information related to the survey of oil palm plantations submitted by the BPS Office of Mukomuko Regency on 17 September 2019 verbally and has been responded directly by Tanah Rekah Estate Management by providing the Data as referred to by the BPS Office. <p>The Company has consistently sent the obligation to provide information to relevant agencies as regulated in other laws or government regulations. There are routine reports carried out by each Estate such as Hazardous Waste Management Reports that are reported every 3 months, Safety Committee Reports that are reported every 3 months, Waste Water Management Reports which are reported by Mukomuko POM every 3 months, Report of Infrastructure Preparedness for Land Fire Control, every 6 months. However there are also routine reports that are submitted based on company intentions, for example RKL-RPL Implementation Reports and UKL-UPL Implementation Reports which are reported every 6 months, Report of Manpower that reported annually.</p> <p>Types of routine reports submitted to related agencies for example:</p> <ul style="list-style-type: none"> Report on PT Agro Muko's RKL-RPL (Environment Management Plan) Implementation, which was reported on 20 August 2019, as evidence in handover letter No.20/ RMO-BKL/ENC/M/VIII/2019 sent to the Bengkulu Provincial Environment Agency. Report on the Implementation of PT Agro Muko Biogas Plant UKL-UPL for the first semester of 2019, which was reported on 1 October 2019, as evidence in document submission No. 87/MMPOM/IX/2019 to the Environmental Service Office of Mukomuko Regency. Report on the management of hazardous waste in Mukomuko POM period April to June 2019, which was sent to the Ministry of Environment and Forestry on 23 July 2019 as evidence in the electronics acceptance. P2K3 (Safety Committee) report for period July - September 2019 of Mukomuko Estate sent to Dinas Penanaman Modal, Pelayanan Perizinan dan Tenaga Kerja Kabupaten Moukomuko through letter dated 25 October 2019. PT Agromuko and PT Mukomuko Agro Sejahtera's Report of infrastructure preparadeness for land fire control sent to Agriculture Office of Mukomuko Regency through Letter No.26/RMO/ENC/M/XI/2019 dated 6 November 2019. 	
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1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	<p>All Estate & POM: The company has established and maintained Procedure for Responding to Request for Information (Doc No. ENC-01-11/04-03-2019/Rev.1) dated 18 Mar 2019. The procedure described that:</p> <ul style="list-style-type: none"> • The company provide types of document that can be accessed by public. • The company have a list of stakeholder directly impacted by estate or mill activity. • PIC to give respond on information request are unit manager in coordination with Senior Manager Administartion (SMA). • Respond time for information request are 3 days for management unit to communicate to RMO (Regional Management Office), if RMO does not have authority to give respond, then RMO forwarded to Head Office maximum 7 days from receiving request from operation unit. Maximum respond time are 25 days. <p>Based on verification, it shows that all information request received by the company, has been responded in timely manner (see indicator 1.1.3).</p>	Comply
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.	<p>All Estate & POM: Each estate and Mukomuko POM consistently has developed and updated list of stakeholder annually. The list of stakeholder have been categorized as follows:</p> <ul style="list-style-type: none"> • Stakeholder that consist of Village apparatus, Disctrict, Regency, e.g. Environment Agency, Manpower Agency, Village Head, District Head. • Stakeholder that consist of public figure (Kepala Adat/Kepala Kaum). • KUD/KMD which have agreement with the company. • Local NGO around the company. • Stakeholder that consist of worker union, employee cooperation. • Stakeholder that consist of contractors which have agreement with the company. • Stakeholder that consist of estates from other company. <p>The list of stakeholder has been verified with name of PIC, address and contact number.</p>	Comply
<p>Criteria 1.2 The unit of certification commits to ethical conduct in all business operations and transactions.</p>			

1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	In general, companies under SIPEF Group have had policy related to Ethical Conduct which have been signed by President Director.	Comply
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	<p>It was available letter issued by Regional Director of Bengkulu No.38/RMO-AM-All.Ou/IX-19 dated 4 September 2019, stated that base on direction from President Director, implementation of Good Coporate Governance is to handle complaint professionally both from internal or external. Base on this, management stated that complaints can be submitted through phone number 0811 636 2200.</p> <p>Mechanism of Ethical Business violation handling is using SOP Wistleblowing System (SOP No. IAD-01-07/29-03-2019/Rev. 0) dated 27 March 2019.</p> <p>Based on document verification of complaints and management information, it stated that during 2019, there is no case of Ethical Business violation.</p>	Comply
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	(C) The unit of certification complies with applicable legal requirements.	<p>All Estate dan Mill:</p> <p>The unit of certification has established list of applicable law and regulation, documented by ENC (Environment and Consercation) Department, which until now there are 347 regulation, including 10 Government of Mukomuko Regency and Bengkulu Province regulation. Those list of applicable regulation has include Annex 1 of the RSPO P&C Generic November 2018 and include international convensions that have been ratified by the government of Republic of Indonesia.</p> <p>The unit of certification has consistently conducted evaluation of compliance to the applicable regulation whenever there is new regulation issued by government. The latest evaluation of applicable law has been conducted in August 2019 related to the issuance of Ministry of Environment and Forestry regulation, Permen LHK No.P.38/Menlhk/Setjen/Kum.I/7/2019 dated 31 July 2019, regarding type of Business or Activity which have to have AMDAL (Environment Impact Analysis) as replacement of Permen LHK No. 5/2012.</p>	Comply

<p>2.1.2</p>	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p>	<p>The company has mechanisms to ensure that all contractors working at the company's area are only contractors that already comply to the law and technically able to cooperate with PT Agromuko/PT MMAS.</p> <p>Based on verification of document "Surat Perjanjian Kerja" (contract/work agreement), contractors demonstrated that the contract has included clauses related to compliance to legal aspects, such as uses of PPE's, prohibition of employing workers under 18 years old, not giving salary under province minimum salary, avoid environment pollution, giving break time for workers, tax payment and other relevant regulation.</p> <p>Document verified:</p> <ul style="list-style-type: none"> • "Surat Perjanjian Kerja" No.059/MM.POM-EDB/2018 dated 12 Feb 2018 between PT Agromuko and CV Putri Bungsu, a heavy equipment rental company located at Mukomuko Regency. • "Surat Perjanjian Kerja" No.047/MM.POM/CRF/GMO-Eng/2019 dated 29 Jan 2019 between PT Agromuko with PT Survindo Link Konsultan, an analytical tester company related quality of emission, ambient, water content, located at Bengkulu city. 	<p>Comply</p>
<p>2.1.3</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p>	<p>Based on field verification at Tanah Rekah and Mukomuko Estate, it demonstrated that the company has installed boundary pegs based on newest areal map as follow up of term and condition for extension of HGU to the "Kantor Pertanahan" (Land Agency) of Mukomuko Regency. Through letter No.G.199/2017 dated 6 March 2017, as proposal for extension of HGU certificate No.02/MU dan letter No.G.200/2017 as proposal for extension of HGU certificate No.03.</p> <p>Based on field verification, boundary pegs are in good conditions and well maintained. Monthly monitoring were consistently performed by appointed officer (Ranger). Monitoring results are recorded in "Daftar Pemeriksaan Patok Batas Kebun (HGU)" each estate. No indication of oil palm planting outside the HGU area. Boundary ditch have been built at the border of PT Agromuko and PT MMAS concession.</p> <p>Sei Kiang Estate: HGU boundary KP40, located adjacent to block 04N01A (2°24'4.91"S and 101°14'4.30"E), the condition is good and visibly maintained. The surrounding boundary is HCV1 and HCV4 of Sungai Kiang river buffer zone.</p>	<p>Comply</p>

		<p>HGU boundary KP41, located adjacent to block 98H03A (2°24'5.14"S and 101°15'7.45"E), the condition is good and visibly maintained. The boundary is located next to Lalang Luas village, with boundary moat separating the property.</p> <p>HGU boundary KP42, located adjacent to block 98H02A (2°24'4.68"S and 101°15'24.01"E), the condition is good and visibly maintained. The surrounding is HCV4, with condition steep slope.</p> <p>Talang Petai Estate</p> <p>HGU boundary TAP65, located adjacent to block 06Y03A (2°29'0.22"S and 101°17'59.11"E), the condition is good and visibly maintained. The surrounding boundary is HCV1 and HCV4 of steep slope.</p> <p>HGU boundary TAP67, located adjacent to block 05X03A (2°29'33.71"S and 101°17'57.82"E), the condition is good and visibly maintained.</p> <p>HGU boundary TAP66, located adjacent to block 05X03A (2°29'21.84"S and 101°17'57.08"E), the condition is good and visibly maintained.</p> <p>Tanah Rekah Estate</p> <p>HGU boundary TAP108 (2°39'28.80"S and 101°11'35.46"E), boundary ANR56 (2°39'28.92"S and 101°11'35.48"E), boundary ANR56A (2°39'19.33"S and 101°11'14.76"E), boundary ANR57 (2°39'16.57"S and 101°11'9.23"E) located adjacent to block 94C18A; the condition is good and visibly maintained, located across government road by the seashore.</p> <p>HGU boundary ANR58 (2°39'9.31"S and 101°10'54.87"E), boundary ANR59 (2°38'57.81"S and 101°10'35.83"E), located adjacent to block 89C04A the condition is good and visibly maintained.</p> <p>Mukomuko Estate:</p> <p>HGU boundary TAP108 (2°39'28.80"S and 101°11'35.46"E) located adjacent to block 94C18A of Tanah Rekah Estate; the condition is good and visibly maintained, located across government road by the seashore</p> <p>HGU boundary TAP66, located adjacent to block 18V02A (2°36'2.22"S and 101°17'39.08"E), the condition is good and visibly maintained, with clear boundary moat.</p> <p>HGU boundary TAP67, located adjacent to HCV area (2°36'6.48"S and 101°17'30.36"E), the condition is good and visibly maintained.</p>	
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		<p>Scheme smallholder: KMD Suka Makmur KMD boundary at 2°38'17.63"S and 101°23'19.29"E – located in Suka Maju village, next to community's oil palm plantation.</p> <p>KMD Bukit Makmur - Sei Jerinjing KMD boundary at 2°38'21.68"S and 101°24'42.98"E – located in Bukit Makmur village, next to community's oil palm plantation.</p> <p>KMD Based on field verification at KMD Tanah Rekah, KMD Talang Petai and KMD Tunggal Jaya I, demonstrated that most KMD have land title SHM and another was in process for SHM. Mapping process by BPN have been conducted and GPS coordinate have been determined. Based on interview with KMD member, they all understood the border of the KMD area. Based on interview with village apparatus, stated that there is no case of land dispute between KMD and surrounding communities.</p>	
<p>Criteria 2.2</p>			
<p>All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
<p>2.2.1</p>	<p>A list of contracted parties is maintained.</p>	<p>Tanah Rekah Estate: The estate have prepared list of contracted parties "Daftar Kontrak", dated 16 September 2019. The list indicating contracted party name, contract number, scope of contracted work, date of contract, and remarks. The list comprise of 10 parties for manpower supply, replanting, palm sanitation, electric installation, health development.</p> <p>Talang Petai Estate: The estate have prepared list of contracted parties "Daftar Kontrak Pekerjaan di Talang Petai Estate Tahun 2019", dated October 2019. The list indicating contracted party name, contract number, scope of contracted work, date of contract, and remarks. The list comprise of 21 parties for manpower supply, land clearing for replanting, palm sanitation, electric installation, material provision, calibration, road maintenance.</p> <p>Talang Petai Estate:</p>	<p>Comply</p>

		The estate have prepared list of contracted parties "Daftar Kontraktor", dated 27 September 2019. The list indicating contracted party name, contract number, scope of contracted work, date of contract, and remarks. The list comprise of 7 parties for FFB transport, housing repair, hazardous waste transport, road maintenance, security service, manpower supply.	
2.2.2	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>Tanah Rekah Estate: "Surat Perjanjian Kerja SPK No.16/TRE-GMO/2018 antara PT. Agro Muko dan CV. Ari Putri tentang Sanitasi Palm Terinfeksi dan Suspect Ganoderma di Area Divisi IV Replanting Kelapa Sawit 2018 – Tanah Rekah Estate", dated 6 February 2018. Chapter 1 Obligation of Contractor – Verse 15 stated "wajib mematuhi Peraturan Hukum dan Perundang-undangan yang berlaku di Negara Republik Indonesia" – shall obey laws and regulation in Indonesia.</p> <p>"Surat Perjanjian Kerja SPK No.20/TRE-RMO Bengkulu/2019 antara PT. Agro Muko dan PT. Mitra Prima Usaha Maju tentang Land Clearing Replanting Kelapa Sawit Seluas 168.91 Ha di Tanah Rekah Estate", dated 19 March 2019. Chapter 1 Obligation of Contractor – Verse 15 stated "wajib mematuhi Peraturan Hukum dan Perundang-undangan yang berlaku di Negara Republik Indonesia" – shall obey laws and regulation in Indonesia.</p> <p>Talang Petai Estate: "Surat Perjanjian Kerja SPK No.04/TPE-GMO/2019 antara PT. Agro Muko dan CV. Ari Putri tentang Rental Alat Berat untuk Pekerjaan di Areal Replanting Kelapa Sawit di Talang Petai Estate tahun 2019", heavy machinery rental for replanting, dated 19 November 2018. Verse 15 stated "wajib mematuhi peraturan hukum dan perundang-undangan yang berlaku di Republik Indonesia" – shall obey and implement Indonesian law and regulation.</p> <p><i>Minor Non Conformity:</i> The contracts between PT. Agro Muko and the KMD (scheme smallholder), and CPO transporters have not contain specific clauses on meeting applicable legal requirements.</p>	Not Comply (Minor NC 1844987- 201911-N1)
2.2.3	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>Tanah Rekah Estate: - "Surat Perjanjian Kerja SPK No.16/TRE-GMO/2018 antara PT. Agro Muko dan CV. Ari Putri tentang Sanitasi Palm Terinfeksi dan Suspect Ganoderma di Area Divisi IV Replanting Kelapa Sawit 2018 – Tanah Rekah Estate", dated 6 February 2018.</p>	Not Comply (Minor NC 1844987- 201911-N2)

		<ul style="list-style-type: none"> - "Surat Perjanjian Kerja SPK No.20/TRE-RMO Bengkulu/2019 antara PT. Agro Muko dan PT. Mitra Prima Usaha Maju tentang Land Clearing Replanting Kelapa Sawit Seluas 168.91 Ha di Tanah Rekah Estate", dated 19 March 2019. <p>PT. Agro Muko – Tanah Rekah Estate use template contract; on Chapter 1 stipulated:</p> <ul style="list-style-type: none"> - Contractor shall obey regulation related to health and safety and fulfil payment for their worker's social insurance; provide PPE in line with company's OHS policy; - Contractor shall obey the regulation related to tax payment; - Contractor shall obey regulation related to prohibit child worker; - Contractor shall obey laws and regulation related to pay minimum wage; - Contractor shall obey laws and regulation related to environmental protection; - Contractor shall obey laws and regulations related to prohibition on narcotic and psychotropic substance; - Contractor shall uphold laws and regulations related to prohibition on sexual harassment; <p>Evidence: During field visit to replanting block and interview with excavator operator, they received monthly payment for piece rate work, contractor bears the insurance for worker, provide PPE (helmet, hand glove, safety shoes) for worker, provide daily meal money for worker. The excavator operator verified 28 years old and 35 years old.</p> <p>Sei Kiang Estate: "Surat Perjanjian Kerja SPK No.10/RMO-BG/SKGE/2019 antara PT. Agro Muko dan UD. Talang Petai Raya tentang Pekerjaan Pengangkutan Tandan Buah Segar", FFB transport, dated 1 August 2019. PT. Agro Muko – Sei Kiang Estate use template contract; on Chapter 3.19 stipulated:</p> <ul style="list-style-type: none"> - Contractor shall obey regulation related to health and safety and fulfil payment for their worker's social insurance; provide PPE in line with company's OHS policy; - Contractor shall obey regulation related to prohibit child worker; <p>Talang Petai Estate: "Surat Perjanjian Kerja SPK No.04/TPE-GMO/2019 antara PT. Agro Muko dan CV. Ari Putri tentang Rental Alat Berat untuk Pekerjaan di Areal Replanting Kelapa Sawit di Talang Petai Estate tahun 2019", heavy machinery rental for replanting, dated 19 November 2018. Verse 15 stated "wajib mematuhi peraturan hokum dan perundang-undangan yang berlaku di Republik Indonesia" – shall obey and implement Indonesian law and regulation.</p>	
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		<p>PT. Agro Muko – Talang Petai Estate use template contract; on Chapter 1 stipulated:</p> <ul style="list-style-type: none"> - Contractor shall obey regulation related to health and safety and fulfil payment for their worker’s social insurance; provide PPE in line with company’s OHS policy; - Contractor shall obey the regulation related to tax payment; - Contractor shall obey regulation related to prohibit child worker; - Contractor shall obey laws and regulation related to pay minimum wage; - Contractor shall obey laws and regulation related to environmental protection; - Contractor shall obey laws and regulations related to prohibition on narcotic and psychotropic substance; - Contractor shall uphold laws and regulations related to prohibition on sexual harassment; <p>KMD: "Perjanjian Pemborong Pekerjaan No.10/SPK/KMD-TJ/X/2019 antara KMD Tunggal Jaya dan BumDes Maju Jaya tentang Pekerjaan Panen dan Transport", dated 1 July 2019. Chapter "5 Pemenuhan Kewajiban Kepada Pekerja" – stipulates the contractor shall have clear work agreement and status with its worker. Chapter "7 Peralatan Kerja" – stipulates contractor shall not employ underage worker.</p> <p><i>Minor Non Conformity:</i> The contracts between PT. Agro Muko and KMD (scheme smallholder as FFB supplier), and CPO transporters have not contain clauses disallowing child, forced and trafficked labour.</p>										
<p>Criteria 2.3 All FFB supplies from outside the unit of certification are from legal sources.</p>												
<p>2.3.1</p>	<p>(C) For all directly sourced FFB, the mill requires:</p> <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 	<p>Talang Petai Estate: The estate manages the information for geo-location, legal ownership of the land and permit for trading – of four (4) Kebun Masyarakat Desa/KMD:</p> <table border="1" data-bbox="1055 1241 1975 1398"> <thead> <tr> <th>Name</th> <th>Location and GPS</th> <th>Legal Ownership of Land</th> </tr> </thead> <tbody> <tr> <td>KMD Tunggal Jaya</td> <td>Teras Terunjam District (2°30'25.50"S and 101°16'43.81"E)</td> <td>Surat Keterangan Tanah No.224 year 2000;</td> </tr> <tr> <td>KMD Sungai Lintang</td> <td>V Koto District (2°30'7.24"S and 101°14'47.31"E)</td> <td>Surat Keterangan Tanah No.SKT/116/SL/IX/2005, No.SKT/115/SL/IX/2005,</td> </tr> </tbody> </table>	Name	Location and GPS	Legal Ownership of Land	KMD Tunggal Jaya	Teras Terunjam District (2°30'25.50"S and 101°16'43.81"E)	Surat Keterangan Tanah No.224 year 2000;	KMD Sungai Lintang	V Koto District (2°30'7.24"S and 101°14'47.31"E)	Surat Keterangan Tanah No.SKT/116/SL/IX/2005, No.SKT/115/SL/IX/2005,	<p>Comply</p>
Name	Location and GPS	Legal Ownership of Land										
KMD Tunggal Jaya	Teras Terunjam District (2°30'25.50"S and 101°16'43.81"E)	Surat Keterangan Tanah No.224 year 2000;										
KMD Sungai Lintang	V Koto District (2°30'7.24"S and 101°14'47.31"E)	Surat Keterangan Tanah No.SKT/116/SL/IX/2005, No.SKT/115/SL/IX/2005,										

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			No.SKT/114/SL/IX/2005, No.SKT/113/SL/IX/2005,
	KMD Sungai Gading	Selagan Raya District (2°30'29.48"S and 101°16'52.82"E)	Surat Keterangan Tanah No.595.3/02/SG/SKT/2004, No.595.3/03/SG/SKT/2004, No.595.3/04/SG/SKT/2004, No.595.3/05/SG/SKT/2004, No.595.3/06/SG/SKT/2004, No.595.3/07/SG/SKT/2004, No.595.3/08/SG/SKT/2004, No.595.3/30/31/SG/2005,
	KMD Talang Petai	V Koto District (2°30'14.52"S and 101°15'46.53"E)	Surat Penyediaan Tanah Desa No.4 tahun 2000
	KMD Tunggal Jaya Dua	Teras Terunjam District (2°30'27.76"S and 101°16'6.77"E)	Certificate/SHM No.BK786398, BK786399, BK786400, BK786401, Surat Keterangan Tanah/SKT No.595.3/3576/SKT/TJ/TT/2017
Sei Kiang Estate:			
	Name	Location and GPS	Legal Ownership of Land
	KMD Lubuk Pinang	Lubuk Pinang District (2°23'25.66"S & 101°13'34.26"E)	Surat Penyediaan Tanah Desa No.116/LP/VI/2000
	KMD Lalang Luas	V Koto District (2°23'39.25"S & 101°14'18.51"E)	Surat Penyediaan Tanah Desa No.01/DLLS/2/2006
	KSU Sei Kiang	V Koto District (2°23'30.23"S & 101°14'1.80"E)	Surat Keterangan Tanah/SKT No.112/SKT/DS-LLS/V/2015, No.113/SKT/DS-LLS/V/2015, No.114/SKT/DS-LLS/V/2015, No.67/SKT/DS-LLS/IV/2016, No.68/SKT/DS-LLS/IV/2016, No.69/SKT/DS-LLS/IV/2016, No.4/SKT/DS-LLS/2013
Tanah Rekah Estate:			
	Name	Location and GPS	Legal Ownership of Land
	KMD Tanah Rekah	Kota Mukomuko District (2°61'33.94"S & 101°14'77.00"E)	Certificate/land title No.AR761501

		KMD Pondok Batu	Kota Mukomuko District (2°59'4.27"S & 101°15'20.54"E)	Certificate/land title No.AR758654	
		KMD Pasar Mukomuko	Kota Mukomuko District (2°54'87.60"S & 101°14'38.75"E)	Surat Keterangan Tanah/SKT No.595.5/03/Kel/2005, No.595.5/04/Kel/2005, No.595.5/05/Kel/2005, No.595.5/06/Kel/2005, No.595.5/07/Kel/2005, No.595.5/08/Kel/2005, No.595.5/01/Kel/2005, No.595.5/02/Kel/2005,	
		KMD Ujung Padang	Kota Mukomuko District (2°65'95.19"S & 101°14'35.50"E)	Surat Keterangan Tanah/SKT No.595.5/39/KDU/VII/2005, No.595.5/40/KDU/VII/2005, No.595.5/41/KDU/VII/2005, No.595.5/42/KDU/VII/2005, No.595.5/43/KDU/VII/2005, No.595.5/44/KDU/VII/2005, No.595.5/45/KDU/VII/2005, No.595.5/46/KDU/VII/2005,	
2.3.2	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.	PT. Agro Muko – Mukomuko POM and its supply base does not use collection centres, agents or other intermediaries.			N/A
PROCEDURAL NOTE:					
For Implementation Procedure for 2.3.2 refer to Annex 4.					
Principle 3: Optimise productivity, efficiency, positive impact and resilience					
Implement plans, procedures and systems for continuous improvement.					
Criteria 3.1					
There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.					
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	PT Agro Muko and its subsidiaries – Consolidated Financial Statements for the Year ended December 31, 2018. It was available Independent Auditor's Report No.00463/2.1097/AU.1/01/0568-3/1/IV/2019 by Satrio Bing Eny & Rekan – dated 26 Apr 2019. Report established by Parlindungan Siahaan, Public Accountant License			Comply

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No.AP.0568. In the report, stated "The accompanying consolidated financial statements present fairly, in all material respects, the financial position of PT Agro Muko and its subsidiaries as of December 31, 2018, and their financial performance and their cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.

PT Mukomuko Agro Sejahtera and its subsidiaries (Malin Deman Estate and Air Manjuntjo Estate) – Consolidated Financial Statements for the Year ended December 31, 2018. It was available Independent Auditor's Report No.00470/2.1097/AU.1/01/0568-3/1/IV/2019 by Satrio Bing Eny & Rekan – dated 26 Apr 2019. Report established by Parindungan Siahaan, Public Accountant License No.AP.0568. In the report, stated "The accompanying consolidated financial statements present fairly, in all material respects, the financial position of PT Mukomuko Agro Sejahtera and its subsidiaries as of December 31, 2018, and their financial performance and their cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.

PT Agro Muko – Mukomuko POM have prepared a business plan for period 2017 – 2027. The business plan updated on 1 November 2019 considering achievement since 2017 to Oct 2019. The business plan indicating the projected production of FFB, CPO and PK; cost of production, revenue and profit estimation. This figures including from the supply base of PT. Mukomuko Agro Sejahtera's Estate and KMD. Below are projection of production 2019 – 2023 of Mukomuko POM that include in the business plan updated 1 Nov 2019.

Description	2019	2020	2021	2022	2023
FFB (Ton):					
- Mukomuko Estate	67,311	84,267	103,382	111,943	116,457
- Sei Betung Estate	33,248	32,140	32,586	32,454	31,281
- Sei Kiang Estate	36,800	35,087	34,917	33,378	30,454
- Talang Petai Estate	42,562	38,001	40,335	43,579	42,174
- Tanah Rekah Estate	56,119	49,010	36,637	42,168	41,473
- KMD	6,511	7,408	8,055	7,823	8,056
- MMAS	18,969	14,831	18,935	22,527	25,945
Total	261,520	260,744	266,792	286,049	287,784
CPO (Ton)	60,150	60,753	62,163	66,649	67,054

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PK (Ton)	13,337	12,255	12,539	13,444	13,526
OER (%)	23.00	23.30	23.30	23.30	23.30
KER (%)	5.10	4.70	4.70	4.70	4.70
Processing Cost CPO/PK (Rp/kg)	293	318	334	351	368
Processing Cost FFB (Rp/kg)	82	89	93	98	103

Sei Kiang Estate:

Business Plan Projection year 2019 – 2022:

	2019	2020	2021	2022	2023
FFB prod.	36,481	38,305	40,220	42,231	44,343
Mature Area	1,646.10	1,942.06	1,942.06	1,942.06	1,942.06
Cost (Rp/Kg)	679	679	681	715	751

The budget signed on 2 January 2019.

Talang Petai Estate:

Business Plan Projection year 2019 – 2022:

	2019	2020	2021	2022	2023
FFB prod.	40,400	35,450	41,721	44,473	39,546
Mature Area	1,705.29	1,705.29	1,717.00	1,917.00	1,757.61
Cost (Rp/Kg)	854	891	958	1,047	1,193

The budget signed on 2 January 2019.

Mukomuko Estate:

Business Plan Projection year 2019 – 2022:

	2019	2020	2021	2022	2023
FFB prod.	67,311	84,267	99,541	100,921	104,665
Mature Area	2,400	3,071	3,671	3,671	3,671
Cost (Rp/Kg)	569	477	424	439	445

The budget signed on 2 January 2019.

Tanah Rekah Estate:

Business Plan Projection year 2019 – 2022:

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	2019	2020	2021	2022	2023
FFB prod.	56,118	45,078	35,431	32,891	29,664
Mature Area	2,084.26	1,674.24	1,315.95	1,221.59	1,112.87
Cost (Rp/Kg)	665	755	804	847	902

The budget signed on 2 January 2019.

Budget for Koperasi Plasma Sungai Tenang Sejahtera demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	505.00	555.50	611.05	672.16	739.37
Area (Ha)	56.18	62.36	69.22	76.83	85.29

Budget for KMD Lubuk Pinang demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	273	285	285	285	285
Area (Ha)	15	15	15	15	15

Budget for KMD Lalang Luas demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	236	270	270	270	270
Area (Ha)	15	15	15	15	15

Budget for KMD Sungai Lintang demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	276	300	300	300	300
Area (Ha)	15	15	15	15	15

Budget for KMD Pondok Batu demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	358	300	300	300	300
Area (Ha)	12	12	12	12	12

Budget for KMD Sei Jerinjing demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023

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		FFB (Ton)	225	300	300	300	300																																																																																																										
		Area (Ha)	15	15	15	15	15																																																																																																										
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>The company has provided replanting program up to year 2030. Replanting program amended on 1 Oct 2019:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Mukomuko</td> <td>394.23</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Sei Betung</td> <td>-</td> <td>-</td> <td>74.67</td> <td>68.42</td> <td>72.32</td> <td>60.51</td> <td>102.72</td> </tr> <tr> <td>Tanah Rekah</td> <td>675.75</td> <td>-</td> <td>406.87</td> <td>358.29</td> <td>357.06</td> <td>324.40</td> <td>200.60</td> </tr> <tr> <td>Talang Petai</td> <td>207.50</td> <td>-</td> <td>128.90</td> <td>110.98</td> <td>176.24</td> <td>152.17</td> <td>183.98</td> </tr> <tr> <td>Sei Kiang</td> <td>-</td> <td>-</td> <td>213.03</td> <td>151.29</td> <td>208.92</td> <td>175.04</td> <td>180.92</td> </tr> <tr> <td>Bunga Tanjung</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>280.37</td> <td>330.36</td> <td>297.32</td> </tr> <tr> <td>Air Bikuk</td> <td>139.64</td> <td>-</td> <td>230.53</td> <td>166.51</td> <td>216.41</td> <td>-</td> <td>-</td> </tr> <tr> <td>Air Buluh</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>156.68</td> <td>286.21</td> <td>341.70</td> </tr> <tr> <td>Total Replanting</td> <td>1,417.12</td> <td>-</td> <td>1,054.00</td> <td>855.49</td> <td>1,468.00</td> <td>1,328.69</td> <td>1,307.24</td> </tr> <tr> <td>Mature</td> <td>14,723.47</td> <td>15,667.26</td> <td>15,135.97</td> <td>15,697.58</td> <td>14,258.53</td> <td>14,096.15</td> <td>13,703.83</td> </tr> <tr> <td>Immature</td> <td>1,627.56</td> <td>2,257.75</td> <td>1,417.12</td> <td>1,054.00</td> <td>1,909.49</td> <td>2,323.49</td> <td>2,796.69</td> </tr> <tr> <td>Grand Total</td> <td>17,768.15</td> <td>17,925.01</td> <td>17,607.09</td> <td>17,607.07</td> <td>17,636.02</td> <td>17,748.33</td> <td>17,807.76</td> </tr> </tbody> </table> <p>Annual review of replanting was conducted during management review. There is a letter from Agronomy Manager of PT Agromuko mention that replanting program 2020 will be postponed.</p>							Estate	2019	2020	2021	2022	2023	2024	2025	Mukomuko	394.23	-	-	-	-	-	-	Sei Betung	-	-	74.67	68.42	72.32	60.51	102.72	Tanah Rekah	675.75	-	406.87	358.29	357.06	324.40	200.60	Talang Petai	207.50	-	128.90	110.98	176.24	152.17	183.98	Sei Kiang	-	-	213.03	151.29	208.92	175.04	180.92	Bunga Tanjung	-	-	-	-	280.37	330.36	297.32	Air Bikuk	139.64	-	230.53	166.51	216.41	-	-	Air Buluh	-	-	-	-	156.68	286.21	341.70	Total Replanting	1,417.12	-	1,054.00	855.49	1,468.00	1,328.69	1,307.24	Mature	14,723.47	15,667.26	15,135.97	15,697.58	14,258.53	14,096.15	13,703.83	Immature	1,627.56	2,257.75	1,417.12	1,054.00	1,909.49	2,323.49	2,796.69	Grand Total	17,768.15	17,925.01	17,607.09	17,607.07	17,636.02	17,748.33	17,807.76	Comply
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3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	<p>Each unit conducted Management Review. Latest Management Review in Sei Kiang Estate conducted on 7 Nov 2019. Management review has discussed:</p> <ul style="list-style-type: none"> Results of internal audits; internal audit conducted on 20 to 21 Sept 2019, corrective action have been reviewed. Such as SPPL report of KMDs have been submitted to relevant agencies, Sei Kiang Estate has reported readiness of system and infrastructure of land fire prevention according to "Permentan No.5/2018"; SKGE has inventoried contractor worker to ensure implementation of company policy not to employ underage worker. Customer feedback; customer of SKGE is Mukomuko POM; MMPOM and its supply bases conducted regular EML Meeting with agenda FFB quality, loose fruit percentage and restan. Input from customer (based on FFB sortation by MMPOM) always followed up according to guidance from Senior Field Manager (SFM). 							Comply																																																																																																								

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		<ul style="list-style-type: none"> • Process performance and product conformity. Such as, normal ripe achievement is 91.6% in Sep 2019 and 91.4% in Oct 2019, from target 90%. Percentage of KMD's long stalk are still high and normal ripe are still under 90%, which is 77.6% in Sep 2019. • Status of preventive and corrective actions; the meeting discussed preventive action and corrective action from latest internal audit. Such as SPPL report of KMDs have been submitted to relevant agencies, Sei Kiang Estate has reported readiness of system and infrastructure of land fire prevention according to "Permentan No.5/2018"; SKGE has inventoried contractor worker to ensure implementation of company policy not to employ underage worker. • Follow-up actions from management reviews. Result of previous management review were always discussed, mostly regarding performance, target achievement and FFB quality • Changes that could affect the management system; PT Agro Muko incorporation with PT Safeguarding Solution Indonesia (SSI) conducted security services in PT Agro Muko. • Recommendations for improvement; SKGE incoordination with RMO will disseminated FFB Price to KMD earlier, although after all the Price is always good and no problem occur with KMD; communicate with KSU as provider of casual worker to established contract between KSU and the workers which they managed. <p>Latest Management Review in Mukomuko Estate conducted on 2 Nov 2019. Management review has discussed:</p> <ul style="list-style-type: none"> • Results of internal audits; internal audit conducted on 10 to 11 Sept 2019, corrective action have been reviewed. Such as SPPL report of KMDs have been submitted to relevant agencies, Mukomuko Estate has reported readiness of system and infrastructure of land fire prevention according to "Permentan No.5/2018"; MME has inventoried contractor worker to ensure implementation of company policy not to employ underage worker; replaced all low pressure fire extinguisher. • Customer feedback; customer of MME is Mukomuko POM; MMPOM and its supply bases conducted regular EML Meeting with agenda FFB quality, loose fruit percentage and restan. Input from customer (based on FFB sortation by MMPOM) always followed up according to guidance from Senior Field Manager (SFM). 	
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		<ul style="list-style-type: none"> • Process performance and product conformity. Such as, normal ripe achievement is 88.78 – 92.35% in Oct 2019, from target 90%. There is improvement of restan percentage from 15% in Jul to 6% in Aug 2019. • Status of preventive and corrective actions; the meeting discussed preventive action and corrective action from latest internal audit. Such as SPPL report of KMDs have been submitted to relevant agencies, Mukomuko Estate has reported readiness of system and infrastructure of land fire prevention according to "Permentan No.5/2018"; MME has inventoried contractor worker to ensure implementation of company policy not to employ underage worker; replaced all low pressure fire extinguisher. • Follow-up actions from management reviews. Result of previous management review were always discussed, mostly regarding performance, target achievement and FFB quality • Changes that could affect the management system; PT Agro Muko incorporation with PT Safeguarding Solution Indonesia (SSI) conducted security services in PT Agro Muko. • Recommendations for improvement; MME incoordination with RMO will disseminated FFB Price to KMD earlier, although after all the FFB Price is always good and no problem occur with KMD; communicate with KSU as provider of casual worker to established contract between KSU and the workers which they managed; MME ensure provision of PPE to KSU as described in the Agreement. <p>Latest Management Review in Tanah Rekah Estate conducted on 8 Nov 2019. Management review has discussed:</p> <ul style="list-style-type: none"> • Results of internal audits; internal audit conducted on 13 to 14 Sept 2019, corrective action have been reviewed. Such as SPPL report of KMDs have been submitted to relevant agencies, TRE has reported readiness of system and infrastructure of land fire prevention according to "Permentan No.5/2018"; MME has inventoried contractor worker to ensure implementation of company policy not to employ underage worker; review and revised HIRADC. • Customer feedback; customer of TRE is Mukomuko POM; MMPOM and its supply bases conducted regular EML Meeting with agenda FFB quality, loose fruit percentage and restan. Input from customer (based on FFB sortation by MMPOM) always followed up according to guidance from Senior Field Manager (SFM). 	
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		<ul style="list-style-type: none"> • Process performance and product conformity. Such as, normal ripe achievement is 91.7% in Sep 2019 and 91.5% in Oct 2019, from target 90%. Restan 3% in Aug 2019 and 2% in Sep 2019, from maximum limit 10%. • Status of preventive and corrective actions; the meeting discussed preventive action and corrective action from latest internal audit. Such as SPPL report of KMDs have been submitted to relevant agencies, TRE has reported readiness of system and infrastructure of land fire prevention according to "Permentan No.5/2018"; MME has inventoried contractor worker to ensure implementation of company policy not to employ underage worker; review and revised HIRADC. • Follow-up actions from management reviews. Result of previous management review were always discussed, mostly regarding performance, target achievement and FFB quality • Changes that could affect the management system; PT Agro Muko incorporation with PT Safeguarding Solution Indonesia (SSI) conducted security services in PT Agro Muko. • Recommendations for improvement; TRE incoordination with RMO will disseminated FFB Price to KMD earlier, although after all the FFB Price is always good and no problem occur with KMD; communicate with KSU as provider of casual worker to established contract between KSU and the workers which they managed; TRE in coordination with RMO ensure that contract between PT Agro Muko – TRE has include clause regarding OHS and provision of PPE. <p>Latest Management Review in Talang Petai Estate conducted on 5 Nov 2019. Management review has discussed:</p> <ul style="list-style-type: none"> • Results of internal audits; internal audit conducted on 17 to 18 Sept 2019, corrective action have been reviewed. Such as SPPL report of KMDs have been submitted to relevant agencies, TPE has reported readiness of system and infrastructure of land fire prevention according to "Permentan No.5/2018"; MME has inventoried contractor worker to ensure implementation of company policy not to employ underage worker; review and revised HIRADC; established the HCV signboard step by step. • Customer feedback; customer of TPE is Mukomuko POM; MMPOM and its supply bases conducted regular EML Meeting with agenda FFB quality, loose fruit percentage and restan. Input from customer (based on FFB sortation by MMPOM) always followed up according to guidance from Senior Field Manager (SFM). 	
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		<ul style="list-style-type: none"> • Process performance and product conformity. Such as, normal ripe achievement (target 90%) and minimum Restan (limit 10%). • Status of preventive and corrective actions; the meeting discussed preventive action and corrective action from latest internal audit. Such as SPPL report of KMDs have been submitted to relevant agencies, TRE has reported readiness of system and infrastructure of land fire prevention according to "Permentan No.5/2018"; MME has inventoried contractor worker to ensure implementation of company policy not to employ underage worker; review and revised HIRADC; established the HCV signboard step by step. • Follow-up actions from management reviews. Result of previous management review were always discussed, mostly regarding performance, target achievement and FFB quality • Changes that could affect the management system; PT Agro Muko incorporation with PT Safeguarding Solution Indonesia (SSI) conducted security services in PT Agro Muko. • Recommendations for improvement; TPE in coordination with RMO disseminated FFB Price to KMD earlier, although after all the FFB Price is always good and no problem occur with KMD. Communicate with KSU as provider of casual worker to established contract between KSU and the workers which they managed. TPE in coordination with RMO ensure that contract between PT Agro Muko – TPE has include clause regarding OHS and provision of PPE. <p>Latest Management Review in Mukomuko POM conducted on 4 Nov 2019. Management review has discussed:</p> <ul style="list-style-type: none"> • Results of internal audits; internal audit conducted on 6 to 7 Sep 2019, corrective action have been reviewed, e.g. MMPOM has revise the list of information that can be access by public; MMPOM has disseminates newest company policy to all workers; MMPOM has followed up field finding, e.g. loading ramp, emergency infrastructure, landfill, clinic, emplacement, laboratory, workshop, processing station and water treatment. • Customer feedback; customer of MMPOM is Agro Muko Tank Terminal (AMTT) as bulking station prior to shipping. AMTT in coordination with MMPOM to ensure FFB quality according to the standard as well as FFA and dirt. During 2019, there is no complaint from customers regarding FFA. • Process performance and product conformity. 	
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		<ul style="list-style-type: none"> • Status of preventive and corrective actions; the meeting discussed preventive action and corrective action from latest internal audit. E.g. MMPOM has revise the list of information that can be access by public; MMPOM has disseminates newest company policy to all workers; MMPOM has followed up field finding, e.g. loading ramp, emergency infrastructure, landfill, clinic, emplacement, laboratory, workshop, processing station and water treatment. • Follow-up actions from management reviews. • Changes that could affect the management system; PT Agro Muko incorporation with PT Safeguarding Solution Indonesia (SSI) conducted security services in PT Agro Muko. • Recommendations for improvement; MMPOM conducted dissemination of company policy periodically to ensure that all parties understood. Process of license extension carried out earlier considering long processing time. BTPOM communicate to Marketing Department to get transaction record from RSPO IT Paltform. <p>The company provided evidence of Manager Meeting dated 5 Oct 2019. The meeting discussed Capex 2019, Fire Control, Smallholder Department budget for 2020 has been made and hope to have it rolled out in January 2020, GRTT procedure should be rolled out by October 2019, and Long Term Business Plan.</p> <p>The company also conducted regular meeting called EML (Estate and Mill Lesson). Latest meeting conducted in 22 Oct 2019. The minutes covers Safety officer report, data presentation by Mill Manager, crop quality, loose fruit and production achievements. Attendance list was available. The meeting discussed that normal ripe fruit shall be increase; Agronomy Manager shall made recapitulation of progeny; bagworm shall be reported to Agronomy Team; unit shall coordination with Safety Manager to determine standard of hazard potency.</p>	
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Criteria 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.

3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and	Internal audit has been conducted on 20 – 21 Sept 2019 in Sei Kiang Estate; on 10 – 11 Sep 2019 in Mukomuko Estate; on 13 – 14 Sep 2019 in Tanah Rekah Estate; on 17 – 18 Sep 2019 in Talang Petai Estate; on 6 – 7 Sep 2019 in Mukomuko POM. Several	Comply
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	<p>environmental impacts and opportunities of the unit of certification.</p>	<p>finding have been recorded; consist of minor finding, Observation and Opportunity for Improvement. Such as in Sei Kiang Estate: provide clinic with air condition to keep the medicine in correct temperature; ensure all worker have work permit before doing their job; made van belt safety for genset.</p> <p>The company has established continual improvement program under "Program Perbaikan Berkelanjutan Tahun 2019". The program monitored consist of Monitoring & Evaluation of Best Agricultural Practices; Monitoring & Management of agrochemical uses and handling of chemical waste; interview to the surrounding communities for social aspect; Mitigation of Green House Gasses; dissemination of conservation area including status of species (flora & fauna) protected, rare, threatened and endangered.</p> <p>Sei Kiang Estate has conducted management and monitoring related to continuous improvement program 2019:</p> <ul style="list-style-type: none"> - Fertilizer application inspection; - FFB quality inspection; - Loose fruit inspection; - Record of pesticides uses; - Evaluation of water uses/ton FFB; - Evaluation of HSD Oil/unit; - HCV Monitoring Report by Ranger. <p>Mukomuko Estate has conducted management and monitoring related to continuous improvement program 2019:</p> <ul style="list-style-type: none"> - Fertilizer application inspection; - FFB quality inspection; - Loose fruit inspection; - Record of pesticides uses; - Evaluation of water uses/ton FFB; - Evaluation of HSD Oil/unit; - HCV Monitoring Report by Ranger. <p>Mukomuko POM has conducted management and monitoring related to continuous improvement program 2019:</p> <ul style="list-style-type: none"> - Monitoring and evaluation of best manufacturing practices; performed monthly. 	
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		<ul style="list-style-type: none"> - Monitoring of renewable energy; performed monthly. - Management and monitoring of chemical use and chemical waste; performed monthly. - Interview with surrounding communities for social aspect; performed on 15 Mar 2019. - Mitigation of Green House Gas; performed monthly. - Dissemination of conservation area, including status of species (flora & fauna) that rare, threatened and endangered to the stakeholder; performed 9 Oct 2019. 	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	The company has been reported Annual Communication of Progress (ACOP) 2019 to RSPO website under organization name SIPEF Group, membership number 1-0021-05-000-00. Based on the report, number of management units certified under RSPO P&C Certification are 9 units; total certified area 97,018 Ha. Scheme Smallholder FFB volume supplied that is certified are 243,571 tonnes. Total CSPO sold as RSPO-certified are 261,374 tonnes; CSPO sold under other certification schemes are 63,399 tonnes; CSPO sold as conventional are 12,880 tonnes; total CSPO are 337,653 tonnes. CSPK sold under RSPO certified are 53,902 tonnes; total CSPK are 53,902 tonnes.	Comply
<p>Criteria 3.3 Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>Estate: The procedures documented in "Oil Palm Agricultural Manual" (revised April 2019), where it contains all sub section of the process, such as: Nursery, land clearing, planting in peat soil and mineral soil with zero burning, planting legume cover crops, terracing, upkeep (fertilizer and pesticides, included safe working practices), water level management, riparian and watercourse management, harvesting, replanting and FFB transport. Documented SOP are as follows:</p> <ol style="list-style-type: none"> 1. OPM-01-00; dated 02/10/2017; Biology of Oil Palm. 2. OPM-02-00; dated 02/10/2017; General Information: Oil Palm Nursery. 3. OPM-02-01; dated 02/10/2017; Land Preparation of Oil Palm Nursery – Persiapan Lahan Pembibitan Kelapa Sawit 4. OPM-02-02; dated 02/10/2017; Oil Palm Pre Nursery – Pre Nursery Kelapa Sawit. 5. OPM-02-03; dated 02/10/2017; Oil Palm Main Nursery – Main Nursery Kelapa Sawit. 6. OPM-03-01; dated 02/10/2017; Survey and Mapping – Survey dan Pemetaan. 7. OPM-03-02; dated 02/10/2017; Land Clearing – Pembersihan Lahan. 	Comply

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		<ol style="list-style-type: none"> 8. OPM-03-03; dated 06/02/2019; Land Preparation – Persiapan Lahan. 9. OPM-03-04; dated 02/10/2017; Legume Cover Crop <i>Mucuna bracheteata</i> – <i>Mucuna bracheteata</i> Kacangan Penutup Tanah. 10. OPM-03-05; dated 02/10/2017; Field Planting – Penanaman ke Lapangan. 11. OPM-04-01; dated 02/10/2017; Palm Supplying – Penyisipan Tanaman. 12. OPM-04-02; dated 02/10/2017; Thinning Out and Removing Plant – Penjarangan dan pembongkaran Tanaman. 13. OPM-05-01; dated 06/02/2019; Ablation and Sanitation – Ablasi dan Sanitasi. 14. OPM-05-02; dated 06/02/2019; Harvesting – Panen. 15. OPM-05-03; dated 06/02/2019; FFB and LF Delivery – Pengiriman TBS dan Berondolan. 16. OPM-05-04; dated 02/10/2017; Frond Pruning – Pemangkasan Pelepah. 17. OPM-05-05; dated 16/02/2019; Black Bunch Count – Sensus Buah. 18. OPM-05-06; dated 02/10/2017; <i>Elaeobius camerunicus</i> Management – Pengelolaan <i>Elaeobius camerunicus</i>. 19. OPM-06-01; dated 02/10/2017; Inorganic Fertiliser – Pupuk Inorganik. 20. OPM-06-02; dated 02/10/2017; Organic Fertiliser – Pupuk Organik 21. OPM-06-03; dated 02/10/2017; LSU: Palm Marking – LSU: Penandaan Tanaman. 22. OPM-06-04; dated 02/10/2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel. 23. OPM-07-01; dated 06/02/2019; Detection and Census – Deteksi dan Sensus. 24. OPM-07-02; dated 02/10/2017; Pest Control – Pengendalian Hama. 25. OPM-07-03; dated 02/10/2017; Disease Control – Pengendalian Penyakit. 26. OPM-07-04; dated 02/10/2017; Integrated Pest Management – Pengendalian Hama Terpadu. 27. OPM-08-01; dated 06/02/2019; Weed Control – Pengendalian Gulma. 28. OPM-09-01; dated 19/03/2019; Water management in Coastal Soil – Pengelolaan Air di Tanah Pesisir. 29. OPM-09-02; dated 02/10/2017; Management of Riparian Area – Pengelolaan Riparian Area. 30. OPM-09-03; dated 01/04/2019; The Use, Store and Discrad Pesticide – Penggunaan, Penyimpanan dan pemusnahan pestisida. 31. OPM-10-01; dated 06/02/2019; Field Quality Control. 	
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		<p>Interviews with the employees indicate satisfactory level of understanding and implementation in relation to their respective job function.</p> <p>Mukomuko POM: Mukomuko Palm Oil Mill has a set of procedure for processing of oil palm Fresh Frut Bunch into CPO and PK, under "Palm Oil Mill Manual". The procedures explains all activity from receiving FFB into dispatch of products; Such as:</p> <ol style="list-style-type: none"> 1. POM-01-03; Rev2; dated 25/03/2019; Reception in Agro Muko Palm Oil Mill. 2. POM-02-03; Rev2; dated 25/03/2019; Sterilizer in Agro Muko Palm Oil Mill. 3. POM-03-03; Rev1; dated 25/03/2019; Threshing in Agro Muko Palm Oil Mill. 4. POM-04-03; Rev1; dated 25/03/2019; Pressing in Agro Muko Palm Oil Mill. 5. POM-05-03; Rev1; dated 25/03/2019; Clarification in Agro Muko Palm Oil Mill. 6. POM-06-03; Rev3; dated 25/03/2019; Kernel Plant in Agro Muko Palm Oil Mill. 7. POM-07-03; Rev1; dated 25/03/2019; Steam Plant in Agro Muko Palm Oil Mill. 8. POM-08-03; Rev1; dated 25/03/2019; Power Plant in Agro Muko Palm Oil Mill. 9. POM-09-03; Rev1; dated 25/03/2019; Water Treatment in Agro Muko Palm Oil Mill. 10. POM-10-03; Rev1; dated 25/03/2019; Effluent Plant in Agro Muko Palm Oil Mill. 11. POM-11-03; Rev1; dated 25/03/2019; Storage and Dispatch in Agro Muko Palm Oil Mill. 12. POM-12-03; Rev1; dated 25/03/2019; Workshop in Agro Muko Palm Oil Mill. 13. POM-13-03; Rev1; dated 25/03/2019; EFB Plant in Agro Muko Palm Oil Mill. 14. POM-14-03; Rev1; dated 25/03/2019; Biogas Plant in Agro Muko Palm Oil Mill. 15. MKT-03-06; dated 04/03/2019; Supply Chain and Traceability of Palm Oil. <p>A set of work instruction for mill's workshop are available, dated 25/03/2019; including use of welding equipments, cutting metal, operating lathe machine, operating drilling machine, operating portable grinding machine, operating and maintenance of smoke density meter.</p> <p>Engineering Procedures:</p> <ol style="list-style-type: none"> 1. ENG-01-01; Rev1; dated 28/03/2019; Civil Mechanical and Eelctrical Work. 2. ENG-02-01; Rev1; dated 28/03/2019; Weekly Prodcution Report. 3. ENG-02-03; Rev1; dated 28/03/2019; Monthly Prodcution and Stock. 4. ENG-02-14; Rev1; dated 28/03/2019; Material Dstrubution From Storage. 5. ENG-02-16; Rev1; dated 28/03/2019; Resceiving HSD Oil. 	
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		<ul style="list-style-type: none"> 6. ENG-02-21; Rev0; dated 07/03/2019; Weighing Administration. 7. ENG-03-01; Rev1; dated 28/03/2019; Master List of Measuring Equipment. 8. ENG-03-02; Rev1; dated 28/03/2019; Planning, Monitoring and Reporting of Calibration and Verification. 9. ENG-03-03; Rev1; dated 28/03/2019; Calibration Administration Excluding Weighbridge. 10. ENG-03-04; Rev1; dated 28/03/2019; Calibration Administration Weighbridge. 11. ENG-03-05; Rev1; dated 28/03/2019; Verification Administration Procedure. 	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	The company has established mechanism to check consistent implementation of procedures under SOP OPM-10-01; dated 06/02/2019; Field Quality Control. The objectives of the procedure are to check if the result of work are in accordance with existing procedures; to evaluate the work and keep in accordance with the standards; to use as a reference for making improvements. Inspections are carried out on items related to harvesting, weeding, manuring, pest and disease, replanting and nursery.	Comply
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>Record of monitoring in Mukomuko POM are available under documents Action Plan Mukomuko POM as result Vice President Engineering visit. Description of monitoring result and action plan based on visit 19 Aug 2019 are as follows:</p> <ul style="list-style-type: none"> 1. The effluent drain pipe coming from vibrating screen No.2 at the oil reclaim tank is going directly into the sump at the end of the tank, but this means no oil can be removed from this effluent. The pipe should be removed after item d is completed. Closed on 19 Aug 2019. 2. Most of the electrical panels in the mill are dirty inside. MMPOM should make an annual schedule for cleaning the panels and the panels should always be found in a clean condition. 3. Most of the sediment traps and drains around the mill are very dirty and should be cleaned at least once a week. <p>Record of monitoring in Tanah Rekah Estate are available under documents Action Plan Tanah Rekah Estate as result Senior Field Manager (SFM) visit. Description of monitoring result and action plan based on visit 16 Mar 2019 are as follows:</p> <ul style="list-style-type: none"> 1. There was unpicked loose fruit at circle and market place Block A05 and A14; Recommendation: warn the harvesters during morning briefing. Closed on 30 Mar 2019. 2. There were stonoclena and fern found in circle; Recommendation: shall be racking before spraying. Closed on 30 Mar 2019. 	Comply

		<p>3. Wood cannot be control by spraying; Recommendation: shall conduct rub using garlon and diesel. Closed on 30 Mar 2019.</p> <p>Record of monitoring in Tanah Rekah Estate are available under documents Action Plan Tanah Rekah Estate as result Vice President Plantation (VVP) visit. Description of monitoring result and action plan based on visit 18 Jun 2019 are as follows:</p> <ol style="list-style-type: none"> 1. EM work with estate team to achieve the following 3 main KPIs: Push unripe FFB levels to target level of 0% as possible; Aim for target of under ripe FFB at 3% or less; Push a consistent LF production of 8-10%. 2. EM work with estate team to achieve below 10% restan on a monthly basis in 2019. 3. SFM check the STM for likely production of EFB for 2019 and if required make necessary adjustment to the program and advise management of the likely additional cost. <p>Record of monitoring are available under documents as follows:</p> <ol style="list-style-type: none"> 1. "Inspeksi Kualitas FFB" dated period October 2019, described inspection of FFB quality of Tanah Rekah Estate. Summarized that unripe is 0.8%; under ripe is 5.8%; over ripe is 1.8%normal ripe is 91.4% and long stalk is 2.1%. The report mentioned total bunches harvested, unripe bunch, under ripe bunch, over ripe bunch, long stalk. 2. "Inspeksi Brondolan" dated 18 Nov 2019, described inspection of loose fruit from Division 2, Block 97G04. The report mentioned bunches harvested, unpicked loose fruit, uncut frond, frond stacking, pruning quality. 3. Pest Detection dated 15 Oct 2019, described detection of pest at Division 2, Block 98L03. Document mentioned that there is no pest attack in all area of Division 2. 4. Internal audit has been conducted on 20 – 21 Sept 2019 in Sei Kiang Estate; on 10 – 11 Sep 2019 in Mukomuko Estate; on 13 – 14 Sep 2019 in Tanah Rekah Estate; on 17 – 18 Sep 2019 in Talang Petai Estate; on 6 – 7 Sep 2019 in Mukomuko POM. 5. "Inspeksi Pemupukan" dated 20 Sep 2019, described inspection of fertilizer application at Block 08E02A, Division 2 Talang Petai Estate, for Compound 16:10:19:6+0.5B fertilizer, dosage 1.5 kg/palm. The report mentioned palm applied, circle condition, fertilizer applied equally, application radius comply to the recommendation. 	
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<p>Criteria 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/outgrower scheme, is documented.</p>	<p>PT Agromuko – Mukomuko POM has demonstrated the document of Social-Environment Impact Assessment (SEIA) as per government document "Analisis Dampak Lingkungan (AMDAL) dan Rencana Pengelolaan dan Pemantauan Lingkungan (RKL-RPL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit dan Karet di Kecamatan Mukomuko Utara, Kecamatan Lubuk Pinang, Kecamatan Teras Terunjam dan Kecamatan Pondok Sugu, Kabupaten Mukomuko, Propinsi Bengkulu, tahun 2005" - it was found that the document prepared with public consultation process, involving stakeholders from surrounding community, government bodies, traditional leaders.</p> <p>Aside from that, certificated holder has prepared a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI), in 2010 and 2011. The scope of social impact assessment covers 15 villages around company including Kebun Masyarakat Desa/KMD of 524 Ha from 38 surrounding villages.</p> <p>PT Mukomuko Agro Sejahtera – Mukomuko POM has also prepared the document, identifying Social-Environment Impact Assessment (SEIA) under document: "Dokumen AMDAL untuk Kegiatan Perkebunan Kelapa Sawit seluas 6,298 Ha di Kecamatan Malin Deman, Kecamatan Ipuh dan Kecamatan V Koto, Kabupaten Mukomuko, Provinsi Bengkulu". The document was approved by "Surat Keputusan Gubernur Bengkulu No. M.288.XXX Tahun 2011" dated 9 September 2011.</p> <p>Aside from that, company has prepared a social-environment impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI). The report under Dokumen Laporan Final Penilaian Dampak Sosial dan Lingkungan yang dilaksanakan oleh Yayasan Kelapa Sawit Berkelanjutan (YASBI) pada tahun 2011 yang dilakukan terhadap dampak sosial dari pembangunan kebun inti dan rencana pembangunan Kebun Masyarakat Desa (KMD)".</p>	<p>Comply</p>

		<p>For Kebun Masyarakat Desa, in 2010, the certificated holder has also prepared a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI). The scope of social-environment impact assessment covers 15 villages around company including Kebun Masyarakat Desa/KMD of 524 Ha from 38 surrounding villages.</p> <p>In 2017, social-environment impact assessment held in cooperation by Kompas Enviro Institute for scope of 10 KMDs. The social impact assessment was done between 8-16 March 2017 with scope of 15 villages around KMD with focus group discussion (FGD).</p> <p>The result from social impact monitoring reported in "Laporan Pelaksanaan Rencana Pengelolaan Lingkungan-Rencana Pemantauan Lingkungan(RKL-RPL)" period first semester 2019. The report has been submitted to "Dinas Lingkungan Hidup Kabupaen Mukomuko", "Gubernur Bengkulu", "Kepala Badan Lingkungan Hidup Provinsi Bengkulu", "Kepala Dinas ESDM Provinsi Bengkulu", "Bupati Mukomuko Cq Kepala Dinas Penanaman Modal", "Pelayanan Perizinan dan Tenaga Kerja Kabupaten Mukomuko".</p> <p>During this surveillance (ASA 1.4 – year 2019), there was no significant changes in social impact practices. The certificate holder still involved affected parties to collect information and develop the social program/plan to mitigate negative impact.</p> <p>Based on interview with representative of smallholder scheme (KMD), it is clearly informed that Certificate Holder are often to open discuss related how to minimizing negative impact in social aspect.</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>The social impact management plan from documents have lined out program to manage and monitors social-environment impact (e.g: Rencana Pengelolaan Lingkungan dan Rencana Pemantauan Lingkungan (RKL-RPL for period first semester year 2019), timeframe and person in charge. The plan was consulted through questionnaire/survey to surrounding communities on 6-monthly basis. Progress of implementation was monitored, evaluated and reported to government on 6-monthly basis.</p> <p>Within the AMDAL documents, the negative and positive impact of oil palm development has been explained. The environmental management and monitoring plan document has lined out effort that company should carry out in order to minimize negative impact and promote positive impact from oil palm development. Under the document, the social aspect identified covers source of livelihood, community's revenue, community ability,</p>	Comply

		<p>community perception on company activity, social conflict, social-cultural changes, community health status.</p> <p>The Social-Environment Impact Assessment documents have explained the recommendation that should be done by company to minimize negative impact and promote positive impact from social impact management.</p> <p>As commitment to reduce negative impacts in social aspect, the certificate holder created management and monitoring program of social impact annually. Documented sample of management and monitoring program social-environment impact PT Agromuko – Mukomuko POM report in July 2019. There are six (6) major program where focused on, such as:</p> <ul style="list-style-type: none"> • Tenure • Communication with Affected Parties, • Community Empowerment • Economic, • Fire and Haze Prevention, • Environmental Management • Scheme Smallholders (KMD) management (e.g: socialization of KMD development plans; review the location of smallholder plantation location – to ensure consensus and involvement of all parties within village scope; coordination with government related to SPPL. <p>Those program are documented and timetable with specific target and strategy of each activities.</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>Certificate holder have carried out social impact evaluation on annual basis through social survey. The survey was conducted by ENC-AM/MMAS and being part of environment management and monitoring report - "Laporan Pelaksanaan RKL-RPL".</p> <p>Review on social-environment management and monitoring has conducted year 2019 under "Laporan Hasil Kuisisioner dengan Masyarakat untuk Aspek Sosial" PT Agromuko – year 2019.</p> <p>Survey was conducted on 15 to 30 March 2019 total respondent is 160 people in 40 villages in surrounding the company.</p> <p>Aspect for the survey such as:</p>	Comply

		<ul style="list-style-type: none"> • Livelihood • Local community perception of employment opportunities • Income per month • Mobility • Local community perception related to operational activities in PT Agromuko <p>Interview result have been summarized and recorded onto "Laporan Pelaksanaan RKL-RPL period first semester year 2019".</p> <p>For management plans in Kebun Masyarakat Desa/KMD, the social impact was carried out as part of company activity, because the smallholder plantation was managed by company. As explained from PT. Agro Muko and PT. Mukomuko Agro Sejahtera's social monitoring, the current management plan is still relevant – in terms of smallholder management.</p>	
<p>Criteria 3.5 A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.</p>	<p>In general, the unit of certification has issued "Human Resources Department Manual" Second Edition – 2019 signed by President Director. Document available at the OU office, and accessible. The HRD Manual consist of 30 Standard Operating Procedure, among others:</p> <ul style="list-style-type: none"> • General (Doc. No. HRD-00-01/01-02-2019/Rev.1) dated 8 April 2019. • Organization Chart (Doc. No. HRD-00-02/01-02-2019/Rev.1) dated 5 April 2019. • Objective and KPI (Doc. No. HRD-00-03/01-04-2019/Rev.1) dated 8 April 2019 • Risk and Opportunities (Doc. No. HRD-00-04/01-04-2019/Rev.1) dated 8 April 2019. • Recruitment in General (Doc. No. HRD-01-00/01-04-2019/Rev.1) dated 5 April 2019. • Internal Recruitment (Doc. No. HRD-01-01/01-04-2019/Rev.1) dated 8 April 2019. 	<p>Comply</p>
<p>3.5.2</p>	<p>Employment procedures are implemented and records are maintained.</p>	<p>Employment records are well maintained by the HRD, for example:</p> <ul style="list-style-type: none"> • Employee Promotion Application Letter from PKWT (temporary) to SKU-H (permanent) on 3 September 2018 as stated by Estate Manager letter No.080/MDE-RMO/IX/2019. The letter completed with the name of the employee proposed for appointment, Assessment Results of each employee, Statement letter of each 	<p>Comply</p>

		<p>employee, Types of training that have been attended by each employee, Job and Responsibilities of each employee at the time of appointment. Mechanism on appointment of PKWT become SKU are based on Letter from HRAD No.02/HRAD-C-CIR/I/18 dated 19 January 2018 concerning Promotion/Appointment of Employees. Appointment of employees is completed with a Work Agreement (SPK), and Medical Check Up Results.</p> <ul style="list-style-type: none"> • Regular employee appraisals are carried out annually, which outlines the results of assessments on 10 categories such as Ability, Responsibility, Cooperation with others, hard worker, open, trustworthy/honest, discipline, timeliness in carrying out tasks, administration and loyalty. • A record of Mr. Desman Ferdinal Manurung's work transfer from Malin Deman Estate becoming Accounting Clerk at Sungai Terawang Estate in accordance with the Letter of Transfer No.14/GMO-ABE/IX/18 dated 6 September 2018. 	
<p>Criteria 3.6 An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p>C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>PT Agromuko – Mukomuko POM has established an Occupational Health and Safety Policy that was signed by President Director dated 27th March 2019, no Dok: QMM-40-01-P04/27-03/2019/Rev.</p> <p>In point 1 was mentioned PT Tolan Tiga Indonesia Support the implementation of all relevant laws and regulation of Republic of Indonesia ad of applicable international agreement and standards relevant to occupational health and safety.</p> <p>In point 2.b mentioned that the company committed to provision of adequate resources for effective implementation of the occupational health and safety (OHS) program and procedure, including strict compliance reviews.</p> <p>The company has prepared the procedure for OHS under document of Occupational Health and Safety Manual for second edition – 2019, published date 13th March 2019.</p> <p>The document of procedure consisted of:</p> <ol style="list-style-type: none"> 1. Procedure of Hazard Identification Risk Analysis Determining Control for OHS – No: OHS-01-01 2. Procedure of Hot Work – No: OHS-01-02 	<p>Comply</p>

		<ol style="list-style-type: none"> 3. Procedure of Potential Hazard Report – No: OHS-01-03 4. Procedure of P3K (First Aid) – No: OHS-01-04 5. Procedure of Confined Space - No: OHS-01-06 6. Procedure of Working at Heights – No: OHS-01-06 7. Procedure of Gas Pressure Management - No: OHS-01-07 8. Procedure of Incident Reporting - No: OHS-01-08 9. Procedure of Standard for Installation of Safety Sign - No: OHS-01-09 10. Procedure of Personal Protective Equipment - No: OHS-01-10 <p>The certificate holder has prepared the document of risk assessment available under “Penilaian Risiko (Hazard Identification Risk Assessment and Control”, last review on 19th September 2019. The document has covered for all activities in Estate and Mill, e.g: general activities, central clinic, fertilizer storage, temporary storage of hazardous waste, security, chemical shed, office, workshop, field (spraying, manuring, harvesting, transport FFB, IPM), emplacement, laboratory, weighbridge, grading station, loading ramp, sterilizer station, chain capstand, pressing station, boiler station, kernel station, static crane, workshop.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>	<p>PT Agromuko – Mukomuko POM has prepared the program of OHS year 2019 and has shown the monitoring of effectiveness as per document “Program P2K3LHS (safety committee) Tahun 2019”, such as:</p> <ol style="list-style-type: none"> 1. OHS meeting (monthly) 2. Report of OHS performance to Manpower Agency (threes month base) 3. Routine inspection of OHS facilities (fire extinguisher and first aid box); 4. Integrated fire drill (annually); 5. Training for first aider (annually); 6. Training on hazardous waste both of handing and documentation; 7. Review of risk assessment; 8. General Medical Check Up (annually) and Special Medical Check Up (per threes month base) 9. Socialization of healthy life (every month) <p>The record of effectiveness of implementation the OHS program, e.g:</p> <ol style="list-style-type: none"> 1. Record of OHS meeting dated 18th October 2019, location in Mukomuko Estate, agenda: Review of the meeting result of the last, review of OHS inspection and review of incident report 	Comply

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		<ol style="list-style-type: none"> 2. Report of OHS performance for period July – September 2019 was sent to Manpower Agency in Bengkulu Province both for Talang Petai Estate, Tanah Rekah Estate (document number: 02/SKGE/Disnaker/X/2019, dated 9th October 2019) 3. Attendance list on socialization of Risk Assessment document, e.g: <ul style="list-style-type: none"> • Sei Kiang Estate, was conducted on 7th October 2019 and 2nd November 2019, was attended by all workers • Mukomuko POM, was conducted on 27th March 2019, location in Division Inti 4. Special Medical Check Up for workers in high risk area (spraying, fertilizer and chemical handling) – per threes month base, e.g: <ul style="list-style-type: none"> • Talang Petai Estate: last MCU was conducted in September 2019, attended by 40 workers of spraying, operator in generator, operator of fibro, chemical storage keeper. The result was communicated to all workers. • Mukomuko Estate: last MCU was conducted by Estate Clinic in September 2019, attended by 22 workers of Spraying activities. • Report of Medical Check Up (annually), last MCU was conducted on 25th September 2019 by Company Doctor and Laboratorium Klinik Kesehatan Spesialis Anugerah Ibu – Medan 5. Checklist of availability the first aid kit, dated 13th September 2019; result shown OK. Location in Mukomuko POM 6. Checklist of readiness the fire extinguisher facilities dated 13th November 2019; result shown OK 7. Checklist of availability the PPE in warehouse, chemical storage, engine room (generator room), dated 13th November 2019; result shown OK. 8. The report of OHS inspection has reviewed during OHS meeting (monthly basis), last meeting dated 18th October 2019, location in Tennis yard. Agenda: review the progress action of the result last OHS meeting, review of the report of OHS inspection, etc. 9. License for mill machinery, in Mukomuko POM e.g: <ul style="list-style-type: none"> • Boiler 01 (certificate number 07/A 0030) • Boiler 02 (certificate number 07/A 0037) • Sterilizer 01 (certificate number 07/A 0032) • Sterilizer 02 (certificate number 07/A 0033) • Sterilizer 03 (certificate number 07/A 0034) • Sterilizer 04 (certificate number 07/A 0035) • BVP Back pressure vessel No 01 (certificate number 07/A 0031) 	
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Criteria 3.7			
All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	<p>PT Agromuko – Mukomuko POM has shown the document of Training Program year 2019.</p> <p>Training program provided as per “Program Pelatihan/Training Tahun 2019”, prepared on 4th January 2019, such as:</p> <ul style="list-style-type: none"> • Training on harvesting (including for OHS aspect and harvesting quality criterion), was conducted on 15th January 2019 – location in Tanah Rekah Estate, dated 2nd September 2019 location in Mukomuko Estate • Training for spraying applicator (including for OHS training and environment) and Calibration for Spraying tools, was conducted on 23th March 2019 location in Tanah Rekah Estate and 31st October 2019 location in Talang Petai Estate. • Training for manuring application (including OHS and environmental aspect), dated 20th March 2019 location in Tanah Rekah Estate; dated 22th October 2019 location in Mukomuko Estate • First Aid training, conducted on 10th and 11th October 2019 location in Malin Deman Estate and Air Buluh Estate • Refreshment training on implementation of RSPO requirement, date 18th July 2019, location in Tanah Rekah Estate • Training on handling of hazardous waste (including MSDS and hazard label), dated 23rd August 2019 location in Talang Petai Estate <p>Training on emergency respond (training on land fire emergency), dated 7th September 2019, location in Sei Kiang Estate.</p>	Comply
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Record of training has shown for an individual basis as per document of “Employee Training and Education Record”, e.g:</p> <p>Namely Mrs Sarik Lubis (foreman of spraying in Talang Petai Estat); training record:</p> <ul style="list-style-type: none"> • Dated 1st July 2014; refresh training on fertilizer application • Dated 4th March 2015; training for pesticides application • Dated 22nd February 2017; training on calibration of kap/SA15Dated 23rd January 2018; training on preparedness of emergency response for land fire 	Comply

		<ul style="list-style-type: none"> • Dated 19th February 2018; training on calibration of sprayer equipment • Dated 7th March 2018; training on pesticides handling • Dated 20th October 2018; training pesticides handling • Dated 9th February 2019; training on emergency response for land fire • Dated 21st February 2019; Refresh training for MSDS • Dated 7th October 2019; Training for IPM <p>Namely Mr Soleh Rianto (harvester in Sei Kiang Estate); training record:</p> <ul style="list-style-type: none"> • Dated 8th February 2018; training on quality of FFB • Dated 4th April 2018; Refresh training of OHS in harvesting activity • Dated 24th October 2019; Refresh training on implementation of harvesting procedure <p>Namely Mrs Titik Kurniasi (pesticides applicator/sprayer in Mukomuko POM training record:</p> <ul style="list-style-type: none"> • Dated 1st July 2014; refresh training on fertilizer application • Dated 4th March 2015; training for pesticides application • Dated 22nd February 2017; training on calibration of kap/SA15 • Dated 7th November 2017; refresh training on application of pesticides and calibration • Dated 13th August 2018; refresh training on application of pesticides and calibration • Dated 23rd April 2019; refresh training on application of pesticides and calibration 	
3.7.3	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>Sei Kiang Estate: RSPO SCCS Training for FFB checker in Sei Kiang Estate: Dodi Indra, J. Manik, Natal Siahaan, Tulus Butar-butur – dated 18 November 2019.</p> <p>Tanah Rekah Estate: RSPO SCCS Training (including FFB quality, progress crop, loose fruit collection and pruning) for field assistants, field head assistant, mandor, worker, dated 16 March 2019. Verified training record for Syamsir Sitanggang (harvester mandor div. I): training SCCS, harvesting and FFB quality dated 16 March 2019; Training Leaf Sampling and Rachis Sampling – 25 October 2019; training IPM – 9 September 2019. Mr. Zulkifli (harvester clerk) attended training SCCS – 4 November 2019; Training harvesting quality and FFB quality - 22 March 2019;</p>	Comply

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		<p>Talang Petai Estate: RSPO SCCS Training for FFB checker in Talang Petai Estate attended by 10 personnel dated 4 November 2019. Verified training record for Suyatmi (weighbridge operator): training SCCS dated 4 November 2019; Training OHS – 29 January 2019; training weighbridge – 13 March 2015. Suyadi (harvester mandor div. II) training SCCS, harvesting and FFB quality dated 16 March 2019; training spraying – 7 April 2016;</p> <p>Mukomuko POM: Training Program 2019 for RSPO SCCS planned on July 2019. Actual implementation training dated 15 July 2019 for 4 weighbridge clerks, the training relevant to RSPO P&C 2018 Criterion 3.8 (RSPO SCCS). Mr. M. Irsyan (Weighbridge attendant) joined: Training Supply Chain dated 15 July 2019; Training Weighbridge Administration dated 6 April 2019; Training RSPO and ISCC dated 19 November 2018; Mrs. Vince Sariani (Weighbridge attendant) joined: Training Supply Chain dated 15 July 2019; Training Weighbridge Administration dated 6 April 2019; Training RSPO and ISCC dated 19 November 2018; Training SCCS dated 4 October 2018; Mrs. Mariana Purba (Office Administration) joined: Training purchasing 18 October 2019; Training First aider 27 August 2019; Training Supply Chain dated 15 July 2019; Training RSPO P&C 2018 dated 21-22 June 2019;</p>	
<p>Supply chain requirements for mills.</p> <p>Procedural note:</p> <p>The below numbering is as per the current RSPO SCCS standard and will be renumbered to become 3.8 and onwards following the revision of the RSPO SCCS in 2019. 'D' therefore refers to RSPO SCCS 'Module D – Crude Palm Oil (CPO) mills: Identity Preserved' and 'E' to RSPO SCCS 'Module E – CPO mills: Mass Balance'. Depending on the supply chain model chosen, the corresponding requirements apply as well as all general requirements (those with numbers only). The RSPO SCCS document uses the terms 'site' and 'organisation' to refer to the unit of certification.</p>			
<p>Definition</p>			
<p>Identity Preserved Mill D.1</p>	<p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified</p>	<p>Management decided PT. Agro Muko – Mukomuko POM, to implement RSPO Supply Chain Module D CPO Mills: Identity Preserved. With the implementation of Module D CPO Mills: Identity Preserved, the POM only received and process FFB from certified company-owned estate and certified smallholder/KMD.</p>	<p>Comply</p>

	<p>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 Module E is applicable.</p>	<p>Agro Muko Tank Terminal (AMTT) is deemed as part of the palm oil mill. The control over tank terminal (bulking station) is under PT. Agro Muko. Agro Muko Tank Terminal is only receiving CPO from certified palm oil mills under PT. Agromuko, which is Mukomuko POM and Bunga Tanjung POM.</p> <p>Mukomuko POM and AMTT implemented the procedure of supply chain and traceability based on The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Procedure completed with the flow diagram of FFB receiving, processing in POM, CPO shipping to tank terminal; Receiving and shipping of CPO from tank terminal. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager, whilst in the tank terminal is the storage tank manager.</p>	
Mass Balance Mill E.1	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 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>Management decided PT. Agro Muko – Mukomuko POM, to implement RSPO Supply Chain Module D CPO Mills: Identity Preserved. With the implementation of Module D CPO Mills: Identity Preserved, the POM only received and process FFB from certified company-owned estate and certified smallholder/KMD.</p> <p>Not applicable.</p>	<p>N/A Not Applicable</p>
Explanation (Volume and product integrity)			
D.2 E.2	<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. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimate annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases. Mukomuko POM received certified raw material (Fresh Fruit Bunch) from its own estate: Mukomuko Estate; Sei Betung Estate; Tanah Rekah Estate; Talang Petai Estate; Sei Kiang Estate; Air Manjuntio Estate; and from the Scheme Smallholders: Kebun Masyarakat Desa/KMD and Koperasi Serba Usaha/KSU; Koperasi Produksi Plasma Sungai Tenang Sejahtera.</p> <p>Kebun Masyarakat Desa/KMD, Koperasi Serba Usaha/KSU and Koperasi Produksi Plasma are fully managed by PT. Agro Muko, under each estate.</p> <p>The certification of Estates and Scheme Smallholders are fall under PT. Agro Muko – Mukomuko POM with certificate number RSPO 556042, first certification start on 22</p>	<p>Comply</p>

	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>	<p>February 2011, second certification start on 22 February 2016 and expired on 21 February 2021.</p> <p>PT. Agro Muko – Mukomuko Palm Oil Mill has been registered in RSPO IT Platform with registered ID number RSPO_PO1000001278.</p>	
<p>5.3 Documented procedures</p>			
<p>5.3.1 D.3 E.3</p>	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • 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 organisation’s procedures for the implementation of this standard. • The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 	<p>PT. Agro Muko has a written procedures and/work instruction for ensuring the implementation of RSPO Supply Chain Standard. The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure are complete and up to date covering the implementation of all elements in the supply chain requirements, such as:</p> <ul style="list-style-type: none"> a. Sales process, covering from contract approval to delivery of oil palm product (CPO and PK) including information of supply chain mechanism; b. Process at the estates, covers harvesting, FFB and loose fruit delivery include harvesting record and delivery to the Palm Oil Mill; c.Process at Palm Oil Mill, covers FFB and Loose fruit receiving, identification, production process, delivery of product and recording. <p>Agro Muko Tank Terminal (AMTT) is deemed as part of the palm oil mill. The control over tank terminal (bulking station) is under PT Agro Muko. Agro Muko Tank Terminal is receives CSPO from certified palm oil mills under PT. Agro Muko, which is Mukomuko POM and Bunga Tanjung POM.</p> <p>AMTT uses the same procedure with Mukomuko POM.</p>	<p>Comply</p>
<p>5.3.2 Internal Audit</p>			
<p>5.3.2</p>	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> • Conforms to the requirements in the RSPO Supply Chain 	<p>Procedure for Internal Audit refer to SOP Routine Visit and Internal Audit No.ENC-01-02/04-03-2019/Rev.2 date 18 March 2019.</p> <p>Section 6. Frequency and Timing stipulates the internal audits are conducted at least once a year according to the standards referred to.</p>	<p>Comply</p>

	<p>Certification Standard and the RSPO Market Communications and Claims Documents.</p> <ul style="list-style-type: none"> Effectively implements and maintains the standard requirements within its organisation. <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 organisation shall be able to maintain the internal audit records and reports.</p>	<p>Section 5.4 Implementation of Routine/Internal Audit Visits stipulates: <i>In general, non-conformities in each of the principle and criteria, rules and requirement of the sustainable system are categorized under major, minor and observation. Such findings must be immediately followed up. The unit manager may undertake to implement corrections and may also plan improvements according to result of internal audit. Recommended improvement must be completed with timeframe. A review of the non-compliance found in a previous internal audit should be made on the next visit.</i></p> <p>Internal Audit carried out on 6-7 September 2019, against RSPO P&C 2018 Generic version. The internal auditor assessed Criteria 3.8 related to RSPO SCCS. From Internal Audit dated 6-7 September 2019, there were findings related to:</p> <ul style="list-style-type: none"> - PalmTrace registration and removal – corrective action implemented, closed October 2019; - Management review has not carried out – corrective action implemented, closed October 2019. <p>Audit report evident.</p> <p>Management review dated 4 November 2019 – (10 personnel including Mukomuko POM Manager) as recorded in minutes of meeting:</p> <ul style="list-style-type: none"> • Result of internal audits, covering RSPO Supply Chain Certification Standard: Internal audit for Mukomuko POM carried out on 7-8 September 2019, resulting 2 observation issued, all findings closed. • Customer feedback: No complaint received related to CSPO and/or CSPK product. • Status of preventive and corrective actions: status of preventive and corrective action related to internal audit have been discussed during management review meeting. This including opportunity for improvements. • Follow-up actions from management reviews: To continue consistent implementation of RSPO SCCS for CPO Mill: continued awareness on the requirements and control documented in Supply Chain Certification SOPs and implementatoin of the process on the ground. • Changes that could affect the management system: additional function of safeguarding from PT. SSI – including inspection and checking for transporter. • Recommendations for improvement: <ul style="list-style-type: none"> ○ Propose new work instruction related to FFB delivery and stamping. ○ Immediate application for expiring license/permit. 	
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		<p>The management review output, as recorded in minutes of management review meeting dated 4 November 2019:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes: <ul style="list-style-type: none"> ○ Coordinating with Marketing Department for buyer satisfaction evaluation. ○ Resources needs: the PT. Agro Muko is committed to continue provision of adequate and relevant resources for the implementation, maintenance and improvement of RSPO SCCS requirement. 	
5.4 Purchasing Goods In			
<p>D.4.1/ D.4.2 E.4.1/E.4.2</p>	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	<p>PT. Agro Muko has ensured that certified FFB received are RSPO certified based on the source of FFB. These FFB source are certified under PT. Agro Muko – Mukomuko POM certificate (RSPO 556042). Based on interview with weighbridge clerk and FFB receiving station, Mukomuko POM only received certified FFB from sustainable source: Mukomuko Estate; Sei Betung Estate; Tanah Rekah Estate; Talang Petai Estate; Sei Kiang Estate; Air Manjuntio Estate; and from the Scheme Smallholders: Kebun Masyarakat Desa/KMD and Koperasi Serba Usaha/KSU; Koperasi Produksi Plasma Sungai Tenang Sejahtera. Kebun Masyarakat Desa/KMD, Koperasi Serba Usaha/KSU and Koperasi Produksi Plasma are fully managed by PT. Agro Muko, under each estate.</p> <p>There is no FFB received from other source.</p> <p>Mukomuko POM does not need to check the certificate validity of the FFB source on the RSPO website, because the certification of the FFB suppliers is fall under PT. Agro Muko – Mukomuko POM.</p> <p>PT. Agro Muko – Mukomuko POM has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Chapter 5.2 of the procedure indicates the Weighbridge Clerk has responsibility to input data and print "Receiving Slip" based on FFB Delivery Note, covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT. Agro Muko – Mukomuko POM has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure explains Operating Unit can coordinate to an evaluation with CB about the quota between the OU and the CB.</p> <p>During this annual surveillance assessment, Mukomuko POM was not over sold the CPO and PK production.</p>	<p>Comply</p>

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		<p>PT. Agro Muko – Mukomuko POM has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure explains control of product non-conformity refer to Marketing Department Manual - SOP Customer Complaint Handling No.MKT-03-02/26-04/2018/rev.1 dated 30 April 2018. The procedure covers returned of all non-conforming product and/or documents. The responsible is Operating Unit Manager and Senior Manager Marketing. Based on audit, Mukomuko POM only receive and processed sustainable FFB. There have been no complaint from buyer.</p> <p>Delivery of FFB from Field "SPB" No.TPE/7457 dated 18 October 2019 from Talang Petai Estate, block 00M01A, 01M04A, 08C02A; planting year 2000, 2001, 2008, total 717 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB19027078W, Talang Petai Estate dated 18 October 2019; D/O No.7457; block ID 00M01A, 01M04A, 08C02A; planting year 2000, 2001, 2008; total bunches 717; nett weight 8,610 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No.SKGE/18726 dated 21 October 2019 from Sei Kiang Estate, block 04N06A and 04R06A; planting year 2004; total 312 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB19027357W, Sei Kiang Estate dated 21 October 2019; D/O No.18726; block ID 04N06A and 04R06A; planting year 2004; total bunches 312; nett weight 5,710 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No.TRE/6119 dated 22 October 2019 from Tanah Rekah Estate, block 90B02A; planting year 1990; total 275 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB19027437W, Tanah Rekah Estate dated 22 October 2019; D/O No.6119; block ID 90B02A; planting year 1990; total bunches 275; nett weight 6,210 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No.MME/40726 dated 17 October 2019 from Mukomuko Estate, block 12J03A; planting year 2012; total 450 bunches. Stamp Sustainable Product-IP.</p>	
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		<p>Receiving slip/weighbridge ticket No.FFB19026944W, Mukomuko Estate dated 17 October 2019; D/O No.40726; block ID 12J03A; planting year 2012; total bunches 450; nett weight 5,240 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No.SKGE/18702 dated 18 October 2019 from KMD Lalang Luas (under Sei Kiang Estate), block KMD Lalang Luas; planting year 2008; total 310 bunches. Stamp Sustainable Product-IP.</p> <p>Receiving slip/weighbridge ticket No.FFB19027114W, KMD Lalang Luas dated 18 October 2019; D/O No.18702; block ID KMDLL; planting year 2008; total bunches 310; nett weight 5,050 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No.SBE/81144 dated 21 October 2019 from KMD Bukit Makmur, block KMD Bukit Makmur; planting year 2016; total 700 bunches. Stamp Sustainable Product-IP.</p> <p>Receiving slip/weighbridge ticket No.FFB19027301W, KMD Bukit Makmur dated 21 October 2019; D/O No.81144; block ID KMDBMK; planting year 2016; total bunches 700; nett weight 3,240 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No.TPE/3568 dated 17 October 2019 from KMD Sungai Gading, planting year 2005; total 150 bunches. Stamp Sustainable Product-IP.</p> <p>Receiving slip/weighbridge ticket No.FFB19026940W, KMD Sungai Gading (under Talang Petai Estate) dated 17 October 2019; D/O No.3568; block ID KMDSG; planting year 2005; total bunches 150; nett weight 3,370 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No.TRE/5250 dated 22 October 2019 from KMD Pondok Batu, planting year 2002; total 150 bunches. Stamp Sustainable Product-IP.</p> <p>Receiving slip/weighbridge ticket No.FFB19027435W, KMD Pondok Batu (under Tanah Rekah Estate) dated 22 October 2019; D/O No.5250; block ID KMDPB; planting year 2002; total bunches 150; nett weight 2,960 kg. Stamp Sustainable Product-IP.</p>	
5.5 Outsourcing Activities			
5.5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced	The transport for RSPO certified sustainable CPO and PK delivery were carried out by several contractors. These contractors were appointed, contracted and instructed by PT. Agro Muko.	Comply

	<p>activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organisation (not the tank farm manager).</p>	<p>During transport, legal ownership of CSPO and CSPK are still under PT. Agro Muko. This evident by sales contract that between PT. Agro Muko and the buyer.</p>	
<p>5.5.2</p>	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a) The site has legal ownership of all input material to be included in outsourced processes;</p> <p>b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>During transport, legal ownership of CSPO and CSPK are still under PT. Agro Muko. This evident by sales contract that between PT. Agro Muko and the buyer.</p> <p>Contract:</p> <ul style="list-style-type: none"> - Perjanjian Pengangkutan No.05/Angkutan/CPO/AM/06 between PT. Agro Muko and CV. Usaha Jaya for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended since 1 May 2006) – signed on 26 April 2006. - Perjanjian Pengangkutan No.05/Angkutan/CPO/AM/12 between PT. Agro Muko and CV. Genta Perdana for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended since March 2012) – signed on 5 March 2012. - Addendum No.01/2014 - Perjanjian Pengangkutan No.06/Angkutan/CPO/AM/09 between PT. Agro Muko and PT. Bersama Sejahtera Mandiri (previously UD. Budi Syukur) for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended since 1 December 2009) – signed on 30 April 2014. 	<p>Comply</p>

	<p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	<p>- Addendum No.02/2012 - Perjanjian Pengangkutan No.06/Angkutan/CPO/AM/12 between PT. Agro Muko and PT. Mutia Mulia (previously CV.Mekar Mulia) for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended) – signed on 18 October 2012.</p> <p>PT. Agro Muko – Mukomuko POM has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Section 5.4 Evaluation by Certification Body stipulates the Contractor Control: POM ensures that related contractors in the product supply chain have followed applicable procedures and audited contractors by internal/external if necessary.</p> <p>Means of control by Mukomuko POM: "Buku Pemeriksaan Kendaraan CPO dan PK", sampled: CPO truck No.BH8170NU from PT. Genta Perdana Diandra; inspected to carry CPO from Mukomuko POM to Agro Muko Tank Terminal, dated 11 October 2019. PK truck No.BA8837AU from PT. Mutia Mulia inspected to carry PK from Mukomuko POM to buyer PT. UIP, dated 4 November 2019.</p>																					
<p>5.5.3</p>	<p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products. 5.5.4 The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>CPO Transporter of PT. Agro Muko:</p> <table border="1" data-bbox="1055 887 1924 1177"> <thead> <tr> <th>Contractor</th> <th>Contact Person</th> <th>Telephone</th> <th>Address</th> </tr> </thead> <tbody> <tr> <td>PT. Usaha Jaya Express</td> <td>Ibu Siska</td> <td>085355967779</td> <td>Jl. Olo Ladang No.3 Padang</td> </tr> <tr> <td>PT. Genta Perdana Diandra</td> <td>Ibu Wiwik</td> <td>081374277233</td> <td>Jl. Raya Lubuk Begalung, Gang Sehati 54A, Lubuk Begalung, Padang, Sumatera Barat</td> </tr> <tr> <td>PT. Bersama Sejahtera Mandiri</td> <td>Ibu Sri</td> <td>081372833944</td> <td>Kompleks Pertokoan Sakura Jaya Jalan Raya Bypass KM.6, Padang</td> </tr> <tr> <td>PT. Mutia Mulia</td> <td>Ibu Fitri</td> <td>085263174327</td> <td>Jalan Raya Bypass, Arai Pinang KM.6, Batung Taba, Lubuk Begalung, Kota Padang 25223</td> </tr> </tbody> </table>	Contractor	Contact Person	Telephone	Address	PT. Usaha Jaya Express	Ibu Siska	085355967779	Jl. Olo Ladang No.3 Padang	PT. Genta Perdana Diandra	Ibu Wiwik	081374277233	Jl. Raya Lubuk Begalung, Gang Sehati 54A, Lubuk Begalung, Padang, Sumatera Barat	PT. Bersama Sejahtera Mandiri	Ibu Sri	081372833944	Kompleks Pertokoan Sakura Jaya Jalan Raya Bypass KM.6, Padang	PT. Mutia Mulia	Ibu Fitri	085263174327	Jalan Raya Bypass, Arai Pinang KM.6, Batung Taba, Lubuk Begalung, Kota Padang 25223	<p>Comply</p>
Contractor	Contact Person	Telephone	Address																				
PT. Usaha Jaya Express	Ibu Siska	085355967779	Jl. Olo Ladang No.3 Padang																				
PT. Genta Perdana Diandra	Ibu Wiwik	081374277233	Jl. Raya Lubuk Begalung, Gang Sehati 54A, Lubuk Begalung, Padang, Sumatera Barat																				
PT. Bersama Sejahtera Mandiri	Ibu Sri	081372833944	Kompleks Pertokoan Sakura Jaya Jalan Raya Bypass KM.6, Padang																				
PT. Mutia Mulia	Ibu Fitri	085263174327	Jalan Raya Bypass, Arai Pinang KM.6, Batung Taba, Lubuk Begalung, Kota Padang 25223																				
<p>5.5.4</p>	<p>The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>Audit team made annual visit to Agro Muko Tank Terminal (bulking storage facility), because there is always shipment through AMTT.</p>	<p>Comply</p>																				
<p>5.9 Record keeping</p>																							

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5.9.1	The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	The organization has implemented RSPO Supply Chain Certification Standard based on procedure SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure explains all aspects of supply chain and traceability scope in PT. Agro Muko: FFB harvesting, harvest recording and delivery to Palm Oil Mill; FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for export; Shipping instruction and preparation; CPO and PK stock balancing post-shipping.	Comply
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	The SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019; Section 5.2 Production Process stipulates storage and control of recording related to product sales, transportation until product delivery is stored with minimum period of 5 years.	Comply
5.9.3	The organisation shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	PT. Agro Muko – Mukomuko POM is able to provide estimate volume of CPO and PK in a year period as in “Budget Produksi Bulanan” consists estimate of FFB receiving from Mukomuko Estate, Sei Betung Estate, Sei Kiang Estate, Talang Petai Estate, Tanah Rekah Estate and Scheme Smallholders (KMD and Koperasi). Estimate of FFB volume received and processed in Mukomuko POM for period February 2019 to January 2020 is 263,520.92 MT. Estimated volume for CPO is 60,609.81 MT and estimated volume for PK is 13,439.57 MT.	Comply
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	The organization has implemented SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure explains in all aspects of supply chain and traceability scope in PT. Agro Muko, starting from FFB harvesting, harvest recording and delivery to Palm Oil Mill; FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for export, Shipping instruction and preparation, CPO and PK stock balancing post-shipping. Sample 1: CPO dispatch from Mukomuko POM and receiving in storage tank: Despatch Slip No.CPO19002521W, dated 4 November 2019; from PT. Agro Muko-Mukomuko POM; product CPO; quantity 19,310 MT; D/O No.2019/MM-CPO/DO/191 (party of 230 MT); Certificate RSPO556402; Module Sustainable Product IP; Vehicle No.BA9649QU; Transporter PT. Genta Perdana Diandra;	Comply

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		<p>Receiving Slip No.CPO19004748W dated 5 November 2019; from PT. Agro Muko-Mukomuko POM; product CPO; quantity 19,280 MT; Certificate RSPO556402; Module Sustainable Product IP; Vehicle No.BA9649QU; Transporter PT. Genta Perdana Diandra – goes to Tank No.3</p> <p>Storage tank shipping records MM-POM:</p> <ul style="list-style-type: none"> - Shipping Instruction No.2018/AM-OE/SI/14 dated 20 August 2018. Contract No. PMMO-10144; product CSPO SG; quantity 500 MT (part of 4,000 MT); Shipper PT. Agro Muko, Notify Cargill B.V. NL-1118 CZ Schiphol; vessel MT Houyoushi Express; Destination Rotterdam; Certificate RSPO 556402 and RSPO 646338, valid until 21 February 2021; Module RSPO SG; - Statement of Delivery dated 29 August 2018 – CSPO SG with quantity 3,999.921 MT from tank 8 and tank 3 to MT Houyoushi Express II; - Bill Of Lading No.PAD/ROTT-01; Shipper PT. Agro Muko, Consignee to Order; Notify Cargill B.V. NL-1118 CZ Schiphol; vessel MT Houyoshi Express II V.1801; Destination Rotterdam; product CSPO SG; volume 3,999.921 MT; Certificate RSPO 556402 and RSPO 646338, valid until 21 February 2021; Module RSPO SG; dated 29 August 2018. - TR-89f1516d-5fd7, volume 500 MT CSPO, dated 22 February 2019. 	
E.5.1	<p>a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)</p>	Not applicable.	N/A Not Applicable
5.10 Conversion Factors			
5.10.1	Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past	Conversion rate is applied to provide reliable estimation of CPO and PK produced. For year 2018 and 2019, the budget for conversion from FFB into CPO is 23.00%, whilst from FFB to PK is 5.10%.	Comply

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	experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org).	For actual 2018 (data year todate 20 November 2019), actual conversion ratios from FFB into CPO is 25.51%, whilst from FFB to PK is 4.77%.	
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The actual conversion rates in form of Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in Daily Production Report. Daily Production Report 31 August 2019: FFB restant 325.25 MT; FFB received 999.92 MT; FFB processed 1,040.94 MT; CPO Production 2,653.26 MT; OER 25.97%; PK Production 49.40 MT; KER 4.75%. "Laporan Cek Sounding CPO Storage Tank" – CPO tank sounding, dated 31 August 2019; Reading in Bulk Storage Tank No.1 is 605 cm; in tank No.2 is 520 cm. "Laporan Cek Sounding Kernel Bin Storage" – palm kernel silo sounding, dated 31 August 2019. Reading in silo No.1 is 370 cm; silo No.2 is 233 cm; silo No.3 is 350 cm; silo No.4 is 142 cm;	Comply
Processing D.6	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.	PT. Agro Muko - Mukomuko POM did not receive any non-certified FFB. Therefore, no non-certified FFB being entered the process, no non-certified CPO and PK being produced, no non-certified product being dispatched. Storage tank for CPO dedicated only for certified oil. Silo for PK used to store certified product. Agro Muko Tank Terminal (AMTT) has three dedicated tank to received CPO from Mukomuko and Bunga Tanjung POM. Currently Tank uses for RSPO certified CPO are Tank No.3, No.7 and No.8 (capacity 3,000 MT each). To prevent contamination with other scheme CPO, AMTT has a designated piping system to pump the CPO from Agro Muko to the tanks. Receiving station using dedicated pipe number 3, 4 and 5 for CSPO IP, whilst pipe number 1 and 2 are for other source CPO. Based on field observation and document review (pipe line design and blowing up checklist) that the site was able to reach 100% segregated material through ensuring that non-certified material will always be segregated from unloading material (from Mukomuko POM) up to the dispatching products (to vessel/tanker).	Comply
5.6 Sales and goods out			
5.6.1	The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer; <ul style="list-style-type: none"> The name and address of the seller; 	The SOP SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019 regulated that several information required by the standard have to be available in the sales and goods out document. Sales and goods out documents seen are as follows:	Comply

	<ul style="list-style-type: none"> • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number. • Information 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). • For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. 	<ul style="list-style-type: none"> - Contract No.PMMO-10144 dated 25 January 2018. For 500 MT CSPO in SG; Buyer SIPEF Antwerp; End Buyer Cargill B.V. NL-1118 CZ Schiphol; Seller PT. Agro Muko, Gedung Forum Nine Lt.10, Suite 1-11, Jl Imam Bonjol No.9, Medan 20112; Shipping -; Destination Rotterdam. - Despatch Slip issued by Mukomuko POM No.61/06/AM-MS/18, Ticket No. CPO18001756W, dated 7 August 2018, quantity 18.30 MT from Mukomuko POM to Agro Muko Tank Terminal (AMTT), with truck No.BA9316BU. Product: Crude Palm Oil – Sustainable Product IP, RSPO Certificate No.RSPO556042. Transporter PT. Genta Perdana Diandra (GPD); Seal number: 171029-171031. - Shipping Instruction No.2018/AM-OE/SI/14 dated 20 August 2018. Contract No. PMMO-10144; product CSPO SG; quantity 500 MT (part of 4,000 MT); Shipper PT. Agro Muko, Notify Cargill B.V. NL-1118 CZ Schiphol; vessel MT Houyoushi Express; Destination Rotterdam; Certificate RSPO 556402 and RSPO 646338, valid until 21 February 2021; Module RSPO SG; - Statement of Delivery dated 29 August 2018 – CSPO SG with quantity 3,999.921 MT from tank 8 and tank 3 to MT Houyoushi Express II; - Bill Of Lading No.PAD/ROTT-01; Shipper PT. Agro Muko, Consignee to Order; Notify Cargill B.V. NL-1118 CZ Schiphol; vessel MT Houyoshi Express II V.1801; Destination Rotterdam; product CSPO SG; volume 3,999.921 MT; Certificate RSPO 556402 and RSPO 646338, valid until 21 February 2021; Module RSPO SG; dated 29 August 2018. <p>Informations are complete and presented in several document, e.g. Despatch Slip, Receiving Slip, Shipping Instruction, Contract and Bill of Lading (B/L).</p> <p>The information completely available in the documents:</p> <ul style="list-style-type: none"> • The name and address of the buyer: Cargill B.V. NL-1118 CZ Schiphol; • The name and address of the seller: PT Agro Muko, Gedung Forum Nine Lt.10, Suite 1-11, Jl Imam Bonjol No.9, Medan 20112; • The loading or shipment/ delivery date: 7 August 2018 on Despatch Slip from Mukomuko POM to AMTT, 29 August 2018 on B/L from AMTT to Rotterdam; • The date on which the documents were issued; 7 August 2018 on Despatch Slip from Mukomuko POM to AMTT, 29 August 2018 on Shipping Instruction and B/L from AMTT to Rotterdam; 	
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		<ul style="list-style-type: none"> • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Palm Oil – Sustainable Product IP on Despatch Slip, Crude Palm Oil RSPO SG on B/L; • The quantity of the products delivered; 3,999.921 MT on B/L; • Any related transport documentation: - Bill of Lading (B/L) No.PAD/ROTT-01; • Supply chain certificate number of the seller; RSPO Certificate No. RSPO 556042 on Despatch Slip; • A unique identification number: CPO18001756W on Despatch Slip, 	
5.7 Registration of Transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> • Are mills, traders, crushers and refineries; and • Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	<p>PT. Agro Muko – Mukomuko POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000001278.</p>	Comply
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping Announcement / Announcement is based on members' own standard operating procedures.</p> <p>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation</p>	<p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, PT. Agro Muko – Mukomuko POM has made Shipping Announcement for certified CPO and PK sold.</p> <p>For example:</p> <ul style="list-style-type: none"> - Shipping Announcement transaction ID TR-b87baf75-be96 dated 4 February 2019; for 200 MT CSPK IP; from PT. Agro Muko – Mukomuko POM as Seller to Buyer PT. Usaha Inti Padang. - Shipping Announcement transaction ID TR-87c88152-b7ca dated 15 July 2019; for 2,999.98 MT CSPO SG; from PT. Agro Muko – Mukomuko POM as Seller to PT. Wira Inno Mas. <p>PT. Agro Muko – Mukomuko POM is producing sustainable CPO and PK. The RSPO P&C certification scope does not go beyond refinery. Not applicable.</p>	Comply

	<p>of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</p> <p>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</p> <p>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</p>	<p>PT. Agro Muko - Mukomuko POM has done "Remove" in the RSPO IT Platform for CSPK sold as other scheme (ISCC or conventional), e.g.:</p> <ul style="list-style-type: none"> - Transaction ID: ST-TR-02592699-c126; dated 13 November 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 400 MT. - Transaction ID: ST-TR-68292673-03a1; dated 9 October 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 89.7 MT. - Transaction ID: ST-TR-edd23b39-6685; dated 9 October 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 510.3 MT. - Transaction ID: ST-TR-a856e6a0-7a60; dated 2 October 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 500 MT. - Transaction ID: ST-TR-ffd96cfb-c675; dated 2 October 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 500 MT. - Transaction ID: ST-TR-b48ae37e-9b02; dated 2 October 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 9.36 MT. - Transaction ID: ST-TR-a48dbf21-966a; dated 2 October 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 498.85 MT. - Transaction ID: ST-TR-497d4d17-9dc8; dated 2 October 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 790.64 MT. - Transaction ID: ST-TR-576b2beb-e8e9; dated 2 October 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 3.48 MT. <p>Remove of CSPO:</p> <ul style="list-style-type: none"> - Transaction ID: ST-TR-40474351-1db8; dated 15 October 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 9,999.96 MT. - Transaction ID: ST-TR-77a25dd5-ce78; dated 9 October 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 0.23 MT. - Transaction ID: ST-TR-9987c438-20f3; dated 2 October 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 0.61 MT. - Transaction ID: ST-TR-e20cb15a-9e7d; dated 2 October 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 0.24 MT. <p>Total PK volume removed: 3,302.33 MT Total CPO volume removed: 10,001.04 MT</p> <p>PT. Agro Muko – Mukomuko POM is a palm oil mill, which does not need to confirm any purchase of FFB.</p>	
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5.11 Claims			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	PT. Agro Muko – Mukomuko POM has not made any claim regarding the use of or support of RSPO certified oil palm products. The organization has good understanding on the RSPO Rules on Market Communications and Claims.	Comply
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.	PT. Agro Muko is a subsidiary of RSPO registered member, SIPEF Group. SIPEF Group, the parent company of PT Agro Muko is highlighting its commitment to the principles of RSPO – therefore making an off product communication. The corporate communication of SIPEF Group can be seen in the corporate website: www.sipef.com .	Comply
4.2	In corporate communications a member is allowed to: <ol style="list-style-type: none"> Display its RSPO membership status Display the RSPO web address (www.rspo.org) State that the member supports the work of the RSPO State the member's history with regard to the RSPO. Use the RSPO trademark to promote its membership of the RSPO. 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.	Corporate communication in SIPEF Group website: <ol style="list-style-type: none"> Display its RSPO membership status: No, SIPEF did not display its RSPO membership status. Display the RSPO web address: Not in direct manner. SIPEF made a link to RSPO website. State the member supports the work of the RSPO: Not in direct manner. In the website, SIPEF wrote "We believe in a landscape approach to new oil palm developments, guided by the methodology endorsed by the RSPO". State the member's history with regards to the RSPO: No. SIPEF did not state their history with regards to the RSPO. Use of RSPO Trademark to promote its membership of the RSPO: No, SIPEF did not use RSPO trademark in its corporate communication such in website.	Comply
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.	No, SIPEF did not display its RSPO membership status. It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Comply
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the	No, SIPEF did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the SIPEF's own products.	Comply

	certified content of oil palm products in the member's own products.		
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.	No, SIPEF Group did not display the RSPO Corporate Logo in the website as well as in the correspondence letter.	Comply
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.	PT. Agro Muko stating RSPO SG in the sales document. The RSPO SG notation adhere to the requirements of RSPO SCCS. PT. Agro Muko – Mukomuko POM and Bunga Tanjung POM is certified against RSPO P&C and comply to the RSPO SCCS for CPO Mills – Module D: Identity Preserved. All of the palm oil mills managed to demonstrate integrity of supply chain against the identity preserved system. During sales of CSPO and CSPK, PT. Agro Muko made clear the product is Segregated. Because at the point of shipping, all identity preserved oil palm product have been mixed between Certificate Holder's palm oil mills.	Comply
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.	PT. Agro Muko stating RSPO SG in the sales document. The RSPO SG notation adhere to the requirements of RSPO SCCS. PT. Agro Muko – Mukomuko POM and Bunga Tanjung POM is certified against RSPO P&C and comply to the RSPO SCCS for CPO Mills – Module D: Identity Preserved. All of the palm oil mills managed to demonstrate integrity of supply chain against the identity preserved system. During sales of CSPO and CSPK, PT. Agro Muko made clear the product is Segregated. Because at the point of shipping, all identity preserved oil palm product have been mixed between Certificate Holder's palm oil mills.	Comply
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case	PT. Agro Muko – Mukomuko POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFB into CPO and PK. Not Applicable.	N/A

	<p>of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT. Agro Muko – Mukomuko POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached.</p> <p>Not applicable.</p>	N/A
Business to consumer communication			
6.1	<p>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.</p>	<p>PT. Agro Muko – Mukomuko POM is an RSPO certificate holder with certificate number RSPO 556042 valid until 21 February 2021. The certificate holder sold its oil palm product in bulk, no product label attached. No 'product-specific' claims are used.</p> <p>Not applicable.</p>	N/A
6.2	<p>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.</p>	<p>PT. Agro Muko – Mukomuko POM is an RSPO certificate holder with certificate number RSPO 556042 valid until 21 February 2021. The certificate holder sold its oil palm product in bulk, no product label attached. No RSPO trademark and/or RSPO label claims are used.</p> <p>Not applicable.</p>	N/A

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.	PT. Agro Muko – Mukomuko POM sold its oil palm product in bulk, no product pack are used. Not applicable.	N/A
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	PT. Agro Muko – Mukomuko POM communication has not stated information about the claimant’s RSPO membership status.	Comply
6.5	Members shall not communicate to consumers information about their suppliers’ RSPO membership status.	PT. Agro Muko – Mukomuko POM is certified RSPO P&C, selling CSPO and CSPK. PT Agro Muko and the parent compant - SIPEF Group did not make any communication about their supplier’s RSPO membership status.	Comply
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.	The site sold its oil palm product in bulk, up to this moment, PT. Agro Muko – Mukomuko POM has not use RSPO trademark.	Comply
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.	Up to this moment, PT. Agro Muko - Mukomuko POM has not use any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products.	Comply
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 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	PT. Agro Muko - Mukomuko POM is not a retailer or food service company. Not applicable.	N/A

	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.rspo.org .		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	The General Chain of Custody requirements of the RSPO Supply Chain Standard is applicable for PT. Agro Muko – Mukomuko Palm Oil Mill (POM). Mukomuko POM physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK). Mukomuko POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module D - CPO Mills: Identity Preserved.	Comply
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	PT. Agro Muko stating RSPO SG in the sales document. The RSPO SG notation adhere to the requirements of RSPO SCCS. PT. Agro Muko – Mukomuko POM and Bunga Tanjung POM is certified against RSPO P&C and comply to the RSPO SCCS for CPO Mills – Module D: Identity Preserved. Whenever PT. Agro Muko made ans SG claims, it was combination of IP from Mukomuko POM and IP from Bunga Tanjung POM. All of the palm oil mills managed to demonstrate integrity of supply chain against the identity preserved system. During sales of CSPO and CSPK, PT. Agro Muko made clear the product is Segregated. Because at the point of shipping, all identity preserved oil palm product have been mixed between Certificate Holder’s palm oil mills.	Comply
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	PT. Agro Muko managed to demonstrated that the traceability is intact throughout the supply chain. There is no percentage of non-certified oil palm contaminating/ commingling with the certified product.	Comply
Labelling and trademark (IP)			

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	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ol style="list-style-type: none"> RSPO trademark which includes the tag 'CERTIFIED' or RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	<p>PT. Agro Muko – Mukomuko POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached.</p> <p>Not applicable.</p>	<p>N/A</p>
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org 	<p>Up to this moment, PT. Agro Muko - Mukomuko POM has not use any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products.</p> <p>PT. Agro Muko – Mukomuko POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached.</p> <p>Not applicable.</p>	<p>N/A</p>

	<ul style="list-style-type: none"> References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 		
<p>Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<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, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>The company has policies related to Human Rights as outlined in Policy No. QMM-40-01-P02 (Human Right Policy) dated 27 March 2019 which stated the company recognizes that Human Rights are universal and apply to all, without any form of distinction. The company supports the implementation of the international of Human Rights, and of the ILO Declaration on Fundamental Principles and Rights at work, as they are transcribed into the laws and regulations of the Republic of Indonesia.</p> <p>Based on interviews with the Security contractor (SSI), worker union, KMD Committee and the surrounding community, stated that the company did not conduct intimidation practices to employees or the surrounding community by using security personnel (Security/SSI) or others.</p> <p>Based on document verification, it shows that Management has disseminate Human Rights policies through:</p> <ol style="list-style-type: none"> Post the policy on the bulletin board in each estate/mill office. Conducting direct dissemination to workers, especially to security contractors (SSI), for example; <ul style="list-style-type: none"> Dissemination to SSI members of Sei Kiang Estate on 26 October 2019, attended by 6 Participants. Dissemination to Mukomuko POM employees on 9-11 September, which was attended by 132 workers. Dissemination to Sei Kiang Estate Employees on 23 September 2019, which was attended by 16 workers. Dissemination to Talang Petai Estate Employees on 6 September 2019, which was attended by 29 workers. 	<p>Comply</p>

4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	<p>Based on interviews with the Security contractor (SSI), worker union, KMD Committee and the surrounding community, stated that the company did not conduct intimidation practices to employees or the surrounding community by using security personnel (Security/SSI) or others.</p> <p>Based on document verification, it shows that Management has disseminate Human Rights policies through:</p> <ol style="list-style-type: none"> 1. Post the policy on the bulletin board in each estate/mill office. 2. Conducting direct dissemination to workers, especially to security contractors (SSI), for example; <ul style="list-style-type: none"> • Dissemination to SSI members of Sei Kiang Estate on 26 October 2019, attended by 6 Participants. • Dissemination to Mukomuko POM employees on 9-11 September, which was attended by 132 workers. • Dissemination to Sei Kiang Estate Employees on 23 September 2019, which was attended by 16 workers. • Dissemination to Talang Petai Estate Employees on 6 September 2019, which was attended by 29 workers. 	Comply
<p>Criteria 4.2</p>			
<p>There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>			
4.2.1	(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 whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	<p>The company already has a mechanism for resolving disputes consisting of:</p> <ol style="list-style-type: none"> a. Land dispute refers to the mechanism of land dispute resolution as stipulated in "Land and Planting Compensation inside Location Permit of the Company" No. LCA-01-01/01-02-2018/Rev.0, dated 18 February 2018, it shows that the company has provided effective resolution of land dispute resolution as follows: <ul style="list-style-type: none"> - The company disseminates company location permits/HGU to the public. - If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership. - Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out. - Field surveys and land measurements involve companies, claimants and government representatives. 	Comply

		<ul style="list-style-type: none"> - Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties. - Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims. - If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation. - If a compensation price agreed, the company will pay the compensation to the land owner. <p>b. Resolution of Internal Complaint refers to the Internal Grievance mechanism (HRD-04-01/01-04-2019/Rev.1) dated 5 April 2019.</p> <p>c. Resolving external complaints refers to the External Grievance mechanism (HRD-04-02/19-02-2019/Rev.0) dated 19 February 2019.</p> <p>d. Whistleblowing policy refers to company policy No. QMM-40-01-P16 (Whistleblowing Policy) dated 14 January 2019.</p> <p>All SOPs and Company Policies are available in two languages, English and Indonesian, which can be understood by the parties.</p>	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	<p>All SOPs and Company Policies are available in two languages, English and Indonesian, which can be understood by the parties.</p> <p>Based on document verification, it shows that the Management has disseminate the mechanism of land dispute resolution, Internal Grievance, External Grievance and Whistleblowing Policy mechanisms through:</p> <ol style="list-style-type: none"> 1. Post the policy on the bulletin board in each estate/mill office. 2. Conducting direct dissemination to workers, especially to security contractors (SSI), for example; <ul style="list-style-type: none"> • Dissemination to SSI members of Sei Kiang Estate on 26 October 2019, attended by 6 Participants. • Dissemination to Mukomuko POM employees on 9-11 September, which was attended by 132 workers. • Dissemination to Sei Kiang Estate Employees on 23 September 2019, which was attended by 16 workers. 	Comply

		<ul style="list-style-type: none"> Dissemination to Talang Petai Estate Employees on 6 September 2019, which was attended by 29 workers. 	
<p>4.2.3</p>	<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>The company already has a mechanism for resolving disputes consisting of:</p> <ol style="list-style-type: none"> Land dispute refers to the mechanism of land dispute resolution as stipulated in "Land and Planting Compensation inside Location Permit of the Company" No. LCA-01-01/01-02-2018/Rev.0, dated 18 February 2018, it shows that the company has provided effective resolution of land dispute resolution as follows: <ul style="list-style-type: none"> The company disseminates company location permits/HGU to the public. If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership. Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out. Field surveys and land measurements involve companies, claimants and government representatives. Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties. Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims. If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation. If a compensation price agreed, the company will pay the compensation to the land owner. Resolution of Internal Complaint refers to the Internal Grievance mechanism (HRD-04-01/01-04-2019/Rev.1) dated 5 April 2019. Resolving external complaints refers to the External Grievance mechanism (HRD-04-02/19-02-2019/Rev.0) dated 19 February 2019. Whistleblowing policy refers to company policy No. QMM-40-01-P16 (Whistleblowing Policy) dated 14 January 2019. <p>Based on document verification, it shows that the Management has disseminate the mechanism of land dispute resolution, Internal Grievance, External Grievance and Whistleblowing Policy mechanisms through:</p> <ol style="list-style-type: none"> Post the policy on the bulletin board in each estate/mill office. 	<p>Comply</p>

		<p>2. Conducting direct dissemination to workers, especially to security contractors (SSI), for example;</p> <ul style="list-style-type: none"> • Dissemination to SSI members of Sei Kiang Estate on 26 October 2019, attended by 6 Participants. • Dissemination to Mukomuko POM employees on 9-11 September, which was attended by 132 workers. • Dissemination to Sei Kiang Estate Employees on 23 September 2019, which was attended by 16 workers. • Dissemination to Talang Petai Estate Employees on 6 September 2019, which was attended by 29 workers. 	
<p>4.2.4</p>	<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>At the moment the company does not made any compensation process to the surrounding community. All of the land used by Mukomuko POM & Supply Base is free land controlled by the state, however, some of them have been cultivated in form of plantations and agriculture. Based on the document verification, it shows that the records of the completion of the arable land compensation are well documented by the Legal department, where each document has been completed with maps of joint measurements results, for example;</p> <ol style="list-style-type: none"> 1. GRTT document (Compensation for Growing Crops) that was carried out in 2013 has been implemented to Mr. Amin S. who owns an area of 1.14 Ha and Mr. Zakaria who has a land area of 1.36 Ha, both of whom are residents of Air Merah Village. The Document includes a Certificate of Land Ownership that is known by the Village Head and Sub-District Head; a Land Compensation Statement made by both parties and witnessed by each parties and known by the Head of the Village and Sub-District Head; Letter of release made by both parties, known by the Head of Air Merah Village and Sub-District Head Malin Deman; Map of measurement results with a scale of 1:2500 known by the Head of Air Merah Village. The process of compensation negotiation is outlined in the Land Acquisition Compensation Certificate including the agreed compensation value. Payment to the recipient is carried out through "Bank Bengkulu", Ipuh Sub-Branch on 15 July 2013 with No. A/C; 501-01.07.00030-6 worth Rp. 37,620,000, - for Mr. Amin S. and worth Rp. 44,880,000 for Mr. Zakaria. The document also comes with photos of the compensation handover process. 2. Document of land compensation process that carried out in 2016 was documented in GRTT Document (Compensation for Growing Crops) No.30, carried out to Mr. Ali Mikir with an area of 2.51 Ha, villagers of Talang Baru village. The Document 	<p>Comply</p>

		<p>includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Realease on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results with a scale of 1: 1,500 known by the Village Head of Talang Baru, 27 January 2016. The Negotiation Process of compensation is outlined in the Land Compensation Certificate including the agreed compensation value, on 11 February 2016. Payments to the recipient was carried out through "Bank Bengkulu", Ipuh Sub-Branch on 11 February 2016, valued at Rp.107,930,000 for Mr. Ali Mikir. The document also comes with photos of the compensation handover.</p> <p>3. Document of the GRIT (Compensation for Growing Crops) No.15 to Mr. Edi Mansur, a resident of Talang Baru village, with an area of 0.65 Ha. The Document includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Release on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results together with a scale of 1: 1,500 known by the Village Head of Talang Baru, 26 January 2016. The Negotiation Process for compensation is outlined in the Land Compensation Certificate including the agreed compensation value, on 11 February 2016. Payment to the recipient was carried out through "Bank Bengkulu", Ipuh Sub-Branch on 11 February 2016 worth Rp.27,950,000 for Mr. Edi Mansur. The document also comes with photos of the compensation handover.</p> <p>Based on interviews with local community leaders, they stated that they had received growth compensation payments carried out by management before carrying out oil palm development.</p>	
<p>Criteria 4.3 The unit of certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated.	There is a program to improve the quality of life and beneficial environment, both for Plantation Companies or local and general communities as stipulated in the Community Development and Corporate Social Responsibility program of each Estate, for example "Community Development and Corporate Social Responsibility Program" Muko-Muko Estate 2019 consists of 9 types of activities, namely:	Comply

		<ol style="list-style-type: none"> 1. Education 2. Health 3. Infrastructure; Repair of public facility buildings, repair of village trenches, construction of public toilets in schools, renovation of worship facilities 4. Agriculture 5. Micro and Small Enterprises 6. Sports; Maintenance of sports facilities, provision of facilities by the surrounding village sports facilities 7. Art 8. Religious; Religious assistance, breaking the fast and Ramadan gifts 9. Socio-economic <p>The realization of social activities up to April 2019 is as follows;</p> <ol style="list-style-type: none"> 1. Heavy equipment aid for hoarding the area outside the football field of Baru V Koto Village which was submitted on 14 January 2019 as recorded in the Minutes of Handover of Assistance signed by the Chairperson of Karang Taruna Dusun Baru V Koto. 2. Heavy equipment aid for the maintenance of Air Dikit Village football field as stated in Official Report on aid handover dated 25 January 2019, which was signed by Air Dikit Village Head. 3. Repair of Sari Bulan Village Trench that were carried out in January 2019 as evidence by the handover dated 29 January 2019, which was signed by Sari Bulan Village Head. 4. Providing material assistance for the construction of Air Dikit SDN 01 (Elementary School), at Pondok Lunang Village as stated in the Official Report on the Handover dated 18 February 2019, which was signed by the Principal of SDN 01 Air Dikit. 	
<p>Criteria 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.</p>			
<p>4.4.1</p>	<p>(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.</p>	<p>PT. Agro Muko (AM): Company has a legal ownership of the land, in form of "Hak Guna Usaha/HGU" – land title, as demonstrated.</p> <ol style="list-style-type: none"> 1. "Hak Guna Usaha (HGU) No.31/HGU/BPN/89", based on "Keputusan Kepala Badan Pertanahan Nasional No.31/HGU/BPN/89 tentang Pemberian Hak Guna Usaha atas Nama PT. Tri Aqgra Persada, seluas 10,315 Ha di Desa Air Dikit, Pondok Lunang, 	<p>Comply</p>

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		<p>Desa Baru, Sari Bulan, Penarik, Teras, Terunjam, Lubuk Sahung, Seri Bungkal, Sungai Jerinjing, Pondok Baru, Sungai Ipuh, Sungai Gading, Talang Petai dan Sungai Lintang, Kecamatan Mukomuko Utara, Kabupaten Bengkulu Utara, Propinsi Bengkulu - Seluas 10,000 Ha” dated 27 June 1989. HGU valid since registered and ends in 31 December 2019. “Kantor Pertanahan Kabupaten Mukomuko” issued HGU Certificate:</p> <ul style="list-style-type: none"> - “Sertifikat HGU No.02/MU” for area of 2,270 Ha, dated 27 June 1989 valid until 31 December 2019. Based on “Surat Ukur No.04/PT/1988 seluas 2.270 ha, dilengkapi peta HGU skala 1:20,000 No.04/PT/1988”, dated 1 Agustus 1988; - “Sertifikat HGU No.03 untuk lahan 7,730 Ha, di Desa Air Dikit, Pondok Lunang, Dusun Baru, Sari Bulan, Penarik, Teras Terunjam, Lubuk Sahung, Surian Bungkal, Sungai Jerinjing, Pondok Baru, Sungai Ipuh, Sungai Gading” dated 18 March 1991 and valid until 31 December 2019. Based on “Surat Ukur No.13/PT/1990, seluas 7,730 Ha, dilengkapi peta HGU skala 1:50,000 No.13/PT/1990”, dated 9 November 1990. <p>All of the area under HGU No.31/HGU/BPN/89 was allocated: 3,786.20 Ha for Mukomuko Estate; 923.52 Ha for Sei Betung Estate; 1,749.00 Ha for Tanah Rekah Estate; 2,270 Ha for Talang Petai Estate - supply base to Mukomuko POM.</p> <p>There is a note, related to hectarage deviation in the HGU decree and certificate, whereby in the decree written 10,350 Ha and total hectarage under HGU certificate 10,000 Ha. This occured because the 350 Ha has been released from the HGU into “Hak Guna Bangunan/HGB Industri Pengolahan Kelapa Sawit” – see explanation on HGB Mukomuko POM.</p> <p>With regards to the validity of HGU in year 2019, company has applied for extension to “Kantor Pertanahan Kabupaten Mukomuko” through letter “Surat Permohonan Perpanjangan Sertifikat HGU No.G.199/2017 atas Sertifikat HGU No.02/MU” and “Surat Permohonan Perpanjangan Sertifikat HGU No.G.199/2017 atas Sertifikat HGU No.03” dated 6 March 2017. During assessment, the process has been progressed. The process of HGU extension has been performed by the company and accepted by Land Office of Mukomuko Regency. The area under HGU has been re-measured “Pengukuran Bidang Tanah” by “Badan Pertanahan Nasional (BPN) Pusat” oin 2017 as pre-requisite for HGU extension. Land Office of Mukomuko Regency has submit letter to the Land Office of Bengkulu Province No.405/100-17.16/IX/2019 dated 20 September 2019, regarding proposal for extension of HGU No.02/MU covers</p>	
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		<p>2,269.3205 Ha located in District of V Koto, Teras Terunjam and Selagan Raya; and letter No.450/100-17.16/X/2019 dated 23 October 2019, regarding proposal for extension of HGU No.03 covers 7,730 Ha located in District of Air Dikit, Teras Terunjam, Penarik and Selagan Raya. It also available letter from Land Office of Bengkulu Province to Miniters of Agraria and Spatial (Chairman of National Land Office) No.1363/SP-300.HP.01/X/2019 dated 31 October 2019, comprise all required document for HGU extension. Regarding this HGU extension which is still in process, the Company has obtained recommendation letter from Regent of Mukomuko Regency to continue investment and operational activities, based on letter No.750/389/A.1/XII/2019 dated 14 December 2019.</p> <p>Utilization of HGU No.31/HGU/BPN/89, dated 27 June 1989 with an area of 10,000 Ha is as follows:</p> <ul style="list-style-type: none"> • Mukomuko Estate: 3,786.20 Ha • Sei Betung Estate: 923, 52 Ha • Land Rekah Estate: 1,749.00 Ha • Talang Petai Estate: 2,270.00 Ha • Sei Jerinjing: 1,271.28 Ha (Rubber Plant) <p>The whole area of HGU No.31/HGU/BPN/89 mentioned above becomes the Supply Base of Muko-Muko POM.</p> <p>2. "Hak Guna Usaha (HGU) No.09/HGU/BPN/93, seluas 5,786.03 Ha" dated 8 March 1993. The HGU based on "Surat Keputusan Kepala Badan Pertanahan Nasional No.9/HGU/BPN/93 tentang Pemberian Hak Guna Usaha atas nama PT. Agronusa Raflesia atas tanah di Kabupaten Bengkulu Utara seluas 5,800 Ha dalam peta situasi tanggal 16 Desember 1988 No.12/PT/1988 tanggal 15 Mei 1989 No.09/PT/1989, tanggal 20 Desember 1989 No.23/PT/1989 (sebagian) terletak di Desa Pasar Mukomuko, Desa Tanah Rekah, Desa Lalang Luas dan Desa Penarik, Kecamatan Mukomuko Utara, Kabupaten Bengkulu Utara, Propinsi Bengkulu". The HGU valid from 8 March 1993 until 31 December 2022. As a follow up, "Kantor Pertanahan Kabupaten Mukomuko" issued certificate, which consist of:</p> <ul style="list-style-type: none"> - "Sertifikat HGU No.U.30 Desa Lalang Luas" for area of 2,185 Ha, valid until 31 December 2022. Based on "Surat Ukur No.09/PT/1989 seluas 2,185 Ha", completed with HGU map scale 1:25,000, dated 15 May 1989; revised area 2,171 Ha. 	
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		<ul style="list-style-type: none"> - "Sertifikat HGU No.U.31 Desa Penarik" for area of 1,515 Ha, under name PT Agronusa Rafflesia. Based on "Surat Ukur No.65/1993 seluas 1,515 Ha", dated 10 December 1993; - "Sertifikat HGU No.U.32 Desa Pasar Mukomuko dan Desa Tanah Rekah" for area of 2,100 Ha, valid until 31 December 2022. The certificate based on "Surat Ukur No.12/PT/1988 seluas 2,100 Ha, dated 16 December 1988". Completed with HGU map scale 1:25,000. <p>All of the 5,786.03 Ha area under HGU No.09/HGU/BPN/93 was allocated: 686.60 Ha for Sei Betung Estate; 828.40 Ha for Tanah Rekah Estate; 2,171.03 Ha for Sei Kiang Estate - supply base to Mukomuko POM.</p> <p>3. Air Manjunto Estate uses PT Mukomuko Agro Sejahtera (MMAS) HGU as per HGU Decree for Location Permit No.700-212, dated 18 March 2014 covering + 1,800 Ha through Minister of Agrarian/Head of BPN Decree No.93/HGU/KEM-ATR/BPN/2018 dated 18 October 2018 concerning Granting of Cultivation Rights (HGU) on behalf of PT MMAS on land in Mukomuko Regency, Bengkulu Province.</p> <p>Mukomuko POM: Muko-Muko POM had a basis for land rights in the form of the "Hak Guna Bangunan" (HGB) based on "Keputusan Gubernur Kepala Daerah Tingkat I Bengkulu No.1 tahun 1991 tentang Pemberian hak Guna Bangunan atas Tanah Seluas 315 ha kepada PT Agro Muko", dated 18 Februari 1991. The right includes utilization for waste treatment ponds, offices, employee housing, workshops, warehouses, religious facilities, sports facilities and conservation forests (artificial) as a buffer of waste which is then issued HGB Certificate: No.01 in Teras Terunjam Village; based on the situation map No.12/PT/1990, dated 9 November 1990, covering an area of 315 ha.</p> <p>The HGB Decree is a partial release of HGU Certificate No.01/ MU dated July 10, 1989. The rights expired on 18 March 2011. The HGB Decree above has been extended in accordance with the Decree of the Head of BPN No.2/HGB/BPNRI/2011 dated 26 April 2011 with a period of 20 years up to 18 March 2031. The extension has been registered to Mukomuko Regency Land Office through "Daftar Isian 307 No.1400/2011" and "Daftar Isian 208 No.617/2011" dated 4 May 2011.</p> <p>Tanah Rekah Estate:</p>	
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		<p>Tanah Rekah Estate uses land within 2 HGU, namely:</p> <ul style="list-style-type: none"> - HGU in accordance with Surat Keputusan Kepala Badan Pertanahan Nasional (BPN) No. 09/HGU/BPN/93 dated 8 March 1988 which was later issued HGU Certificate by Kantor Pertanahan Kabupaten Bengkulu Utara No.32 dated 20 May 1994 on behalf of PT Agronusa Raflesia covering an area of 2,100 Ha (based on Land Map No.12/PT/1988, dated 16 December 1988). The area of HGU used for Tanah Rekah Estate is 828.40 Ha. - Based on Decree of the Head of the National Land Agency No.31/HGU/BPN/89 regarding Granting of Cultivation Rights on behalf of PT Tri Aqgra Persada, covering an area of 10,315 Ha which was then issued HGU Certificate No.03 for 7,730 Ha. The area of HGU used for Tanah Rekah Estate is 1,749 Ha. <p>Talang Petai Estate: Talang Petai Estate uses land under Decree of the Head of the National Land Agency No.31/HGU/BPN/89 regarding Granting of Cultivation Rights on behalf of PT Tri Aqgra Persada, covering an area of 10,315 Ha which was then issued HGU Certificate No.02/MU for area of 2.270 Ha.</p> <p>KMD dan Koperasi Based on document verification and interviews with the community, it was noted that there were several types of KMD/Cooperative land ownership that became the Mukomuko POM supply base, namely:</p> <ol style="list-style-type: none"> 1. Village land submitted to the company for the development of KMD, legal ownership of the land in form of "Surat Keterangan Tanah" (SKT) which is currently in the process of submitting a Land Rights Certificate to Mukomuko District Land Office, e.g. KMD Lubuk Pinang. 2. Land purchased by the village government from the villagers through the KMD development program with PT Agro Muko and then handed over to the company to be build "Kebun Masyarakat Desa" (KMD), e.g. KMD Talang Petai, KMD Tunggal Jaya and KMD Setiabudi. This land is also in the process of submitting a Land Rights Certificate by the Village to the Mukomuko District Land Office. 3. Private villagers' land which is cooperated with the village government to be develop KMD PT Agro Muko. The form of land ownership is in the form of SKT or Sertifikat Hak Milik (SHM). Residents who own the land get a share of the FFB sold to PT Agro Muko in accordance with the agreement. 	
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		<p>4. Land owned by each member of the cooperative to be incooperated with PT Agro Muko, e.g. Koperasi Produksi Plasma Sungai Tenang Sejahtera consisting of 98 parcels with total area of 87.77 Ha. As well as KOPABA, the land owned by each member is combined in the Cooperative and then cooperated with PT Agro Muko.</p> <p>Partnership in development of KMD/Koperasi are stated in the Work Agreement Letter for example: Mukomuko Estate has 4 collaborative agreement in KMD developments, for example:</p> <ol style="list-style-type: none"> 1. "Surat Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit antara Pemerintah Desa Bukit Makmur dengan Manajemen PT Agro Muko" dated 19 June 2015 for the development of KMD Bukit Makmur covering an area of 10 hectares according to Land Certificate No. 593.2/01-05/BKM/2015 Desa Bukit Makmur. Valid until 30 June 2040. 2. Sei Betung Estate has 15 Cooperation Agreement related KMD development with surrounding village communities, e.g.: <ul style="list-style-type: none"> • "Perjanjian Kerjasama Panitia Kebun Masyarakat Desa Sungai Ipuh dengan PT Agro Muko" dated 1 October 2015 for the development of KMD Sungai Ipuh with an area of 15 Ha. • "Perjanjian Kerjasama Panitia Kebun Masyarakat Desa Pondok Suguah dengan PT Agro Muko", Agreement Letter related KMD Pondok Suguah PT Agro Muko dated 1 November 2000 for the development of KMD Pondok Suguah with an area of 10 Ha. • "Perjanjian Kerjasama No. 05/PKS/GMO/II/2012 tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit antara Pemerintah Desa Setia Budi dengan Manajemen PT Agro Muko" dated 28 February 2012 for the development of KMD Setia Budi, covering an area of 10 hectares according to Land Certificate No. 595.3/75-79/SKT/SID/E.10/2010 for Setia Budi Village. The term of the agreement is 25 years from the signing of the Agreement. • "Perjanjian Kerjasama No. 10/PKS/GMO/II/2012 Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit antara Pemerintah Desa Aur Cina dengan Manajemen PT Agro Muko" dated 28 February 2012 for the development of 10 Ha KMD Aur Cina based on Land Certificate No.595.3/52-57/SKT/SID/E.10/2010 for Aur China Village. The term of the agreement is 25 years from the signing date of the Agreement. 	
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<p>4.4.2</p>	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>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</p>	<p>At the moment the company does not made any compensation process to the surrounding community. All of the land used by Mukomuko POM & Supply Base is free land controlled by the state, however, some of them have been cultivated in form of plantations and agriculture. Based on the document verification, it shows that the records of the completion of the arable land compensation are well documented by the Legal department, where each document has been completed with maps of joint measurements results, for example;</p> <ol style="list-style-type: none"> 1. GRTT document (Compensation for Growing Crops) that was carried out in 2013 has been implemented to Mr. Amin S. who owns an area of 1.14 Ha and Mr. Zakaria who has a land area of 1.36 Ha, both of whom are residents of Air Merah Village. The Document includes a Certificate of Land Ownership that is known by the Village Head and Sub-District Head; a Land Compensation Statement made by both parties and witnessed by each parties and known by the Head of the Village and Sub-District Head; Letter of release made by both parties, known by the Head of Air Merah Village and Sub-District Head Malin Deman; Map of measurement results with a scale of 1:2500 known by the Head of Air Merah Village. The process of compensation negotiation is outlined in the Land Acquisition Compensation Certificate including the agreed compensation value. Payment to the recipient is carried out through "Bank Bengkulu", Ipuh Sub-Branch on 15 July 2013 with No. A/C; 501-01.07.00030-6 worth Rp. 37,620,000, - for Mr. Amin S. and worth Rp. 44,880,000 for Mr. Zakaria. The document also comes with photos of the compensation handover process. 2. Document of land compensation process that carried out in 2016 was documented in GRTT Document (Compensation for Growing Crops) No.30, carried out to Mr. Ali Mikir with an area of 2.51 Ha, villagers of Talang Baru village. The Document includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Realease on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results with a scale of 1: 1,500 known by the Village Head of Talang Baru, 27 January 2016. The Negotiation Process of compensation is outlined in the Land Compensation Certificate including the agreed compensation value, on 11 February 2016. Payments to the recipient was carried out through "Bank Bengkulu", Ipuh Sub-Branch on 11 February 2016, valued at Rp.107,930,000 for Mr. Ali Mikir. The document also comes with photos of the compensationhandover. 	<p>Comply</p>
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		<p>3. Document of the GRIT (Compensation for Growing Crops) No.15 to Mr. Edi Mansur, a resident of Talang Baru village, with an area of 0.65 Ha. The Document includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Release on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results together with a scale of 1: 1,500 known by the Village Head of Talang Baru, 26 January 2016. The Negotiation Process for compensation is outlined in the Land Compensation Certificate including the agreed compensation value, on 11 February 2016. Payment to the recipient was carried out through "Bank Bengkulu", Ipuh Sub-Branch on 11 February 2016 worth Rp.27,950,000 for Mr. Edi Mansur. The document also comes with photos of the compensation handover.</p> <p>Based on interviews with local community leaders, they stated that they had received growth compensation payments carried out by management before carrying out oil palm development.</p>	
	<p>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</p>	<p>At the moment the company does not made any compensation process to the surrounding community. All of the land used by Mukomuko POM & Supply Base is free land controlled by the state, however, some of them have been cultivated in form of plantations and agriculture. Based on the document verification, it shows that the records of the completion of the arable land compensation are well documented by the Legal department, where each document has been completed with maps of joint measurements results.</p>	
	<p>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.</p>	<p>At the moment the company does not made any compensation process to the surrounding community. All of the land used by Mukomuko POM & Supply Base is free land controlled by the state, however, some of them have been cultivated in form of plantations and agriculture. Based on the document verification, it shows that the records of the completion of the arable land compensation are well documented by the Legal department, where each document has been completed with maps of joint measurements results</p>	
<p>4.4.3</p>	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties</p>	<p>At the moment the company does not made any compensation process to the surrounding community. All of the land used by Mukomuko POM & Supply Base is free land controlled by the state, however, some of them have been cultivated in form of</p>	<p>Comply</p>

	(including neighbouring communities where applicable, and relevant authorities).	plantations and agriculture. Based on the document verification, it shows that the records of the completion of the arable land compensation are well documented by the Legal department, where each document has been completed with maps of joint measurements results.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	At the moment the company does not made any compensation process to the surrounding community. All of the land used by Mukomuko POM & Supply Base is free land controlled by the state, however, some of them have been cultivated in form of plantations and agriculture. Based on the document verification, it shows that the records of the completion of the arable land compensation are well documented by the Legal department, where each document has been completed with maps of joint measurements results.	Comply
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.	At the moment the company does not made any compensation process to the surrounding community. All of the land used by Mukomuko POM & Supply Base is free land controlled by the state, however, some of them have been cultivated in form of plantations and agriculture. Based on the document verification, it shows that the records of the completion of the arable land compensation are well documented by the Legal department, where each document has been completed with maps of joint measurements results.	Comply
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	At the moment the company does not made any compensation process to the surrounding community. All of the land used by Mukomuko POM & Supply Base is free land controlled by the state, however, some of them have been cultivated in form of plantations and agriculture. Based on the document verification, it shows that the records of the completion of the arable land compensation are well documented by the Legal department, where each document has been completed with maps of joint measurements results.	Comply
Criteria 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.	PT. Agro Muko (AM): Company has a legal ownership of the land, in form of "Hak Guna Usaha/HGU" – land title, as demonstrated.	

		<p>1. "Hak Guna Usaha (HGU) No.31/HGU/BPN/89", based on "Keputusan Kepala Badan Pertanahan Nasional No.31/HGU/BPN/89 tentang Pemberian Hak Guna Usaha atas Nama PT. Tri Aqgra Persada, seluas 10,315 Ha di Desa Air Dikit, Pondok Lunang, Desa Baru, Sari Bulan, Penarik, Teras, Terunjam, Lubuk Sahung, Seri Bungkal, Sungai Jerinjing, Pondok Baru, Sungai Ipuh, Sungai Gading, Talang Petai dan Sungai Lintang, Kecamatan Mukomuko Utara, Kabupaten Bengkulu Utara, Propinsi Bengkulu - Seluas 10,000 Ha" dated 27 June 1989. HGU valid since registered and ends in 31 December 2019. "Kantor Pertanahan Kabupaten Mukomuko" issued HGU Certificate:</p> <ul style="list-style-type: none"> - "Sertifikat HGU No.02/MU" for area of 2,270 Ha, dated 27 June 1989 valid until 31 December 2019. Based on "Surat Ukur No.04/PT/1988 seluas 2.270 ha, dilengkapi peta HGU skala 1:20,000 No.04/PT/1988", dated 1 Agustus 1988; - "Sertifikat HGU No.03 untuk lahan 7,730 Ha, di Desa Air Dikit, Pondok Lunang, Dusun Baru, Sari Bulan, Penarik, Teras Terunjam, Lubuk Sahung, Surian Bungkal, Sungai Jerinjing, Pondok Baru, Sungai Ipuh, Sungai Gading" dated 18 March 1991 and valid until 31 December 2019. Based on "Surat Ukur No.13/PT/1990, seluas 7,730 Ha, dilengkapi peta HGU skala 1:50,000 No.13/PT/1990", dated 9 November 1990. <p>All of the area under HGU No.31/HGU/BPN/89 was allocated: 3,786.20 Ha for Mukomuko Estate; 923.52 Ha for Sei Betung Estate; 1,749.00 Ha for Tanah Rekah Estate; 2,270 Ha for Talang Petai Estate - supply base to Mukomuko POM.</p> <p>There is a note, related to hectarage deviation in the HGU decree and certificate, whereby in the decree written 10,350 Ha and total hectarage under HGU certificate 10,000 Ha. This occurred because the 350 Ha has been released from the HGU into "Hak Guna Bangunan/HGB Industri Pengolahan Kelapa Sawit" – see explanation on HGB Mukomuko POM.</p> <p>With regards to the validity of HGU in year 2019, company has applied for extension to "Kantor Pertanahan Kabupaten Mukomuko" through letter "Surat Permohonan Perpanjangan Sertifikat HGU No.G.199/2017 atas Sertifikat HGU No.02/MU" and "Surat Permohonan Perpanjangan Sertifikat HGU No.G.199/2017 atas Sertifikat HGU No.03" dated 6 March 2017. During assessment, the process has been progressed. The process of HGU extension has been performed by the company and accepted by Land Office of Mukomuko Regency. The area under HGU has been re-measured</p>	
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		<p>“Pengukuran Bidang Tanah” by “Badan Pertanahan Nasional (BPN) Pusat” oin 2017 as pre-requisite for HGU extension. Land Office of Mukomuko Regency has submit letter to the Land Office of Bengkulu Province No.405/100-17.16/IX/2019 dated 20 September 2019, regarding proposal for extension of HGU No.02/MU covers 2,269.3205 Ha located in District of V Koto, Teras Terunjam and Selagan Raya; and letter No.450/100-17.16/X/2019 dated 23 October 2019, regarding proposal for extension of HGU No.03 covers 7,730 Ha located in District of Air Dikit, Teras Terunjam, Penarik and Selagan Raya. It also available letter from Land Office of Bengkulu Province to Minitr of Agraria and Spatial (Chairman of National Land Office) No.1363/SP-300.HP.01/X/2019 dated 31 October 2019, comprise all required document for HGU extension. Regarding this HGU extention which is still in process, the Company has obtained recommendation letter from Regent of Mukomuko Regency to continue investation and operational activities, based on letter No.750/389/A.1/XII/2019 dated 14 December 2019.</p> <p>Utilization of HGU No.31/HGU/BPN/89, dated 27 June 1989 with an area of 10,000 Ha is as follows:</p> <ul style="list-style-type: none"> • Mukomuko Estate: 3,786.20 Ha • Sei Betung Estate: 923, 52 Ha • Land Rekah Estate: 1,749.00 Ha • Talang Petai Estate: 2,270.00 Ha • Sei Jerinjing: 1,271.28 Ha (Rubber Plant) <p>The whole area of HGU No.31/HGU/BPN/89 mentioned above becomes the Supply Base of Muko-Muko POM.</p> <p>2. “Hak Guna Usaha (HGU) No.09/HGU/BPN/93, seluas 5,786.03 Ha” dated 8 March 1993. The HGU based on “Surat Keputusan Kepala Badan Pertanahan Nasional No.9/HGU/BPN/93 tentang Pemberian Hak Guna Usaha atas nama PT. Agronusa Raflesia atas tanah di Kabupaten Bengkulu Utara seluas 5,800 Ha dalam peta situasi tanggal 16 Desember 1988 No.12/PT/1988 tanggal 15 Mei 1989 No.09/PT/1989, tanggal 20 Desember 1989 No.23/PT/1989 (sebagian) terletak di Desa Pasar Mukomuko, Desa Tanah Rekah, Desa Lalang Luas dan Desa Penarik, Kecamatan Mukomuko Utara, Kabupaten Bengkulu Utara, Propinsi Bengkulu”. The HGU valid from 8 March 1993 until 31 December 2022. As a follow up, “Kantor Pertanahan Kabupaten Mukomuko” issued certificate, which consist of:</p>	
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		<ul style="list-style-type: none"> - "Sertifikat HGU No.U.30 Desa Lalang Luas" for area of 2,185 Ha, valid until 31 December 2022. Based on "Surat Ukur No.09/PT/1989 seluas 2,185 Ha", completed with HGU map scale 1:25,000, dated 15 May 1989; revised area 2,171 Ha. - "Sertifikat HGU No.U.31 Desa Penarik" for area of 1,515 Ha, under name PT Agronusa Rafflesia. Based on "Surat Ukur No.65/1993 seluas 1,515 Ha", dated 10 December 1993; - "Sertifikat HGU No.U.32 Desa Pasar Mukomuko dan Desa Tanah Rekah" for area of 2,100 Ha, valid until 31 December 2022. The certificate based on "Surat Ukur No.12/PT/1988 seluas 2,100 Ha, dated 16 December 1988". Completed with HGU map scale 1:25,000. <p>All of the 5,786.03 Ha area under HGU No.09/HGU/BPN/93 was allocated: 686.60 Ha for Sei Betung Estate; 828.40 Ha for Tanah Rekah Estate; 2,171.03 Ha for Sei Kiang Estate - supply base to Mukomuko POM.</p> <p>3. Air Manjunto Estate uses PT Mukomuko Agro Sejahtera (MMAS) HGU as per HGU Decree for Location Permit No.700-212, dated 18 March 2014 covering + 1,800 Ha through Minister of Agrarian/Head of BPN Decree No.93/HGU/KEM-ATR/BPN/2018 dated 18 October 2018 concerning Granting of Cultivation Rights (HGU) on behalf of PT MMAS on land in Mukomuko Regency, Bengkulu Province.</p> <p>Mukomuko POM: Muko-Muko POM had a basis for land rights in the form of the "Hak Guna Bangunan" (HGB) based on "Keputusan Gubernur Kepala Daerah Tingkat I Bengkulu No.1 tahun 1991 tentang Pemberian hak Guna Bangunan atas Tanah Seluas 315 ha kepada PT Agro Muko", dated 18 Februari 1991. The right includes utilization for waste treatment ponds, offices, employee housing, workshops, warehouses, religious facilities, sports facilities and conservation forests (artificial) as a buffer of waste which is then issued HGB Certificate: No.01 in Teras Terunjam Village; based on the situation map No.12/PT/1990, dated 9 November 1990, covering an area of 315 ha.</p> <p>The HGB Decree is a partial release of HGU Certificate No.01/ MU dated July 10, 1989. The rights expired on 18 March 2011. The HGB Decree above has been extended in accordance with the Decree of the Head of BPN No.2/HGB/BPNRI/2011 dated 26 April 2011 with a period of 20 years up to 18 March 2031. The extension has been registered</p>	
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		<p>to Mukomuko Regency Land Office through "Daftar Isian 307 No.1400/2011" and "Daftar Isian 208 No.617/2011" dated 4 May 2011.</p> <p>Tanah Rekah Estate: Tanah Rekah Estate uses land within 2 HGU, namely:</p> <ul style="list-style-type: none"> - HGU in accordance with Surat Keputusan Kepala Badan Pertanahan Nasional (BPN) No. 09/HGU/BPN/93 dated 8 March 1988 which was later issued HGU Certificate by Kantor Pertanahan Kabupaten Bengkulu Utara No.32 dated 20 May 1994 on behalf of PT Agronusa Raflesia covering an area of 2,100 Ha (based on Land Map No.12/PT/1988, dated 16 December 1988). The area of HGU used for Tanah Rekah Estate is 828.40 Ha. - Based on Decree of the Head of the National Land Agency No.31/HGU/BPN/89 regarding Granting of Cultivation Rights on behalf of PT Tri Aggra Persada, covering an area of 10,315 Ha which was then issued HGU Certificate No.03 for 7,730 Ha. The area of HGU used for Tanah Rekah Estate is 1,749 Ha. <p>Talang Petai Estate: Talang Petai Estate uses land under Decree of the Head of the National Land Agency No.31/HGU/BPN/89 regarding Granting of Cultivation Rights on behalf of PT Tri Aggra Persada, covering an area of 10,315 Ha which was then issued HGU Certificate No.02/MU for area of 2.270 Ha.</p> <p>KMD dan Koperasi Based on document verification and interviews with the community, it was noted that there were several types of KMD/Cooperative land ownership that became the Mukomuko POM supply base, namely:</p> <ol style="list-style-type: none"> 1. Village land submitted to the company for the development of KMD, legal ownership of the land in form of "Surat Keterangan Tanah" (SKT) which is currently in the process of submitting a Land Rights Certificate to Mukomuko District Land Office, e.g. KMD Lubuk Pinang. 2. Land purchased by the village government from the villagers through the KMD development program with PT Agro Muko and then handed over to the company to be build "Kebun Masyarakat Desa" (KMD), e.g. KMD Talang Petai, KMD Tunggal Jaya and KMD Setiabudi. This land is also in the process of submitting a Land Rights Certificate by the Village to the Mukomuko District Land Office. 	
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3. Private villagers' land which is cooperated with the village government to be develop KMD PT Agro Muko. The form of land ownership is in the form of SKT or Sertifikat Hak Milik (SHM). Residents who own the land get a share of the FFB sold to PT Agro Muko in accordance with the agreement.
4. Land owned by each member of the cooperative to be incooperated with PT Agro Muko, e.g. Koperasi Produksi Plasma Sungai Tenang Sejahtera consisting of 98 parcels with total area of 87.77 Ha. As well as KOPABA, the land owned by each member is combined in the Cooperative and then cooperated with PT Agro Muko.

Partnership in development of KMD/Koperasi are stated in the Work Agreement Letter for example:

1. Mukomuko Estate has 4 collaborative agreement in KMD developments, for example: "Surat Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit antara Pemerintah Desa Bukit Makmur dengan Manajemen PT Agro Muko" dated 19 June 2015 for the development of KMD Bukit Makmur covering an area of 10 hectares according to Land Certificate No. 593.2/01-05/BKM/2015 Desa Bukit Makmur. Valid until 30 June 2040.
2. Sei Betung Estate has 15 Cooperation Agreement related KMD development with surrounding village communities, e.g.:
 - "Perjanjian Kerjasama Panitia Kebun Masyarakat Desa Sungai Ipuh dengan PT Agro Muko" dated 1 October 2015 for the development of KMD Sungai Ipuh with an area of 15 Ha.
 - "Perjanjian Kerjasama Panitia Kebun Masyarakat Desa Pondok Suguh dengan PT Agro Muko", Agreement Letter related KMD Pondok Suguh PT Agro Muko dated 1 November 2000 for the development of KMD Pondok Suguh with an area of 10 Ha.
 - "Perjanjian Kerjasama No. 05/PKS/GMO/II/2012 tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit antara Pemerintah Desa Setia Budi dengan Manajemen PT Agro Muko" dated 28 February 2012 for the development of KMD Setia Budi, covering an area of 10 hectares according to Land Certificate No. 595.3/75-79/SKT/SID/E.10/2010 for Setia Budi Village. The term of the agreement is 25 years from the signing of the Agreement.
 - "Perjanjian Kerjasama No. 10/PKS/GMO/II/2012 Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit antara Pemerintah Desa Aur Cina dengan Manajemen PT Agro Muko" dated 28 February 2012 for the development of 10

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		<p>Ha KMD Aur Cina based on Land Certificate No.595.3/52-57/SKT/SID/E.10/2010 for Aur China Village. The term of the agreement is 25 years from the signing date of the Agreement.</p>	
<p>4.5.2</p>	<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>All of the land used by Mukomuko POM & Supply Base is free land controlled by the state, however, some of them have been cultivated in form of plantations and agriculture. Based on the document verification, it shows that the records of the completion of the arable land compensation are well documented by the Legal department, where each document has been completed with maps of joint measurements results, for example;</p> <ol style="list-style-type: none"> 1. GRTT document (Compensation for Growing Crops) that was carried out in 2013 has been implemented to Mr. Amin S. who owns an area of 1.14 Ha and Mr. Zakaria who has a land area of 1.36 Ha, both of whom are residents of Air Merah Village. The Document includes a Certificate of Land Ownership that is known by the Village Head and Sub-District Head; a Land Compensation Statement made by both parties and witnessed by each parties and known by the Head of the Village and Sub-District Head; Letter of release made by both parties, known by the Head of Air Merah Village and Sub-District Head Malin Deman; Map of measurement results with a scale of 1:2500 known by the Head of Air Merah Village. The process of compensation negotiation is outlined in the Land Acquisition Compensation Certificate including the agreed compensation value. Payment to the recipient is carried out through "Bank Bengkulu", Ipuh Sub-Branch on 15 July 2013 with No. A/C; 501-01.07.00030-6 worth Rp. 37,620,000, - for Mr. Amin S. and worth Rp. 44,880,000 for Mr. Zakaria. The document also comes with photos of the compensation handover process. 2. Document of land compensation process that carried out in 2016 was documented in GRTT Document (Compensation for Growing Crops) No.30, carried out to Mr. Ali Mikir with an area of 2.51 Ha, villagers of Talang Baru village. The Document includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Realease on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results with a scale of 1: 1,500 known by the Village Head of Talang Baru, 27 January 2016. The Negotiation Process of compensation is outlined in the Land Compensation Certificate including the agreed compensation value, on 11 February 2016. Payments to the recipient was carried out through "Bank Bengkulu", 	

		<p>Ipuh Sub-Branch on 11 February 2016, valued at Rp.107,930,000 for Mr. Ali Mikir. The document also comes with photos of the compensation handover.</p> <p>3. Document of the GRIT (Compensation for Growing Crops) No.15 to Mr. Edi Mansur, a resident of Talang Baru village, with an area of 0.65 Ha. The Document includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Release on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results together with a scale of 1: 1,500 known by the Village Head of Talang Baru, 26 January 2016. The Negotiation Process for compensation is outlined in the Land Compensation Certificate including the agreed compensation value, on 11 February 2016. Payment to the recipient was carried out through "Bank Bengkulu", Ipuh Sub-Branch on 11 February 2016 worth Rp.27,950,000 for Mr. Edi Mansur. The document also comes with photos of the compensation handover.</p> <p>Based on interviews with local community leaders, they stated that they had received growth compensation payments carried out by management before carrying out oil palm development.</p>	
<p>4.5.3</p>	<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>Based on the results of interviews with surrounding communities, stated that all the land used by Mukomuko POM & Supply bases is free land controlled by the state, and the company has carried out the process of compensation for loss of plant and growth on land developed by the company, as explained in indicator 4.5.2. At this time, the company does not carried out a process of compensation to the surrounding community.</p>	<p>Comply</p>
<p>4.5.4</p>	<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>Based on the results of interviews with surrounding communities, stated that all the land used by Mukomuko POM & Supply bases is free land controlled by the state, and the company has carried out the process of compensation for loss of plant and growth on land developed by the company, as explained in indicator 4.5.2. At this time, the company does not carried out a process of compensation to the surrounding community.</p>	<p>Comply</p>

4.5.5	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.	Based on the results of interviews with surrounding communities, stated that all the land used by Mukomuko POM & Supply bases is free land controlled by the state, and the company has carried out the process of compensation for loss of plant and growth on land developed by the company, as explained in indicator 4.5.2. At this time, the company does not carried out a process of compensation to the surrounding community.	Comply
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.	Based on the results of interviews with surrounding communities, stated that all the land used by Mukomuko POM & Supply bases is free land controlled by the state, and the company has carried out the process of compensation for loss of plant and growth on land developed by the company, as explained in indicator 4.5.2. At this time, the company does not carried out a process of compensation to the surrounding community.	Comply
4.5.7	New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	<p>Sei Kiang Estate: There is no new acquired land for plantation and mill after 15 November 2018.</p> <p>Talang Petai Estate: There is no new acquired land for plantation and mill after 15 November 2018.</p> <p>Tanah Rekah Estate: There is no new acquired land for plantation and mill after 15 November 2018.</p> <p>Mukomuko Estate: There is no new acquired land for plantation and mill after 15 November 2018.</p>	N/A
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	<p>Sei Kiang Estate: There is no new land acquired land in areas inhabited by community in voluntary isolation.</p> <p>Talang Petai Estate: There is no new land acquired land in areas inhabited by community in voluntary isolation.</p> <p>Tanah Rekah Estate: There is no new land acquired land in areas inhabited by community in voluntary isolation.</p>	N/A

		<p>Mukomuko Estate: There is no new land acquired land in areas inhabited by community in voluntary isolation.</p>	
<p>Criteria 4.6</p>			
<p>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.</p>			
<p>4.6.1</p>	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p>	<p>Based on document verification, results of the public consultation with the Mukomuko District Land Office and the results of interviews with the Setiabudi Village, Tunggal Jaya Village, Sari Bulan Village, and Talang Petai Village mentioned that until now there was no land dispute between the company and the community. However it was recognized that there were still traditional land rights that are in the PT Agromuko's HGU that have never done compensation or the land owner has not been willing to relinquish his land ownership rights. Based on interviews with Sari Bulan Village officials and community leaders of Air Dikit Village, stated that related to the HGU extension there was a request from Sari Bulan Village and Air Dikit Village for the company to release 20% of its HGU area for the oil palm plantation partnership scheme. The company's program of Plasma (smallholder scheme) is in accordance with the applicable rules and regulations, Permentan No. 98/2013 concerning Plantation Business Licensing (IUP). The Company has been comply to facilitate the construction of smallholder plantations at least 20% from the IUP-B or IUP area; and stated in Article 15 Paragraph (2) that the facilitation of development of community plantation are outside the IUP-B or IUP area. There is no obligation that 20% of the HGU area is for the community. Currently, the company has facilitate a lot of area that is provided by the community to be used as plasma (smallholder) plantations.</p> <p>The company has a land compensation mechanism as stipulated in "Land and Planting Compensation Procedure inside of the Company" No.LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019. Even though the disputed land is the legal property of the company contained in the HGU, but because it is still controlled by the community and has never been made to compensate, the company has taken steps to deliberate with those who claim and offer adequate compensation.</p> <p>The dispute resolution mechanism according to the procedure above is as follows:</p>	<p>Comply</p>

		<ol style="list-style-type: none"> 1. The company disseminates company location permits/HGU to the public. 2. If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership. 3. Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out. 4. Field surveys and land measurements involve companies, claimants and government representatives. 5. Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties. 6. Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims. 7. If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation. 8. If a compensation price agreed, the company will pay the compensation to the land owner. <p>Based on document verification, it shows that there are still 81.89 Ha of land that is still controlled by the community, the company has identified these lands, for example: The company has identified the arable land within the HGU, for example; in Sungai Betung Estate (SBE) there are 6 locations of the land cultivated by Penarik and Air Dikit communities who do not want to be compensated yet, e.g. cultivated land of Mr. Tamrin, Penarik Village community (Div. 3) with an area of 1.5 Ha and has been planted with 2 years old type of Palm Oil. The document is completed with a map of the location of the arable land. The company respects the existence of community land ownership and mutual understanding between the two parties.</p>	
4.6.2	<p>(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.</p>	<p>Based on document verification, results of the public consultation with the Mukomuko District Land Office and the results of interviews with the Setiabudi Village, Tunggal Jaya Village, Sari Bulan Village, and Talang Petai Village mentioned that until now there was no land dispute between the company and the community. However it was recognized that there were still traditional land rights that are in the PT Agromuko's HGU that have never done compensation or the land owner has not been willing to relinquish his land ownership rights. Based on interviews with Sari Bulan Village officials and community leaders of Air Dikit Village, stated that related to the HGU extension</p>	Comply

		<p>there was a request from Sari Bulan Village and Air Dikit Village for the company to release 20% of its HGU area for the oil palm plantation partnership scheme. The company's program of Plasma (smallholder scheme) is in accordance with the applicable rules and regulations, Permentan No. 98/2013 concerning Plantation Business Licensing (IUP). The Company has been comply to facilitate the construction of smallholder plantations at least 20% from the IUP-B or IUP area; and stated in Article 15 Paragraph (2) that the facilitation of development of community plantation are outside the IUP-B or IUP area. There is no obligation that 20% of the HGU area is for the community. Currently, the company has facilitate a lot of area that is provided by the community to be used as plasma (smallholder) plantations.</p>	
<p>4.6.3</p>	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.</p>	<p>Based on the document verification, it shows that the records of the completion of the arable land compensation are well documented by the Legal department, where each document has been completed with maps of joint measurements results, for example;</p> <ol style="list-style-type: none"> 1. GRTT document (Compensation for Growing Crops) that was carried out in 2013 has been implemented to Mr. Amin S. who owns an area of 1.14 Ha and Mr. Zakaria who has a land area of 1.36 Ha, both of whom are residents of Air Merah Village. The Document includes a Certificate of Land Ownership that is known by the Village Head and Sub-District Head; a Land Compensation Statement made by both parties and witnessed by each parties and known by the Head of the Village and Sub-District Head; Letter of release made by both parties, known by the Head of Air Merah Village and Sub-District Head Malin Deman; Map of measurement results with a scale of 1:2500 known by the Head of Air Merah Village. The process of compensation negotiation is outlined in the Land Acquisition Compensation Certificate including the agreed compensation value. Payment to the recipient is carried out through "Bank Bengkulu", Ipuh Sub-Branch on 15 July 2013 with No. A/C; 501-01.07.00030-6 worth Rp. 37,620,000, - for Mr. Amin S. and worth Rp. 44,880,000 for Mr. Zakaria. The document also comes with photos of the compensation handover process. 2. Document of land compensation process that carried out in 2016 was documented in GRTT Document (Compensation for Growing Crops) No.30, carried out to Mr. Ali Mikir with an area of 2.51 Ha, villagers of Talang Baru village. The Document includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Realease on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of 	<p>Comply</p>

		<p>measurement results with a scale of 1: 1,500 known by the Village Head of Talang Baru, 27 January 2016. The Negotiation Process of compensation is outlined in the Land Compensation Certificate including the agreed compensation value, on 11 February 2016. Payments to the recipient was carried out through "Bank Bengkulu", Ipuh Sub-Branch on 11 February 2016, valued at Rp.107,930,000 for Mr. Ali Mikir. The document also comes with photos of the compensation handover.</p> <p>3. Document of the GRTT (Compensation for Growing Crops) No.15 to Mr. Edi Mansur, a resident of Talang Baru village, with an area of 0.65 Ha. The Document includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Release on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results together with a scale of 1: 1,500 known by the Village Head of Talang Baru, 26 January 2016. The Negotiation Process for compensation is outlined in the Land Compensation Certificate including the agreed compensation value, on 11 February 2016. Payment to the recipient was carried out through "Bank Bengkulu", Ipuh Sub-Branch on 11 February 2016 worth Rp.27,950,000 for Mr. Edi Mansur. The document also comes with photos of the compensation handover.</p>	
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.	Based on interviews with local community leaders, they stated that they had received growth compensation payments carried out by management before carrying out oil palm development.	Comply
<p>Criteria 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.</p>			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	The company has a mechanism for identifying people entitled to compensation as stipulated in "Land and Planting Compensation Procedure inside of the Company" No.LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019. Even though the disputed land is the legal property of the company contained in the HGU, but because it is still controlled by the community and has never been made to compensate, the company has taken steps to deliberate with those who claim and offer adequate compensation.	Comply

		<p>The dispute resolution mechanism according to the procedure above is as follows:</p> <ol style="list-style-type: none"> 1. The company disseminates company location permits/HGU to the public. 2. If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership. 3. Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out. 4. Field surveys and land measurements involve companies, claimants and government representatives. 5. Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties. 6. Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims. 7. If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation. 8. If a compensation price agreed, the company will pay the compensation to the land owner. 	
<p>4.7.2</p>	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	<p>The company has a mechanism for calculating and distributing fair compensation as stipulated in "Land and Planting Compensation Procedure inside of the Company" No.LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019. Even though the disputed land is the legal property of the company contained in the HGU, but because it is still controlled by the community and has never been made to compensate, the company has taken steps to deliberate with those who claim and offer adequate compensation.</p> <p>The dispute resolution mechanism according to the procedure above is as follows:</p> <ol style="list-style-type: none"> 1. The company disseminates company location permits/HGU to the public. 2. If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership. 3. Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out. 4. Field surveys and land measurements involve companies, claimants and government representatives. 	<p>Comply</p>

		<ol style="list-style-type: none"> 5. Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties. 6. Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims. 7. If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation. 8. If a compensation price agreed, the company will pay the compensation to the land owner. 	
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>	<p>Communities that have lost access and rights to land are given opportunities to benefit from plantation development by development of smallholder plantation, e.g. KMD and Koperasi Plasma. Partnership in development of KMD/Koperasi are stated in the Work Agreement Letter for example:</p> <ol style="list-style-type: none"> 1. Mukomuko Estate has 4 collaborative agreement in KMD developments, for example: "Surat Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit antara Pemerintah Desa Bukit Makmur dengan Manajemen PT Agro Muko" dated 19 June 2015 for the development of KMD Bukit Makmur covering an area of 10 hectares according to Land Certificate No. 593.2/01-05/BKM/2015 Desa Bukit Makmur. Valid until 30 June 2040. 2. Sei Betung Estate has 15 Cooperation Agreement related KMD development with surrounding village communities, e.g.: <ul style="list-style-type: none"> • "Perjanjian Kerjasama Panitia Kebun Masyarakat Desa Sungai Ipuh dengan PT Agro Muko" dated 1 October 2015 for the development of KMD Sungai Ipuh with an area of 15 Ha. • "Perjanjian Kerjasama Panitia Kebun Masyarakat Desa Pondok Suguh dengan PT Agro Muko", Agreement Letter related KMD Pondok Suguh PT Agro Muko dated 1 November 2000 for the development of KMD Pondok Suguh with an area of 10 Ha. • "Perjanjian Kerjasama No. 05/PKS/GMO/II/2012 tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit antara Pemerintah Desa Setia Budi dengan Manajemen PT Agro Muko" dated 28 February 2012 for the development of KMD Setia Budi, covering an area of 10 hectares according to Land Certificate No. 595.3/75-79/SKT/SID/E.10/2010 for Setia Budi Village. The term of the agreement is 25 years from the signing of the Agreement. 	Comply

		<ul style="list-style-type: none"> • "Perjanjian Kerjasama No. 10/PKS/GMO/II/2012 Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit antara Pemerintah Desa Aur Cina dengan Manajemen PT Agro Muko" dated 28 February 2012 for the development of 10 Ha KMD Aur Cina based on Land Certificate No.595.3/52-57/SKT/SID/E.10/2010 for Aur China Village. The term of the agreement is 25 years from the signing date of the Agreement. 	
Criteria 4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	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.	Based on document verification, results of the public consultation with the Mukomuko District Land Office and the results of interviews with the Setiabudi Village, Tunggal Jaya Village, Sari Bulan Village, and Talang Petai Village mentioned that until now there was no land dispute between the company and the community. However it was recognized that there were still traditional land rights that are in the PT Agromuko's HGU that have never done compensation or the land owner has not been willing to relinquish his land ownership rights.	Comply
4.8.2	(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.	Based on document verification, results of the public consultation with the Mukomuko District Land Office and the results of interviews with the Setiabudi Village, Tunggal Jaya Village, Sari Bulan Village, and Talang Petai Village mentioned that until now there was no land dispute between the company and the community. However it was recognized that there were still traditional land rights that are in the PT Agromuko's HGU that have never done compensation or the land owner has not been willing to relinquish his land ownership rights.	Comply
4.8.3	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 right, there claims will be settled using the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4)	All of the land used by Mukomuko POM & Supply Base is free land controlled by the state, however, some of them have been cultivated in form of plantations and agriculture. Based on the document verification, it shows that the records of the completion of the arable land compensation are well documented by the Legal department, where each document has been completed with maps of joint measurements results, for example; 1. GRTT document (Compensation for Growing Crops) that was carried out in 2013 has been implemented to Mr. Amin S. who owns an area of 1.14 Ha and Mr. Zakaria who has a land area of 1.36 Ha, both of whom are residents of Air Merah Village. The Document includes a Certificate of Land Ownership that is known by the Village	Comply

		<p>Head and Sub-District Head; a Land Compensation Statement made by both parties and witnessed by each parties and known by the Head of the Village and Sub-District Head; Letter of release made by both parties, known by the Head of Air Merah Village and Sub-District Head Malin Deman; Map of measurement results with a scale of 1:2500 known by the Head of Air Merah Village. The process of compensation negotiation is outlined in the Land Acquisition Compensation Certificate including the agreed compensation value. Payment to the recipient is carried out through "Bank Bengkulu", Ipuh Sub-Branch on 15 July 2013 with No. A/C; 501-01.07.00030-6 worth Rp. 37,620,000, - for Mr. Amin S. and worth Rp. 44,880,000 for Mr. Zakaria. The document also comes with photos of the compensation handover process.</p> <p>2. Document of land compensation process that carried out in 2016 was documented in GRTT Document (Compensation for Growing Crops) No.30, carried out to Mr. Ali Mikir with an area of 2.51 Ha, villagers of Talang Baru village. The Document includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Realease on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results with a scale of 1: 1,500 known by the Village Head of Talang Baru, 27 January 2016. The Negotiation Process of compensation is outlined in the Land Compensation Certificate including the agreed compensation value, on 11 February 2016. Payments to the recipient was carried out through "Bank Bengkulu", Ipuh Sub-Branch on 11 February 2016, valued at Rp.107,930,000 for Mr. Ali Mikir. The document also comes with photos of the compensationhandover.</p> <p>3. Document of the GRTT (Compensation for Growing Crops) No.15 to Mr. Edi Mansur, a resident of Talang Baru village, with an area of 0.65 Ha. The Document includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Release on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results together with a scale of 1: 1,500 known by the Village Head of Talang Baru, 26 January 2016. The Negotiation Process for compensation is outlined in the Land Compensation Certificate including the agreed compensation value, on 11 February 2016. Payment to the recipient was carried out through "Bank Bengkulu", Ipuh Sub-Branch on 11 February 2016 worth Rp.27,950,000 for</p>	
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		<p>Mr. Edi Mansur. The document also comes with photos of the compensation handover.</p> <p>Based on interviews with local community leaders, they stated that they had received growth compensation payments carried out by management before carrying out oil palm development.</p>	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable)	Based on document verification, results of the public consultation with the Mukomuko District Land Office and the results of interviews with the Setiabudi Village, Tunggal Jaya Village, Sari Bulan Village, and Talang Petai Village mentioned that until now there was no land dispute between the company and the community. However it was recognized that there were still traditional land rights that are in the PT Agromuko's HGU that have never done compensation or the land owner has not been willing to relinquish his land ownership rights.	Comply
<p>Principle 5: Support smallholder inclusion Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	<p>FFB price has been made publicly available by the company, as evidence in "Harga Pembelian TBS dari KMD". For example dated 31 Oct 2019, for FFB price period 28 Oct 2019 to 3 Nov 2019, as follow:</p> <ul style="list-style-type: none"> a. Category A = Rp 1,443/kg (\geq 94% ripeness) b. Category B = Rp 1,428/kg (86 – 93% ripeness) c. Category C = Rp 1,413/kg (\leq 85% ripeness). <p>"Harga Pembelian TBS dari KMD" dated 6 Nov 2019, for FFB price period 4 to 10 Nov 2019, as follow:</p> <ul style="list-style-type: none"> a. Category A = Rp 1,460/kg (\geq 94% ripeness) b. Category B = Rp 1,445/kg (86 – 93% ripeness) c. Category C = Rp 1,430/kg (\leq 85% ripeness). 	Comply

		<p>"Harga Pembelian TBS dari KMD" dated 13 Nov 2019, for FFB price period 11 to 17 Nov 2019, as follow:</p> <ul style="list-style-type: none"> a. Category A = Rp 1,523/kg (\geq 94% ripeness) b. Category B = Rp 1,508/kg (86 – 93% ripeness) c. Category C = Rp 1,493/kg (\leq 85% ripeness). 	
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Evidence verified that all KMD under Sei Kiang Estate, e.g. KMD Lalang Luas and KMD Lubuk Pinang, have signed the document "Harga Pembelian TBS dari KMD" dated 13 Nov 2019. KMDs under Tanah Rekah Estate, KMD Tanah Rekah, KMD Pondok Batu, KMD Pasar Mukomuko, KMD Ujung Padang have signed the FFB price on 6 Nov 2019. KMDs under Talang Petai Estate, KMD Talang Petai, KMD Tunggal Jaya, KMD Sungai Lintang, KMD Sungai Gading have signed the FFB price on 12 Nov 2019, for FFB price period 7 – 20 Oct 2019; 21 – 27 Oct 2019; 28 Oct 2019 – 3 Nov 2019 and 4 – 10 Nov 2019, as evident in "Buku Tanda Terima Harga TBS".	Comply
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	All FFB prices have been agreed by KMDs, as evidence in "Harga Pembelian TBS dari KMD" dated 13 Nov 2019, which has been signed by all KMD representatives. KMDs under Tanah Rekah Estate: KMD Tanah Rekah, KMD Pondok Batu, KMD Pasar Mukomuko, KMD Ujung Padang have signed the FFB price on 6 Nov 2019.	Comply
5.1.4	(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 contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	<p>Based on interview with KMD committee, all parties are involved and understood the contract they get into, including finance, loans/credits, and repayments through FFB price reductions for upkeep, harvesting and transport and or other mechanisms applicable.</p> <p>Agreement document verified:</p> <ol style="list-style-type: none"> 1. "Perjanjian Kerjasama Tentang Pembangunan dan Pengelolaan kebun Kelapa Sawit Pola Inti Plasma antara Koperasi Produksi Plasma Sungai Tenang Sejahtera dengan PT Mukomuko Agro Sejahtera" dated 9 Aug 2016; 140 Ha. 2. "Perjanjian Kerjasama Panitia Desa Semundam dengan PT Agro Muko", dated 10 Sept 2000; 15 Ha. 3. "Perjanjian Kerjasama Panitia Desa Talang Baru dengan PT Agro Muko", dated 9 Jul 2000; 15 Ha. 4. "Naskah Perjanjian Kerjasama Pelaksanaan Pembangunan, Pengelolaan dan Pemanfaatan Kebun Masyarakat Desa Tanjung Harapan", dated 17 Nov 2009; 10 Ha. 5. "Naskah Perjanjian Kerjasama Pelaksanaan Pembangunan, Pengelolaan dan Pemanfaatan Kebun Masyarakat Desa Medan Jaya", dated 17 Nov 2009; 10 Ha. 	Comply

		<p>6. "Naskah Perjanjian Kerjasama Pelaksanaan Pembangunan, Pengelolaan dan Pemanfaatan Kebun Masyarakat Desa Pulau Baru", dated 17 Nov 2009; 10 Ha.</p> <p>The Agreement mentioned the company obligation to fund all cost related operation of KMDs. All cost issued by the company for development of KMD (36 month) must be paid by KMD including rate 5% per year. Payment will be deducted 15% from FFB sales each month. Routine cost after mature stage, e.g. harvesting, FFB transport, upkeep, fertilizing and other operational cost will be deducted each month by the company from FFB sales.</p>																																																																							
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	Based on interview with KMD committee and review of agreement document, the contract are fair, legal, transparent and have agreed timeframe.	Comply																																																																						
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	<p>Based on interview with KMD committee and review of payment documents, agreed payments are made in a timely manner, and receipts specifying price, weight, deductions and amount paid are given.</p> <p>Payment documents verified:</p> <p>1. Invoice KMDLL No.10 Desa Lalang Luas, Doc.No.KM19100041 for Fiscal Year 2019, Month October.</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Quantity</th> <th>Rate (Rp)</th> <th>Amount (Rp)</th> <th>Deduction (Rp)</th> </tr> </thead> <tbody> <tr> <td>FFB Sales</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>- 24/10/2019 (Class C)</td> <td>4,700</td> <td>1,351</td> <td>6,349,700</td> <td>-</td> </tr> <tr> <td>- 18/10/2019 (Class B)</td> <td>5,050</td> <td>1,303</td> <td>6,580,150</td> <td>-</td> </tr> <tr> <td>- 09/10/2019 (Class B)</td> <td>4,880</td> <td>1,303</td> <td>6,358,640</td> <td>-</td> </tr> <tr> <td>- 08/10/2019 (Class B)</td> <td>4,890</td> <td>1,303</td> <td>6,371,670</td> <td>-</td> </tr> <tr> <td>Sub Total</td> <td>19,520</td> <td></td> <td>25,660,160</td> <td>-</td> </tr> <tr> <td>PPH deduction</td> <td></td> <td></td> <td>-128,301</td> <td>-</td> </tr> <tr> <td>FFB sales nett</td> <td></td> <td></td> <td>25,531,859</td> <td>-</td> </tr> <tr> <td>Loan instalment</td> <td>15%</td> <td>25,660,160</td> <td>-</td> <td>3,849,024</td> </tr> <tr> <td>Afrekening:</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Extra Manuring</td> <td>3</td> <td></td> <td>-</td> <td>445,967</td> </tr> <tr> <td>Tallying Clerk</td> <td>1</td> <td></td> <td>-</td> <td>51,338</td> </tr> <tr> <td>Harvesting Labour</td> <td>5</td> <td></td> <td>-</td> <td>1,790,165</td> </tr> </tbody> </table>	Description	Quantity	Rate (Rp)	Amount (Rp)	Deduction (Rp)	FFB Sales					- 24/10/2019 (Class C)	4,700	1,351	6,349,700	-	- 18/10/2019 (Class B)	5,050	1,303	6,580,150	-	- 09/10/2019 (Class B)	4,880	1,303	6,358,640	-	- 08/10/2019 (Class B)	4,890	1,303	6,371,670	-	Sub Total	19,520		25,660,160	-	PPH deduction			-128,301	-	FFB sales nett			25,531,859	-	Loan instalment	15%	25,660,160	-	3,849,024	Afrekening:					Extra Manuring	3		-	445,967	Tallying Clerk	1		-	51,338	Harvesting Labour	5		-	1,790,165	Comply
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Harvesting Contract	1		-	249,161
Fertilizer Material	2		-	8,373,114
Harvester Transport	2		-	85,777
FFB Carrier	3		-	557,797
Total			25,531,859	15,402,253

Nett paid: Rp 10,129,606.

2. Invoice KMD No.02 Desa Ujung Padang, Doc.No.KM19090154 for period September 2019.

Description	Quantity	Rate (Rp)	Amount (Rp)	Deduction (Rp)
FFB Sales				
- 30/09/2019 (Class C)	2,640	1,285	3,392,400	-
- 14/09/2019 (Class C)	8,840	1,245	11,005,800	-
Sub Total FFB sales	11,480		14,398,200	-
Loan deduction	15%	14,398,200	-	2,159,730
Afrekening:				
Harvesting	11,480	132	-	1,515,360
Transport field to L.Ramp	11,480	110	-	1,262,800
Transport to POM	11,480	220	-	2,525,600
Material	1	55,000	-	55,000
Pruning Labour	5		-	1,836,507
Harvester Transport	3		-	1,792,828
Harvester Labour	2		-	1,578,296
Loan	1		5,207,631	-
Last month deduction	1		-	5,714,500
Total			19,605,831	18,440,621

Nett paid: Rp 1,165,210.

5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).	<p>Weighbridge are verified by government agency in annual basis. Latest certificate of verification were observed for weighbridge in Mukomuko POM, issued by "Dinas Perindustrian dan Perdagangan Kota Bengkulu", as follows:</p> <ol style="list-style-type: none"> 1. Calibration Certificate No.084/DPP-UPTDML/XI/2018 dated 15 Nov 2018; for Avery Weight Tronix type L-225, S/N 00330065; maximum capacity 40,000 kg. 2. Calibration Certificate No.085/DPP-UPTDML/XI/2018 dated 15 Nov 2018; for Avery Weight Tronix type L-225, S/N 79015389; maximum capacity 40,000 kg. <p>Mukomuko POM has done process for 2019 calibration. Based on letter from independent laboratory, next calibration performed on 20 Nov 2019. On 17 Sep 2019 performed cleaning of storage tank no.2. Hydrotest has been done on 10 bar pressure, checking of pipe, steam coil and tank allowed to be use.</p>	Comply
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	<p>Based on review of agreement the company carried out the development of plantation in KMD. Based on interview with KMD committee, the company carried the monitoring of upkeep, manuring, harvesting and FFB transport by providing Mandor (Supervisor) during those works. It was evident "Buku Visit KMD" for all KMD under Sei Kiang Estate, e.g. KMD Lalang Luas and KMD Lubuk Pinang, and KMDs under Tanah Rekah Estate, KMD Tanah Rekah, KMD Pondok Batu, KMD Pasar Mukomuko, and KMD Ujung Padang. As evidence "Buku KMD Lalang Luas", noted that on 12 Aug 2019 Mandor has made visit, with resume: growth wood at boundary, recommended to slashing or polish it with Garlon. On 4 Oct 2019 noted that there are unpicked loose fruit at market place and circle, action: clean the market place and give awareness to harvester. As evidence "Buku KMD Lubuk Pinang", noted that on 3 Sept 2019 Mandor has made visit, with resume: still found wood at harvesting area, recommended to conduct selective spraying.</p>	Comply
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	<p>It was available procedure External Grievance (HRA-04-02/01-02-2018/Rev.0) as guidance for external grievance management process including smallholders. Complainants can submit their complaints via email at http://www.tolantiga.co.id or directly to the respective person. Person whom directly supervises the complainants should discuss with the complainants to solve the issue. Timeframe for resolving grievance is 30 days. It was evident grievance documentation under "Rekaman Keluh Kesah" e.g. KMD Lubuk Pinang, KMD Lalang Luas and KMD Talang Petai. As well as "Rekaman Keluh Kesah" of Koperasi Produksi Plasma Sungai Tenang Sejahtera.</p>	Comply
Criteria 5.2			

The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) 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>It was available procedure External Grievance (HRA-04-02/01-02-2018/Rev.0) as guidance for external grievance management process including smallholders. Complainants can submit their complaints via email at http://www.tolantiga.co.id or directly to the respective person. Person whom directly supervises the complainants should discuss with the complainants to solve the issue. Timeframe for resolving grievance is 30 days. It was evident grievance documentation under "Rekaman Keluh Kesah" e.g. Koperasi Produksi Plasma Sungai Tenang Sejahtera, KMD Lubuk Pinang, KMD Lalang Luas, KMD Sungai Lintang, KMD Sungai Gading, KMD Talang Petai, KMD Tanah Rekah, KMD Sei Jerinjing and KMD Penarik.</p> <p>Initiation of KMD and other Smallholder are come from the communities (bottom up). Interested parties including women are consulted during the initiation and development Smallholders. Female members were evident in Smallholder, e.g. in Koperasi Plasma Sungai Tenang Sejahtera, identified Eri Damayanti (No.40/SKT/DS-TP/VIII/2017), Liariyanti (No.49/SKT/DS-TP/VIII/2017), Siti Hadiah (No.62/SKT/DS-TP/VIII/2017).</p>	Comply
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	The company has develop and implement livelihood improvement programmes of Smallholders in surrounding communities. PT Agro Muko and PT Mukomuko Agro Sejahtera are helping the development of Kebun Masyarakat Desa (KMD) and other Samllholders. Companies provides technical guidance, financial credit, fertilizer support and receiving the FFB production from certified Kebun Masyarakat Desa (KMD) and other Smallholders into Mukomuko POM (full managed). Currently PT. Agro Muko has assisted in development of 669.32 Ha Kebun Masyarakat Desa (KMD) from 56 villages with 10-15 Ha per village.	Comply
PROCEDURAL NOTE:			
The RSPO is currently developing a separate standard for Independent Smallholders.			
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	The company has provides support to Smallholders in surrounding communities to promote legality of FFB production as they are all certified under PT Agro Muko – Mukomuko POM. PT Agro Muko and PT Mukomuko Agro Sejahtera are helping the development of Kebun Masyarakat Desa (KMD) and other Samllholders. Companies provides technical guidance, financial credit, fertilizer support and receiving the FFB production from certified Kebun Masyarakat Desa (KMD) and other Smallholders into Mukomuko POM (full managed). Currently PT. Agro Muko has assisted in development	Comply

		of 669.32 Ha Kebun Masyarakat Desa (KMD) from 56 villages with average 10-15 Ha per village.	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	<p>The company has provided training for all workers that conducted chemical spraying including for Scheme Smallholders (KMD and Plasma), as evidence in "Hasil Pelatihan Spraying dan Kalibrasi Alat Semprot" dated 22 Mar 2019 in Mukomuko Estate. The training was attended by: Field Head Assistant, all Field Assistant, all Spraying workers and supervisors including that apply spraying in KMDs.</p> <p>Training of spraying and chemical handling in Tanah Rekah Estate was conducted on 1 Nov 2019 located at Block 90B14A Division 2. Training attended by 25 spraying workers, Supervisor and Field Assistant. Summary of training was flowrate 220 cc/minutes; spraying wide 165 cm; walking speed 2700 cm/minutes; spraying volume 50 Lt/Ha. Company (Estate) workers conduct spraying activities in KMDs.</p> <p>In Plasma Sungai Tenang, training of pesticides handling carried out on 12 Aug 2019, attended by 11 spraying workers. Training module includes pesticides application method, hazard and PPE used. Training of beneficial weeds conducted on 20 Aug 2019, attended by 11 workers. Training module, evaluation result and attendance list were available.</p>	Comply
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	The company regularly review and reported the progress of plantation including Smallholders to the relevant stakeholder. PT Agro Muko can demonstrated "Laporan Kegiatan Perkebunan Besar Swasta" for period July and August 2019. The report has been distributed to "Dinas Tanaman Pangan, Hortikultura dan Perkebunan Provinsi Bengkulu" on 20 Sep 2019 based letter No.10/RMO-Disbun/IX/19. The report contain information of Smallholders area consist of Kebun Masyarakat Desa (KMD) 221.47 ha and Kemitraan Lainnya (other smallholders) 289.81 Ha. The report also described Production, Sales, Fertilizer applied, Agrochemical used and Labour used.	Comply
<p>Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.</p>			
<p>Criteria 6.1 Any form of discrimination is prohibited.</p>			

<p>6.1.1</p>	<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>The company has a policy to provide equal opportunities and training to obtain employment opportunities that are approved in the "Equal Employment Opportunity Policy" (QMM-40-01-P04) dated 27 March 2019. The Equal Employment Opportunity Policy is also regulated in the Human Resources Department Manual signed by Management on 8 April 2019. The document has regulates equal opportunity without discrimination (Non-Discrimination) based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age starting from the recruitment process, recruitment, transfer, promotion, training, renewal, employment and remuneration.</p> <p>Evidence of the policy implementation is announcing any vacancies at "Radar Muko Muko" (local newspaper) and the company's website (PT Tolan Tiga Indonesia) so that they can be accessed by everyone. E.g. Vacancies for the CW module at Sei Kiang Estate on 1 January 2019; Vacancies for Kindergarten/PAUD Teachers at Sei Kiang Estate on 1 July 2019.</p> <p>Based on the results of public consultations with the Mukomuko District Manpower Office and the results of interviews with workers, it was agreed that there was no indication of discrimination during job recruitment of promotion. Every year, employees conduct performance appraisals as an assessment of promotions.</p> <p>Based on verification of labor documents as of October 2019 shows that there are various of labor origin, ethnic and religious beliefs, which can reflect that every citizen have the same opportunity to work.</p> <p>Based on verification of labor appointment documents, employee transfers, wages documents, employee apraisals in 2019 showed that there were no indications of discrimination practices.</p>	<p>Comply</p>
<p>6.1.2</p>	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.</p>	<p>Based on verification of employee appointment, transfer, salary and 2019 appraisal documents, there is no indication of discrimination, e.g.:</p> <ol style="list-style-type: none"> 1. Document of temporary worker appointment (PKWT) of Ms. S***** (Spraying worker of Air Bikuk Estate) as written in "Perjajian Kerja Waktu Tertentu" No. 01/PT AM-ABKE/I/2019 dated 1 Januari 2019. 	<p>Comply</p>

2. Document of temporary worker appointment (PKWT) of Mr. R**** P***** (Spraying worker of Mukomuko Estate) as written in "Perjajian Kerja Waktu Tertentu" No. 01/PKWT/MME-AM/XIX/2019, dated 1 Januari 2019.
3. Document of temporary worker appointment (PKWT) of Mrs. M**** (Manuring, Mukomuko Estate) as written in "Perjajian Kerja Waktu Tertentu" No. 02/PKWT/MME-AM/XIX/2019, dated 1 Januari 2019.
4. Document of temporary worker appointment (PKWT) of Mrs. S** P**** (Worker, Mukomuko POM) as written in "Perjajian Kerja Waktu Tertentu" dated 1 February 2019.
5. Document of temporary worker appointment (PKWT) of Mr. E*** S**** (Worker, Mukomuko POM) as written in "Perjajian Kerja Waktu Tertentu" dated 1 February 2019.
6. Approval for upgrading based on Employee Assessment documents on behalf Mr. S***** H***** (SKU-B, Harvester, Sei Kiang Estate) dated 10 August 2018.
7. Work Transfer Document of Mr. S*****, T*****, A***** and M***** (Harvester and DT Driver, Tanah Rekah Estate) as written in "Surat Mutasi Kerja" dated 2 March 2019.

Based on verification of salary documents for period September and October 2019 at each Estate and Mukomuko POM, shows that workers at the same level and year of work, get same basic wage, which is in accordance with the provisions issued by the company and remuneration system which is updated annually adjusted to the Management Decree. Determination of Provincial Minimum Wages by the government and negotiations with SPAM (Workers Union). In 2019 there was an agreement between SPAM and PT Agromuko's Management regarding the Establishment of Wages in 2019 for Daily SKU Levels and Monthly SKUs as outlined in the Joint Agreement between PT Agromuko's Management and SPAM dated 22 March 2019, as results of meeting conducted on 19 – 22 March 2019 in Curup, Bengkulu.

The agreed payroll structure is divided into 2 categories, which is daily and monthly SKU. For monthly employees, the payroll system is based on Grades (P, Q, R, S, T, U, EL) whose appraisals are conducted annually by each direct supervisor. The results of the employee appraisal are outlined in the Form "Penilaian Karyawan SKU" which describes the assessment parameters such as ability, responsibility, cooperation with others, hard working, able to receive input, trustworthy/honest, discipline, timeliness in

		<p>carrying out work, administrative and loyalty. The form also describes direct supervisor's comments and proposals/promotions to a higher level.</p> <p>Bengkulu Provincial Government, has set the provincial minimum wage (UMP) in 2019 in accordance with the Decree of the Governor of Bengkulu No.G.480.DISNAKER in 2018 dated 31 October 2018, states that the minimum wage in Bengkulu Province is Rp. 2,040,407/month. Management of PT Agro Muko has set a Minimum Wage in 2019 of Rp. 2,040,407/month with Rp. 81,616/day and Rp. 11,659/Hour via letter from General Manager Office No.53/GMO-All OU/XII-18 dated 5 December 2018.</p> <p>Based on interviews with workers and verification of labor documents for the period of October 2019, it shows that there are no migrant workers in PT Agromuko or PT MMAS.</p>	
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>The company has a policy to provide equal opportunity and treatment for employment as stated in the "Equal Employment Opportunity Policy" (QMM-40-01-P04) dated 27 March 2019. The Equal Employment Opportunity Policy is also regulated in the "Human Resources Department Manual" signed by Management on 8 April 2019. The document has set equal opportunity without discrimination (Non-discrimination) based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age starting from the recruitment process, permanent employment, transfer, promotion, training, workforce assessment, and remuneration.</p> <p>Evidence of the implementation of this policy is to publicly announce every vacancy in the local newspaper "Radar Muko Muko" and the company's website (PT Tolan Tiga Indonesia) so that everyone can access it.</p> <p>Based on the results of public consultations with Mukomuko District Manpower Office and the results of interviews with workers, stated that there was no indication of discrimination in employment opportunities. Every year, employees are assessed for performance as part of their consideration for level promotion.</p> <p>Based on documents verification, shows that results of employee appraisal are documented in Form "Penilaian Karyawan SKU" which outlines assessment parameters such as ability, responsibility, cooperation with others, hard working, able to receive input, trustworthy/honest, discipline, timeliness in carrying out job, administration and</p>	Comply

		<p>Loyalty. The form also describes direct supervisor's comments and proposals for promotions to higher level, for example:</p> <ol style="list-style-type: none"> 1. "Penilaian Karyawan SKU" of Mr. S***** H***** (SKU-B, Harvester, Sei Kiang Estate) dated 10 August 2018, which promoted from Grade P2 to become Grade P3. 2. "Penilaian Karyawan SKU" of Mr. S***** (SKU-B, Production Clerk, Sei Kiang Estate) dated 10 August 2018, which promoted from Grade P2 to become Grade P3. 	
<p>6.1.4</p>	<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>The unit of certification has renewed its Protection of Reproductive Rights Policy (QMM-40-01-P11) dated 27 March 2019.</p> <p>Based on interviews with female workers and members of Gender Committee, shows that the company has understood the implementation of reproductive rights protection policies for employees, for example the implementation of menstrual leave rights, maternity leave, special health checks for female workers who work as spraying and fertilizer workers, prohibition of violence/sexual harassment of female workers. Pregnancy checks are carried out in the First Aid Room by paramedic.</p> <p>The policy has been disseminated to all employees by posting the policies on the notice board (Estate Office) and verbal dissemination to employees, e.g.:</p> <ol style="list-style-type: none"> 1. Dissemination to Mukomuko POM's "B" Shift employees on 16 – 17 Sep 2019, attended by 22 employees. 2. Dissemination to Mukomuko POM's Office workers on 16 - 17 Sep 2019, attended by 8 workers. 3. Dissemination to Electrician and Mechanics of Mukomuko POM on 16 – 17 Sep 2019, attended by 24 workers. 4. Dissemination to permanent daily workers of Mukomuko POM on 16 – 17 Sep 2019, attended by 31 workers. 5. Dissemination to Loading Ramp workers of Talang Petai Estate on 16 November 2019, attended by 12 workers. 6. Dissemination to Harvester of Talang Petai Estate on 17 May 2019, attended by 28 workers. 7. Dissemination to Harvester of Tanah Rekah Estate on 6 Sep 2019, attended by 29 workers. 8. Dissemination to workers of Divisi 2 Tanah Rekah Estate on 9 Sep 2019, attended by 33 workers. 	<p>Comply</p>

		9. Dissemination to workers of Divisi 4 Tanah Rekah Estate on 7 – 9 Juli 2019, attended by 25 workers.	
6.1.5	(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.	Based on document verification and interviews with management and Gender Committee, each Estate and Mill has formed a Gender Committee, for example: 1. Organization Structure of Mukomuko Estate Gender Committee (Gender Committee Contact Group) which was ratified on 1 October 2019, chaired by the Estate Manager with 1 Secretary and 4 committee members. 2. Organization Structure of Talang Petai Gender Committee (Gender Committee Contact Group) which was ratified on 15 November 2019, chaired by the Estate Manager with 3 committee members.	Comply
6.1.6	There is evidence of equal pay for the same work scope.	Based on verification of salary documents for period September and October 2019 at each Estate and Mukomuko POM, shows that workers at the same level and year of work, get same basic wage, which is in accordance with the provisions issued by the company and remuneration system which is updated annually adjusted to the Management Decree. Determination of Provincial Minimum Wages by the government and negotiations with SPAM (Workers Union). In 2019 there was an agreement between SPAM and PT Agromuko's Management regarding the Establishment of Wages in 2019 for Daily SKU Levels and Monthly SKUs as outlined in the Joint Agreement between PT Agromuko's Management and SPAM dated 22 March 2019, as results of meeting conducted on 19 – 22 March 2019 in Curup, Bengkulu. The agreed payroll structure is divided into 2 categories, which is daily and monthly SKU. For monthly employees, the payroll system is based on Grades (P, Q, R, S, T, U, EL) whose appraisals are conducted annually by each direct supervisor. The results of the employee appraisal are outlined in the Form "Penilaian Karyawan SKU" which describes the assessment parameters such as ability, responsibility, cooperation with others, hard working, able to receive input, trustworthy/honest, discipline, timeliness in carrying out work, administrative and loyalty. The form also describes direct supervisor's comments and proposals/promotions to a higher level. Bengkulu Provincial Government, has set the provincial minimum wage (UMP) in 2019 in accordance with the Decree of the Governor of Bengkulu No.G.480.DISNAKER in 2018 dated 31 October 2018, states that the minimum wage in Bengkulu Province is Rp. 2,040,407/month. Management of PT Agro Muko has set a Minimum Wage in 2019 of	Comply

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Rp. 2,040,407/month with Rp. 81,616/day and Rp. 11,659/Hour via letter from General Manager Office No.53/GMO-All OU/XII-18 dated 5 December 2018.

Realization of Minimum Wage Payments is made for wages in March 2019 with increase accumulation in March 2019. Based on the verification of payslip of PT Agro Muko employees, shows that the company has implemented minimum wage in 2019, as evidence below:

- Mr. B**** T***** (PKWT, Harvester, Sei Betung Estate, Division 3), in March 2019 get salary Rp. 2,528,407; in detail: basic wage is Rp. 2,040,407; rice allowance is Rp. 147,000; "BPJS Ketenagakerjaan" allowance is Rp. 99,496; Premium is Rp. 304,588; and absent deduction is Rp. 62,497.
- Mrs. L*** K***** (SKU-H, Upkeep, Sei Betung Estate, Division 1), in March 2019 get salary Rp. 7,005,359; in details: basic wage is Rp. 2,132,000; rice allowance is Rp. 147,000; "BPJS Ketenagakerjaan" allowance is Rp. 118,364; "BPJS Pensiun" allowance is Rp. 52,143; Bonus/THR is Rp. 4,244,875; Premium allowance is Rp. 324,000; and absent deduction is Rp. 13,023.
- Mrs. I** J***** (SKU-H, Upkeep, Sei Betung Estate, Division 2), in March 2019 get salary Rp. 6,653,742; in details: basic wage is Rp. 2,132,000; rice allowance is Rp. 147,000; "BPJS Ketenagakerjaan" allowance is Rp. 118,364; "BPJS Pensiun" is Rp. 52,143; Bonus is Rp. 4,244,875; Premium allowance is Rp. 324,000; and absent deduction is Rp. 364,640.
- Mrs. M***** (PKWT, Spraying worker, Mukomuko Estate, Division 1) in September 2019 get paid Rp. 2,404,850; in details: basic wage is Rp. 2,040,407; rice allowance is Rp. 139,500; "BPJS Ketenagakerjaan" allowance is Rp. 99,497; "BPJS Pensiun" allowance Rp. 43,831; "BPJS Kesehatan" allowance is Rp. 81,616.
- Mrs. E**** W**** S*** (PKWT, Spraying worker, Mukomuko Estate, Division 1) in September 2019 get paid Rp. 2,317,654; in details: basic wage is Rp. 2,040,407; rice allowance is Rp. 139,500; "BPJS Ketenagakerjaan" allowance Rp. 99,496; "BPJS Pensiun" allowance Rp. 43,831; "BPJS Kesehatan" allowance Rp. 81,616; and absent deduction Rp. 87,196.
- Mr. M**** (PKWT, Harvester, Mukomuko Estate, Division 3) in September 2019 get paid Rp. 5,481,424; in details: basic wage Rp. 2,040,407; rice allowance Rp. 139,500; "BPJS Ketenagakerjaan" allowance Rp. 99,497; "BPJS Pensiun" allowance Rp. 43,831; "BPJS Kesehatan" allowance Rp. 81,616; Premium allowance Rp. 425,561; others Rp. 2,642,556.

Criteria 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	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in language they understand.</p>	<p>PT Agro Muko: The company has a Collective Work Agreement (PKB) which has been signed jointly by Management and Worker Union on 19 October 2018 and is recognized by Kepala Dinas Penanaman Modal, Pelayanan Perizinan Terpadu dan Tenaga Kerja (Manpower Office) of Mukomuko Regency. This PKB is effective from October 2018 to October 2020.</p> <p>The document regulates the recognition of worker union existence of Trade Unions, Provisions regarding working time, wage system, sick leave, absence, business trip, overtime, payment of allowances during being detainee, provisions of premiums, payment of holiday allowance and bonuses, social insurance and aid, work equipment, PPE, recruitment, transfer, promotions and terminations, provisions for motorized vehicles for workers and educators, company and worker obligations, Manpower Settlement Methods and the Termination of Collective Labor Agreements.</p> <p>Article IV (Wages) regulates:</p> <ul style="list-style-type: none"> • Wages in the form of money: Daily and Monthly Workers of PT Agro Muko's wages are negotiated between the company and worker union that refers to the applicable provisions, and the wage negotiation must be completed not later than April in the current year. • Wages in the form of Natura: Worker gets 15 kg rice, unemployed wife/husband gets at most 9 kg, children gets 7.50 kg (maximum 3 children). <p>In 2019 there was an agreement between SPAM (Workers Union) with PT Agro Muko's Management regarding the Establishment of 2019 Wages for Daily and Monthly SKU as outlined in the Joint Agreement between PT Agro Muko's Management and SPAM on 22 March 2019, as results of meeting on 19-22 March 2019 in Curup, Bengkulu.</p> <p>PT Muko Muko Agro Sejahtera (MMAS): Previously, PT MMAS had a Company Regulation that was approved by Kepala Dinas Penanaman Modal, Pelayanan, Perizinan dan Tenaga Kerja Kabupaten Mukomuko on 8 December 2016 and valid until 7 December 2018. PT MMAS had sent an application for</p>	Comply

		<p>the Ratification of the Company Regulation (PP) through Manager Letter No.64/RMO-G/XI/19 dated 15 November 2019. PT MMAS Company Regulation has been approved by Kepala Dinas Penanaman Modal, Pelayanan, Perizinan dan Tenaga Kerja Kabupaten Mukomuko as on Decree No.01/2019 dated 18 November 2019 and valid until 15 November 2021. Based on the verification of Company Regulation (PP) document, there is no content change from the previous PP. The document regulates the provisions regarding working time, wage system, sick days, absent, business trip, overtime, payment of allowances during being detainee, provisions of premiums, payment of holiday allowance and bonuses, social insurance and aid, work equipment, PPE, recruitment, transfer, promotions and terminations, provisions for motorized vehicles for workers and educators, company and worker obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Article III (Wages) regulates:</p> <ul style="list-style-type: none"> • Wages in the form of money: Daily and Monthly Workers of PT MMAS wages are negotiated between the company and worker union that refers to the applicable provisions, and the wage negotiation must be completed not later than April in the current year. • Wages in the form of Natura: Worker gets 15 kg rice, unemployed wife/husband gets at most 9 kg, children gets 7.50 kg (maximum 3 children). 	
6.2.2	<p>(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, including work done by family members.</p>	<p>Normative rules on industrial relations are regulated in Collective Work Agreements or Company Regulations, for example provisions regarding working hours, wage systems, sick leave, absence, business trip, overtime, payment of allowances during being detainee, provisions of premiums, payment of holiday allowance and bonuses, social insurance and aid, work equipment, PPE, recruitment, transfer, promotions and terminations, provisions for motorized vehicles for workers and educators, company and worker obligations, Manpower Settlement Methods.</p> <p>Based on document verification and interviews with workers, stated that each worker has a Work Agreement with companies made in Bahasa Indonesia as a language understood by all ethnicities in PT Agro Muko and PT MMAS. The Work Agreement Letter regulates position, validity period and expiration of work agreement, obligations of workers, placement/transfer, payroll, medical, annual leave, insurance, and termination of employment.</p>	Comply

		<p>Sample seen:</p> <ol style="list-style-type: none"> 1. "Surat Perjanjian Kerja" No.03/SPK/ABKE/2012 dated 1 January 2012 on behalf Mr. J*** L***** (Harvester, Air Bikuk Estate). 2. "Surat Perjajian Kerja Tenaga Kerja Waktu Tertentu (PKWT)" No.01/PT AM-ABKE/I/2019 dated 1 January 2019 on behalf Mrs. S***** (Spraying, Air Bikuk Estate). 3. "Surat Perjajian Kerja Tenaga Kerja Waktu Tertentu (PKWT)" No. 01/PKWT/MME-AM/XIX/2019, dated 1 January 2019 on behalf Mr. R**** P***** (Spraying, Mukomuko Estate) 4. "Surat Perjajian Kerja Tenaga Kerja Waktu Tertentu (PKWT)" No. 02/PKWT/MME-AM/XIX/2019, dated 1 January 2019 on behalf Mrs. M***** (Manuring, Mukomuko Estate). 5. "Surat Perjajian Kerja Tenaga Kerja Waktu Tertentu (PKWT)" dated 1 February 2019 on behalf Mrs. S** P***** (worker at Mukomuko POM). 6. "Surat Perjajian Kerja Tenaga Kerja Waktu Tertentu (PKWT)" dated 1 February 2019 on behalf Mr. E*** S***** (worker at Mukomuko POM). 	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p>	<p>Normative rules on industrial relations are regulated in Collective Work Agreements or Company Regulations, for example provisions regarding working hours, wage systems, sick leave, absence, business trip, overtime, payment of allowances during being detainee, provisions of premiums, payment of holiday allowance and bonuses, social insurance and aid, work equipment, PPE, recruitment, transfer, promotions and terminations, provisions for motorized vehicles for workers and educators, company and worker obligations, Manpower Settlement Methods.</p> <p>Based on interview with SPAM (worker union) and worker, stated that the company has realized normative obligation on industrial relation that regulated in Collective Work Agreements (PKB) and Company Regulation (PP).</p>	Comply
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 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</p>	<p>The unit of certification has provided facilities and infrastructure for employee welfare in form of staff housing (98 units), employee housing (1,320 units), mosques (26 units), Church (1 unit), community hall (15 units), Kindergarden (16 units), Elementary Schools (4 units), school buses, day care centers (13 units), polyclinics (11 units), warehouses (17 units), sports facilities such as football field, volley ball, badminton, golf, tennis court and tennis table.</p> <p>Facilities and infrastructure at Mukomuko Estate include:</p>	Comply

	<p>of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<ul style="list-style-type: none"> • Employee Housing: 496 units • Mosque: 3 units • Kindergarten: 3 units • Child care center: 3 units • Sports facilities: volleyball, tennis, badminton, golf • Polyclinic: 1 unit • School Bus: 4 units • Water tank; 4 units <p>Based on interviews with workers, stated that PT Agromuko has a program for the maintenance of employee housing and other public facilities that implemented periodically. Based on documents verification, shows that Mukomuko Estate has had an Employee & Staff Housing Improvement Plan. In addition, the company also provides electricity and clean water that is provided free of charge to employees.</p>	
<p>6.2.5</p>	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p>	<p>The unit of certification provided natura (rice allowance) with amount 15 Kg for worker, maximum 9 kg for unemployed suppose and 7.5 kg for children (maximum 3 children). Providing natura is beyond the basic wage, that is in accordance with statutory regulations.</p> <p>To assist employees in supply of basic needs, the unit of certification committed to form employee cooperatives. This indicated by the existence of an employee cooperative known as the " Koperasi Serba Usaha Karyawan Agromuko" which was established in 2006.</p> <p>The head office of the employee cooperative located Regional Manager Office (RMO) area, branch store have been built in each estate. There is branch store of employee cooperatives in each estate to help employees meet their basic daily needs. The company helps provide cooperative offices and stores, electricity, clean water, legality costs and salary deduction for employees who gets cooperatives loan.</p>	<p>Comply</p>
<p>6.2.6</p>	<p>A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera has prepared the prevailing wage calculation. The company referred to RSPO Guidance for Implementing Decent Living Wage. Company have taken into calculation the component:</p>	<p>Comply</p>

		<ul style="list-style-type: none"> - Reference family size (incl. Total Fertility Rate/TFR and Child Mortality Rate/CMR – Indonesia year 2018); - Full time equivalent per Family (incl. Labor Force Participation Rate/LFPR, Unemployment rate, People Working Part Time – Indonesia year 2018); - Food cost (with 2100 calory, footnote 19 RSPO Guidance on Implementing DLW) and noted company provided in kind benefit, rice; - Housing cost (provided by company); - Non Food Non Housing cost (electricity, clean water, medical treatment, education, school children transportation cost – provided by company); - Mandatory deduction (from tax and BPJS levy); <p>Gross Living Wage at Rp.2,405,295; Prevailing wage at Rp.2,859,333; Gap at Rp.454,039 (positive);</p>	
<p>PROCEDURAL NOTE: The RSPO Labour Task Force will prepare guidance on the DLW implementation, including details on how to calculate a DLW, expected for 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist.</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>There is no casual worker works at the unit of certification. All workers have status of permanent workers (SKU-B or SKU-H) of temporary worker (PKWT). PKWT is only applicable for probation period. Gradually the status of PKWT has been upgraded to be Permanent Workers (SKU-H), as evidence:</p> <ol style="list-style-type: none"> 1. Appointment Letter of PKWT became SKU-H No.03/RMO-MME/IV/2019 dated 1 April 2019 for 14 harvester in Mukomuko Estate. 2. Appointment letter of PKWT became SKU-H No.20/RMO-MME/X/2019 dated 2 October 2019 for 7 harvester in Mukomuko Estate. 3. Appointment letter from SKU-H to SKU-B No.209/JWB-RMOBG/IX/2019 dated 16 November 2019 for 3 workers of Sungai Kiang Estate, Air Buluh Estate and CWAM (Central Workshop). 4. Appointment letter of PKWT became SKU-H No.31/TRE-RMO/VI/2019 dated 20 June 2019 for 2 workers in Tanah Rekah Estate. <p>For other types of work, PT Agromuko collaborates with local labor service providers to do seasonal work such as Replanting.</p>	Comply

Criteria 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.			
6.3.1	(C) A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.	<p>The unit of certification has a policy related to freedom of association set in Policy No. QMM-40-01-P13 (Freedom of Association Policy) dated 1 March 2014. The policy stated that "the company recognizes the role of lawful and independent workers and employees representative organizations in creating a constructive working environment". The existence of worker union has been recognized under "Serikat Pekerja Agromuko Mandiri (SPAM)" which has been registered to the Manpower Office of Mukomuko regency under registration No. D.3/560/16/PC-F.SPPP. SPSI/IV/2011, dated 18 February 2011.</p> <p>SPAM Group Committee for period 2017 - 2019 was according to "Surat Keputusan Pengurus Induk" No. KEP.01/SK/SPAM-AM/X/2017 dated 17 October 2017 concerning Ratification of the SPAM committee in parent level. The composition of the SPAM Board has been registered to the Dinas Penanaman Modal, Pelayanan Perizinan Terpadu dan Tenaga Kerja Kabupaten Mukomuko under registration No. D.10/560/61/PUK.SPAM-FSPMI/I/2018 dated 23 January 2018. The organizational structure of PT Agro Muko's SPAM (Group) period 2017 - 2019 was chaired by Mr. Nofirizal.</p> <p>Each unit then forms a Unit Level Coordinator, for example: Tanah Rekah Estate Workers Union is chaired by Mr. Zulkifli in accordance with SPAM's Committee Decree No. KEP.12/SK/SPAM-AM/X/2017 dated 31 October 2017, concerning Ratification of the Management Structure of Tanah Rekah Estate Worker Union.</p>	Comply
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.	The Workers Union (SPAM) regularly holds meetings with the company every month or at certain times if there are urgent issues to be discussed, for example a meeting on 19-22 March 2019 in Curup, Bengkulu, to discuss 2019 wages, which the results are set forth in Joint Agreement between PT Agro Muko's Management and SPAM on 22 March 2019.	Comply
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or	The unit of certification has a policy related to freedom of association set in Policy No. QMM-40-01-P13 (Freedom of Association Policy) dated 1 March 2014. The policy stated that "the company recognizes the role of lawful and independent workers and	Comply

	<p>other freely elected representatives for all workers including migrant and contract workers.</p>	<p>employees representative organizations in creating a constructive working environment".</p> <p>Based on interviews with the parent Worker Union and Estate coordinator, it was stated that the Management did not intervene in the formation/selection of the management of the Workers Union, although the office facilities were provided by company Management. The unit of certification also gives concessions to Workers Union management to hold events related to the Union, e.g. permit to hold management meetings.</p> <p>For PT MMAS which until now there has not been formed a Workers Union, the discussion related to manpower, a Bipartite Cooperation (LKS) has been formed and holds a meeting with management once a month.</p>	
<p>Criteria 6.4: Children are not employed or exploited.</p>			
<p>6.4.1</p>	<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>The unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019, stated that "PT Agro Muko is committed not to employ children under 18 years of age, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".</p> <p>Based on verification of worker documents for period October 2019 in each Estate and Mill, there are no workers who are less than 18 years of age when hired as workers. Sample seen:</p> <ol style="list-style-type: none"> 1. Mr. Edi Siswanto's birth date is 1 August 1993, accepted as an employee of PT Agro Muko (Mukomuko Estate) on 1 November 2019 (26 years and 1 month). 2. Ms. Nani Sutrisnawati's birth date is 11 November 1991, accepted as an employee of PT Agro Muko (Mukomuko Estate) on 1 September 2018 (26 years and 10 months). 3. Mr. Ahmad Fauzi Siregar's birth date is 18 August 1999, accepted as an employee of PT Agro Muko (Mukomuko POM) on 1 March 2019 (19 years and 7 months). 4. Ms. Yuli Mawati's birth date is 31 July 1994, accepted as an employee of PT Agro Muko (Mukomuko POM) on 1 September 2018 (25 years and 4 months). 5. Mr. Candra Pratama's birth date is 7 July 1998, accepted as an employee of PT Agro Muko (Sei Kiang Estate) on 1 August 2017 (19 years and 1 month). 	<p>Comply</p>

		<p>6. Ms. Rupiyanthi's birth date is 26 November 1997, accepted as an employee of PT Agro Muko (Sei Kiang Estate) on 12 February 2019 (21 years and 3 months).</p> <p>7. Mr. Reki Bayu Saputra Utama's birth date is 6 February 1999, accepted as an employee of PT Agro Muko (Talang Petai Estate) since 1 April 2018 (19 years and 2 months).</p>	
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>As outlined in indicator 6.4.1, The unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019, stated that "PT Agro Muko is committed not to employ children under 18 years of age, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".</p> <p>Based on verification of job vacancy announcement documents as well as job application requirements data, it shows that each applicant file must attach a copy of National Identity Card (KTP) to verify data of age and citizenship status.</p>	Comply
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>As outlined in indicator 6.4.1, The unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019, stated that "PT Agro Muko is committed not to employ children under 18 years of age, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".</p> <p>Based on verification of worker documents for period October 2019 in each Estate and Mill, there are no workers who are less than 18 years of age when hired as workers.</p>	Comply
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>Based on interviews with contractors, workers union officials, KMD committees and workers in field, showed that they have understood company policies to prohibit the use of child labor in all types of company operational activities.</p> <p>Based on document verification, shows that the unit of certification has disseminated the policy prohibiting the use of child labor through:</p> <ol style="list-style-type: none"> 1. Post the policy on the bulletin board in each estate/mill office 2. Conducting verbal dissemination to workers, especially types of work which are vulnerable to use "informal workers" such as in the harvesting. 3. Include a clause of prohibiting the use of child labor in each contract document with the contractor. 	Comply
<p>Criteria 6.5:</p>			

There is no harassment or abuse in the workplace, and reproductive rights are protected.		
6.5.1	(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>The unit of certification has a policy on prevention of sexual harassment/ violence as outlined in policy No. QMM-40-01-P10, Rev 1 (Sexual Harassment Policy) dated 27 March 2019. Based on interview with female workers and Gender Committee, shows that they have understood the company's policies on prevention of sexual harassment. During 2019 there had never been complaints from employees related to sexual harassment/violence at work, however there were reports of affair between employees in Tanah Rekah Estate and has been processed using the Company Code of Ethics.</p> <p>The policy has been disseminated to employees through posting the policies on the notice board (Estate/Mill Office) and conduct verbal dissemination to employees, for example:</p> <ol style="list-style-type: none"> a. Dissemination to Mukomuko Estate employees on 4 November 2019, attended by 84 workers. b. Dissemination to Mukomuko POM Lab employees on 16-17 September 2019, attended by 11 workers. c. Dissemination to Talang Petai Estate employees on 5 August 2019, attended by 29 workers. d. Dissemination to Tanah Rekah Estate employees on 9 September 2019, attended by 33 workers. e. Dissemination to Sei Kiang Estate employees on 24 September 2019, attended by 48 workers including contractors.
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	<p>The unit of certification has a policy on protection of reproductive rights as outlined in policy No. QMM-40-01-P11, Rev 1 (Protection of Reproductive Rights Policy) dated 27 March 2019. Based on interview with female workers and gender committee, show that they have understood the company's policy on protection of reproductive rights. The unit of certification have implemented protection of reproductive rights, for example:</p> <ol style="list-style-type: none"> 1. Give 90 days of maternity leave. 2. Give menstrual leave (H1) rights to female workers who are sick during menstruation for 2 days with the consideration from medical personnel. 3. Conduct pregnancy test for to female workers who work at high-risk stations such as spraying and fertilizing. Transferring pregnant workers to other types of work that are not at risk for pregnancy. 4. Give special time for female workers who are breastfeeding at 10:00 to 11:00 and at 15:00 to 15:30.

		<p>All policies on the protection of reproductive rights are also regulated in Collective Labor Agreements or Company Regulations.</p> <p>The policy has been disseminated to employees through posting the policies on the notice board (Estate/Mill Office) and conduct verbal dissemination to employees, for example:</p> <ul style="list-style-type: none"> a. Dissemination to Mukomuko Estate employees on 4 November 2019, attended by 84 workers. b. Dissemination to Mukomuko POM Lab employees on 16-17 September 2019, attended by 11 workers. c. Dissemination to Talang Petai Estate employees on 5 August 2019, attended by 29 workers. d. Dissemination to Tanah Rekah Estate employees on 9 September 2019, attended by 33 workers. e. Dissemination to Sei Kiang Estate employees on 24 September 2019, attended by 48 workers including contractors. 	
6.5.3	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.	The unit of certification has implemented policy to give special time to female workers who are breastfeeding for breastfeeding their children at 10:00 - 11:00 and 15:00 - 15:30 as stipulated in the Collective Labor Agreement or Company Regulations. However the company can reassess the needs of female worker who just given birth by involving Gender Committee Contact Group.	Comply
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	<p>Specific Grievance mechanisms for complaints related to sexual harassment/ violence are set out in the Sexual Harrassment/Violence Prevention Policy (QMM-40-01-P10, Rev 1) dated 27 March 2019. The complaint mechanism refers to the Grievance Policy (QMM-40-01-P12) dated 1 March 2014.</p> <p>Based interview with female workers and Gender Committee, they have understood the company's policy related Prevention of Sexual Harrassment/ Violence.</p> <p>The policy has been disseminated to employees through posting the policies on the notice board (Estate/Mill Office) and conduct verbal dissemination to employees, for example:</p>	Comply

		<ul style="list-style-type: none"> a. Dissemination to Mukomuko Estate employees on 4 November 2019, attended by 84 workers. b. Dissemination to Mukomuko POM Lab employees on 16-17 September 2019, attended by 11 workers. c. Dissemination to Talang Petai Estate employees on 5 August 2019, attended by 29 workers. d. Dissemination to Tanah Rekah Estate employees on 9 September 2019, attended by 33 workers. e. Dissemination to Sei Kiang Estate employees on 24 September 2019, attended by 48 workers including contractors. 	
<p>Criteria 6.6: No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All work is voluntary and following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages 	<p>Based on interview with workers and workers union, stated that the unit of certification does not practiced such thing as follows:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages 	Comply
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p>	<p>There is no casual worker works at the unit of certification. All workers have status of permanent workers (SKU-B or SKU-H) of temporary worker (PKWT). PKWT is only applicable for probation period. Gradually the status of PKWT has been upgraded to be Permanent Workers (SKU-H), as evidence:</p> <ol style="list-style-type: none"> 1. Appointment Letter of PKWT became SKU-H No.03/RMO-MME/IV/2019 dated 1 April 2019 for 14 harvester in Mukomuko Estate. 2. Appointment letter of PKWT became SKU-H No.20/RMO-MME/X/2019 dated 2 October 2019 for 7 harvester in Mukomuko Estate. 	Comply

		<p>3. Appointment letter from SKU-H to SKU-B No.209/JWB-RMOBG/IX/2019 dated 16 November 2019 for 3 workers of Sungai Kiang Estate, Air Buluh Estate and CWAM (Central Workshop).</p> <p>4. Appointment letter of PKWT became SKU-H No.31/TRE-RMO/VI/2019 dated 20 June 2019 for 2 workers in Tanah Rekah Estate.</p> <p>For other types of work, PT Agromuko collaborates with local labor service providers to do seasonal work such as Replanting.</p>	
<p>Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<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>PT Agromuko – Mukomuko POM has appointed the responsible person(s) for OHS is identified, e.g:</p> <p>Tanah Rekah Estate:</p> <ul style="list-style-type: none"> • OHS expert namely Mr. Mohd. Nurdiansyah certificate number “Ser 18 17869/AK3/U/V/2018 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum Menteri Tenaga Ketenagakerjaan”, issued dated 2nd May 2018 – valid until 3 years • OHS committee (P2K3) has registered to Manpower Agency as per “Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Provinsi Bengkulu Nomor: 503/983/27/DPMPSTP tentang Surat Keputusan Kelapa Dinas Tentang Pembentukan Panitia Keselamatan dan Kesehatan Kerja PT Agromuko – Tanah Rekah Estate”. <p>The record of OHS meeting, e.g:</p> <ul style="list-style-type: none"> • Record of OHS meeting dated 30th October 2019, location in Sei Kiang Estate, agenda: Review of the meeting result of the last, review of OHS inspection and review of incident report • Report of OHS performance for period July – September 2019 was sent to Manpower Agency in Bengkulu Province both for Tanah Rekah Estate, Sei Kiang Estate and Mukomuko POM (report number: 02/SKGE/Disnaker/X/2019 – dated 9th October 2019). The contains of the report: <ul style="list-style-type: none"> - Minute of OHS meeting month July, August and September 2019 - Record of OHS inspection July to September 2019 	<p>Comply</p>

		<ul style="list-style-type: none"> - Report of accidents (if any) - Record of the OHS program implementation 	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>PT Agromuko – Mukomuko POM has prepared the procedure of accident and emergency as per document of Incident Report, No: OHS-01-08, issued date 4th February 2019 version 0.</p> <p>Steps to Report Incidents:</p> <ol style="list-style-type: none"> 1. Applies to all accidents, diseases and incidents that occur in the PT TTI environment 2. The initial data that must be given if an incidents occur is: <ul style="list-style-type: none"> • Date and time occur • Location of the incidents • Name and or number of victims • Activity at the time of incidents • The is injury or death <p>The procedure available in appropriate language of the workforce and has been socialization to all workers, e.g: Attendance list on socialization of accidents procedure dated 13th – 14th September 2019.</p> <p>Sei Kiang Estate has assigned operatives trained in First Aid are present in both field and other operations, e.g: namely Mr Sukedi (certificate number: 560/093/D.3/IV/P3K/2015 – issued by Manpower Agency in Mukomuko Regency.</p>	Comply
6.7.3	<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>PT Agromuko – Mukomuko POM has shown the document of Labor Agreement as per “Perjanjian Kerja Bersama 2018-2020”, in chapter XIV mentioned OHS equipment including PPE was provided free of charge to all workers at the place of works to cover all potentially hazardous operations.</p> <p>Based on viist to chemical storage (pesticides) in Sei Kiang Estate, Tanah Rekah Estate and Mukomuko Estate, there was a facilities related to OHS, e.g: sanitation facilities, PPE, eye wash and the facilities to put personal clothing.</p>	Comply
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</p>	<p>PT Agromuko – Mukomuko POM provide all workers will medical care and covered by accidents insurance, the statement as mentioned Labor Agreement year 2018-2020 in chapter XIII Jaminan Sosial dan Bantuan Sosial.</p>	Comply

	national law or by the unit of certification where national law does not offer protection.	Based on interview with sample workers during field visit and consultation with labor union, they were stated all workers in PT Agromuko are provided with medical care and accident under BPJS Kesehatan and PBJK Ketenagakerjaan. Sample of data verified: <ul style="list-style-type: none"> • Payment record of medical care (BPJS Kesehatan), month October 2019 – was paid on 31st October 2019 (document number: JV19100073), amount paid IDR XX,264,244 (number of employee in Talang Petai Estate is 353 workers and number of dependent is 610 persons. • Record of payment of social insurance (BPJS Ketenagakerjaan) for month October 2019, reference number: 1911 0332 1691, total IDR XX,531,796 was covered for 340 wokers (all workers) in Talang Petai Estate, dated 22nd October 2019 	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	PT Agromuko – Mukomuko POM has shown the record of injuries using lost time accident (LTA) metrics as in "Laporan Kehilangan Waktu Kerja – LTA" year 2019. <ul style="list-style-type: none"> • Mukomuko POM, there was no accidents reported since 2019. • Tanah Rekah Estate, year 2019 there was reported 2 cases of accidents, total LTA is 7 mandays. • Sei Kiang Estate, year 2019 there was reported 1 case of accidents, total LTA is 5 mandays. <p>Each accident has conducted the investigation and followed up with corrective action, e.g: Formulir Pelaporan Kecelakaan Kerja, anmely Mr Soleh Rianto (harvester) – workplace in Sei Kiang Estate dated 25th September 2019; chronology: Mrs Soleh was being hit by palm thorns. Accident category is medium. The recommendation of investigation result has been followed up.</p>	Comply
Principle 7:			
Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1:			
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	It was available documented IPM Program under "Program Pengendalian Hama Terpadu Tahun 2019" for each Estate and Scheme Smallholders. Program consist of monitoring of barn-owl nest; repair of barn-owl nest; identification of beneficial weeds that grown	Comply

		<p>in plantation area; census of Ganoderma; planting of <i>Turnera</i>, <i>Antigonon</i> and <i>Casia tora</i>; identification of natural predator of leaf eater caterpillar.</p> <p>IPM Program 2019 of Tanah Rekah Estate consist of monitoring of barn-owl nest; identification of beneficial weeds, planting of <i>Antigonon leptopus</i>, <i>Turnera subulatta</i> and <i>Casia tora</i>; ganoderma census and dissemination of beneficial weeds to spraying workers. Barn-owl monitoring period Oct 2019 described that there is 3 barn-owl nest in Division 1; 6 in Division 2; 6 in Division 3; 2 in Division 4 and 2 in Division 5 with 80% of occupation. Dissemination of beneficial weed conducted in Division 4 on 9 Apr 2019.</p> <p>IPM Program 2019 of Talang Petai Estate consist of monitoring of barn-owl nest; establish new barn-owl nest; census of ganoderma (pest detection); identification of beneficial weeds, planting <i>Antigonon leptopus</i>, <i>Turnera subulatta</i> and <i>Casia tora</i>. Pest Detection period Aug, Sep, Oct and Nov 2019 indicates no leaf-eater caterpillar infestation in Talang Petai Estate.</p> <p>Kebun Plasma Sungai Tenang IPM Program 2019 described that pest and disease detection has been done in January, May and September 2019. Pest and disease census period Sep 2019 indicates light attack of wild boar in some area. Attack level is still under the 5% threshold, no control action needed. Identification of beneficial weeds performed monthly; in 2019 February it was identified 2060 plants, in March identified 3446 plants, in April 422 plants, in May 499 plants, in June 461 plants, in July 318 plants, in August 533 plants, in September 501 plants and in October 564 plants. Species identified are <i>Clidemia hirta</i>, <i>Urena lobate</i>, <i>Borreria tahfolia</i>, <i>Elephantopus tomentosus</i>, <i>Ageratum spp.</i>, and <i>Nephrolepis biserrata</i>. no leaf eater caterpillar infestation.</p> <p>KMD Lubuk Pinang, KMD Sungai Lintang and KMD Pondok Batu pest and disease census period Oct 2019 indicates no leaf-eater caterpillar infestation, as well as no rat and termite attack identified. Plasma Sungai Tenang pest and disease census period Oct 2019 also indicates no leaf-eater caterpillar infestation, and no rat and termite attack identified.</p>	
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.	The company can provided "100 of the World's Worst Invasive Alien Species" a selection from the Global Invasive Species Database, published by Invasive Species Specialist Group (ISSG) in association with IUCN, Species Survival Commission and Bionet. Based	Comply

		on field visit, there is no species listed in the document used in Sei Kiang Estate, Talang Petai Estate, Mukomuko Estate, Tanah Rekah Estate, Plasma Sungai Tenang and KMDs.																																																	
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. [For NI to define process]	Based on filed visit and document review, there is no use of fire for pest control in whole area of Sei Kiang Estate, Talang Petai Estate, Mukomuko Estate, Tanah Rekah Estate, Plasma Sungai Tenang and KMDs.	Comply																																																
Criteria 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.	<p>The company has recorded list of herbicide used, completed with active ingredient, WHO class, trademark, target, registration number and expiry date.</p> <table border="1"> <thead> <tr> <th>Trademark</th> <th>Active Ingredient</th> <th>WHO Class</th> <th>Target</th> <th>Registration Number</th> <th>Expiry date</th> </tr> </thead> <tbody> <tr> <td>Smart 486 SL</td> <td>Isopropil amina glifosat</td> <td>U</td> <td>Grasses weed</td> <td>RI.01030119971313</td> <td>12/11/2023</td> </tr> <tr> <td>Metsulindo 20 WP</td> <td>Metil metsulfuron</td> <td>U</td> <td>Ferns, Broad Leaf, Sedges</td> <td>RI.01030119991484</td> <td>05/05/2021</td> </tr> <tr> <td>Garlon 670 EC</td> <td>Triclopir butoksi etil ester</td> <td>III</td> <td>Drus Weeds/Wood</td> <td>RI.0103011984695</td> <td>30/12/2023</td> </tr> <tr> <td>Basta 150 SL</td> <td>Amonium glufosinat</td> <td>III</td> <td>Grass weed, broad leaf</td> <td>RI.01030119921113</td> <td>12/12/2020</td> </tr> <tr> <td>Marshal 5 G</td> <td>Karbasulfan</td> <td>II</td> <td>Oryctes rhinoceros</td> <td>RI.01010119961279</td> <td>06/10/2022</td> </tr> <tr> <td>Decis 25 EC</td> <td>Deltametrin</td> <td>II</td> <td>Oryctes, Apogonia sp.</td> <td>RI.0101011979387</td> <td>06/10/2022</td> </tr> <tr> <td>Dithane M45 80 WP</td> <td>Mankozep</td> <td>U</td> <td>Fungi control</td> <td>RI.01020197459</td> <td>15/12/2019</td> </tr> </tbody> </table>	Trademark	Active Ingredient	WHO Class	Target	Registration Number	Expiry date	Smart 486 SL	Isopropil amina glifosat	U	Grasses weed	RI.01030119971313	12/11/2023	Metsulindo 20 WP	Metil metsulfuron	U	Ferns, Broad Leaf, Sedges	RI.01030119991484	05/05/2021	Garlon 670 EC	Triclopir butoksi etil ester	III	Drus Weeds/Wood	RI.0103011984695	30/12/2023	Basta 150 SL	Amonium glufosinat	III	Grass weed, broad leaf	RI.01030119921113	12/12/2020	Marshal 5 G	Karbasulfan	II	Oryctes rhinoceros	RI.01010119961279	06/10/2022	Decis 25 EC	Deltametrin	II	Oryctes, Apogonia sp.	RI.0101011979387	06/10/2022	Dithane M45 80 WP	Mankozep	U	Fungi control	RI.01020197459	15/12/2019	Comply
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7.2.2	(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>Document "Evaluasi Pemakaian Pestisida" recorded pesticides use including active ingredients, LD50, area treated, amount of active ingredients applied per Ha and per ton FFB.</p> <p>Pesticide use in Mukomuko Estate and KMD in 2019 (up to Oct):</p>	Comply																																																

Trademark	Volume (L or kg)	LD50 Skin (mg/kg bw)	A.I.	A.I./Ha	Toxicity
Smart 486 SL	10,850	5000	5,273.10	1.61	0.000322
Metsulindo 20 WP	409.75	5000	81.95	0.03	0.000005
Basta 150 SL	5,660	2000	849.00	0.26	0.000130
Marshal 5 G	1,040	2000	5.20	0.00	0.000001
Decis 25 EC	265	2000	6.63	0.00	0.000001
Dithane M45 80 WP	228	2000	18.24	0.01	0.000003

Pesticide use in Tanah Rekah Estate and KMD in 2019 (up to Oct):

Trademark	Volume (L or kg)	LD50 Skin (mg/kg bw)	A.I.	A.I./Ha	Toxicity
Smart 486 SL	5,533.15	5000	2,689.11	0.88	0.000177
Metsulindo 20 WP	348.48	5000	69.70	0.02	0.000005
Basta 150 SL	954.64	2000	143.20	0.05	0.000024
Marshal 5 G	20,634.00	2000	103.17	0.03	0.000017
Garlon 670 EC	120.48	5000	80.72	0.03	0.000005

Herbicide use in Talang Petai Estate and KMD in 2019 (up to Oct):

Trademark	Volume (L or kg)	LD50 Skin (mg/kg bw)	A.I.	A.I./Ha	Toxicity
Smart 486 SL	3,460.00	5000	1,681.56	0.80	0.000161
Metsulindo 20 WP	173.75	5000	34.75	0.02	0.000003
Basta 150 SL	620.00	2000	93.00	0.04	0.000022
Garlon	155.00	5000	103.85	0.05	0.000010

Herbicide Smart 486 SL used in Plasma Sungai Tenang in 2019 (up to Oct) is 102.72 L; Garlon used 20.69 L; Metsulindo used 3.21 Kg; and Agristik used 29.94 L.

7.2.3

(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.

There is no use of prophylactic use of pesticides throughout PT. Agro Muko, PT. Mukomuko Agro Sejahtera and in Kebun Masyarakat Desa/KMD. Pesticide are only use to reduce / eliminate existing pest, which has exceeded the economic threshold.

Comply

7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best	There is no use of prophylactic use of pesticides throughout PT. Agro Muko, PT. Mukomuko Agro Sejahtera and in Kebun Masyarakat Desa/KMD. Pesticide are only use to reduce / eliminate existing pest, which has exceeded the economic threshold.	Comply
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>7.2.5a Judgment of the threat and verify why this is a major threat</p> <p>7.2.5b Why there is no other alternative which can be used</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative</p> <p>7.2.5d What is the process to limit the negative impacts of the application</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>PT Agro Muko and PT Mukomuko Agro Sejahtera are not using pesticide Class I and Class II. Despite paraquat is not prohibited in Indonesia, company committed to avoid use of Paraquat.</p> <p>The company has commitment to eliminated using Paraquat since 1 January 2017 based on General Manager letter No.35/GMAM-Est/XII/2015, dated 8 December 2017. Visit to chemical store and record review upon "Rekaman Penggunaan Pestisida Per Metric Ton FFB tahun 2019" shows company chemical product for specific target species (weed), and no paraquat.</p> <p>There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat in PT Agro Muko and PT Mukomuko Agro Sejahtera.</p> <p>There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat in PT Agro Muko and PT Mukomuko Agro Sejahtera.</p> <p>There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat in PT Agro Muko and PT Mukomuko Agro Sejahtera.</p> <p>There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat in PT Agro Muko and PT Mukomuko Agro Sejahtera.</p>	Comply
7.2.6	(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 Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	<p>The company has provided training for all workers that conducted chemical spraying including for Scheme Smallholders (KMD and Plasma), as evidence in "Hasil Pelatihan Spraying dan Kalibrasi Alat Semprot" dated 22 Mar 2019 in Mukomuko Estate. The training was attended by: Field Head Assistant, all Field Assistant, all Spraying workers and supervisors including that apply spraying in KMDs.</p> <p>Training of spraying and chemical handling in Tanah Rekah Estate was conducted on 1 Nov 2019 located at Block 90B14A Division 2. Training attended by 25 spraying workers, Supervisor and Field Assistant. Summary of training was flowrate 220 cc/minutes;</p>	Comply

		<p>spraying wide 165 cm; walking speed 2700 cm/minutes; spraying volume 50 Lt/Ha. Training module, evaluation result and attendance list were available.</p> <p>Handover of PPE to spraying worker of Division 1 Mukomuko Estate dated 4 Oct 2019, consist of 5 pcs Apron (shift type orange colour); 5 pcs Hand gloves PVC blue colour; 5 pcs Cotton mask black colour and 5 pcs plastic googles.</p> <p>Handover of PPE to spraying worker of Tanah Rekah Estate was available dated 30 Apr 2019. PPE observed during auditor field visit are gumboots, wearpack; Apron (shift type orange colour); Cotton mask black colour; Hand gloves PVC blue colour; and plastic googles.</p> <p>Handover of PPE to spraying worker of Sei Kiang Estate was available dated 8 Nov 2019 to 22 spraying workers and 1 supervisor. PPE observed during auditor field visit are gumboots, wearpack; Apron (shift type orange colour); Cotton mask black colour; Hand gloves PVC blue colour; and plastic googles.</p>	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p>	<p>The storage for all pesticide is in good condition.</p> <p>Surveillance 1.4 – year 2019, based on filed visit in storage of pesticides and interview with storage keepers both in Mukomuko POM, Tanah Rekah Estate, Mukomuko Estate, Talang Petai and Sei Kiang Estate, the storage for all pesticide is in good condition.</p> <p>A standard storage system appears to be implemented across PT. Agro Muko and PT. Mukomuko Agro Sejahtera. Double lock storage dedicated for WHO II chemical is available. The storage is equipped with sufficient air ventilation to provide air circulation.</p> <p>Hazard signs, emergency shower, secondary containment, spill kit, appropriate PPE (overall, face shield, impermeable rubber gloves, apron and mask) is available and ready for use.</p> <p>Working instruction for pre-mixing, stacking and storing pesticide is current, MSDS is also readily available. Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the areas of mixing. These were all seen be controlled by date</p>	Comply

		and were readily available. No concentrates are taken into the field are pre-mixed in designated mixing area.	
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	<p>Permit of temporary hazardous waste storage as per "Keputusan Kepala Dinas Penanaman Modal Pelayanan Perizinan dan Tenaga Kerja Kabupaten Mukomuko Nomor 503/10/D.10/IPLB3/VII/2017 tentang Pemberian Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun kepada PT Agromuko – Sei Kiang Estate, dated 21st July 2017, valid until 5 years.</p> <p>Record of disposal of all pesticides container as per "Berita Acara Serah Terima Barang Limbah Bahahn Berbahaya dan Beracun (B3)" dated 27th August 2019, delivered to PT Amindy Barakah Sumut, consisted of:</p> <ul style="list-style-type: none"> - Oil used (720 liters) - Filer used (120 kg) - Empty pesticides containers (75 kg) - Hazardous waste manifest nomor: AVT 0011594, material name: empty pesticides container (quantity: 75 kg), vehicle BK 9552 MN, transporter name PT Amindy Barakah, dated 27th August 2019. - Environmental Performance Report (3 months basis) on handling of hazardous was to Environmental Agency in Mukomuko Regency as per "Laporan Kegiatan Pengelolaan dan Penyimpanan Limbah B3" for period July to September 2019, was submitted on 28th October 2019, document number: 02/SKGE/X/V/2019 - was received by Mrs Aisya (staff in BLH Regency). 	Comply
7.2.9	(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.	There is no aerial application of pesticide in PT Agro Muko and PT Mukomuko Agro Sejahtera.	Comply
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Sei Kiang – the special annual medical surveillance for pesticides operators was conducted on 24 th September 2019 by Klinik Anugerah Ibu dan Laboratory – Medan. The result of MCU still in prepared by the clinical.	Comply

		MCU was attended by 38 workers, consisted of pesticides applicators, chemical storage keeping, generator (electrical) operator, e.g. Mrs Rosni (sprayer), Mrs Suciati (sprayer), Mr Suharto (generator operator), Mrs Nur Janah (supervisor for chemical applicator).	
7.2.11	(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.	Based on interview with workers on handling of pesticides, there was no works with pesticides is undertaken by person under the of 18, pregnant or breastfeeding women or other people that have medical restrictions. Data seen: - Report of monitoring no pregnant and breastfeeding workers (monthly), the were no indications. E.g: Mrs Repriana Sihombing, Mrs Iin Rahayu, Mrs Saniah, Mrs Asmayanti. - Based on list of pesticides applicator updated in October 2019, the youngest worker is Namely Mrs Nurbaidah (register number 700), date of birth 9 th September 1984 joined in 1 st May 2011 (35 years old).	Comply
Criteria 7.3:			
Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	Certificated holder has shown the document of waste management plan is documented in procedure "Pengelolaan Sampah" and "Rencana Pengelolaan Limbah". Waste management which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, such as: <ul style="list-style-type: none"> • Domestic waste, to reduce pollution to the environment. • Organic and inorganic waste sent to landfill and then covered with soil. • Medical waste, and other type hazardous waste (waste oil, empty chemical container, contaminated material, battery) regulated as per procedure "Penyimpanan Limbah Bahan Berbahaya dan Beracun (Limbah B3) dan Tanggap Darurat". • The hazardous waste stored in a dedicated storage completed with alarm, spill kit, secondary containment and PPE for operation. • Location of landfill in Sei Kiang Estate in block 98LOA 	Comply
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	The unit of certification has prepared a procedure on disposal of waste material under procedure of "Management of Hazardous and Toxic Water Material" no: ENC 01-10/04-03-2019/Revision 1, dated 18 th March 2019.	Comply

		<p>Step of the procedures are:</p> <ul style="list-style-type: none"> • Identification of hazardous waste • Identification of hazardous waste review • Data collection and B3 waste collection • Installation of B3 waste risk and hazard symbols • Review of hazardous waste management B3 • Making contract with carrier (SPK) • Transportation in accordance with SPK • Making a B3 waste management report to the related department <p>Based on interview with PIC in handling of hazardous waste are fully understood in proper disposal of waste material according the procedures.</p> <p>Data verified:</p> <ul style="list-style-type: none"> • "Berita Acara Serah Terima Limbah Bahan Berbahaya dan Beracun (B3)" No document: 005/MM-MILL/LB3/VII/2019, dated 27th August 2019, was sent to PT Amindy Barakah Sumut (ABS), consisted of: <ul style="list-style-type: none"> - Oils used (1,740 kg) - Filter used (33.50 kg) - Chemical container used (596.40 kg) - Printer cartridge used (1 kg) - TL lamp used (3.40 kg) - Battery used (87 kg) - Medical waste (3.40 kg) • Hazardous waste manifest No. AVT 0011603, waste name: Oil used (1,740 kg), transporter name PT Amindy Barakah Sumut (ABS), vehicle number BK 8080 MO, dated 27th August 2019. • Hazardous waste manifest No. AVT 0011604, waste name: filter used (33 kg), transporter name PT Amindy Barakah Sumut (ABS), vehicle number BK 8080 MO, dated 27th August 2019. • Hazardous waste manifest No. AVT 0011606, waste name: Chemical container used (596.40 kg), transporter name PT Amindy Barakah Sumut (ABS), vehicle number BK 8080 MO, dated 27th August 2019. 	
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		<p>Sei Kiang Estate: The waste from domestic refuse sent for landfill, located in block 98L02A (2°25'1.00"S and 101°14'4.30"E). The landfill used only for domestic household, located far from worker housing, far from river and outside conservation area. The landfill properly dug, with clear signage and barrier to avoid disturbance and/or potential hazard.</p> <p>Talang Petai Estate: The waste from domestic refuse sent for landfill, located in block 10M03A. The landfill used only for domestic household, located far from worker housing, far from river and outside conservation area. The landfill properly dug, with clear signage and barrier to avoid disturbance and/or potential hazard.</p> <p>Tanah Rekah Estate: The waste from domestic refuse sent for landfill, located in block 94B19 (2°36'28.87"S – 101°11'3.26"E). The landfill used only for domestic household, located far from worker housing, far from river and outside conservation area.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>PT Agromuko – Mukomuko POM prepared the procedure of waste management" as per Standard Operation Procedure on "Pengelolaan Sampah", no: SOP/General/ESD, revision 0) issued date 1st March 2010. In point 6.1.1. mentioned the waste disposal not allowed to uses open fire.</p> <p>Record of socialization the procedure no open fire for waste disposal, e.g:</p> <ul style="list-style-type: none"> • Attendance list of muster chit (Laporan Apel Pagi), dated 26th October 2019 location in division 3, attended by 51 workers • Attendance list of muster chit (Laporan Apel Pagi), dated 9th October 2019 location in division 2, attended by 79 workers (including contractors) 	Comply
Criteria 7.4:			
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	<p>The company has established SOP to managed soil fertility in whole plantation area include Scheme Smallholder to gain optimum yield and minimising environmental impact. The SOPs are as follows:</p> <ol style="list-style-type: none"> 1. OPM-06-01; dated 02/10/2017; Inorganic Fertiliser – Pupuk Inorganik. 2. OPM-06-02; dated 02/10/2017; Organic Fertiliser – Pupuk Organik 3. OPM-06-03; dated 02/10/2017; LSU: Palm Marking – LSU: Penandaan Tanaman. 	Comply

		<p>4. OPM-06-04; dated 02/10/2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel.</p> <p>The company has conduct Leaf Sample analysis, as basic of fertilizer recommendation. Estates and Scheme Smallholder conduct fertilizer application based on fertilizer recommendation.</p>	
<p>7.4.2</p>	<p>Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.</p>	<p>Leaf and rachis analysis in Talang Petai Estate was carried out on December 2017 takes 37 leaf samples and 37 rachis samples, analysis result issued on 24 January 2018. This analysis was performed by PT. Central Alam Resources Lestari. Sampled leaf and rachis taken from oil palm in among others Block 05X02A, 00L01A, 01P03A, 03R01A, 04U01A and 08B03A. Sample seen: Block 05X02A; Year of Planting 2005; Division 3; analysis result 2.48% N; 0.14% P; 0.77% K; 0.21% Mg; 0.47% Ca and 15 ppm B.</p> <p>Leaf Sample Analysis in Sei Kiang Estate, e.g. Block 00P01A; planting year 2000; Division 4; Area 31.63 Ha; Leaf nutrient content: 2.58% N; 0.152% P; 0.81% K; 0.23% Mg; 0.54% Ca; Rachis nutrient content: 0.075% P; 1.02% K; 0.09% Mg; 0.34% Ca; Trace Element: 14 ppm B.</p> <p>Leaf Sample Analysis in Mukomuko Estate, e.g. Block 12F01A; planting year 2012; Division 3; Area 29.51 Ha; Leaf nutrient content: 2.53% N; 0.151% P; 0.77% K; 0.2% Mg; 0.58% Ca; Rachis nutrient content: 0.111% P; 1.24% K; 0.11% Mg; 0.3% Ca; Trace Element: 17 ppm B.</p> <p>Leaf Sample Analysis in Tanah Rekah Estate, e.g. Block 14E09A; planting year 2014; Division 5; Leaf nutrient content: 2.69% N; 0.166% P; 0.73% K; 0.3% Mg; 0.5% Ca; Rachis nutrient content: 0.092% P; 1.01% K; 0.1% Mg; 0.24% Ca; Trace Element: 14.9 ppm B.</p> <p>Soil analysis in Mukomuko, Tanah Rekah, Sei Kiang and Talang Petai Estate was conducted in March and June 2010, carried out by JH Agriculture. This exercise includes soil analysis for KMD and cooperative (Scheme Smallholder).</p> <p>Based on JH Agriculture Services, soil series in Plasma Sungai Tenang is Berlian Jaya series (BJA); Typic kandiuults; sub soil brownies yellow to yellowish brown to strong brown; fine sandy clay to clay; 35-60% clay; deep to very deep soil; well drained; mainly</p>	<p>Comply</p>

		undulating to very steep terrain. The latest soil survey in Tanah Rekah Estate was conducted by "Laboratorium Ilmu Tanah, Fakultas Pertanian - Universitas Bengkulu" in August 2017. The result reported under "Laporan Akhir dan Reklasifikasi Tanah Gambut PT Agromuko di Tanah Rekah Estate – Agustus 2017". The report summarized the changes in land area between period 2008 to 2017.	
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.	<p>EFB application in Talang Petai Estate in 2019 were recorded in Block 19E01 in Jun 2019, EFB applied 23.08 ton for 2 Ha; Oct 2019 in Block 19E02, EFB applied 117.29 ton for 7 Ha; in Block 19E03, EFB applied 129.04 ton for 7.6 Ha; in Block 19E04, EFB applied 84.62 ton for 5.9 Ha; in Block 19E05, EFB applied 60.83 ton for 4 Ha; in Block 19E06, EFB applied 65.71 ton for 4.6 Ha; in Block 19E07, EFB applied 36.38 ton for 2.2 Ha.</p> <p>EFB application in Sei Kiang Estate in 2019 were recorded in Block 17A01; 17A02; 17A03; 17C01; 17C02; 17C03 and 17B03, EFB applied 3,518,150 kg for area 195 Ha.</p> <p>EFB application in Mukomuko Estate in 2019 were recorded in Block 12F01A; EFB applied in Apr, Jun, Jul, Aug 706.91 ton for area 16.03 Ha. In Block 12F02A; EFB applied in Apr, Jul, Aug 347.71 ton for area 7.88 Ha. In Block 12F03A; EFB applied in Apr, May, Jul 487.24 ton for area 11.05 Ha. In Block 12F04A; EFB applied in Apr, May, Jun, Jul, Aug 1,040.76 ton for area 23.60 Ha. In Block 12F05A; EFB applied in Aug 542.86 ton for area 12.31 Ha.</p> <p>EFB application in Tanah Rekah Estate in 2019 were recorded in Division 3, EFB applied 168,360 kg for area 119.40 Ha, in Block P20C09A and P20C11A. In Division 4, EFB applied 1,939,950 kg for area 63.40 Ha.</p> <p>There is no POME application in all plantation estates, Mukomuko palm oil mill waste are used for biogas plant.</p>	Comply
7.4.4	Records of fertiliser inputs are maintained.	<p>Fertilizer application conducted following fertilizer recommendation issued by Verdant Bioscience (PT. Timbang Deli Indonesia), subsidiary of Sipef Group. Evidence seen: Oil Palm Fertilizer Recommendation for PT Agro Muko – Mukomuko Estate (1st and 2nd Semester 2019).</p> <p>Recapitulation of fertilizer input in Tanah Rekah Estate for 1st and 2nd Semester 2019 was available. For example Block 90A15A; 30.09 Ha; progeny MRS; SPH 135; 4,062</p>	Comply

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palms; recommendation for fertilizer Cpd 16:10:19:6+0.5B is dosage 1.5 kg/palm; total 6,100 kg; has been applied in Sep 2019.

Recapitulation of fertilizer input in Sei Kiang Estate for 1st and 2nd Semester 2019 was available. For example Division 1 Block 99D01A; 37.04 Ha; progeny BLRS; SPH 102; 3,796 palms; recommendation for Borate is 380 kg; has been applied in 19 Jul 2019. Recommendation for Cpd 16:10:19:6+0.5B is 6,650 kg; has been applied in 19 Sep 2019.

Recapitulation of fertilizer input in Talang Petai Estate for 1st and 2nd Semester 2019 was available. For example Division 2 Block 08E02A; 38 Ha; progeny SJ; SPH 110; 4,167 palms; recommendation for Cpd 16:10:19:6+0.5B is 12,500 kg; has been applied 6,250 kg on 22 Aug 2019 and 6,250 kg on 20 Sep 2019.

Recapitulation of fertilizer input in Mukomuko Estate for 2019:

Fertilizer Type	2 nd Semester	
	Program (kg)	Realisation (kg)
Urea	191,667.50	45,402.50
CIRP	88,665.40	88,665.40
TSP	80,488.50	73,775.00
MOP	213,914.50	163,592.80
Kieserite	47,706.00	47,706.00
Borate	18,942.62	18,942.62
Cpd 16:10:19:6+0.5B	981,723.00	981,723.00
Cpd 12:12:17:2	297.00	297.00

Fertilizer input for Koperasi Plasma Sungai Tenang Sejahtera in 2019: fertilizer type Compound 16:10:19:6; for OP 2017 Block 17K02 (2nd Semester): TSP 211 kg, applied on 2 Sep 2019; Kieserite 106 kg applied on 17 Nov 2019; MOP 211 kg, applied on 11 Nov 2019 and Borate 16 kg, applied on 8 Nov 2019.

Fertilizer input for KMD under Tanah Rekah Estate in 2019: fertilizer type Compound 16:10:19:6+0.5B; program 24,400 kg; realisation 12,200 kg (1st Semester).

KMD	1 st Semester	
	Program (kg)	Realisation (kg)
KMD Tanah Rekah	3,200	3,200

		KMD Pondok Baru	2,500	2,500		
		KMD Pasar Mukomuko	3,250	3,250		
		KMD Ujung Padang	3,250	3,250		
		Total KMD	12,200	12,200		
Criteria 7.5:						
Practices minimise and control erosion and degradation of soils.						
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available.	In Tanah Rekah Estate, there was a soil survey in 2008 to determine the hectarage of peat soil in Tanah Rekah Estate. The latest soil survey was conducted by "Laboratorium Ilmu Tanah, Fakultas Pertanian - Universitas Bengkulu" in August 2017. The result reported under "Laporan Akhir dan Reklasifikasi Tanah Gambut PT Agromuko di Tanah Rekah Estate – Agustus 2017". The report summarized the changes in land area between period 2008 to 2017.				Comply

No	Land Description	Area (Ha)	(%)	
1	Peat survey 2008			
	Peat in 2008	1,030.05	33.54	
	Mineral 2008	2,041.30	66.46	
	Semi detailed peat survey 2017			
	Peat in 2017	590.28	19.22	
	Mineral 2017	2,481.03	80.78	
	Depreciation of peat 2008-2017	439.77	14.32	
	<i>Additional Mineral from changes between period 2008-2017</i>	439.77	14.32	
	2	Depth of peatland		
		40 – 120 cm	171.15	5.57
120 – 300 cm		237.29	7.73	
>300 cm		181.84	5.92	
3	Maturity of peatland			
	Saprist	590.28	19.22	
4	Peat soil taxonomy			
	Typic Haplosaprist	583.46	19.00	
	Terric Haplosaprist	6.82	0.22	
	Peat in 2017	590.28		
Total area PT. Agromuko – Tanah Rekah Estate		3,071.35	100	

In Sei Kiang Estate, soil map is available in scale 1:30,000. Based on soil survey by JH Agriculture (March and June 2010), soil characteristic of Sei Kiang Estate are:

- Berlian Jaya Series (BJA); 1,268 Ha; Typic Kandiuults, sub-soil brownies yellow to yellowish brown to strong brown; fine sandy clay to clay; 35-60% clay; deep to very deep soil; well drained; mainly on undulating to very steep terrain.
- Mukomuko Series (MMK); 867 Ha; Oxic kandiuults; sub-soil yellowish red; coarse sandy clay loam; 18-35% clay; deep to very deep; well to somewhat excessively drain; on hilly to steep terrain.
- Sangai Series (SGI); 100 Ha; Typic kandiuults; sub-soil brown to strong brown; clay; 35-60% clay; deep to very deep soil; well drained; on raised flat to rolling terrain.

		<p>Sei Kaing Estate demonstrates topographic map, indicating the area varies between 0-5° up to 15-25°. Area with slope $\geq 25^\circ$ sets aside as HCV area. No peat soil in Sei Kiang Estate.</p> <p>In Talang Petai Estate, soil map is available in scale 1:30,000. Based on soil survey by JH Agriculture (March and June 2010), soil characteristic of Talang Petai Estate are:</p> <ul style="list-style-type: none"> - Berlian Jaya Series (BJA); Typic Kandiudults, sub-soil brownies yellow to yellowish brown to strong brown; fine sandy clay to clay; 35-60% clay; deep to very deep soil; well drained; mainly on undulating to very steep terrain. - Tungkal Series (TKL); Typic Kandiudults, sub-soil yellowish brown; coarse sandy clay loam; 18-35% clay; deep to very deep; well to somewhat excessively drained; mainly on undulating to hilly terrain. - Mukomuko Series (MMK); Oxic kandiudults; sub-soil yellowish red; coarse sandy clay loam; 18-35% clay; deep to very deep; well to somewhat excessively drain; on hilly to steep terrain. - Paser Series (PSR); Lithic Hapludult; sub-soil light yellowish brown; fine sandy clay to clay; 35-60% clay; somewhat shallow to moderately deep soil; with consolidated sandstone present between 50 to 100 cm from soil surface well drained; on steep to very steep terrain. <p>Talang Petai Estate demonstrates topographic map, indicating the area varies between 0-5° up to 15-25°. Area with slope $\geq 25^\circ$ sets aside as HCV area. No peat soil in Talang Petai Estate.</p> <p>KMD Sungai Lintang have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Sungai Lintang indicates the slope between 0-5° up to 20-25°.</p> <p>KMD Talang Petai have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Talang Petai indicates the slope between 0-5° up to 20-25°.</p> <p>KMD Lubuk Pinai have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape</p>	
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		<p>relief is undulating (mineral). The topographic map in KMD Lubuk Pinai indicates the slope between 0-5° up to 20-25°.</p> <p>KMD Lalang Luas have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Lalang Luas indicates the slope between 0-5° up to 20-25°.</p>	
7.5.2	There is no extensive replanting of oil palm on steep terrain.	Based on field visit to all Estates and KMDs there is no replanting or new planting of oil palm on steep terrain.	Comply
7.5.3	There is no new planting of oil palm on steep terrain.	Based on field visit to all Estates and KMDs there is no replanting or new planting of oil palm on steep terrain.	Comply
<p>Criteria 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.</p>			
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>PT Agro Muko and PT Mukomuko Agro Sejahtera has carried out soil surveys identifying marginal and fragile soils, including steep terrain, these are taken into consideration in plans and operation. In Tanah Rekah Estate, there was a soil survey in 2008 to determine the hectarage of peat soil in Tanah Rekah Estate. The latest soil survey was conducted by "Laboratorium Ilmu Tanah, Fakultas Pertanian - Universitas Bengkulu" in August 2017. The result reported under "Laporan Akhir dan Reklasifikasi Tanah Gambut PT Agromuko di Tanah Rekah Estate – Agustus 2017". The report summarized the changes in land area between period 2008 to 2017.</p>	Comply

No	Land Description	Area (Ha)	(%)	
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	Typic Haplosaprist	583.46	19.00	
	Terric Haplosaprist	6.82	0.22	
	Peat in 2017	590.28		
Total area PT. Agromuko – Tanah Rekah Estate		3,071.35	100	

In Sei Kiang Estate, soil map is available in scale 1:30,000. Based on soil survey by JH Agriculture (March and June 2010), soil characteristic of Sei Kiang Estate are:

- Berlian Jaya Series (BJA); 1,268 Ha; Typic Kandiuults, sub-soil brownies yellow to yellowish brown to strong brown; fine sandy clay to clay; 35-60% clay; deep to very deep soil; well drained; mainly on undulating to very steep terrain.
- Mukomuko Series (MMK); 867 Ha; Oxic kandiuults; sub-soil yellowish red; coarse sandy clay loam; 18-35% clay; deep to very deep; well to somewhat excessively drain; on hilly to steep terrain.
- Sangai Series (SGI); 100 Ha; Typic kandiuults; sub-soil brown to strong brown; clay; 35-60% clay; deep to very deep soil; well drained; on raised flat to rolling terrain.

		<p>Sei Kaing Estate demonstrates topographic map, indicating the area varies between 0-5° up to 15-25°. Area with slope $\geq 25^\circ$ sets aside as HCV area. No peat soil in Sei Kiang Estate.</p> <p>In Talang Petai Estate, soil map is available in scale 1:30,000. Based on soil survey by JH Agriculture (March and June 2010), soil characteristic of Talang Petai Estate are:</p> <ul style="list-style-type: none"> - Berlian Jaya Series (BJA); Typic Kandiudults, sub-soil brownies yellow to yellowish brown to strong brown; fine sandy clay to clay; 35-60% clay; deep to very deep soil; well drained; mainly on undulating to very steep terrain. - Tungal Series (TKL); Typic Kandiudults, sub-soil yellowish brown; coarse sandy clay loam; 18-35% clay; deep to very deep; well to somewhat excessively drained; mainly on undulating to hilly terrain. - Mukomuko Series (MMK); Oxic kandiudults; sub-soil yellowish red; coarse sandy clay loam; 18-35% clay; deep to very deep; well to somewhat excessively drain; on hilly to steep terrain. - Paser Series (PSR); Lithic Hapludult; sub-soil light yellowish brown; fine sandy clay to clay; 35-60% clay; somewhat shallow to moderately deep soil; with consolidated sandstone present between 50 to 100 cm from soil surface well drained; on steep to very steep terrain. <p>Talang Petai Estate demonstrates topographic map, indicating the area varies between 0-5° up to 15-25°. Area with slope $\geq 25^\circ$ sets aside as HCV area. No peat soil in Talang Petai Estate.</p> <p>KMD Sungai Lintang have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Sungai Lintang indicates the slope between 0-5° up to 20-25°.</p> <p>KMD Talang Petai have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Talang Petai indicates the slope between 0-5° up to 20-25°.</p> <p>KMD Lubuk Pinai have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape</p>	
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		<p>relief is undulating (mineral). The topographic map in KMD Lubuk Pinai indicates the slope between 0-5° up to 20-25°.</p> <p>KMD Lalang Luas have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Lalang Luas indicates the slope between 0-5° up to 20-25°.</p>	
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	There is no extensive planting carried out by PT Agro Muko and PT Mukumuko Agro Sejahtera.	Comply
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	<p>PT Agro Muko and PT Mukomuko Agro Sejahtera is able to present map, consist of information related to the soil type and topographic condition of the Estate. Based on identified soil type, the plantation located on mineral soil – limiting factor identified was steep slope. The resolution from consultant was suitable for oil palm plantation given appropriate management for area with slope.</p> <p>Talang Petai Estate demonstrates topographic map, indicating the area varies between 0-5° up to 15-25°. Area with slope $\geq 25^\circ$ sets aside as HCV area. No peat soil in Talang Petai Estate.</p> <p>Soil surveys and topographic information from Agronomy Department has guide the company in planning of drainage, irrigation systems, roads and other infrastructure.</p>	Comply
Criteria 7.7			
No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Based on field visit and document review, there is no new planting after 15 November 2018 in Tanah Rekah and Mukomuko Estate, which have peat soil.	Comply
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	In Tanah Rekah Estate, there was a soil survey in 2008 to determine the hectarage of peat soil in Tanah Rekah Estate. The latest soil survey was conducted by "Laboratorium Ilmu Tanah, Fakultas Pertanian - Universitas Bengkulu" in August 2017. The result reported under "Laporan Akhir dan Reklasifikasi Tanah Gambut PT Agromuko di Tanah Rekah Estate – Agustus 2017". The report summarized the changes in land area between period 2008 to 2017.	Comply

No	Land Description	Area (Ha)	(%)	
1	Peat survey 2008			
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	Saprist	590.28	19.22	
4	Peat soil taxonomy			
	Typic Haplosaprist	583.46	19.00	
	Terric Haplosaprist	6.82	0.22	
	Peat in 2017	590.28		
Total area PT. Agromuko – Tanah Rekah Estate		3,071.35	100	

PROCEDURAL NOTE: 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).

7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	Subsidence of peat is monitored following SOP OPM-09-01/15-02-2019/Rev.3 (Water Management in Peat Soil). Monitoring of peat subsidence are documented in "Pemantauan Penurunan Permukaan (Subsistensi) Tanah Gambut 2019". Auditor has visited peat subsidence pole at Block P20C15A Division 3; at Block E15A Division 5 and at Block D21 Division 4 Tanah Rekah Estate. Also at Block 13M04A Division 2 and at Block 13L04A at Division 3 Mukomuko Estate.	Comply
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7.7.4	(C) A documented water and ground cover management programme is in place.	<p>Tanah Rekah and Mukomuko Estate able to demonstrated water and ground cover management program for peat area following SOP Water Management in Peat (OPM-09-01/15-02-2019/Rev.3).</p> <p>Auditor has visited peat subsidence pole at Block P20C15A Division 3; at Block E15A Division 5 and at Block D21 Division 4 Tanah Rekah Estate. Also at Block 13M04A Division 2 and at Block 13L04A at Division 3 Mukomuko Estate. Piezometer visited at Block P20C15A and C05A Division 3 Tanah Rekah Estate; also at Block M04 Division 2 Mukomuko Estate. Water gate and water level pole visited at Block C16A Division 3 Tanah Rekah Estate and at Block K02 Division 2 Mukomuko Estate.</p>	Comply
7.7.5	(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>The company has demonstrated replanting plan review for replanting program on peat area. Drain-ability assessment are conducted following internal method that documented (OPM/06-08-2019) and submitted to RSPO Secretariat.</p> <p>Tanah Rekah Estate has demonstrated Planting Plan of replanting 2020 which taken preparation in 2019 for area 457.23 Ha from surveyed area 458.09 Ha. Taken into consideration: existing year of planting, general map, planting material, soil map, Drainability Assessment, Water Management, topography and slopes, conservation area, OHS and land fire, and work schedule. Method of Drainability Assessment has been submitted to RSPO Secretariat on 16 Aug 2019.</p> <p>Key of drainability assessment is no serious flood risk and no slat water interference for the next two planting cycle that determine drain continuity of oil palm growth. Soil type for replanting area are:</p> <ul style="list-style-type: none"> - Entisol: Mollic Udifluvents (117.34 Ha). - Ultisol: Typic Paleudults (192.78 Ha). - Histosol: Typic Haplosaprist (147.11 Ha). <p>Document of Drainability Assessment for replanting in Tanah Rekah Estate was available dated 6 Feb 2019. Document contains rainfall data, water management on peat, management of flood during high rainfall, water level management on drain, deep water level management, peat subsidence.</p>	Comply

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		<p>Tanah Rekah Estate has done geotagging of each piezometer point, e.g. Block C15A Division 3, GPS coordinate is 2° 37' 17.004" S and 101° 11' 18.492" E; Block C06A Division 3, GPS coordinate is 2° 37' 15.600" S and 101° 10' 55.200" E.</p>	
<p>PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.</p> <p>PROCEDURAL NOTE: PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues].</p>			
<p>7.7.6</p>	<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 (2018) and associated audit guidance.</p>	<p>All existing plantings on peat in Tanah Rekah and Mukomuko Estate are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) which described in SOP Water Management in Peat (OPM-09-01/15-02-2019/Rev.3).</p> <p>Auditor has visited peat subsidence pole at Block P20C15A Division 3; at Block E15A Division 5 and at Block D21 Division 4 Tanah Rekah Estate. Also at Block 13M04A Division 2 and at Block 13L04A at Division 3 Mukomuko Estate. Piezometer visited at Block P20C15A and C05A Division 3 Tanah Rekah Estate; also at Block M04 Division 2 Mukomuko Estate. Water gate and water level pole visited at Block C16A Division 3 Tanah Rekah Estate and at Block K02 Division 2 Mukomuko Estate.</p>	<p>Comply</p>
<p>7.7.7</p>	<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 on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.</p>	<p>Based on field visit, there is no extensive planting on peat in Tanah Rekah and Mukomuko Estate, which have peat area.</p>	<p>Comply</p>

Criteria 7.8			
Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p>	<p>Sei Kiang and Talang Petai Estate has prepared water management plan under "Program Pengelolaan Air" issued on 4 Jan 2019. The program consist of reporting of deep water usage; quality analysis of deep water; establish silt pit at terrace contour; making individual terrace on plant that have high risk of erosion; pesticide mixing only done in mixing area. The Estate management monitor the progress monthly. The Estate has provide access to clean water for the communities. The Estate has eliminate potential pollution to the watercourse by conduct mixing of pesticide in the mixing area only.</p> <p>Water management plan available in document "Water Management Plan & Praktek Meminimalisir Pengendalian Erosi dan Degradasi Tanah 2019", such as:</p> <ul style="list-style-type: none"> - Efficient of water usage in mill and estate, included water usage for FFB process. - Install the platform on hill. - Individual terrace. - Prevent contamination in river water: planting vertiver grass, install dam, upkeep "Bronjong". - Maintain water level and piezometer in peat areas. - Planting Mucuna. <p>There was no water source identified in the Kebun Masyarakat Desa/KMD and cooperative visited. Water management plan for Kebun Masyarakat Desa/KMD in form of agrochemical regime and maintain erosion, to minimize surface runoff – that may affect surface water quality.</p>	Comply
	7.8.1b Workers have adequate access to clean water.	<p>The Estate has provide access to clean water for the workers by providing deep water. Domestic water usage are reported to the RMO monthly.</p> <p>Deep water analysis was conducted annually, as reported in "Laporan Hasil Uji" No.443.5/636b/Labkes.III dated 27 Dec 2018, issued by UPTD Laboratorium Kesehatan Daerah, Dinas Kesehatan Provinsi Bengkulu". Parameter checked consist of smell, taste, colour, DHL, TSS, temperature, Fe, F, Cu, Mn, NO₃, NO₂, pH, Al, SO₄, BOD, COD, NH₃, Cr, Zn and PO₄. It was verified sample code 05.A/20.12.2018/AS/K and 05.B/20.12.2018/AS/K.</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).</p>	<p>River in PT Agro Muko and PT Mukomuko Agro Sejahtera are protected, buffer zone of riparian are well maintained as observed during field visit.</p> <p>PT. Agro Muko – Mukomuko POM has prepared the procedure related to protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones available in SOP "Pengelolaan Sempadan Sungai, Danau dan Waduk Doc.No.16 SOP/Oil Palm/ESD rev.0, dated 1 Oct 2009.</p> <p>Based on field visit and interview with spraying team, there was that riparian zones maintained well and no chemical applied along the riparian zones.</p> <p>There was no water source identified in the KMD and cooperative visited. Water management plan for <i>Kebun Masyarakat Desa/KMD</i> in form of agrochemical regime and maintain erosion, to minimize surface runoff – that may affect surface water quality.</p> <p>Company was assisting Koperasi Produksi Plasma Sungai Tenang to prepare SPPL (Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup) – statement letter to abide environment management and monitoring plan, dated 12 December 2017. The SPPL comprise plan to manage and monitors: to avoid oil palm development/land clearing on conservation/protected area (river riparian or area with steep slope); to control soil erosion and surface run off; to prevent loss of biodiversity; to monitor the flora and fauna on the smallholder location; no hunting in KMD area; efficient use of fertilizer and herbicide; report to environment office.</p>	<p>Comply</p>
<p>7.8.3</p>	<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>Mukomuko POM has monitored the mill effluent to be in compliance with national regulation as per document "Laporan Hasil Analisa Limbah Cair PT Agromuko – Mukomuko POM year 2019.</p> <p>Measurement of mill effluent quality conducted by accreditation environmental testing and laboratory PT Mutu Agung Lestari (registered number: LP-001-IDN). The national regulation as be reference is Degree Letter Gubernur Bengkulu No 92 Tahun 2001 Lampiran 1 tentang Baku Mutu Limbah Cair untuk Industri Minyak Sawit.</p> <p>The result of monitoring year first 2019, such as:</p>	<p>Comply</p>

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		<table border="1"> <thead> <tr> <th>Parameter</th> <th>Satuan</th> <th>Baku Mutu</th> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> <th>May</th> <th>June</th> <th>July</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>mg/l</td> <td>100</td> <td>22.6</td> <td>80.6</td> <td>91.2</td> <td>89.4</td> <td>94.6</td> <td>87.2</td> <td>92.6</td> </tr> <tr> <td>COD</td> <td>mg/l</td> <td>350</td> <td>68.6</td> <td>228</td> <td>342</td> <td>336</td> <td>347</td> <td>287</td> <td>348</td> </tr> <tr> <td>TSS</td> <td>mg/l</td> <td>250</td> <td>4.5</td> <td>23</td> <td>20</td> <td>15</td> <td>16</td> <td>20</td> <td>2</td> </tr> <tr> <td>Minyak & Lemak</td> <td>mg/l</td> <td>25</td> <td>5</td> <td>5</td> <td>5</td> <td>5</td> <td>5</td> <td>5</td> <td>5</td> </tr> <tr> <td>N</td> <td>mg/l</td> <td>40</td> <td>2.56</td> <td>0.31</td> <td>10</td> <td>6.91</td> <td>10.1</td> <td>11.4</td> <td>8.32</td> </tr> <tr> <td>pH</td> <td>mg/l</td> <td>6-9</td> <td>6.37</td> <td>7.37</td> <td>7.6</td> <td>7.16</td> <td>7.7</td> <td>7.68</td> <td>7.02</td> </tr> <tr> <td>NH₃</td> <td>mg/l</td> <td>-</td> <td>1.58</td> <td>0.02</td> <td>5.92</td> <td>4</td> <td>4.12</td> <td>5.83</td> <td>2.94</td> </tr> </tbody> </table> <p>Based on the result of monitoring above, all of the parameter are compliance with national regulation.</p> <p>Mukomuko POM has shown the permit to disposed the water effluent as per "Keputusan Kepala Dinas Penanaman Modal, Pelayanan Perizinan dan Tenaga Kerja Kabupaten Mukomuko, Nomor: 503/02/D.10/IPAL/I/2019 tentang Permbelian Perpanjangan Izin Pembuangan Air Limbah ke Sungai Kepada PT Agromuko Pabrik Pengolahan Minyak Kelapa Sawit Mukomuko POM", dated 16th January valid until 5 years.</p>	Parameter	Satuan	Baku Mutu	Jan	Feb	Mar	Apr	May	June	July	BOD	mg/l	100	22.6	80.6	91.2	89.4	94.6	87.2	92.6	COD	mg/l	350	68.6	228	342	336	347	287	348	TSS	mg/l	250	4.5	23	20	15	16	20	2	Minyak & Lemak	mg/l	25	5	5	5	5	5	5	5	N	mg/l	40	2.56	0.31	10	6.91	10.1	11.4	8.32	pH	mg/l	6-9	6.37	7.37	7.6	7.16	7.7	7.68	7.02	NH ₃	mg/l	-	1.58	0.02	5.92	4	4.12	5.83	2.94	
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7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>PT Agromuko – Mukomuko POM has shown the document of mill water use per tonne of Fresh Fruit Bunches (FFB) in 2019 as per document "Laporan Pemakaian Air Pabrik per MT FFB tahun 2019", such as:</p> <table border="1"> <thead> <tr> <th>Months</th> <th>Water consumption (M³)</th> <th>FFB processed (Ton)</th> <th>Water use per FFB (M³/ton FFB)</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>20,501</td> <td>17,465.49</td> <td>0.80</td> </tr> <tr> <td>February</td> <td>17,267</td> <td>15,245.02</td> <td>1.35</td> </tr> <tr> <td>March</td> <td>20,765</td> <td>17,041.80</td> <td>1.22</td> </tr> <tr> <td>April</td> <td>20,441</td> <td>17,100.83</td> <td>1.20</td> </tr> <tr> <td>May</td> <td>27,084</td> <td>20,606.88</td> <td>1.31</td> </tr> <tr> <td>June</td> <td>22,206</td> <td>17,848.54</td> <td>1.24</td> </tr> <tr> <td>July</td> <td>37,773</td> <td>26,231.57</td> <td>1.44</td> </tr> <tr> <td>August</td> <td>34,852</td> <td>23,773.23</td> <td>1.47</td> </tr> <tr> <td>September</td> <td>28,992</td> <td>20,700.70</td> <td>1.40</td> </tr> </tbody> </table>	Months	Water consumption (M ³)	FFB processed (Ton)	Water use per FFB (M ³ /ton FFB)	January	20,501	17,465.49	0.80	February	17,267	15,245.02	1.35	March	20,765	17,041.80	1.22	April	20,441	17,100.83	1.20	May	27,084	20,606.88	1.31	June	22,206	17,848.54	1.24	July	37,773	26,231.57	1.44	August	34,852	23,773.23	1.47	September	28,992	20,700.70	1.40	Comply																																								
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October	26,561	20.852.85	1.27
Total	254,372	196,867	1.30

Mukomuko POM has shown the permit of water usage as per "Surat Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat nomor 503/KPTS/M/2018 tentang Pemberian Perpanjangan Izin Pengusahaan Sumber Daya Air kepada Perseroan Terbatas Agro Muko untuk semua Usaha Industri, Kabupaten Mukomuko, dated 1st August 2018 – valid until 5 years.

Criteria 7.9:
Efficiency of fossil fuel use and the use of renewable energy is optimised

7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is in place, monitored and reported	<p>Certificate holder has demonstrated the record on improving efficiency of the use of fossil fuels and to optimize renewable energy, e.g:</p> <p>HSD Oil usage per metric ton FFB year 2019,</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Talang Petai Estate (HSD Oil / ton FFB)</th> </tr> </thead> <tbody> <tr><td>January</td><td>8.66</td></tr> <tr><td>February</td><td>9.72</td></tr> <tr><td>March</td><td>10.60</td></tr> <tr><td>April</td><td>9.97</td></tr> <tr><td>May</td><td>10.10</td></tr> <tr><td>June</td><td>7.75</td></tr> <tr><td>July</td><td>7.29</td></tr> <tr><td>August</td><td>8.44</td></tr> <tr><td>September</td><td>7.50</td></tr> <tr><td>October</td><td>8.35</td></tr> </tbody> </table> <p>Mukomuko POM – Total of renewable Energy/Ton of CPO produced (Kcal/Ton CPO)</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Total of renewable Energy/Ton of CPO produced (Kcal/Ton CPO)</th> </tr> </thead> <tbody> <tr><td>January</td><td>2,738</td></tr> <tr><td>February</td><td>2,564</td></tr> <tr><td>March</td><td>2,698</td></tr> </tbody> </table>	Month	Talang Petai Estate (HSD Oil / ton FFB)	January	8.66	February	9.72	March	10.60	April	9.97	May	10.10	June	7.75	July	7.29	August	8.44	September	7.50	October	8.35	Month	Total of renewable Energy/Ton of CPO produced (Kcal/Ton CPO)	January	2,738	February	2,564	March	2,698	Comply
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		April	6,682		
		May	2,847		
		June	2,800		
		July	2,814		
		August	2,645		
		September	2,422		
		October	2,679		

Criteria 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	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.	<p>Company has procedure Calculation and Mitigation of Green House Gas, whereby provide guidance to register source of emissions as a result of company operation, mointor and reduce the use of materials emitting GHG emission, calculate GHG emission from company operational activities. Source of emission inventory from estate operation: use of inorganic fertilizer Urea (N), Dolomite (CaO), MOP (K₂O), Rock Phosphate (P₂O₅), use of pesticide, use HSD fuel.</p> <p>Handling emission from steam boiler in Mukomuko POM No.AMPOM-WI/PROD/009E, consist of guideline for minimizing soot pollution/particulate: ensure fibre and shell feed; minimize shell to prevent black smoke; setting air damper for ignition, avoid excess air; dumping grate on regular basis, to minimize unburn fuel; shoot blowing every 4 hours to clean heat exchanger pipes; ensure dust collector operating in good manner; monitor boiler exhaust emission through smoke density meter; monitor boiler emission every 6 months by independent laboratory; record any problem.</p> <p>Handling emission from engine generator No.AMPOM-WI/PROD/010D, consist of guideline for minimizing emission: ensure the generator operating at permitted load (80% from design); replace air filter element (every 1,250 hours), replace fuel filter (every 500 hours), replace oil filter (250 hours) – on regular basis; replace engine lubricant every 250 hours; should black smoke sighted – check engine load; should the black smoke sighted – check injection pump; monitor engine emission every 6 months by independent laboratory;</p>			Comply

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GHG reduction plan identified under "Rencana Pengurangan Emisi Gas Rumah Kaca (GHG Emission)":

Stages/Activity type	Mitigation Plan	Implementation
Preparation		
Land clearing/tree felling	Zero burning	<ul style="list-style-type: none"> - Memorandum from Director of Estate Department on zero burning - Restoration (tree planting) record - HCV map - Topographic map - HCV assessment - Land clearing SOP
	Planting trees to absorb emission	
	Identification of HCV and restore HCV area	
	Implement oil palm best management practice	
	River riparian/buffer zone management	
	Planting trees in river riparian/buffer zone and critical area	
Use of vehicle and heavy machinery	Socialization to all level of worker on GHG mitigation plan during land clearing	<ul style="list-style-type: none"> - Vehicle maintenance record - Planting record - Evaluation on vehicle use (incl. fuel efficiency)
	Maintenance the vehicle/ heavy machinery	
	Vehicle emission test on regular basis	
	Transportation arrangement (effective and efficient)	
Planting on peat	Socialization to all level of worker on GHG mitigation plan related to use of fossil fuel	<ul style="list-style-type: none"> - To manages the peat area as per regulation such as controlling the water level; - Avoid peat with depth >3 meters - Restore river riparian/buffer zone as conservation/HCV - HCV map
	Not recommended	
	If needed, implement best management practices	
	Manages the river riparian/buffer zone	
Fertilizer application	Planting trees in river riparian/buffer zone	<ul style="list-style-type: none"> - Leaf sampling analysis for accurate fertilizer recommendation
	Socialization to all level of worker on GHG mitigation plan related to land clearing on peat	
	Effective fertilizer application as per recommendation	
	No fertilizer application in rainy season	

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		No fertilizer application on river buffer zone/riparian area	- Implement SOP fertilizer application
		Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer application	
		Upkeep and harvesting	
Use of fossil fuel for transportation (FFB, fertilizer, manpower)	Maintenance the vehicle on regular basis	- Vehicle maintenance record - Planting record - Evaluation on vehicle use (incl. fuel efficiency)	
	Planting trees		
	Transportation arrangement (effective and efficient)		
	Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel		
Fertilizer and pesticide application	Effective fertilizer application as per recommendation	- Leaf sampling analysis for accurate fertilizer recommendation - Implement SOP fertilizer application - Utilize recommended pesticide	
	No fertilizer and pesticide application in rainy season		
	No fertilizer and pesticide application on river buffer zone/riparian area		
	Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer and pesticide application		
		Housing	
Use of fossil fuel for electric generation	Maintenance the machinery (genset) on regular basis	- Vehicle maintenance record - Planting record - Evaluation on Genset's fuel efficiency	
	Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel; and electricity efficiency		
	Emission monitoring on regular basis		
Waste decomposition in landfill	Waste collection to landfill	Landfill in each estate	
		FFB processing in palm oil mill	
Waste management	Using methane capture and utilize the biogas	- Methane capture and biogas plant in POM - Install EFB shredder in POM	
	Utilize EFB as boiler fuel		

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		<p>Use of fossil fuel for transportation (FFB, CPO, PK, EFB)</p>	<p>Maintenance the vehicle on regular basis Socialization to all level of worker on GHG mitigation plan related to electricity efficiency</p>	<p>- Vehicle maintenance record - Evaluation on electricity efficiency</p>	
		<p>Operation of POM's machinery including boiler</p>	<p>Maintenance the POM's machinery on regular basis Socialization to all level of worker on GHG mitigation plan related to emission Emission monitoring on regular basis</p>	<p>- Machinery maintenance record - Evaluation on boiler's efficiency - Emission monitoring report</p>	
		<p>Company have prepared the PalmGHG calculator, based on database period October 2018-September 2019. The result of calculation have been attached as appendix. The company have report the GHG calculator to RSPO.</p> <p>Tanah Rekah Estate: Training on fertilizer application for 26 fertilizer applicators in Division V, Tanah Rekah Estate, dated 22 October 2019. EFB application record, to date October 2019 shown 2,108 tons EFB applied for 182.80 Ha in Division V, Tanah Rekah Estate. Planting "Mimba" (Azadirachta indica A. Juss) 78 trees from nursery to the field, dated 16 October 2019.</p>			
<p>7.10.2</p>	<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 minimize them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p>	<p>In PT. Mukomuko Agro Sejahtera, From the "Hectare Statement", recording the land preparation and planting realization, no planting on primary forest and/or peat area for PT. Mukomuko Agro Sejahtera – Malin Deman Estate. HCV area and the vegetation are maintained.</p> <p>PT. Agro Muko has provide complete information on planting plan for <i>Kebun Masyarakat Desa/KMD</i> – including avoiding area with high carbon stock for development. Based on interview with KMD committees and document review upon "Planting Approval" document, KMD have agreed on the approach. Based on soil survey, no peat soil identified in the smallholder land.</p> <p>From the HCV report, carbon stock assessment stated area that contain high carbon stock was sets aside. No supply base to Mukomuko Estate categorized as HCS area.</p>			<p>Comply</p>

7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.	The company has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and power generator, water quality test for surface and ground water, effluent water quality, noise level, etc. The monitoring result is incorporated in RKL/RPL (environmental management and monitoring plan) and reported regularly to the government. In Mukomuko POM, all emission are monitored.	Comply
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	Based on field visit and document review there is no new planting or replanting preparation carried out by burning.	Comply
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.	The company has established fire prevention committee as reported to the Agriculture Agency of Mukomuko Regency, based on report No.26/RMO-AM/ENC/M/XI/2019 dated 6 Nov 2019. The committee is align with Emergency Response Team. The committee consist of: Chairman; Secretary; PIC for prevention; PIC for control; PIC for Logistic; Main Team consist of 2 team; Support Team consist of 2 team; Helper Team consist of 2; team each team consist of 5 personnel. Emergency Response Committee were available in Sei Kiang Estate, Talang Petai Estate, Tanah Rekah Estate and Mukomuko Estate. The committee covers estates and smallholders (KMD).	Comply
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	As evidence that prevention and control measures are engaged with adjacent stakeholder, helper team are farmer from surrounding village, for examples in Sei Kiang Estate, helper team are coming from Sei Kiang Village, Lubuk Pinang Village and Lalang Luas Village. In Tanah Rekah Estate, helper team are coming from Tanah Rekah Village, Pondok Batu Village and Ujung Padang Village. Document of Infrastructure readiness for fire prevention are reported to the local government, Agriculture Agency of Mukomuko Regency.	Comply
Criteria 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.			
PROCEDURAL NOTE for 7.12:			

<p>The 2018 RSPO P&C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Toolkit in the revised standard.</p> <p>The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems.</p> <p>High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards.</p> <p>Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs).</p> <p>The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available.</p>			
<p>7.12.1</p>	<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>The HCV assessment carried out in 2010 by “Yayasan Sawit Berkelanjutan (Indonesia Sustainable Palm Oil Foundation – YASBI Foundation)” using the guidance of Indonesia HCV Toolkit 2008 to monitor the possible extent of HCV inside the estates as well as area adjacent to it. All HCV mapped and identified.</p> <p>There is no land clearing after November 2005 that is not preceded with review against the HCV Assessment.</p>	<p>Comply</p>
<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p>	<p>The HCV assessment carried out in 2010 by “Yayasan Sawit Berkelanjutan (Indonesia Sustainable Palm Oil Foundation – YASBI Foundation)” using the guidance of Indonesia HCV Toolkit 2008 to monitor the possible extent of HCV inside the estates as well as area adjacent to it. All HCV mapped and identified. The assessment team comprise of Ir. Purwo Susanto (lead assessor – RSPO approved HCV assessor); Dr. Kunkun Jaka Gurmaya (biodiversity – RSPO approved HCV assessor); Neny Indrayana Shut. MT (ecology – RSPO approved HCV assessor); Ir. Hery Prasetyo (social impact); M. Setyawan N (GIS); Amirul Ikhsan (GIS); Asep Ridwan Anaribowo (biodiversity); Abdillah Luhur Nuratmaja Ssi (biodiversity); Arief Wahyu Candra Susilo, Ssos. (social-cultural); Sofyan Ansori (anthropology).</p>	<p>Comply</p>

The HCV assessment report concluded that PT. Agro Muko has already set aside conservation areas of a total 2,304.9 Ha consisting of natural vegetation in between palm planting to provide habitat and corridors for wildlife.

In addition, PT. Agro Muko conducted mapping of HCV area by PT. Perencana Karya Hijau Konsultan, in 2018. The HCV Assessment team comprise of Sigit B Setyanto (Team Leader, ALS); Riswan (Remote sensing and environmental service, ALS provisional); Wibowo A Djatmiko (Conservation and biodiversity); Harry Kurniawan (GIS and mapping); Kodri Sitompul (Survey and GIS assistant).

Talang Petai Estate:

Based on HCV assessment, YASBI 2010:

HCV Status	Location	Hectarage (Ha)
1 and 4	Conservation area	120.08
1	Man-made water reservoir	2.08
1 and 4	Riparian Mayan River, Rengas River, Bungin River	161.07

Sei Kiang Estate:

Based on HCV assessment, YASBI 2010:

HCV Status	Location	Hectarage (Ha)
1 and 2	Conservation area	179.02
4	Conservation area	70.19
1 and 4	Riparian Bahan River, Sako River, Sekendak River	72.22
6	Sacred Cemetery block B1 GUK	0.3
	Sacred Cemetery block F8 Orang Kayo Besar	
	Cemetery block C3 & C5	

Tanah Rekah Estate:

Based on HCV assessment, YASBI 2010:

HCV Status	Location	Hectarage (Ha)
1, 3 and 4	Danau Lebar Forest	494.73
	100 meters seashore buffer zone	45.08
6	Cemetery Danau Lebar	0.09

Mukomuko Estate:

Based on HCV assessment, YASBI 2010:

HCV Status	Location	Hectarage (Ha)
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		HCV Status	Location	Hectarage (Ha)	
	7.12.2 b: 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.	1	100 meters seashore buffer zone Conservation area	9.25 109.12	
		1 and 4	Riparian Betung river	25.51	
		6	Sacred Cemetery Makam Panjang Div.C17	0.18	
<p>PROCEDURAL NOTE for 7.12.2: For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p>					
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>PT. Agro Muko – Mukomuko POM and its supply base located in Bengkulu Province, Sumatera Island, Indonesia. Based on document “RSPO No Deforestation Consultancy: High Forest Cover Countries – Consultancy report on definitions and recommendations to the RSPO, June 2018” by Proforest;</p> <ul style="list-style-type: none"> - Indonesia fall into “High Remaining Forest, High Rate of Deforestation/HFHD”. Refer to “Section 4.6 Statistics on potential high forest cover countries” – Indonesia categorized to have 53% forest cover; 15% Intact Forest Landscape; 54.2% forest (national source); 5.4% Oil Palm Land Area; 0.7%/year deforestation rate (FAO); Increasing Deforestation Trend; 0.9%/year deforestation rate (national source); constant deforestation rate/trend. <p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera’s estate located relative to “Kerinci Seblat” National Park:</p> <ul style="list-style-type: none"> - Sei Kiang Estate estate’s boundary is “Hutan Produksi Tetap”, and adjacent to “Kerinci Seblat” National Park (<20 km); <p>PT. Agro Muko’s NDPE policy:</p>			Comply

		<p>General Information: New Development Area and Replanting No.OPM-03-00/02-10-2017, dated 20 November 2017. Stipulates "land clearing and replanting on peat land will be influenced by the type and depth of peat".</p> <p>General Information: Survey and Mapping No.OPM-03-01/02-10-2017, dated 20 November 2017. Stipulates company views on peat: "Especially for extensive peat soil, the distribution, level of maturity and depth of peat must be explained"; company view on conservation area: "the presence or absence of national park, production forest and limited production forest. Whether or not there is riparian reserves and conservation area".</p> <p>SOP Planting Plant – Approval No.ESD-01-02/11-03-2019 dated 27 March 2019. The planting approval process will review information on planting material (incl. seed certificate), soil information (soil type, peat depth map, drainability assessment, water management plan, drainage and Watergate map), topographic and slope information, presence of conservation area, OHS requirement and fire risk.</p> <p>Based on HCV assessment document by YASBI, 2018 – there is no HCV area located on local community's land, and/or local communities with legal or customary rights. Company demonstrated recognition of legal and customary lands based on participatory land use planning by preparing scheme smallholder plantation on clean-and-clear land. The local community proposed their plantation to become oil palm plantation (replanting).</p>	
<p>PROCEDURAL NOTE for 7.12.3:</p> <p>There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&C requirements apply, including FPIC and HCV requirements.</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 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</p>	<p>PT. Agro Muko prepared HCV management plan: Sei Kiang Estate: "Program Kegiatan Sei Kiang Estate 2019"</p> <ul style="list-style-type: none"> - Patrol/controlling conservation area – every month; - Camera trap install – every month; - Propagating tree seedling (for restoration) – on February, May, August, November 2019; - Nurture tree seedling (for restoration) – every month, by ranger; 	Comply

	<p>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>	<ul style="list-style-type: none"> - Planting tree seedling (for restoration) – on February, May, August, November 2019, by ranger; - Maintain and listing/inventory the tree in restoration – every end of month, by ranger; - Inventory the signboard of conservation area – every month, by ranger, report into monitoring form; - Controlling Mucuna and invasive species – every other month, by ranger, report into monitoring form; - Monitoring RTE flora and fauna – every month, by ranger, report into monitoring form; - Prepare/replace new signboard – on April & September 2019; - Socialization of conservation area to worker – on February and July 2019, by ranger; - Socialization of conservation area to stakeholder/surrounding community – on March, June and October 2019, by ranger; - Management meeting with ENC team on every month <p>Result: Camera trap period 9 February – 6 March 2019: pig-tailed macaque (<i>Macaca nemestrina</i>), hog (<i>Sus scrofa</i>), gibbon (<i>Hylobates syndactylus</i>), long-tailed macaque (<i>Macaca fascicularis</i>).</p> <p>Planting tree in HCV area (restoration) Bahan river riparian: "Ketapang" (<i>Terminalia catappa</i>) 7 trees, "Kayu bawang" (<i>Scorodocarpus berneensis</i>) 3 trees, "Kayu Afrika" (<i>Maesopsis eminii</i>) 2 trees.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland 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>Talang Petai Estate: There is no HCV area located in local community's land.</p> <p>Sei Kiang Estate: There is no HCV area located in local community's land. Audit team noted the presence of cemetery (HCV 6) used by community and workers in Sei Kiang Estate.</p> <p>Tanah Rekah Estate: There is no HCV area located in local community's land. Audit team noted the presence of cemetery (HCV 6) used by community and workers in Tanah Rekah Estate.</p> <p>Mukomuko Estate: There is no HCV area located in local community's land. Audit team noted the presence of sacred cemetery (HCV 6) respected by community in Mukomuko Estate.</p>	Comply

<p>7.12.6</p>	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p>	<p>Sei Kiang Estate: Socialization of no burning waste, no oil spill, HCV area and RTE species for worker during muster chit for 48 workers, comprise of mechanics, truck drivers, tractor drivers, ranger, carpenter, electrician, genset operator in workshop, dated 23 September 2019. Socialization of HCV area and RTE species for worker during muster chit for 31 worker, comprise of upkeep worker (oil palm, harvesting path, loading ramp, office, collection road, worker housing), spraying, circle weeding, loose fruit collector, FFB grader/checker in Division I, dated 9 October 2019. Socialization of HCV area and RTE species for worker during muster chit for 11 worker, comprise of upkeep worker (loading ramp, office, collection road, worker housing), gardener, baby sitter, manuring worker in Division III, dated 14 October 2019. Socialization of HCV area and RTE species for surrounding community to Lalang Luas village (Mr.Abu Sawar, Mr. Sadir), dated 14 March 2019. Photograph evidenced.</p> <p>Tanah Rekah Estate: Socialization of HCV area and RTE species for Desa Tanah Harapan, dated 19 January 2019 attended by 9 farmers. Socialization of HCV area and RTE species for Desa Setia Budi SP4, dated 8 January 2019 attended by 8 community member. Socialization of HCV area and RTE species for worker during muster chit for 11 harvesters, mandor, assistant, driver, dated 9 January 2019.</p> <p>Talang Petai Estate: Socialization of HCV area and RTE species for Desa Lalang Luas, dated 14 March 2019 carried out by conservation ranger to 2 community members. Socialization of HCV area and RTE species for worker during muster chit for 93 harvesters, mandor, assistant, driver, manure applicators, gardener, upkeep, sprayers; dated 30 October 2019. During the socialization, conservation ranger explained company policy prohibit hunting, poisoning, harming, collecting, trading, possess or killing RTE flora and fauna, as recorded in minute.</p>	<p>Comply</p>
<p>7.12.7</p>	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE</p>	<p>Sei Kiang Estate: Monitoring through patrol report "Monitoring Area Konservasi PT. Agro Muko" period 10-17 January 2019. The HCV area intact, fauna sighted: chipmunk, pig-tailed Macaque (Macaca nemestrina), eagle (Spilornis cheela).</p>	<p>Comply</p>

	<p>species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>Conservation Area restoration: Ranger Sei Kiang Estate planted trees as part of HCV area restoration. On 25 July 2019 planting "Pohon Salam"/Indonesian Laurel (<i>Syzygium polyanthum</i>) 12 trees, Pohon Rambutan (<i>Nephelium lappaceum</i>) 6 trees, Mahogany 2 trees, "Pohon Jambu Bol"/Malay Apple (<i>Syzygium malaccense</i>) 6 trees – in Division I.</p> <p>Talang Petai Estate: Monitoring through patrol report "Monitoring Area Konservasi PT. Agro Muko" period 21-26 January 2019. The HCV area intact, fauna sighted: chipmunk, hog, monitor lizard, and gibbon (<i>Symphalangus syndactylus</i>).</p>																																	
<p>7.12.8</p>	<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>Sei Kiang Estate:</p> <table border="1" data-bbox="1055 799 1839 1158"> <thead> <tr> <th>Planting Year</th> <th>Planted area (Ha)</th> </tr> </thead> <tbody> <tr><td>1997</td><td>242.26</td></tr> <tr><td>1998</td><td>261.02</td></tr> <tr><td>1999</td><td>231.51</td></tr> <tr><td>2000</td><td>114.18</td></tr> <tr><td>2001</td><td>66.73</td></tr> <tr><td>2004</td><td>443.10</td></tr> <tr><td>2005</td><td>94.20</td></tr> <tr><td>2008 (conversion from rubber)</td><td>15.61</td></tr> <tr><td>2009 (conversion from rubber)</td><td>147.8</td></tr> <tr><td>2013 (new planting)</td><td>29.69</td></tr> <tr><td>2017 (replanting from OP 1996 and OP 1997)</td><td>295.96</td></tr> <tr><td></td><td>1,942.06</td></tr> </tbody> </table> <p>2013 Planting Plan Sei Kiang Estate from rubber to oil palm, approved on 11 June 2013. The replanting covered 35.28 Ha land (compensated oil palm plantation planted in low laying area) and restored 18.5 Ha Sangkil river riparian – total 51.58 Ha.</p> <p>Tanah Rekah Estate:</p> <table border="1" data-bbox="1055 1302 1839 1382"> <thead> <tr> <th>Planting Year</th> <th>Planted area (Ha)</th> </tr> </thead> <tbody> <tr><td>1989</td><td>323.56</td></tr> <tr><td>1990</td><td>921.52</td></tr> </tbody> </table>	Planting Year	Planted area (Ha)	1997	242.26	1998	261.02	1999	231.51	2000	114.18	2001	66.73	2004	443.10	2005	94.20	2008 (conversion from rubber)	15.61	2009 (conversion from rubber)	147.8	2013 (new planting)	29.69	2017 (replanting from OP 1996 and OP 1997)	295.96		1,942.06	Planting Year	Planted area (Ha)	1989	323.56	1990	921.52	<p>Comply</p>
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Planting Year	Planted area (Ha)																																		
1989	323.56																																		
1990	921.52																																		

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1993	130.57
1994	80.70
1995	37.76
1996	162.84
1998	139.48
2014 (replanting from OP 1990)	74.37
2015 (replanting from OP 1990)	235.32
2018 (replanting from OP 1988 and 1989)	262.70
2019 (replanting from OP 1988)	86.37
2019 land preparation for replanting 2020	582.06

2019 Replanting Plan Tanah Rekah Estate, approved on 14 August 2018. The replanting covered 264.18 Ha land (from oil palm planting year 1988 and 1989) whereby there was 30.10 Ha was peat soil (Haplosaprist) and 234.08 Ha was mineral soil. The basis was Peat Assessment by Universitas Bengkulu in 2017. There was no HCV area identified in the proposed area.

2020 Replanting Plan Tanah Rekah Estate (felling in 2019), approved on 28 February 2019. The replanting covered 457.23 Ha land (from oil palm planting year 1990, 1993, 1994) whereby there was 147.11 Ha was peat soil (Haplosaprist) and 310.12 Ha was mineral soil. The basis was Peat Assessment by Universitas Bengkulu in 2017. There was no HCV area identified in the proposed area.

Talang Petai Estate:

Evidence:

2010 Planting Plan Talang Petai Estate from rubber to oil palm, approved on 24 May 2010. The replanting covered 222.3 Ha rubber (planted in 1990) to be convert into oil palm and restored 21.4 Ha Mayan river riparian, 2.08 Ha man-made water reservoir riparian, 15.25 Ha steep slope conservation area – total 262 Ha.

2018 Planting Plan Talang Petai Estate from oil palm (planting year 1997, 1998, 2009, 2010), approved on 27 December 2017. The replanting covered 192.07 Ha oil palm and restored 30.07 Ha conservation area – total 222.14 Ha.

2019 Planting Plan Talang Petai Estate from oil palm (planting year 1998, 1999, 2000, 2005, 2009, 2010) in Division I, II, III and IV; approved on 2 November 2018. The replanting covered 207.50 Ha oil palm and restored 24.48 Ha conservation area – total 232 Ha.

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Appendix B: Approved Time Bound Plan

Name of company	Name of Mill	Location	Supply Base	Time Bound Plan	Target Year for RSPO
PT. Agro Muko	Muko Muko Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Muko Muko estate, Sei Betung estate, Tanah Rekah estate, Talang Petai estate, Sei Kiang estate and KMD	2011	Certified
	Bunga Tanjung Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Bunga Tanjung estate, Air Bikuk estate, Air Buluh estate and KMD	2011	Certified
			PT. Mukomuko Agro Sejahtera: - Air Manjunto estate - Malin Deman estate	2014	Certified
			Ex. PT. Asri Rimba Wirabhakti (acquisition in 2018)	2020	A new NPP will be submitted waiting for HCV, LUC review
PT. Tolan Tiga	Bukit Maradja Mill	Simalungun Regency, North Sumatera, Indonesia	- Bukit Maradja Estate (PT. Eastern Sumatra Indonesia) - Kerasaan Estate (PT. Kerasaan Indonesia) - PT. Timbang Deli Indonesia	2010 2018	Certified May 2010 Certified in 2018 as supply base of Bukit Maradja POM, PT Eastern Sumatra Indonesia
	Perlabian Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	Perlabian estate and Tolan estate.	2010	Certified May 2010
PT. Umbul Mas Wisesa	Umbul Mas Wisesa Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South estate, UMW North estate and Toton Usaha Mandiri estate	2014	Certified in March 2015
PT. Agro Kati Lama		Musirawas Regency, South Sumatera, Indonesia		2021	developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014.
PT. Agro Rawas Ulu		Musirawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014.
PT. Agro Muara Rupit		Musirawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 st March 2014.
Hargy Oil Palm Limited (HOPL)	Hargy Mill	East of Bialla, West New Britain Province, PNG	Hargy Estate	2009	Certified in April 2009
	Navo Mill	50 Kms East of Bialla, West New Britain Province, PNG	Navo Estate, Bakada Estate and Mengen Estate	2009	Certified in April 2009
	Barema Mill	30 km East of Bialla, West New Britain Province, PNG	Barema Estate	2014	RSPO Certified in April 2014
PT. Dendy Maker Indah Lestari	Dendy Maker Mill	Musirawas Utara Regency, South Sumatera Province, Indonesia	Sei Mandang Estate, Sei Liam Estate	2015	Acquired on 1 August 2017. RSPO certified in 2015.

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **October 2018 – September 2019** for **Mukomuko POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **October 2018 – September 2019** for **Mukomuko POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.66
PKO	1.66

Extraction	%
OER	23.87
KER	4.75

Production	t/yr
FFB Process	234,356.69
CPO Produced	55,937.71
PKO Produced	11,122.31

Land Use	Ha
OP Planted Area	13,568.300
OP Planted on peat	1,128.232
Conservation (forested)	1,129.350
Conservation (non-forested)	0
Total	15,825.882

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	99,635.85	0.45	11,333.79	1.15	6,748.08	1.44	117,717.72	3.04
CO ₂ Emission from fertilizer	12,563.83	0.06	1,184.95	0.12	266.90	0.06	14,015.68	0.24
NO ₂ Emission	18,105.30	0.08	736.64	0.07	177.49	0.04	19,019.43	0.19
Fuel Consumption	3,922.93	0.02	0.32	0	0	0	3,923.25	0.02
Peat Oxidation	61,601.36	0.28	0	0	0	0	61,601.36	0.28
Sink								
Crop Sequestration	-88,666.76	-0.40	-9,142.95	-0.93	-5,443.66	-1.16	-103,253.37	-2.49
Conservation Sequestration	-10,797.2	-0.05	-1,318.83	-0.13	-484.18	-0.10	-12,600.21	-0.28
Total	96,365.31	0.44	2,793.92	0.28	1,264.63	0.27	100,423.9	0.99

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	21,141.73	0.09
Fuel Consumption	761.06	0
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	-2,241.15	-0.01
Sales of PKS	0	0
Sales of EFB	-8,913.59	-0.04
Total	10,748.05	0.05

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	18438.53
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	39
Divert to methane captured (flaring) (%)	21
Divert to methane captured (energy generation) (%)	40

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1.	November 2018	18,254.19	0	18,254.19
2.	December 2018	18,239.43	0	18,239.43
3.	January 2019	17,783.98	0	17,783.98
4.	February 2019	15,255.58	0	15,255.58
5.	March 2019	16,901.95	0	16,901.95
6.	April 2019	17,165.26	0	17,165.26
7.	May 2019	20,439.09	0	20,439.09
8.	June 2019	18,369.63	0	18,369.63
9.	July 2019	25,898.79	0	25,898.79
10.	August 2019	23,783.31	0	23,783.31
11.	September 2019	20,735.70	0	20,735.70
12.	October 2019	20,874.51	0	20,874.51
Total		233,701.42	0	233,701.42
Note:				

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1.	November 2018	4,127.59	890.70
2.	December 2018	4,265.94	884.64
3.	January 2019	4,024.18	828.99
4.	February 2019	3,717.85	725.79
5.	March 2019	4,220.53	794.51
6.	April 2019	4,093.54	792.19
7.	May 2019	4,973.28	952.04
8.	June 2019	4,026.47	823.36
9.	July 2019	6,337.92	1,213.92
10.	August 2019	5,980.01	1,110.11
11.	September 2019	5,239.38	1,014.45
12.	October 2019	5,319.12	995.45
Total		56,325.81	11,026.15
Note:			

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C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1.	PT. Usaha Inti Padang	TR-c4287daa-a996		1,100.00
2.	PT. Usaha Inti Padang	TR-c1361a61-2fd3		500.00
3.	PT. Usaha Inti Padang	TR-dc74a966-6246		300.00
4.	PT. Usaha Inti Padang	TR-b87baf75-be96		200.00
5.	Cargill B.V. Refined Oils Europe	TR-a643cc0b-d73b	2,000.00	
6.	Cargill B.V. Refined Oils Europe	TR-6d313644-d2b7	1,499.92	
7.	Cargill B.V. Refined Oils Europe	TR-89f1516d-5fd7	500.00	
8.	PT. Usaha Inti Padang	TR-ce60b788-2d3e		303.57
9.	PT. Usaha Inti Padang	TR-408c223f-33c3		96.43
10.	PT. Wira Inno Mas	TR-61f81d6d-a15c		500.00
11.	PT. Wira Inno Mas	TR-f6caaf06-dd1d		700.00
12.	PT. Wira Inno Mas	TR-87c88152-b7ca	2,999.88	
13.	PT. Usaha Inti Padang	TR-c4287daa-a996		1,100.00
14.	PT. Usaha Inti Padang	TR-c1361a61-2fd3		500.00
Total			6,999.80	5,300.00
Note:				

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1.	Classified	ISCC	39,999.662	0
Note:				

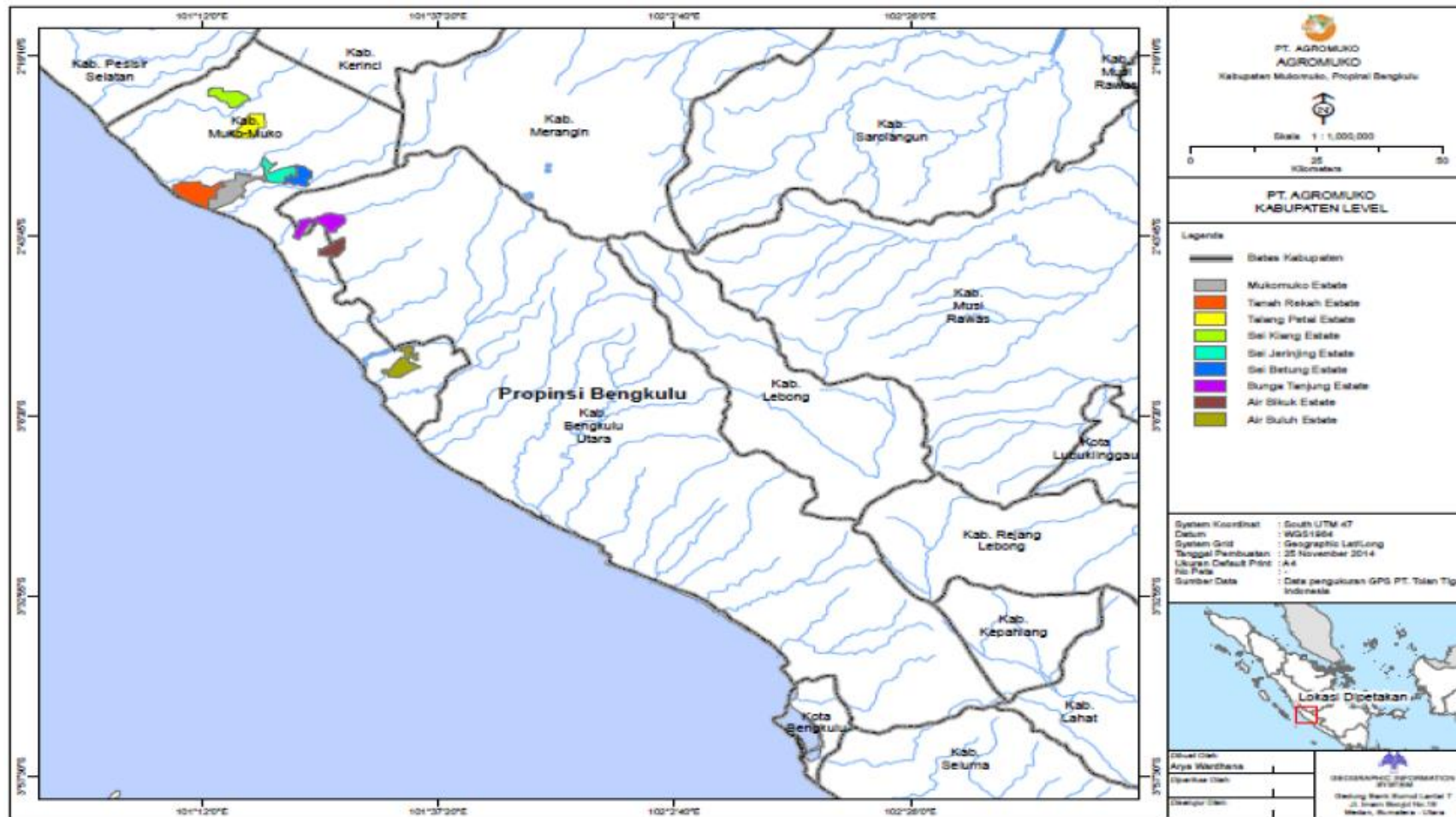
E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1.	Classified	5,999.875	0	
2.	Classified	0	5,560.64	
Note:				

F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		
Note:			

Appendix E: Location Map of Certification Unit and Supply bases



Appendix F: Estate Field Map



Appendix G: List of Smallholder Sampled

- KMD Tanah Rekah
- KMD Ujung Padang
- KMD Tunggal Jaya
- KMD Sungai Lintang
- KMD Talang Petai
- KMD Lubuk Pinang
- KSU Sei Kiang (Sungai Kiang Estate)
- Koperasi Produksi Plasma Sungai Tenang Sejahtera
- KMD Penarik
- KMD Sei Jerinjing

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