

# Audit Report

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2<sup>nd</sup> Annual Surveillance Audit and its Follow Up for

**PT. Bumi Permai Lestari, Bukit Perak Mill and its Supply Bases**

FMS40038

RSPO Membership number: 1-0096-11-000-00

RSPO Member Name: Golden Agri Resources

Audited Address:

**Bukit Perak Mill**

Dendang Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia

Supply Bases:

**Bukit Perak Estate**

Dendang Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia

**Bukit Permata Estate**

Terentang and Kacung Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia

Date of audit : 10 – 14 July 2017

Date of follow up audit : 28 August 2017

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## Executive Overview

This is the 2<sup>nd</sup> annual surveillance audit visit on 10 – 14 July 2017 against the Generic RSPO Principles and Criteria for Sustainable Palm Oil Production, 2016 (INANI) and RSPO Supply Chain Certification Standard, CPO Mill, Module E Mass Balance, November 2014.

PT Bukit Permai Lestari Bukit Perak Mill operations is comprised 1 (one) Palm Oil Mill and 2 (two) FFB supply bases owned by PT Bukit Permai Lestari. There were also supply base from independent third party which excluded from the scope of certification.

There were 1 (one) major non-conformance (NCR) and 4 (four) minor non-conformances issued during this audit. The organization has been followed up by submitting correction and corrective action plan on 28 August 2017 (off-site) in Head Office – SMART and the Major NCR was closed out.

The audit concluded that PT Bukit Permai Lestari Bukit Perak Mill and its supply bases operation were found complies with the requirements of the Generic RSPO Principles and Criteria for Sustainable Palm Oil Production, 2016 (INANI) and RSPO Supply Chain Certification Standard, CPO Mill, Module E Mass Balance, November 2014. The estimate figures of production offered for certification 2016 are:

<b>Estimated tonnage of certified CPO produced</b>	<b>: 26,558.35 MT</b>
<b>Estimated tonnage of certified PK produced</b>	<b>: 6,793.98 MT</b>

Therefore PT Bukit Permai Lestari Bukit Perak Mill and supply bases can continue to be certified as RSPO Mass Balance Model CPO and PK producer.

### Summary of net GHG emissions

The Mill has calculated the net GHG emissions using The RSPO Palm GHG Calculator Version 3.0.1 and that data inputs are verified to be accurate. Capturing the information about summary of net GHG emissions, summary of field emissions and sinks, and summary of mill emissions and credits

Emissions per Product	tCO <sub>2</sub> e/ton Product
CPO	1.03
PK	1.03

Production	ton/year
FFB processed	58,104.64
CPO Produced	12,050.09
PK Produced	3,116.7

Land use	ha
OP planted area	5,463.99
OP planted on peat	0
Conservation (forested)	116.37
Conservation (non-forested)	0
<b>Total</b>	<b>5,580.36</b>

Extraction	%
OER	20.74
KER	5.36

### Summary of field emissions and sinks

	<b>Own Crop</b>		<b>Group</b>		<b>3rd Party</b>		<b>Total</b>	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emissions</b>								
<i>Land Conversion</i>	21,822.29	0.40	0	0	0	0	0	0
<i>*CO<sub>2</sub> Emissions from Fertilizer</i>	1,075.30	0.02	0	0	0	0	0	0
<i>**N<sub>2</sub>O Emissions</i>	1,487.30	0.03	0	0	0	0	0	0
<i>Fuel Consumption</i>	373.20	0.01	0	0	0	0	0	0
<i>Peat Oxidation</i>	0	0	0	0	0	0	0	0
<b>Sinks</b>								
<i>Crop Sequestration</i>	-20,684.64	-0.38	0	0	0	0	0	0
<i>Conservation Sequestration</i>	-490	-0.01	0	0	0	0	0	0
<b>Total</b>	<b>3,583.45</b>	<b>0.07</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Summary of mill emissions and credits

	<b>tCO<sub>2</sub>e</b>	<b>tCo<sub>2</sub>e/tFFB</b>
<b>Emissions Sources</b>	11,389.49	0.20
<i>POME</i>	603.85	0.01
<i>Fuel Consumption</i>	0	0
<i>Grid Electricity Utilization</i>	11,389.49	0.20
<b>Credits</b>		
<i>Export of Grid Electricity</i>	0	0
<i>Sales of PKS</i>	0	0
<i>Sales of EFB</i>	0	0
<b>Total</b>	11,993.34	0.21

**Palm Oil Mill Effluent (POME) Treatment:**

Divert to compost	0%
Divert to anaerobic digestion	100%

**POME Diverted to Anaerobic Digestion:**

Divert to anaerobic pond	100%
Divert to methane capture (flaring)	0%
Divert to methane capture (electricity generation)	0%

## Abbreviations Used

AK3U	OHS Expert ( <i>Ahli Kesehatan dan Keselamatan Kerja Umum</i> )
AMDAL	Environmental Impact Analysis ( <i>Analisis Dampak Lingkungan</i> )
B3	Hazardous Material ( <i>Bahan Berbahaya dan Beracun</i> )
BHL	Daily worker ( <i>Buruh Harian Lepas</i> )
BKM	Log book of group leader activity ( <i>Buku Kegiatan Mandor</i> )
BLH	Environmental Agency
BOD	Biological Oxygen Demand
BPL	Bumi Permai Lestari
BNP	National Land Agency ( <i>Badan Pertanahan Nasional</i> )
BPRE	Bukit Perak Estate
BPRM	Bukit Perak Mill
BPTE	Bukit Permata Estate
CEO	Chief Executive Officer
CPO	Crude Palm Oil
CSR	Corporate Social Responsibility
Disnaker	Work Force Agency
EFB	Empty fruit bunches
FFB	Fresh Fruit Bunch
GAR	Golden Agri-Resources Limited
GPS	Global Positioning
HCV	High Conservation Value
HGU	Land Use Title ( <i>Hak Guna Usaha</i> )
IMT	PT. Ivo Mas Tunggal
INANI	Indonesia National Interpretation
IPM	Integrated Pest Management
ISO	International Standards Organisation
ISPO	Indonesia on Sustainable Palm Oil
KER	Kernel Extraction Rate
KLH	Ministry of Environment
LA	Land Application
LD	Lethal Dosage
LOTO	Lock out tag out
MB	Mass Balance
MCAR	Management Committee Agronomy and Research
MSDS	Material Safety Data Sheet
MT	Metric Ton
NGO	Non-Government Organisation
OER	Oil Extraction Rate
OHS	Occupational Health and Safety
OIA	Operation Internal Audit
P2K3	Safety Committee
PK	Palm Kernel
PKB	Joint Working Agreement ( <i>Perjanjian Kerja Bersama</i> )
PKWT	Contracted worker ( <i>Pekerja Waktu Tertentu</i> )
POME	Palm Oil Mill Effluent
PP	Government Regulation
PPE	Personal Protective Equipment
RC	Regional Controller
RKL	Environmental Management Plan ( <i>Rencana Pengelolaan Lingkungan</i> )
RPL	Environmental Monitoring Plan ( <i>Rencana Pemantauan Lingkungan</i> )

RSPO	Roundtable on Sustainable Palm Oil
SCCS	Supply Chain Certification System
SIA	Social Impact Assessment
SKU	Permanent worker ( <i>Satuan Kerja Unit</i> )
SMD	Senior Managing Director
SMARTRI	SMART Research Institute
SMK3	Occupational Health and Safety Management System
SOP	Standard Operating Procedure
SPO	Sustainable Palm Oil
SPM	Independent Worker Union ( <i>Serikat Pekerja Mandiri</i> )
TLV	Threshold Limit Value
UMP	Provincial Minimum Payment ( <i>Upah Minimum Propinsi</i> )
VPA	Vice President of Agronomy
WWTP	Waste Water Treatment Plant



## 1.0 SCOPE OF THE ASSESSMENT

### 1.1 Introduction

SAI Global conducted the 2<sup>nd</sup> annual surveillance audit on 10 – 14 July 2017 at PT. Bumi Permai Lestari - Bukit Perak Mill and its supply bases. The follow up audit of the Major NCR for reviewing the verification of effectively was conducted on 28 August 2017 (off-site) at Head Office – SMART and the Major NCR was closed out.

The purpose of this audit report is to summarise the degree of compliance with the relevant criteria, as defined on the cover page of this report, based on the evidence obtained during the audit of your organisation.

SAI Global audits are carried out within the requirements of SAI Global procedures that also reflect the requirements and guidance provided in the international standards relating to audit practice such as ISO/IEC 17021, ISO 19011, RSPO Certification System, relevant RSPO Supply Chain Certification System and other normative criteria. SAI Global Auditors are assigned to audits according to industry, standard or technical competencies appropriate to the organisation being audited. Details of such experience and competency are maintained in our records. The audit team is detailed in the attached audit record.

In addition to the information contained in this audit report, SAI Global maintains files for each client. These files contain details of organisation size and personnel as well as evidence collected during preliminary and subsequent audit activities (Documentation Review and Scope) relevant to the application for initial and continuing certification of your organisation.

Details of your primary contact persons and their contact details and site addresses are also maintained. Please take care to advise us of any change that may affect the application/certification or may assist us to keep your contact information up to date, as required by SAI Global Terms and Conditions.

Please note that this report is subject to independent review and approval. Should changes to the outcomes of this report be necessary as a result of the review, a revised report will be issued and will supersede this report.

### 1.2 Audit Objective

The purpose of this audit was to determine continuing compliance of your organization's management system with the audit criteria; and it's effectiveness in achieving continual improvement and system objectives in accordance with RSPO P&C Standard INANI 2016 and RSPO Supply Chain Standard 2014.

Also to verify the volume of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers, and the implementation of any processing controls.

### 1.3 Scope of certification

The scope of certification is the CPO production from one (1) Palm Oil Mill and two (2) FFB supply bases owned by PT. Bumi Permai Lestari. There were also receiving of the other non certified supply bases during July 2016 – June 2017 from PT. Bumi Bangka Lestari and PT. Bumi Permai Surya Lestari.

## 1.4 Location of mill and estates

### 1.4.1 Palm Oil Mill

Bukit Perak Mill, PT. Bumi Permai Lestari.

Location : Dendang Village, Kelapa District, Bangka Barat Regency, Kepulauan Bangka Belitung Province, Indonesia

GPS Location : East 105° 28' 35,13" South 1° 54' 04,91"

Mill Capacity : 60 MT FFB/hour

### 1.4.2 Oil Palm Estate

Bukit Perak Estate, PT. Bumi Permai Lestari.

Location : Dendang Village, Kelapa District, Bangka Barat Regency, Kepulauan Bangka Belitung Province, Indonesia

GPS Location : East 105°29'42.45" - 105° 36'50.82" and South 1°47'2.94" - 1°51'49.86"

Bukit Permata Estate, PT. Bumi Permai Lestari.

Location : Terentang and Kacung Villanges, Kelapa District, Bangka Barat Regency, Kepulauan Bangka Belitung Province, Indonesia

GPS Location : East 105°28'39.96" - 105°32'31.09" and South 1°50'0.99" - 1°52'17.23"

**Table 1: Mill and Estates GPS Locations**

MILL AND ESTATE	EAST	SOUTH
Bukit Perak Mill	105° 28' 35.13"	1° 54' 04.91"
Bukit Perak Estate	105°29'42.45" - 105° 36'50.82"	1°47'2.94" - 1°51'49.86"
Bukit Permata Estate	105°28'39.96" - 105°32'31.09"	1°50'0.99" - 1°52'17.23"

## 1.5 Description of supply base

**Table 2: Estimated FFB Production of the supply base in 2017**

ESTATE	PRODUCTION AREA (HA)	ESTIMATED FFB PRODUCTION (TON/YEAR)
Bukit Perak Estate	3,666.76	79,137.83
Bukit Permata Estate	1,797.23	40,609.43
<b>Total</b>	<b>5,463.99</b>	<b>119,747.26</b>

Figure 1 Location Map of Bukit Perak Mill and Estate

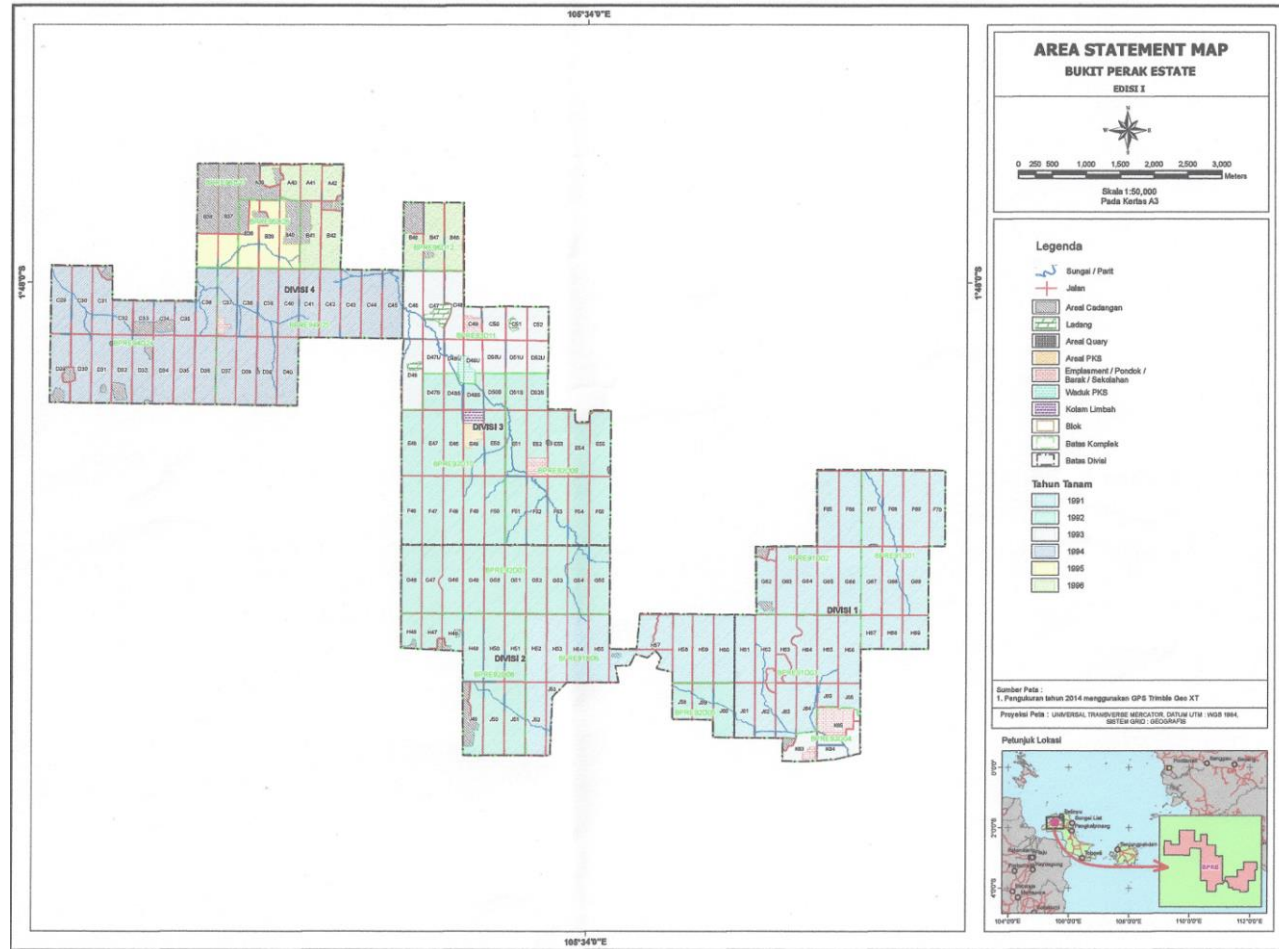
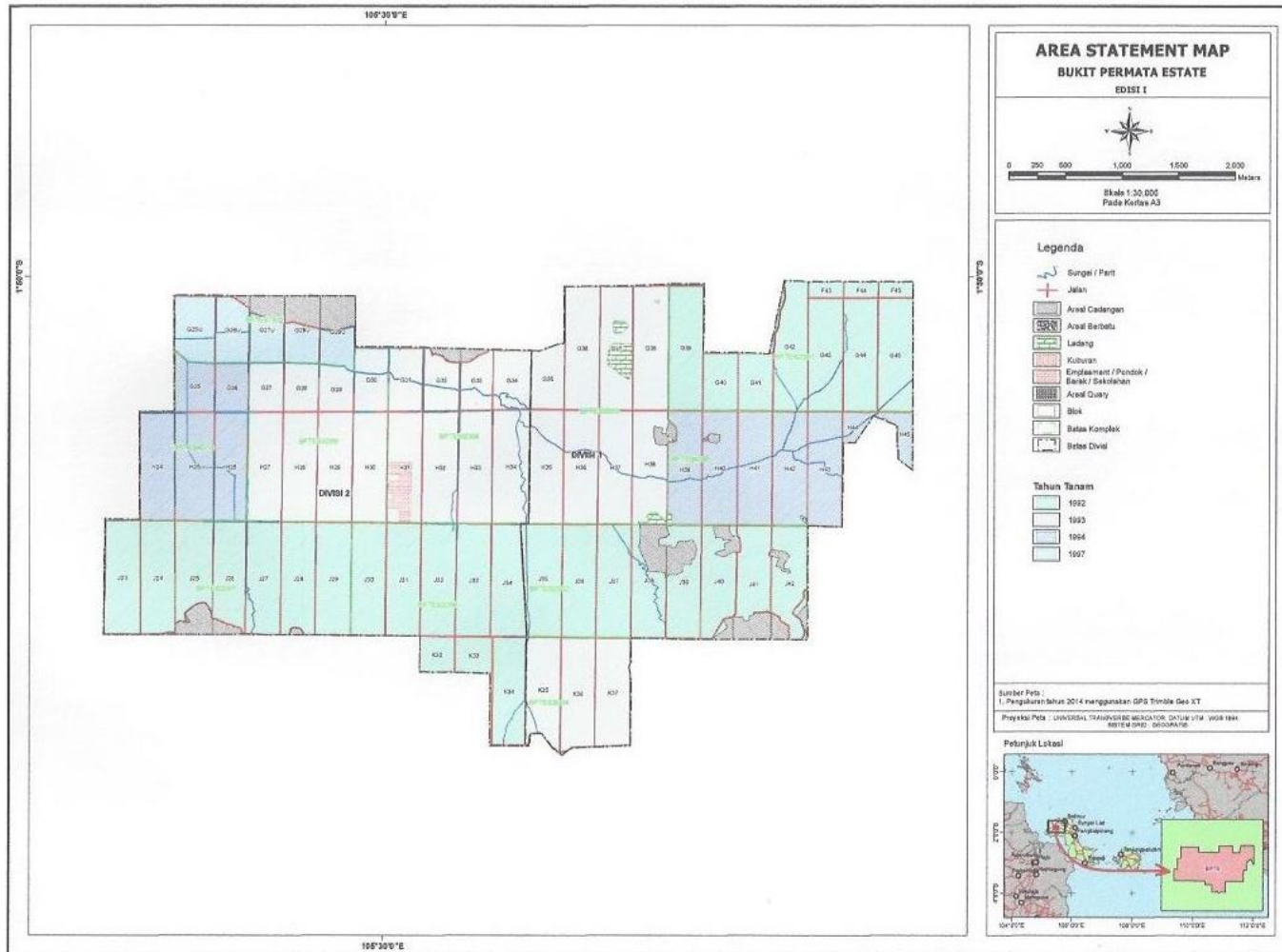


Figure 2 Location Map of Bukit Permata Estate



## 1.6 Date of plantings

Table 3: Age Profiles of Planted Palms in 2017

Year	BPRE (Ha)	BPTE (Ha)	SUM (Ha)	% of Planted Area
<b>Mature</b>				
1991	1,131.99	-	1,131.99	20.72
1992	1,227.76	799.01	2,026.77	37.09
1993	279.15	644.61	923.76	16.91
1994	765.47	287.41	1,052.88	19.27
1995	92.17	-	92.17	1.69
1996	170.22	-	170.22	3.11
1997	-	66.20	66.20	1.21
<b>Sub Total Mature</b>	<b>3,666.76</b>	<b>1,797.23</b>	<b>5,463.99</b>	<b>100.00</b>
<b>Immature</b>	-	-	-	-
<b>Sub Total Immature</b>	-	-	-	-
<b>Total</b>	<b>3,666.76</b>	<b>1,797.23</b>	<b>5,463.99</b>	<b>100.00</b>

## 1.7 Area of plantation

Table 4: Land use description in 2017

AREA	AREA (HA)		
	BPRE	BPTE	TOTAL
Mature plantation area	3,666.76	1,797.23	5,463.99
Immature plantation area	0	0	0
<b>Total area planted</b>	<b>3,666.76</b>	<b>1,797.23</b>	<b>5,463.99</b>
Emplacement and Mill	51.33	8.6	59.93
Nursery	0	0	0
Other area (enclave, water ponds, land with slope >30%)*	393.41	167.62	561.03
HCV Area (included in planted area)	55.49	60.89	116.38
<b>Total non-planted area</b>	<b>444.74</b>	<b>176.22</b>	<b>620.96</b>

AREA	AREA (HA)		
	BPRE	BPTE	TOTAL
<b>Certified area</b>	<b>4,111.50</b>	<b>1,973.45</b>	<b>6,084.95</b>
<b>Total leased area</b>	<b>7,295.01</b>	<b>7,024.05</b>	<b>14,319.06</b>
Other estate area (BMSE and BINE)	3,183.51	5,050.60	8,234.11

Note:

- BMSE: Bukit Mas Estate
- BINE: Bukit Intan Estate

**Table 5: Estates and Area Planted in 2017**

ESTATE	MATURE (HA)	IMMATURE (HA)
Bukit Permai	3,666.76	-
Bukit Permata	1,797.23	-

**1.8 Approximate tonnages offered for certification (CPO and PK)****Table 6: Estate FFB Production Trend 2012 – 2016**

YEAR	Actual Production (MT)		
	Bukit Permai Estate	Bukit Permata Estate	Total
2012	74,779.34	41,511.48	116,290.82
2013	71,588.10	35,671.06	107,259.16
2014	77,561.95	39,963.87	117,525.82
2015	84,162.41	44,558.38	128,720.79
2016	70,704.30	35,240.00	105,944.30

**Table 7: Mill Total CPO and PK Production of 2016 – 2017 and Estimate Production of 2017 - 2018**

Supply Base	FFB Processed (MT)	CPO Production (MT)	OER (%)	PK Production (MT)	KER (%)
<b>Actual Production July 2016 – June 2017</b>					
Bukit Permai Estate	62,299.17	12,096.80	19.42	3,284.88	5.27
Bukit Permata Estate	776.48	158.17	20.37	42.78	5.51
<b>Sub total</b>	<b>63,075.65</b>	<b>12,254.97</b>	<b>19.43</b>	<b>3,327.66</b>	<b>5.28</b>
Other supply bases (Non-Certified)	77,607.06	16,525.34	21.29	4,278.13	5.51

Supply Base	FFB Processed (MT)	CPO Production (MT)	OER (%)	PK Production (MT)	KER (%)
- PT. Bumi Bangka Lestari - PT. Bumi Permai Surya Lestari					
<b>Total actual production</b>	<b>140,682.71</b>	<b>28,780.31</b>	<b>20.46</b>	<b>7,605.79</b>	<b>5.41</b>
<b>Estimated Production July 2017 – June 2018</b>					
Bukit Permai Estate	81,972.17	17,624.02	21.50	4,508.46	5.50
Bukit Permata Estate	41,555.00	8,934.33	21.50	2,285.52	5.50
<b>Sub total</b>	<b>123,527.17</b>	<b>26,558.35</b>	<b>21.50</b>	<b>6,793.98</b>	<b>5.50</b>
Other supply bases (Non-Certified)	87,422.47	18,795.83	21.50	4,808.26	5.50
<b>Total estimated production</b>	<b>210,949.64</b>	<b>45,354.18</b>	<b>21.50</b>	<b>11,602.24</b>	<b>5.50</b>

**Table 8: Mill Production of CPO and PK derived from Estates FFB in 2016 - 2017**

Month	Total FFB (MT)				CPO Produced (Ton)				PK Produced (Ton)			
	Certified			Non-Certified	Certified			Non-Certified	Certified			Non-Certified
	BPRE	BPTE	Total		BPRE	BPTE	Total		BPRE	BPTE	Total	
<b>2016</b>												
July	1,773.88	-	1,773.88	4,553.05	367.46	-	367.46	943.16	99.32	-	99.32	254.92
August	3,461.79	-	3,461.79	4,660.86	687.92	-	687.92	926.19	201.29	-	201.29	271.01
September	1,561.68	-	1,561.68	7,447.68	318.65	-	318.65	1,519.63	72.59	-	72.59	346.18
October	1,077.95	-	1,077.95	8,196.95	224.24	-	224.24	1,705.19	57.31	-	57.31	435.77
November	6,873.96	-	6,873.96	8,379.98	1,412.79	-	1,412.79	1,722.33	358.75	-	358.75	437.35
December	7,704.04	-	7,704.04	7,425.55	970.21	-	970.21	2,174.29	289.33	-	289.33	503.77
<b>2017</b>							-				-	
January	8,497.58	202.70	8,700.28	6,695.59	1,683.93	40.17	1,724.10	1,326.84	477.87	11.40	489.27	376.54
February	7,428.40	56.50	7,484.90	5,403.27	1,490.16	11.33	1,501.49	1,083.91	419.73	3.19	422.92	305.31
March	7,122.73	-	7,122.73	5,777.51	1,477.50	-	1,477.50	1,198.45	410.85	-	410.85	333.26
April	6,459.40	265.74	6,725.14	5,778.49	1,347.61	55.44	1,403.05	1,205.56	359.92	14.81	374.73	321.98
May	5,389.03	225.42	5,614.45	7,116.66	1,096.09	45.85	1,141.94	1,447.47	288.40	12.06	300.46	380.86
June	4,948.73	26.12	4,974.85	6,171.47	1,020.24	5.38	1,025.62	1,272.32	249.52	1.32	250.84	311.18
<b>Total</b>	<b>62,299.17</b>	<b>776.48</b>	<b>63,075.65</b>	<b>77,607.06</b>	<b>12,096.80</b>	<b>158.17</b>	<b>12,254.97</b>	<b>16,525.34</b>	<b>3,284.88</b>	<b>42.78</b>	<b>3,327.66</b>	<b>4,278.13</b>



**Table 9: Estimated Mill Production of CPO and PK from Estates FFB in 2017 - 2018**

Month	Total FFB (MT)				CPO Produced (Ton)				PK Produced (Ton)			
	Certified			Non-Certified	Certified			Non-Certified	Certified			Non-Certified
	BPRE	BPTE	Total		BPRE	BPTE	Total		BPRE	BPTE	Total	
<b>2017</b>												
July	6,331.03	3,248.80	9,579.83	7,848.46	1,361.17	698.49	2,059.66	1,687.42	348.21	178.68	526.89	431.67
August	7,122.40	3,654.90	10,777.30	8,002.88	1,531.32	785.80	2,317.12	1,720.62	391.73	201.02	592.75	440.16
September	7,913.78	3,654.90	11,568.68	8,002.88	1,701.46	785.80	2,487.27	1,720.62	435.26	201.02	636.28	440.16
October	7,913.78	4,060.90	11,974.68	8,002.88	1,701.46	873.09	2,574.56	1,720.62	435.26	223.35	658.61	440.16
November	7,913.78	4,060.90	11,974.68	7,848.46	1,701.46	873.09	2,574.56	1,687.42	435.26	223.35	658.61	431.67
December	7,122.40	3,654.90	10,777.30	7,130.83	1,531.32	785.80	2,317.12	1,533.13	391.73	201.02	592.75	392.20
<b>2018</b>												
January	7,531.00	2,802.87	10,333.87	6,022.00	1,619.17	602.62	2,221.78	1,294.73	414.21	154.16	568.36	331.21
February	6,777.90	2,802.87	9,580.77	6,022.00	1,457.25	602.62	2,059.87	1,294.73	372.78	154.16	526.94	331.21
March	6,777.90	3,203.28	9,981.18	6,882.29	1,457.25	688.71	2,145.95	1,479.69	372.78	176.18	548.96	378.53
April	6,024.80	3,203.28	9,228.08	7,589.93	1,295.33	688.71	1,984.04	1,631.83	331.36	176.18	507.54	417.45
May	6,024.80	3,603.70	9,628.50	7,034.93	1,295.33	774.80	2,070.13	1,512.51	331.36	198.20	529.57	386.92
June	4,518.60	3,603.70	8,122.30	7,034.93	971.50	774.80	1,746.29	1,512.51	248.52	198.20	446.73	386.92
<b>Total</b>	<b>81,972.17</b>	<b>41,555.00</b>	<b>123,527.17</b>	<b>87,422.47</b>	<b>17,624.02</b>	<b>8,934.33</b>	<b>26,558.35</b>	<b>18,795.83</b>	<b>4,508.46</b>	<b>2,285.52</b>	<b>6,793.99</b>	<b>4,808.26</b>

Based on the above figures, the estimated of certified CPO and PK offered in 2017 – 2018 for certification are:

**Estimated tonnage of certified CPO produced** : 26,558.35 MT  
**Estimated tonnage of certified PK produced** : 6,793.98 MT

**Table 10: Delivery of Certified and Non Certified Product**

Month	CPO (MT)			PK (MT)		
	RSPO	Other Certified	Non-Certified	RSPO	Other Certified	Non-Certified
<b>2016</b>						
July	-	365.22	657.58	-	-	350.00
August	-	520.36	1,023.68	-	-	400.00
September	-	412.59	1,343.71	-	-	333.41
October	-	214.15	1,378.41	-	-	696.59
November	-	337.29	2,467.94	-	-	400.00
December	-	1,653.79	1,270.38	200.00	-	600.00
<b>2017</b>						
January	-	1,591.43	2,156.39	510.00	-	340.00
February	-	1,179.26	428.64	940.00	-	-
March	-	1,728.41	1,407.41	350.00	-	100.00
April	-	764.78	1,268.03	300.00	-	400.00
May	-	-	2,299.44	-	-	850.00
June	-	-	2,527.79	-	-	800.00
<b>Total</b>	-	<b>8,767.28</b>	<b>18,229.40</b>	<b>2,300.00</b>	-	<b>5,270.00</b>

## 1.9 Organizational information/contact person

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## 1.10 Time bound plan for other management units

PT. SMART Tbk, PT. Ivo Mas Tunggal, Golden Agri Resources and its subsidiaries are committed to RSPO certification of all its management units located in Indonesia. Time bound plan has been developed to achieve the RSPO certification for all its management units. The time-bound plan is updated regularly, it is realistic and challenging. The Time Bound Plan last update is on 31 January 2016 and revision on 13 July 2016. The plan is detailed on Table 11.

**Table 11: RSPO Certification Time Bound Plan**

Mill Name	Mill Address	Supply Base Name	Estate Address	Time Bound for Certification	Progress
Padang Halaban	Desa Padang Halaban, Kecamatan Aek Kuo, 21455 Kabupaten Labura, North Sumatera	Padang Halaban Estate	Kecamatan Aek Kuo, Kabupaten Labuan Batu Utara, North Sumatera, Indonesia	2011	Certified
		Pernantian Estate	Kecamatan Merbau, Kabupaten Labuan Batu Utara, North Sumatera, Indonesia		
		Adi Pati Estate	Kecamatan Merbau, Kabupaten Labuan Batu Utara, North Sumatera, Indonesia		
		Kanopan Ulu Estate	Kecamatan Kualuh Hulu, Kabupaten Labuan Batu Utara, North Sumatera, Indonesia		
Langga Payung	Desa Huta Baru Nangka, Kecamatan Halongonan, 22753 Kabupaten Padang Lawas Utara, North Sumatera	Langga Payung Estate	Huta Baru Nangka Village, Halongonan, Padang Lawas Utara, North Sumatera	2012	Certified
		Paya Baung Estate	Huta Baringin Village, Simangambat, Padang Lawas Utara, North Sumatera		
		Normark Estate	Normark Village, Kota Pinang, Labuhanbatu Selatan, North Sumatera		
		Pernantian Estate	Kecamatan Merbau, Kabupaten Labuan Batu, North Sumatera		
Jelatang	Desa Jelatang; Kecamatan Pamenang Kabupaten Merangin; Jambi Province 37352; Indonesia	Bangko Estate	Desa Langling, Kecamatan Bangko, Kabupaten Merangin, Jambi Province, Indonesia	2014	Supply bases decided not to continue cooperation with Jelatang Mill since 2017
		Bangko Plasma	Desa Langling, Kecamatan Bangko, Kabupaten Merangin, Jambi Province, Indonesia	2017	
		Bukit Bungkul KKPA	Desa Bukit Bungkul, Kecamatan Renah Pamenang, Kabupaten Merangin, Jambi Province, Indonesia	2017	
		Pamenang Plasma	Desa Bukit Bungkul, Kecamatan Renah Pamenang, Kabupaten Merangin, Jambi Province, Indonesia	2017	
		Batang Gading Plasma	Desa Tanjung, Kecamatan Bathin VIII, Kabupaten Sarolangun, Jambi Province, Indonesia	2017	
		Batang Gading Estate	Desa Tanjung, Kecamatan Bathin VIII, Kabupaten Sarolangun, Jambi Province, Indonesia	2017	Main audit in September 2017
Langling	Desa Langling; Kecamatan Bangko Kabupaten Merangin; Jambi Province 37351; Indonesia	Bangko Estate	Desa Langling, Kecamatan Bangko, Kabupaten Merangin, Jambi Province, Indonesia	2014	Supply bases decided not to continue cooperation with Langling Mill since
		Bangko Plasma	Desa Langling, Kecamatan Bangko, Kabupaten Merangin, Jambi Province, Indonesia	2017	
		Bukit Bungkul KKPA	Desa Bukit Bungkul, Kecamatan Renah Pamenang, Kabupaten Merangin, Jambi Province, Indonesia	2017	

Mill Name	Mill Address	Supply Base Name	Estate Address	Time Bound for Certification	Progress
		Pamenang Plasma	Desa Bukit Bungkul, Kecamatan Renah Pamenang, Kabupaten Merangin, Jambi Province, Indonesia	2017	2017
		Batang Gading Estate	Desa Bukit Kemang, Kecamatan Tanah Tumbuh, Kabupaten Muara Bungo, Jambi Province, Indonesia	2017	Main audit in September 2017
		Batang Gading Plasma	Desa Bukit Kemang, Kecamatan Tanah Tumbuh, Kabupaten Muara Bungo, Jambi Province, Indonesia	2017	Pre audit in September 2017
		Tiga Serumpun Plasma	Desa Tanjung, Kecamatan Bathin VIII, Kabupaten Sarolangun, Jambi Province, Indonesia	2017	Main audit in September 2017
Pelakar	Desa Tanjung; Kecamatan Bathin VIII Kabupaten Sarolangun; Jambi Province 37481; Indonesia	Pelakar Estate	Desa Tanjung, Kecamatan Bathin VIII, Kabupaten Sarolangun, Jambi Province, Indonesia	2017	Main audit in September 2017
		Tiga Serumpun KKPA	Desa Tanjung, Kecamatan Bathin VIII, Kabupaten Sarolangun, Jambi Province, Indonesia	2017	Main audit in September 2017
		Batang Merangin Estate	Desa Lidung, Kecamatan Sarolangun, Kabupaten Sarolangun, Jambi Province, Indonesia	2017	Main audit in September 2017
		Batang Tembesi Estate	Desa Kasang Melintang, Kecamatan Pauh, Kabupaten Sarolangun, Jambi Province, Indonesia	2017	Main audit in September 2017
		Kubang Ujo Plasma	Desa Tanjung, Kecamatan Bathin VIII, Kabupaten Sarolangun, Jambi Province, Indonesia	2017	Supply base decided not to continue cooperation with Pelakar Mill since 2017
Sungai Bengkal	Desa Betung Berdarah Barat ; Kecamatan Tebo Ilir Kabupaten Tebo ; Jambi Province 37572; Indonesia	Sungai Bengkal Estate	Kecamatan Tebo Ilir, Kabupaten Tebo, Jambi Province	2014	Certified
		Muara Kilis Estate	Kecamatan Tebo Tengah, Kabupaten Tebo, Jambi Province		
		Sungai Bengkal KKPA	Kecamatan Tebo Ilir, Kabupaten Tebo, Jambi Province	2019	
		Kilis KKPA	Kecamatan Tebo Tengah, Kabupaten Tebo, Jambi Province		
Tanjung Kembiri	Desa Kembiri, Kecamatan Membalong 33452 Kabupaten Belitung, Kepulauan Bangka Belitung Province	Tanjung Kembiri Estate	Kembiri Village, Membalong Sub District, Belitung District, Bangka Belitung Province, Indonesia	2014	Certified
		Tanjung Rusa Estate	Kembiri Village, Membalong Sub District, Belitung District, Bangka Belitung Province, Indonesia	2014	Certified

Mill Name	Mill Address	Supply Base Name	Estate Address	Time Bound for Certification	Progress
		Tanjung Rusa KKPA	Kembiri Village, Membalong Sub District, Belitung District, Bangka Belitung Province, Indonesia	2019	
Leidong West	Kecamatan Kelapa, Kabupaten Bangka Barat Kepulauan Bangka Belitung 33364	Leidong West Utara	Kelapa Sub-district, Bangka Barat Regency, Bangka Belitung Province.	2014	Certified
		Leidong West Selatan	Kelapa Sub-district, Bangka Barat Regency, Bangka Belitung Province.		
		Bukit Intan	Kelapa Sub-district, Bangka Barat Regency, Bangka Belitung Province		
		Bukit Mas	Kelapa Sub-district, Bangka Barat Regency, Bangka Belitung Province.		
Bukit Perak	Kecamatan Kacung, Kabupaten Bangka Barat, Kepulauan Bangka Belitung 33364	Bukit Perak Estate	Kecamatan Kelapa, Kabupaten Bangka Barat, Bangka Belitung, Indonesia	2015	Certified 2015
		Bukit Permata Estate	Kecamatan Kelapa, Kabupaten Bangka Barat, Bangka Belitung, Indonesia		
		Bukit Permai	Sungai Selan Sub-district, Bangka Tengah Regency, Bangka Belitung Province.		
		Bukit Lestari	Sungai Selan Sub-district, Bangka Tengah Regency, Bangka Belitung Province.		
Sungai Buaya	Kampung Talang Batu, Kecamatan Mesuji Timur, Kabupaten Mesuji 34697, Lampung Province	Sungai Buaya	Desa Talang Batu, Kecamatan Mesuji Timur, Kabupaten Mesuji – Lampung Province	2014	Certified
		Mesuji KKPA	Desa Brabasan, Kecamatan Tanjung Raya, Kabupaten Mesuji – Lampung Province		
		Gedung Aji Lama KKPA	Desa Paduan Rajawali, Kecamatan Meraksa Aji, Kabupaten Tulang Bawang – Lampung Province		
Sungai Merah	Kampung Sidomukti, Kecamatan Gedung Aji, Kabupaten Tulang Bawang 34595 Kampung Sidomukti	Sungai Merah	Desa Sidang Gunung Tiga, Kecamatan Rawa Jitu Utara, Kabupaten Mesuji – Lampung Province	2014	Certified
		Gedung Aji Baru KKPA	Desa Sidoharjo, Kecamatan Penawartama, Kabupaten Tulang Bawang – Lampung Province		
		Gedung Aji Lama KKPA	Desa Paduan Rajawali, Kecamatan Meraksa Aji, Kabupaten Tulang Bawang – Lampung Province		
Kasuari	Desa Lapua, Distrik Kaureh. Kabupaten Jayapura, Papua Province	Cendrawasih Estate	Lapua village, Kaureh Sub-district, Jayapura District, Papua Province	2018	Pre Audit
		Nuri Estate	Lapua village, Kaureh Sub-district, Jayapura District, Papua Province		

Mill Name	Mill Address	Supply Base Name	Estate Address	Time Bound for Certification	Progress
		Rajawali Estate	Lapua village, Kaureh Sub-district, Jayapura District, Papua Province		
		Mambruk Estate	Lapua village, Kaureh Sub-district, Jayapura District, Papua Province		
Pangkalan Panji	Desa Pangkalan Panji, Kecamatan Banyuasin III, Kabupaten Banyuasin 30954, South Sumatera Province, Indonesia	Sawit Mas Estate	Pangkalan Panji and Langkan Village, Banyuasin III District, Banyuasin Regency, South Sumatera Province, Indonesia	2015	Certified 2015
Bumi Sawit	Desa Tanjung Miring, Kecamatan Rambang Buang, Kabupaten Ogan Ilir, South Sumatera Province, 30869, Indonesia	Sawit Mas Estate	Pangkalan Panji and Langkan Village, Banyuasin III District, Banyuasin Regency, South Sumatera Province, Indonesia	2015	Certified 2015
		Bumi Sawit Estate	Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency South Sumatera Province, Indonesia		
Muara Kandis	Desa Lubuk Pandan, Kecamatan Muara Lakitan Kabupaten Muara Rawas, South Sumatera Province, 31666, Indonesia	Muara Kandis Estate	Karya Sakti village, Muara Lakitan Sub-district, Musi Rawas District, South Sumatera Province	2015	Certified 2015
		Muara Tawas Estate	Karya Mukti village, Muara Kelingi Sub-district, Musi Rawas District, South Sumatera Province		
		Pandawa KKPA	Karya Sakti village, Muara Kelingi Sub-district, Musi Rawas District, Sumatera Selatan Province	2018	
Batu Ampar	Desa Serongga, Kecamatan Kelumpang Hilir, Kabupaten Kotabaru Kalimantan Selatan 72161	Batu Ampar	Kelumpang Hilir Subdistrict, Kotabaru Regency, South Kalimantan, Indonesia	2012	Certified
		Batu Mulia	Kelumpang Hilir Subdistrict, Kotabaru Regency, South Kalimantan, Indonesia		
		Sungai Panci	Kelumpang Hilir Subdistrict, Kotabaru Regency, South Kalimantan, Indonesia		
		Sungai Panci Plasma	Kelumpang Hilir Subdistrict, Kotabaru Regency, South Kalimantan, Indonesia		
Tanah Laut	Desa Serongga, Kecamatan Kelumpang Hilir,	Tanah Laut	Kecamatan Kintap, Kabupaten Tanah Laut, South Kalimantan Province, Indonesia	2012	Certified

Mill Name	Mill Address	Supply Base Name	Estate Address	Time Bound for Certification	Progress
	Kabupaten Kotabaru, South Kalimantan Province 70883	Kintapura	Kecamatan Kintap, Kabupaten Tanah Laut, South Kalimantan Province, Indonesia		
Sei Kupang	Kecamatan Kelumpang Hilir, Kabupaten Kotabaru, South Kalimantan Province 72161	Sungai Kupang Estate	Desa Sangking Baru, Kecamatan Kelumpang Selatan, Kab. Kota Baru, South Kalimantan Province	2016	Main Audit, 25-29 May 2015. HGU has been released and the company is still processing the Major NCR closing.
		Sungai Kupang KKPA	Desa Sangking Baru, Kecamatan Kelumpang Selatan, Kab. Kota Baru, South Kalimantan Province		
		Sungai Panci Estate	Desa Pulau Panci, Kecamatan Kelumpang Hilir, South Kalimantan Province		
		Sungai Panci KKPA	Desa Pulau Panci Kecamatan Kelumpang Hilir, South Kalimantan Province		
Sawita	Kabupaten Kotabaru, South Kalimantan Province	Sawita Estate	Manunggul Lama KM 6 Village, Sungai Durian Sub Distric, Kotabaru Distric, South Kalimantan Province	2018	Pre Audit in March 2015
		Sawita KKPA	Rantau Buda Village, Sungai Durian Sub Distric, Kotabaru Distric, South Kalimantan Province		
		Pamukan Estate	Manunggul Baru Village, Sungai Durian Sub Distric, Kotabaru Distric, South Kalimantan Province		
Senakin	Desa Sangsang, Kecamatan Kelumpang Tengah, Kabupaten Kotabaru Kalimantan Selatan	Senakin Estate	Sang - Sang Village, Kelumpang Tengah sub distric, Kotabaru distric, South Kalimantan Province	-	SNKM stop operating in March 2015. Senakin estate supply to Magalau Mill.
Bukit Kapur	Desa Bangkalan Melayu, Kecamatan KelumpangHulu, Kabupaten Kotabaru, South Kalimantan Province	Bukit Kapur Estate	Karang Liwar Village, Kelumpang Hulu sub distric, Kotabaru District, South Kalimantan Province	2020	Pre Audit in 15 – 19 February 2016
		Sungai Cantung Estate	Bangkalan Melayu Village, Kelumpang Hulu sub distric, Kotabaru District, South Kalimantan Province		

Mill Name	Mill Address	Supply Base Name	Estate Address	Time Bound for Certification	Progress
Muara Wahau	Desa Sukamaju, Kecamatan Kongbeng, Kabupaten Kutai Timur, East Kalimantan Province 75666	Muara Wahau Estate	Makmur Jaya Village, Kongbeng Sub District, Kutai Timur District, East Kalimantan Province	2014	Certified
		Gunung Kombeng Estate	Sukamaju Village, Kongbeng Sub District, Kutai Timur District, East Kalimantan Province		
Jak Luay	Desa Jakluay, Kecamatan Muara Wahau, Kabupaten Kutai Timur, East Kalimantan Province 75655	Jak Luay Estate	Desa Jak Luay Kecamatan Muara Wahau Kabupaten Kutai Timur	2015	Certified
		Pantun Mas	Desa Karya Bakti Kecamatan Muara Wahau		
		Long Buluh Estate	Desa Jak Luay Kecamatan Muara Wahau Kabupaten Kutai Timur		
		Bukit Subur Estate	Desa Juk Ayak Kecamatan Telen Kabupaten Kutai Timur	2018	
		Jak Luay KKPA	Desa Jak Luay Kecamatan Muara Wahau Kabupaten Kutai Timur	2018	
		Bukit Subur KKPA	Desa Juk Ayak Kecamatan Telen Kabupaten Kutai Timur	2018	
		Pantun Mas KKPA	Desa Jak Luay Kecamatan Muara Wahau Kabupaten Kutai Timur		
Gunung Kombeng	Desa Sukamaju, Kecamatan Kongbeng, Kabupaten Kutai Timur Propinsi Kalimantan Timur 75666	Gunung Kombeng KKPA	Desa Sukamaju, Kecamatan Kongbeng, Kabupaten Kutai Timur Propinsi Kalimantan Timur 75666	2019	GKMM currently only supplied by non certified estate
		Gunung Kombeng	Desa Sukamaju, Kecamatan Kongbeng, Kabupaten Kutai Timur Propinsi Kalimantan Timur 75666		
Bumi Palma	Desa Bagan Jaya, Kecamatan Tempuling, 29261 Kabupaten Indragiri Hilir, Provinsi Riau	Bumi Palma Estate	Bagan Jaya village, sub district of Tempuling, district of Indragiri Hilir, Riau Province	2014	Certified
		Bumi Sentosa Estate	Suhada village, sub district of Enok, district of Indragiri Hilir, Riau province		
		Bumi Lestari Estate	Pebanaan village, sub dictrict of Kritang, district of Indragiri Hilir, Riau province		
Indra Sakti	Desa Talang Sukamaju, Kecamatan Rakit Kulim, Kabupaten Indragiri Hulu, Provinsi Riau	Indrasakti	Village Of Sungai Limau Sub District Of Rakit Kulim District Of Indragiri Hulu	2013	Certified
		Indrasakti KKPA	Village Of. Sungai Limau, Sub District Of Rakit Kulim, District Of Indragiri Hulu		
		Indralestari KKPA	Village Of Kuala Gading, Sub District Of Batang Cenaku, District Of Indragiri Hulu		



Mill Name	Mill Address	Supply Base Name	Estate Address	Time Bound for Certification	Progress
		Indragiri KKPA	Village Of Talang Bersemi, Sub District Of Batang Cenaku, District Of Indragiri Hulu		
Kijang	Desa Kijang Makmur, Kecamatan Tapung Hilir , 28464 Kabupaten Kampar, Provinsi Riau	Kijang Mas	Desa Sekijang, Kecamatan Tapung Hilir, Kabupaten Kampar, Riau	2012	Certified (Recertification in September 2016)
		Kijang Kencana Plasma	Desa Kijang Jaya, Kecamatan Tapung Hilir, Kabupaten Kampar, Riau		
Naga Sakti	Desa Sekijang, Kecamatan Tapung Hilir 28464 Kabupaten Kampar, Provinsi Riau	Nagamas	Desa Sekijang, Kecamatan Tapung Hilir, Kabupaten Kampar, Riau	2012	Certified (Recertification in September 2016)
		Nagasakti	Desa Sekijang, Kecamatan Tapung Hilir, Kabupaten Kampar, Riau		
		Ramabakti	Desa Beringin Lestari, Kecamatan Tapung Hilir, Kabupaten Kampar, Riau		
		Kijang Mas	Desa Sekijang, Kecamatan Tapung Hilir, Kabupaten Kampar, Riau		
Rama Rama	Desa Petapahan, Kecamatan Tapung 28464 Kabupaten Kampar, Provinsi Riau	Ramarama	Petapahan Village , Tapung Sub District, Kampar District, Riau Province	2012	Certified (Recertification in September 2016)
		Amarta Jaya Plasma	Petapahan Village , Tapung Sub District, Kampar District, Riau Province		
		Sungai Tapung Plasma	Petapahan Village , Tapung Sub District, Kampar District, Riau Province		
Libo	Desa Sam-Sam, Kecamatan Kandis 28686 Kabupaten Siak, Provinsi Riau	Libo	Village of Samsam, Sub-district of Kandis, District of Siak, Riau Province, Indonesia	2012	Certified (ASA-4 in July 2017)
		Nenggala	Village of Samsam, Sub-district of Kandis, District of Siak, Riau Province, Indonesia		
		Sungai Rokan	Village of Samsam, Sub-district of Kandis, District of Siak, Riau Province, Indonesia		
		Ramabakti	Village of Petapahan, Sub-district of Kampar, District of Siak, Riau Province, Indonesia		
Sam Sam	Desa Bekalar, Kecamatan Kandis 28686 Kabupaten Siak, Provinsi Riau	Samsam	Village of Bekalar, Sub-district of Kandis, District of Siak, Riau Province, Indonesia	2012	Certified (ASA-4 in August 2017)
		Kandista	Village of Belutu, Sub-district of Kandis, Riau Province, Indonesia		
		Palapa	Village of Bekalar, Sub-district of Kandis, Riau Province, Indonesia		
		Ujung Tanjung	Sub-district of Kandis, District of Siak, Riau Province, Indonesia		

Mill Name	Mill Address	Supply Base Name	Estate Address	Time Bound for Certification	Progress
Ujung Tanjung	Desa Kandis, Kecamatan Kandis Kota 28686 Kabupaten Siak, Provinsi Riau	Sungai Tapung Plasma	Petapahan Village , Tapung Sub District, Kampar District, Riau Province	2012	Certified (ASA-4 in August 2017)
		Ujung Tanjung	Sub-district of Kandis, District of Siak, Riau Province, Indonesia		
Hanau	Kecamatan Hanau, Kabupaten Seruyan, 74271 Desa Derangga	Hanau	Kecamatan Hanau, Kabupaten Seruyan, Kalimantan Tengah, Indonesia	2013	Certified
		Tasik Mas	Kecamatan Hanau, Kabupaten Seruyan, Kalimantan Tengah, Indonesia		
		Tanjung Paring	Kecamatan Batu Ampar, Kabupaten Seruyan, Kalimantan Tengah, Indonesia		
		Langadang	Kecamatan Batu Ampar, Kabupaten Seruyan, Kalimantan Tengah, Indonesia		
		Medang Sari	Desa Runtuh, Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat, Kalimantan Tengah, Indonesia	2018	HGU in progress until the location permit extension process in June 2016.
Semilar	Desa Rungau Raya, Kecamatan Danau Seluluk, 74271 Kabupaten Seruyan, Central Kalimantan Province	Semilar	Rungau Raya Village, Sub District of Danau Seluluk, District of Seruyan, Province of Central Kalimantan	2013	Certified
		Sei Rindu	Tangar Village, Sub District of Mentaya, District of Kotawaringin Timur, Province of Central Kalimantan		
		Mandang	Rungau Raya Village, Sub District of Danau Seluluk, District of Seruyan, Province of Central Kalimantan		
		Puri	Biru Maju Village, Sub District of Telawang, District of Kotawaringin Timur, Province of Central Kalimantan		
Sungai Rungau	Desa Rungau Raya, Kecamatan Danau Seluluk, 74271 Kabupaten Seruyan, Central Kalimantan Province	Sungai Rungau	Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Central Kalimantan Province	2013	Certified
		Sungai Seruyan	Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Central Kalimantan Province		
		Terawan	Selunuk Village, Seruyan Raya, Seruyan Sub district, Central Kalimantan Province		
		Tangar	Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Central Kalimantan Province		
		Bukit Tiga	Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Central Kalimantan Province		

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Mill Name	Mill Address	Supply Base Name	Estate Address	Time Bound for Certification	Progress
Perdana	Desa Terawan, Kec. Seruyan Raya, Kab. Seruyan, Central Kalimantan Province	Perdana Estate	Desa Terawan, Kec. Danau Sembuluh, Kab. Seruyan, Central Kalimantan Province	2020	Pre Audit in February 2015
		Lenggana Estate	Desa Terawan, Kec. Danau Sembuluh, Kab. Seruyan, Central Kalimantan Province		
		Semandau Estate	Desa Terawan, Kec. Danau Sembuluh, Kab. Seruyan, Central Kalimantan Province		
		Muara Dua Estate	Desa Terawan, Kec. Danau Sembuluh, Kab. Seruyan, Central Kalimantan Province		
		Sungai Rungau	Desa Terawan, Kec. Danau Sembuluh, Kab. Seruyan, Central Kalimantan Province		
Kuayan	Jalan Ex PT.Sarpatim KM 21 Desa Keminting,Kec Bukit Santuhai Kab.Kotim, Central Kalimantan Province	Mentaya Estate	Sungai Ayawan Village, Seruyan Tengah Sub District, Seruyan District, Central Kalimantan Province	2020	Pre Audit in October 2014. LUCA has resubmitted to RSPO in July and August 2017
		Kuayan Estate	Tumbang Keminting Village, Bukit Santuai Sub District, Kotawaringin Timur District, Central Kalimantan Province		
		Bukit Santuhai Estate	Tumbang Keminting Village, Bukit Santuai Sub District, Kotawaringin Timur District, Central Kalimantan Province		
		Tajur Beras Estate	Pematang Village , Mentaya Hulu Sub District, Kotawaringin Timur District, Central Kalimantan Province		
		Seranau Estate	Sapiri Village, Mentaya Hulu Sub District, Kotawaringin Timur District, Central Kalimantan Province		
		Sapiri Estate	Tukang Langit Village, Metaya Hulu Sub District, Kotawaringin Timur District, Central Kalimantan Province		
Tangar	Desa Rungau Raya, Kecamatan Danau Seluluk, 74271 Kabupaten Seruyan, Central Kalimantan Province	Katayang Estate	Sahabu Village, Batu Ampar Sub District, Seruyan District, Central Kalimantan Province	2020	Pre Audit in October 2014. LUCA will be resubmitted in October 2017.
		Nahiyang Estate	Seibabi Village, Batu Ampar Sub District, Seruyan District, Central Kalimantan Province		
		Sulin Estate	Wanatirta Village, Batu Ampar Sub District, Seruyan District, Central Kalimantan Province		
		Sungai Nusa Estate	Gantung Pengayuh Village, Seruyan Tengah Sub District, Seruyan District, Central Kalimantan Province		
		Sulin KKPA	Wanatirta Village, Batu Ampar Sub District, Seruyan District, Central Kalimantan Province		
		Sungai Ayawan Estate	Suka Mandang Village, Seruyan Tengah Sub District, Seruyan District, Central Kalimantan Province		
Pekawai	Kecamatan nanga Tayap,Kabupaten	Kayung Estate	Desa Sungai Kelik, Kecamatan Nanga Tayap, Kabupaten Ketapang, West Kalimantan	2018	Pre Audit in

Mill Name	Mill Address	Supply Base Name	Estate Address	Time Bound for Certification	Progress
	Ketapang, West Kalimantan Province		Province, Indonesia		September 2014
		Pekawai Estate	Desa Sungai Kelik, Kecamatan Nanga Tayap, Kabupaten Ketapang, West Kalimantan Province, Indonesia		
		Kayung KKPA	Desa Lembah Hijau 1, Kecamatan Nanga Tayap, Kabupaten Ketapang, West Kalimantan Province, Indonesia		
		Nanga Tayap Estate	Desa Nanga Tayap, Kecamatan Nanga Tayap, Kabupaten Ketapang, West Kalimantan Province, Indonesia		
		Sungai Kelik Estate	Desa Siantau Raya, Kecamatan Nanga Tayap, Kabupaten Ketapang West Kalimantan Province, Indonesia		
Kenanga	Dusun Bakung, Desa Randai, Kecamatan Marau, Kabupaten Ketapang, West Kalimantan Province	Kencana Kemitraan	Desa Randai, Kecamatan Marau, Kabupaten Ketapang, West Kalimantan Province, Indonesia	2018	
		Kenanga Estate	Desa Randai, Kecamatan Marau, Kabupaten Ketapang, West Kalimantan Province, Indonesia	2018	
		Cendana Estate	Desa Belaban, Kecamatan Marau, Kabupaten Ketapang, West Kalimantan Province, Indonesia	2015	Certified
		Delima Estate	Desa Randai, Kecamatan Marau, Kabupaten Ketapang, West Kalimantan Province, Indonesia	2018	
		Kenari Plasma	Desa Rangkung, Kecamatan Marau, Kabupaten Ketapang, West Kalimantan Province, Indonesia	2018	
		Kencana Estate	Desa Randai, Kecamatan Marau, Kabupaten Ketapang, West Kalimantan Province, Indonesia	2015	Certified
		Gaharu Plasma	Desa Periangan, Kecamatan Jelai Hulu, Kabupaten Ketapang, West Kalimantan Province, Indonesia	2018	
		Kenanga Kemitraan	Desa Merabong, Kecamatan Manis Mata, Kabupaten Ketapang, West Kalimantan Province, Indonesia	2018	
		Kenari Estate	Desa Biku Sarana, Kecamatan Jelai Hulu, Kabupaten Ketapang, West Kalimantan Province, Indonesia	2018	
		Gaharu Estate	Desa Periangan, Kecamatan Jelai Hulu, Kabupaten Ketapang, West Kalimantan Province, Indonesia	2018	
		KerANJI Estate	Desa Biku Sarana, Kecamatan Jelai Hulu, Kabupaten Ketapang, West Kalimantan Province, Indonesia	2018	
Belian	Desa Nanga Seberuang Kecamatan Semitau 78771 Kab. Kapuas Hulu, West Kalimantan Province	Belian Estate	Desa Baru (Kec. Silat Hilir), Desa Nanga Seberuang dan Desa Komplek Kenepai (Kec. Semitau), Kab. Kapuas Hulu, West Kalimantan Province	2018	LUCA will be resubmitted to RSPO in November 2017

Mill Name	Mill Address	Supply Base Name	Estate Address	Time Bound for Certification	Progress
Rantau Panjang	East Kalimantan Province	Rantau Panjang Estate	East Kalimantan Province	2017	In progress of region exchange ( <i>tukar-menukar kawasan</i> )
		Rantau Panjang KKPA	East Kalimantan Province	2017	
Sungai Magalau	South Kalimantan	Sungai Magalau Estate	South Kalimantan Province	2019	LUCA will be resubmitted to RSPO in October 2017
		Senakin Estate	Sang - Sang Village, Kelumpang Tengah sub distric, Kotabaru distric, South Kalimantan Province	2019	
Sungai Kikim	South Sumatera Province	Sungai Kikim Estate	South Sumatera Province	2019	
		Sungai Pangi Estate	South Sumatera Province	2019	
		Sungai Musi Estate	South Sumatera Province	2019	
		Sungai Saling Estate	South Sumatera Province	2019	
		Sungai Enim Estate	South Sumatera Province	2019	
		Sungai Lematang Estate	South Sumatera Province	2019	
Jalemo	Central Kalimantan Province	Manuhing Estate	Central Kalimantan Province	2020	LUCA Submission has been accepted in April 2017
		Kajui Estate	Central Kalimantan Province	2020	
		Balasang Estate	Central Kalimantan Province	2020	
		Jalemo Estate	Central Kalimantan Province	2020	
Kuayan	Central Kalimantan Province	Sungai Sambon Estate	Central Kalimantan Province	2020	
		Sungai Sambon Plasma	Central Kalimantan Province	2020	
		Bukit Dua Estate	Central Kalimantan Province	2020	
		Bukit Tunggal Estate	Central Kalimantan Province	2020	

Mill Name	Mill Address	Supply Base Name	Estate Address	Time Bound for Certification	Progress
Sako	Central Kalimantan Province	Sungai Ayawan	Central Kalimantan Province	2020	LUCA Re-submission plan on October 2017
		Sulin Plasma	Central Kalimantan Province	2020	
		Sapiri Plasma	Central Kalimantan Province	2020	
		Sako Plasma	Central Kalimantan Province	2020	

### 1.11 Other certificates held

The organisation has implemented quality, environmental, and occupational health and safety management system based on ISPO certification. The details of its certification held are shown in the following table.

**Table 12: Certificates Held by Mill and Estates**

MILL/ESTATE	OTHER CERTIFICATION HELD
Bukit Perak Mill, Bukit Perak Estate, and Bukit Permata Estate	ISCC EU Certificate, No. EU-ISCC-Cert-DE137-20160085, by Intertek Certification GmbH, valid until 21 December 2017
Bukit Perak Mill, Bukit Perak Estate, and Bukit Permata Estate	ISPO Certificate, No. FMS40037, by PT. SAI Global Indonesia, valid until 18 July 2021.

1.12 Partial Certification Requirements

NO	CERTIFICATION SYSTEM/ CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS	COMPLIANCE (YES/NO)
4.2.4	Organizations <sup>1</sup> that have a majority <sup>1</sup> holding in and / or management control of more than one autonomous company growing oil palm will be permitted to certify individual management units and/or subsidiary companies only if all the following are complied with:			
1	<sup>1</sup> For groups with complex management structures the following are required: (a) A statement of the ultimate controlling shareholders and directors in the managing agency company/companies. (b) Ditto in respect of each of the operating groups. (c) Application for membership by the top asset owning company/companies. (d) Application for membership by the managing agency company/companies.			
	a. Is the management structure of the group complex?  If the answer to question a above is yes, check the following b-e check items  b. Is there a statement of the ultimate controlling shareholders and directors in the managing agency company/companies  c. Is there a statement of the ultimate controlling shareholders and directors in each operating group  d. Is there application for membership by the top asset owning company/companies  e. is there application for membership by the managing agency company/companies	List of Operating Company in 2017.	The management structure of the group is not complex. The following is structure sequence :  Golden Agri Resources Limited → PT. Purimas Sasmita → PT. Sawit Mas Sejahtera → PT. Bumi Permai Lestari.	YES
2	<b>RSPO membership</b> a. The parent organization or one of its majority <sup>1</sup> owned and / or managed subsidiaries are member of RSPO. The requirements (b) to (j) will be applicable, whether the			



NO	CERTIFICATION SYSTEM/ CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS	COMPLIANCE (YES/NO)
registered RSPO member is the holding company or one of its subsidiaries;				
	<ol style="list-style-type: none"> <li>1. Does the parent organisation or one of its majority<sup>1</sup> owned and / or managed subsidiaries is member or RSPO?</li> <li>2. State organisation who is member of RSPO</li> <li>3. State RSPO membership number of the above organisation(s)</li> </ol>	<ul style="list-style-type: none"> <li>- List of Operating Company in 2017.</li> <li>- www.rspo.org</li> </ul>	<p>The company is one of managed subsidiaries by Golden Agri Resources as RSPO membership. It was also stated in RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>) that the Golden Agri Resources as RSPO membership and have the number of 1-0096-11-000-00.</p>	<p>YES</p>
3	<b>Time bound plan</b>			
<p><b>b.</b> A challenging time-bound plan for certifying all its relevant entities<sup>2</sup> is submitted to the Certification Body (CB) during the first certification audit. The time-bound plan should contain a list of subsidiaries, estates and mills. The Certification Body will be responsible for reviewing the appropriateness of this plan<sup>3</sup>, taking into account comments received from stakeholders following the public consultation process. Progress towards this plan will be verified and reported on in subsequent annual surveillance assessments (see Annex 4). Where the Certification Body conducting the surveillance audit is different from that which first accepted the time-bound plan, the later Certification Body shall accept the appropriateness of the time-bound plan at the moment of first acceptance and shall only check continued appropriateness.</p>				
	<ol style="list-style-type: none"> <li>1. Is there a challenging time-bound plan for certifying all its relevant entities<sup>2</sup> submitted to CB during the first certification audit?</li> <li>2. Is the time-bound plan containing list of subsidiaries, estates and mills?</li> <li>3. Are there comments received from stakeholders following the public consultation process relevant to the time-bound plan?</li> <li>4. Taking into account comments in the point 3 above, are the time-bound plan appropriate/continued to be appropriate?</li> <li>5. How is the progress towards this</li> </ol>	<ul style="list-style-type: none"> <li>- The updated time-bound plan on 31 January 2016 and its revision on 13 July 2016.</li> <li>- Public consultation on 13 July 2017</li> </ul>	<p>There was a challenging TBP for all its relevant entities. TBP was containing list of subsidiaries (estates and mills). There was no complaint during public consultation. During public consultation, there no comment and issue from stakeholders regarding time-bound plan.</p>	<p>YES</p>

NO	CERTIFICATION SYSTEM/ CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS	COMPLIANCE (YES/NO)
	plan?			
<p><b>c.</b> Any revision to the time-bound plan or to the circumstances of the company shall cause the plan to be reviewed (as provided for in the guidance on surveillance assessments, Annex 4) for whether it is still appropriate, such that changes to the time-bound plan are permitted only where the organisation can demonstrate that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent).</p>				
	<ol style="list-style-type: none"> <li>1. Is the any revision to the time-bound plan or to the circumstances of the company?</li> <li>2. When there is revision as indicated in the point 1 above, has the plan reviewed whether it is still appropriate?</li> <li>3. Can the organisation demonstrate that the revisions to the time-bound are justified?</li> <li>4. Is there any newly acquired subsidiary that already legally registered with the local notary of chamber of commerce (or equivalent)?</li> <li>5. Are the time-bound plans including the above newly acquired subsidiary?</li> </ol>	<ul style="list-style-type: none"> <li>- The updated time-bound plan on 31 January 2016</li> <li>- Revision of time-bound plan date on 13 July 2016.</li> <li>- Time-bound plan forecast for RSPO certification of all mills and its supply bases</li> </ul>	<p>There was revision of the time-bound plan for the some subsidiaries (estates and mills), date on 13 July 2016. The company has conducted review of time-bound plan. The revision are due to :</p> <ul style="list-style-type: none"> <li>- Several unresolved licenses (HGU, Waste Management).</li> <li>- Contruction of the mill (Jalemo Mill) is still processing.</li> <li>- Remediation and compensation procedure is still process approval from RSPO.</li> </ul> <p>There was no newly acquired subsidiary that already legally registered with the local notary of chamber of commerce.</p>	<p>YES</p>
<p><b>d.</b> Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance is raised. Where there is evidence of systematic failure to proceed with implementation of the plan, a major non-compliance is raised.</p>				
	<ol style="list-style-type: none"> <li>1. Are there isolated lapses in implementation of a time-bound plan? Raise minor non-compliance if found</li> <li>2. Is there systematic failure to precede implementation of the plan? Raise</li> </ol>	<ul style="list-style-type: none"> <li>- The updated time-bound plan on 31 January 2016</li> <li>- Revision of time-bound plan date on 13 July 2016.</li> <li>- Time-bound plan forecast for RSPO certification of all mills and its supply</li> </ul>	<p>There was no the isolated lapses in implementation of a time-bound plan. It was evidenced by TBP progress includes HGU progress, planning of pre and main audit, and RaCP progress. There was HGU progress in Medang Sari Estate, until this audit was processing the location permit extension with government institution. For more detail, please refer to Table 11.</p>	<p>YES</p>

NO	CERTIFICATION SYSTEM/ CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS	COMPLIANCE (YES/NO)
	major non-compliance if found	bases		
4	Requirements for uncertified management units and/or holdings			
	<p><b>e.</b> No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. Any new plantings since January 1st 2010 must comply with the RSPO New Plantings Procedure (Annex 5).</p> <p><b>f.</b> Land conflicts, if any, are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.</p> <p><b>g.</b> Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.</p> <p><b>h.</b> Legal non-compliance, if any, are being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.</p> <p><b>i.</b> Certification bodies will assess compliance with these rules for partial certification at each and every assessment of any of the management units (see Annex 4). Assessment of compliance with requirements (e) – (h) by the certification body based on self-declarations only by the Company, with no other supporting documentation, will not be acceptable</p>			
	<p>a. Is there any verification compliance for uncertified management units and or holdings of requirements e-f above e.g. through self-assessment (i.e. internal audit).</p> <p>b. Has the verification covered all requirements of e-f above?</p> <p>c. Based on the result of verification in point 1 and 2 above, please indicate is there any:</p> <p style="padding-left: 20px;">i. Replacement of primary forest or any area containing HCV or required to maintain or enhance HCV in line with RSPO criterion 7.3?</p> <p style="padding-left: 20px;">ii. Are there new planting since January 1<sup>st</sup> 2010 which was not comply with RSPO NPP?</p>	<p>- The updated time-bound plan on 31 January 2016</p> <p>- Revision of time-bound plan date on 13 July 2016.</p> <p>- Time-bound plan forecast for RSPO certification of all mills and its supply bases</p> <p>- RSPO Internal Audit at Sungai Kupang Mill and its supply bases, date on 24 – 28 October 2016.</p> <p>- RSPO Internal Audit at Kasuari Mill and its supply bases, date on 24 – 28 October 2016.</p> <p>- RSPO Internal Audit at Pekawai Mill and its supply bases, date on 21 – 25 November 2016</p> <p>- RSPO Internal Audit at Perdana Mill and its supply bases, date on 19 – 23 December 2016</p>	<p>Verification compliance for uncertified management units were conducted by Certification Division through RSPO Internal Audit that covered all RSPO Principle and Criteria. Based on internal audit found that the companies:</p> <ul style="list-style-type: none"> <li>• No land conflicts</li> <li>• No labour disputes</li> </ul> <p>Several non-conformances of the RSPO internal audit were regulation compliance still in progress with other parties and RaCP (Remediation and Compensation Procedure) is also still in progress for RSPO approval, RSPO requests the organisation to prepare the report based on “RSPO Remediation and Compensation Procedures”. The organisation is still in process to prepare the report (Lund Use Change Analysis) for several units and each units have had a target time line for the completion of its reports. Other than that, there is also unit still in the process of Major NCR closing of Main Audit.</p> <p>For more detail, please refer to Table 11.</p>	YES

NO	CERTIFICATION SYSTEM/ CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS	COMPLIANCE (YES/NO)
	<ul style="list-style-type: none"> <li>iii. Land conflict, which was not being resolved through a mutually agreed process in accordance with RSPO criteria 6.4, 7.5 and 7.6?</li> <li>iv. Labour dispute, which was not being resolved through a mutually agreed process in accordance with RSPO criterion 6.3</li> <li>v. Legal non-compliance, which are not resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2</li> <li>d. Are there targeted stakeholder consultation carried out by other CB?</li> <li>e. Considering all the above data is there necessary to conduct further targeted stakeholder consultation or filed inspection?</li> </ul>	<ul style="list-style-type: none"> <li>- RSPO Internal Audit at Belian Mill and its supply bases, date on 28 March – 01 April 2016</li> <li>- RSPO Internal Audit at Sungai Mangalau Mill and its supply bases, date on 28 March – 01 April 2016</li> <li>- RSPO Internal Audit at Rantau Panjang Mill and its supply bases, date in December 2016</li> <li>- RSPO Internal Audit at Kuayan Mill and its supply bases through Monthly Monitoring of SPO Scorecard System.</li> <li>- RSPO Internal Audit at Tangar Mill and its supply bases through Monthly Monitoring of SPO Scorecard System.</li> <li>- RSPO Internal Audit at Sungai Kikim Mill and its supply bases through Monthly Monitoring of SPO Scorecard System.</li> <li>- RSPO Internal Audit at Jalemo Mill and its supply bases through Monthly Monitoring of SPO Scorecard System.</li> <li>- RSPO Internal Audit at Sako Mill and its supply bases through Monthly Monitoring of SPO Scorecard System.</li> </ul>		
<p>Guidance</p> <p>For requirements (e) – (h), the approach to defining major and minor non-compliance can be applied from the relevant national interpretation. For example, if non-compliance against a 'major indicator' in a non-certified holding/management unit is identified, the current certification assessment cannot proceed to a successful conclusion until that is addressed.</p>				

NO	CERTIFICATION SYSTEM/ CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS	COMPLIANCE (YES/NO)
			<p>Failure to address any of the requirements (e)-(h) may lead to certification suspension(s) (consistent with the RSPO Certification Systems document rules on non-compliance).</p> <p><sup>2</sup> Relevant entities – including both the business units and parent company(ies)' commitment to RSPO, membership status and involvement with palm oil for each subsidiary</p> <p><sup>1</sup> Majority shareholding: the largest shareholding. Where the largest shareholdings are equal (e.g. 50/50) this applies to the organisation that has management control.</p> <p><sup>3</sup> in particular, that the time scale is sufficiently challenging, taking into account circumstances around each entity</p>	

### 1.13 Date of issue of certificate and date of previous assessment

Date of issue of certificate: 23 September 2015

Date of previous audit: 09 – 11 August 2016

## 2.0 AUDIT PROCESS

### 2.1 Certification body

#### PT. SAI Global Indonesia

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SAI Global is one of the world's leading business providers of independent assurance. SAI Global provides organisations around the world with information services and solutions for managing risk, achieving compliance and driving business improvement.

We provide aggregated access services to Standards, Handbooks, Legislative and Property publications; we audit, certify and register your product, system or supply chain; we facilitate good governance and awareness of compliance, ethics and policy issues and provide training and improvement solutions to help individuals and organisations succeed.

The SAI Global business is driven by two equally important client needs - the mandated need for organisations to conform to regulations, standards and legislation in all their locations, and the operational need for organisations to improve business processes and procedures as well as corporate culture. As we are a global company, we can meet these needs for any client - those operating within one country's borders and in one language or those operating across borders and in many languages.

There are three business units/divisions within SAI Global namely the Information Services Division, the Compliance Division, and the Assurance Division. The Assurance Division helps organisations manage risk, achieve process or product certification and drive improvement by providing training, registration audits and supplier management programs that can improve business performance. We provide independent audits, assessments and certification of your products or business processes to ensure they comply with industry standards or customer specific requirements. We understand how compliance with those standards can improve the efficiency, economy and profitability of your operation. With auditing and assessment staff located around the world, our clients include large global corporations as well as single site organisations.

### 2.2 Audit methodology

The 2<sup>nd</sup> Annual Surveillance Audit was performed on 11 – 14 July 2017. The audit programme was included in the body of report. The audit methodology for collection of objective evidences is site inspection, documentation and record review and interview with staffs, workers, and other

stakeholders. Objective evidences from documentation/record review in one area may also be cross checked with other objective evidences in other areas and with the evidence of implementation on site during the audit. Inputs from stakeholders via letter, email, or other communication media were also considered for this certification audit. Particular attention has been paid to previous non-conformities. Area of potential environmental and social risk was concern. For detail of audit plan, can be seen on the page of 206.

### 2.3 Qualification of the lead auditor and audit team member

#### **R. Yosi Zainal Muhammad – Lead Auditor and audited BMP Agronomy, Supply Chain, and Partial Certification System Aspects**

He graduated as bachelor from Department of Forest Resources Conservation and Ecotourism, Faculty of Forestry, Bogor Agricultural Institute in 2008. He has experienced in the management of sustainable palm oil (RSPO and ISPO), environment management, social impact, and safety management system at palm oil plantation. Join at SAI Global since on December 2015 as Auditor for the ISO 9001:2008, ISPO, and RSPO. It was involved in the quality management system for various the industry sectors, RSPO and ISPO. Several trainings that have been followed were Calculation of Palm Oil Footprint Carbon (2011), Safety Specialist (2013), and Social Impact Assessment (2014). He has also completed lead auditor training / course for ISO 9001:2008 (2015), ISO 14001:2015, ISPO P&C (2016), RSPO Supply Chain (2016), and RSPO P&C (2016).

#### **Daniel Sitompul – Audit team member and audited BMP Processing and Safety Aspects**

Daniel graduated with Bachelor of Chemical Engineering degree from Indonesia Institute of Technology in 1995. He has working experience as Quality, Environment and Safety Consultant for many years. She has completed ISO 14001 (2007), OHSAS 18001 (2010), Ahli K3 Umum (2007), ISO 9001 (2009), RSPO PC Training (2013), Auditor SMK3 (2013) and ISPO Auditor Training (2013). He has also completed the training form government regarding to Safety Management System (SMK3), PROPER and AMDAL (environment). For the last 5 years she has been involved in quality (ISO 9001), Safety (OHSAS 18001) and environmental (ISO 14001) management system consultancy and audits for very broad industrial and in the palm oil sector since 2013 for several plantations and mills.

#### **Fitria Rahmayanti – Audit team member and audited Environment Aspect**

She owned bachelor degree majoring health nutrition from Gadjah Mada University. She has experience as nutritionist at hospital in Jakarta. She joined SAI Global Indonesia in 2012. She has followed the lead auditor training ISO 9001:2008 (2012), ISO 14001:2004 (2012), lead auditor training ISPO (2013) also registered in local government ministry of manpower AK3U. She is also the ISPO auditor who has obtained a certificate from the ISPO Commission, Ministry of Agriculture of Indonesia, in February 2013.

#### **Eko Prasetyo Ramadhan – Audit Team Member and audited HCV and Social Aspects**

He graduated as Bachelor of Forestry from Forest Conservation and Ecotourism Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB) in 2008. He owned working experience at NGO Birdlife Indonesia since May 2009 – December 2012 as Field Officer, at PT Inoa Konsultindo since May 2013 – November 2013 as Biodiversity Consultant and at PT Salim Ivomas Pratama Tbk since May 2014 – November 2015 as Assistant of Sustainability Department. He has completed training courses for LAT ISO 14001:2015 (July 2016), LAT RSPO P&C (May 2016), Social Impact Assessment (May 2016), RSPO SCC Auditor (2016), LAT ISO 9001:2008 (2015), ISPO Auditor (2015), Introduction to RSPO Supply Chain Certification (2015) and HCV Assessment and Identification (2014).

## 2.4 Stakeholder consultation

**Table 13: List of internal and external stakeholder**

STAKEHOLDERS	METHODS OF CONSULTATION
Camat Kelapa, Jebus, Simpang Tritip	Focus Group Discussion
Kapolsek Kecamatan Kelapa, Jebus	Focus Group Discussion
Danramil Kecamatan Kelapa, Jebus	Focus Group Discussion
Dinas Ketenagakerjaan District West Bangka	An invitation letter to comment was sent
Dinas Perkebunan District West Bangka	An invitation letter to comment was sent
Kabid Pengawasan – BLH District West Bangka	An invitation letter to comment was sent
Dinas Kebersihan dan Kebakaran West Bangka	An invitation letter to comment was sent
BPN District West Bangka	An invitation letter to comment was sent
Local Contractor	Focus Group Discussion
WWF Indonesia	An invitation letter to comment was sent
Sawit Watch	An invitation letter to comment was sent
Greenpeace	An invitation letter to comment was sent
Greenomics Indonesia	An invitation letter to comment was sent
Forest People Program	An invitation letter to comment was sent
Yayorin	An invitation letter to comment was sent
Tropenbos International Indonesia	An invitation letter to comment was sent
The Nature Conservancy	An invitation letter to comment was sent
Flora & Fauna Indonesia	An invitation letter to comment was sent
GAPKI	An invitation letter to comment was sent
Village Head of Berang, Ibul, Jebus, Mislak, Pangkal Beras, Rangi Asam, Terentang, Tumbak Petar	Focus Group Discussion
Community Leader of Jebus, Pangkal Beras, Tumbak Petar Village	Focus Group Discussion
FFB Suppliers (PT. PT. Bumi Bangka Lestari PT. Bumi Permai Surya Lestari)	Focus Group Discussion



## **2.5 Date of next audit**

The next audit is follow-up audit that will be conducted in August or September 2017.

## **3.0 AUDIT FINDINGS**

### **3.1 Action taken on previous audits findings**

All non-conformances (Major and Minor) from the previous audits have been followed up by taking corrective actions. Corrective actions have been implemented and verified.

### **3.2 Claim and use of certification mark and or logo**

There was no use of certification mark and or logo. Claim has been made for the RSPO certified product, PK of 2,300 MT and CPO of null.

### **3.3 Description of audit findings**

#### **3.3.1 RSPO Principle and Criteria**

**PRINCIPLES 1: COMMITMENT TO TRANSPARENCY**

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
1.1	<p>Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p> <p><b>Guidance:</b>  <i>Growers and millers should have a Standard Operating Procedure (SOP) to respond constructively to stakeholders, including a specific timeframe to respond to requests for information. Growers and millers should respond constructively and promptly to requests for information from stakeholders. The SOP should include information on the officer, who may be contacted by the interested external parties.</i></p> <p><i>Growers and millers should ensure that sufficient objective evidence exists to demonstrate that the response is timely and appropriate.</i></p> <p><i>See Criterion 1.2 for requirements relating to publicly available documentations.</i>  <i>See Criterion 6.2 on consultation.</i>  <i>See Criterion 4.1 on SOPs.</i></p> <p><i>Definition of relevant stakeholders according to the Regulation of the Minister of Environment No. 17 year 2012 regarding Guidance for Involvement of Communities in the Process of Environmental and Social Impact Assessment (AMDAL) and Environmental Permit are.</i></p> <ul style="list-style-type: none"> <li>• <i>Affected communities are the communities who live within the AMDAL study boundary (social boundary), which will be beneficially or adversely affected by the operations and/or plan of activities;</i></li> <li>• <i>Environmental concerned communities are communities who are not affected by the operations and/or business plan, however they shall pay attention to the environmental and social issues of the upcoming operations and/or business plan, including the potential environmental and social impacts;</i></li> <li>• <i>Influenced communities by the decisions of AMDAL process are communities who are located outside and or directly adjacent to the boundary of AMDAL study areas relevant to the impact of operations and/or business plan.</i></li> </ul> <p><i>Relevant stakeholders are also NGOs that have concerns on the environmental and social issues of the upcoming operations and/or business plan, including the potential environmental and social impacts;</i></p>			
1.1.1	<p>List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available.</p> <p><b>Specific Guidance:</b>  <i>For 1.1.1: Evidence should be provided by growers and millers that information is received in appropriate form(s) and language(s) by relevant stakeholders. Information will include information on the RSPO mechanisms for stakeholder involvement, including information on their rights and responsibilities.</i></p>			
	<p>a. Does the company maintain a list of stakeholders? (E.g. listed by category and stakeholders listed should be site specific)</p> <p>b. What is the frequency of updating the stakeholder list?</p> <p>c. Is there evidence of stakeholder verification?</p>	<p>- Stakeholder list of PT Bumi Permai Lestari, updated 27 Januari 2017</p> <p>- SOP/SMART/SENS-CSR/SADV/II/001 dated 1 July 2014</p>	<p>The organization documented and maintained stakeholder list on document "Daftar Stakeholder PT Bumi Permai Lestari" updated on 27 Januari 2017. Stakeholder consists of governance agency, village chief, prominent figure, workers organization, local contractor and NGO's. Data and information will be updated by SPO Region Bangka if there are changes but usually update annually. Stakeholder verification conducted by Stakeholder Analysis and Mapping as</p>	<p>YES</p>

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	<p>d. What type of information is provided? (E.g. Environmental, social and legal)</p> <p>e. What is the frequency and level of access to this information?</p> <p>f. How and where is the information disseminated?</p> <p>g. Who is responsible for providing &amp; updating information?</p> <p>h. Is there an SOP available to describe the process (of information sharing/dissemination)?</p> <p>i. Are stakeholders aware of the type of information available and the procedures for accessing the information?</p>	<p>- SOP/SMART/UMUM/SADV/I/004 dated 1 July 2014</p> <p>- List information for stakeholder F/SMART/UMUM/SADV/004/003</p>	<p>mention in SOP <i>Keberperanan Pemangku Kepentingan</i> SOP/SMART/SENS-CSR/SADV/I/001.</p> <p>The Organization has determined the type of information that is available and accessible to all stakeholders. List of information to the public specified in the document "List information for stakeholder" F/SMART/UMUM/SADV/004/003. There are 13 types of information that is available to stakeholders :</p> <ul style="list-style-type: none"> <li>- Number of employees and a list of basic wages of employees (village, sub-district, district Manpower and province, worker, worker union)</li> <li>- NPWP (KPP)</li> <li>- Payment of local taxes/levies (Dispenda)</li> <li>- Document of EIA (BLH District dan Province, KLH, NGOs)</li> <li>- Certificate of incorporation and its amendments, areal statement and its production (Disbun District and Province, BPS, BPPT)</li> <li>- Evidence of land tenure (village, subdistrict, Disbun district and province, BPN, NGOs)</li> <li>- Report of HCV identification (Village, BKSDA, BLH District and province, NGOs)</li> <li>- Reports SIA identification (Village, BKSDA, BLH District and province, NGOs)</li> <li>- Report of empowerment (Village, Subdistrict, District, Province, NGOs)</li> <li>- Report of P2K3 (Manpower office district and province)</li> <li>- Document improvement program (Government agencies)</li> <li>- Document RSPO audit report (Village, Subdistrict, District, Province, NGOs)</li> </ul>	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>- Document human rights policy (Village, Subdistrict, District, Province, NGOs)</p> <p>All information above can be accessed by interested parties. Provision of information should be known by Estate Manager and approved by the Regional Controller (RC). If the information is confidential trade must go through the approval of Head Office.</p> <p>The relevant stakeholders received information on the RSPO mechanisms for stakeholder involvement, including information on their rights and responsibilities. All information provided in several stakeholders are in accordance with the terms and language used, for example in the form of reports and the contents of the report. Delivery of Information is delivered in <i>Bahasa</i>.</p>	
1.1.2	<p>(M) Records of requests for information and responses to the information requested shall be available.</p> <p><b>Specific Guidance:</b>  <b>For 1.1.2:</b>  <i>Records of requests for information and responses are maintained for a period of time determined by the company, taking into account their importance and need.</i></p>			
	<p>a. Does the company have an SOP to ensure constructive response to stakeholders?</p> <p>b. Who is the personnel in charge (PIC)?</p> <p>c. Does the SOP cover the elements under 1.1.1?</p> <p>d. Is there a clear time frame for response to request for information?</p> <p>e. Are records of requests for information and responses maintained?</p> <p>f. Are responses to requests for information timely and appropriate?</p>	<p>- SOP/SMART/UMUM/SADV/I/004 dated 1 July 2014</p> <p>- Logbook Communication and Consultation</p> <p>- Record of information request and responses</p>	<p>Organization has established and implemented a mechanism for receiving and providing information in the procedure - SOP <i>Komunikasi dan Konsultasi</i> SOP/SMART/UMUM/SADV/I/004 dated 1 July 2014 which explain the mechanism of response to requests for information by referring to the list of stakeholders and stakeholder information according to the principles and criteria for sustainable palm oil.</p> <p>All information except confidential commercial information or information which has a negative impact on the environment and social can be provided by the organization. Request for information outside of the list of public information should be approval of top management and the provision of information comes with an official receipt.</p> <p>In the procedure also described specific timeframe to respond the requests for information from stakeholder depend on its request. Organizations usually respond directly to requests for information</p>	YES

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			<p>from all interest party/stakeholder.</p> <p>All information requests from stakeholder and their respond were listed and recorded by Mill and Estate on logbook "Record of information request and responses". Most of requests were an invitation to follow the event held by the stakeholders, for example: invitation for memorial of religious holidays, invitation for area meeting from Camat, etc. However, organizations are routinely required to submit reports to the regulatory agencies, such as: Monthly Social Security, Report to the CTF return period PPh21, P2K3 Report (Office of Manpower and Transmigration), and Report of the implementation of the RKL / RPL (Environmental Agency of the district, the province and the Ministry of Environment, Land Application Report (LA). Organization (estate and Mill) monitor all of the information that is communicated to stakeholders routinely. For example :</p> <p>a. Letter from Governor of Bangka Belitung Province No: 005/464/IV dated 2 May 2017 about CSR Program Meeting which held on 31 May 2017. Responded by company with send Mr. Damrah Thalib (SPO Region Bangka Belitung), assignment letter No: 011/MGR-BPRE/ST/VI/2017 date 31 May 2017.</p> <p>b. Letter from Manpower Agency of Bangka Belitung Province No 560/784/DISNAKER/2017 dated 29 May 2017 about Request for Manpower, Contract and Company Policy Data and Information. Responded by company with sending the requested data and information to Manpower Agency of Bangka Belitung Province on 2 July 2017. Evidences of receipt note and document was sighted.</p>	
1.2	Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			
1.2.1	<p>(M) Publicly available documents shall include, but are not necessarily limited to:</p> <p>a. Land titles/user rights (Criterion 2.2)</p> <p>b. Occupational health and safety plans (Criterion 4.7)</p> <p>c. Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)</p>			

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	<p>d. HCV documentation (Criteria 5.2 and 7.3)                      e. Pollution prevention and reduction plans (Criterion 5.6)                      f. Details of complaints and grievances (Criterion 6.3)                      g. Negotiation procedures (Criterion 6.4)                      h. Continual improvement plans (Criterion 8.1)                      i. Public summary of certification assessment report                      j. Human Rights Policy (Criterion 6.13).</p> <p><b>Guidance:</b>                      This concerns management documents relating to environmental, social and legal issues that are relevant to compliance with RSPO Criteria. Management documents will include monitoring reports.                      The auditors will comment on the adequacy of each of the documents listed in the public summary of the assessment report.                      Examples of commercially confidential information include financial data such as costs and income, and details relating to customers and/or suppliers. Data that affects personal privacy should also be confidential. One of legal requirements related to personal privacy is Act No. 14 year 2008 regarding Public Disclosure, clause 17 (h):                      Ongoing disputes (within or outside of a legal mechanism) can be considered as confidential information where disclosure could result in potential negative outcomes for all parties involved.                      On-going dispute (within or outside law mechanism) can be considered as confidential information if disclosure of information potentially causes negative impact to all related parties. However, affected stakeholders and those seeking resolution to conflict should have access to relevant information.                      However, affected stakeholders and parties who are working towards resolutions should have access to relevant information.                      Examples of information where disclosure could result in potential negative environmental or social outcomes include information on sites of rare species where disclosure could increase the risk of hunting or capture for trade, or sacred sites which a community wishes to maintain as private.                      Growers and millers should ensure that sufficient objective evidence exists to demonstrate that the level of measuring and monitoring of the management plan, and information, is appropriate and made available.</p>			
	<p>a. How are the management documents listed in (c) below made publicly available?                      b. Where are the documents placed?                      c. Is the information provided adequate? Note: At minimum, an information summary of the document listed below should be made available.</p> <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2)                             <ul style="list-style-type: none"> <li>- Legal boundaries ,land use, classification, total area, grant title, permit validity , NCR rights,</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- List of public documents F/SMART/UMUM/SADV/004/003</li> <li>- Site Permit (Izin Lokasi),</li> <li>- Land Use Title (HGU),</li> <li>- Plantation Operation Permit (IUP),</li> <li>- Environmental and Environment Impact Analysis document (AMDAL),</li> </ul>	<p>Organisation documents that is generally available by the organisation. List of management documents are publicly available such as: Site Permit (Izin Lokasi), Land Use Title (HGU), Plantation Operation Permit (IUP), Environmental and Environment Impact Analysis document (AMDAL), environmental management and monitoring report (RKL and RPL implementation reports), HCV Assessment report, Social Impact Assessment (SIA) Report, Occupational Health and Safety Management Plan, Corporate Social Responsibility (CSR) and Continuous Improvement Plan Those documents were accessible and shown during this audit.</p> <p>The documented procedure was established, it's described the process and responsibilities and authorities in regards responding</p>	<p>YES</p>

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	<ul style="list-style-type: none"> <li>• Occupational health and safety plans (Criterion 4.7);               <ul style="list-style-type: none"> <li>- risk assessment and mitigation, emergency response plan, training, accident records</li> </ul> </li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);               <ul style="list-style-type: none"> <li>- main social and environmental impacts and mitigation measures,</li> </ul> </li> <li>• HCV documentation (Criteria 5.2 and 7.3);               <ul style="list-style-type: none"> <li>- identification on HCV areas, maps, management and monitoring HCV</li> </ul> </li> <li>• Pollution prevention and reduction plans (Criterion 5.6);               <ul style="list-style-type: none"> <li>- identification of pollutants, management and reduction measures</li> </ul> </li> <li>• Details of complaints and grievances (Criterion 6.3);               <ul style="list-style-type: none"> <li>- nature of complaints, parties involved, status of case</li> </ul> </li> <li>• Negotiation procedures (Criterion 6.4);               <ul style="list-style-type: none"> <li>- SOP, consultative, neutral, inclusiveness, timeframe, responsibility</li> </ul> </li> <li>• Continual improvement plans (Criterion 8.1);               <ul style="list-style-type: none"> <li>- for all elements under 8.1,</li> </ul> </li> <li>• Public summary of certification assessment report;               <ul style="list-style-type: none"> <li>- follow RSPO format</li> </ul> </li> <li>• Human Rights Policy (Criterion 6.13).               <ul style="list-style-type: none"> <li>- policy statement should comply to</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Environmental management and monitoring report (RKL and RPL implementation reports),</li> <li>- HCV Assessment report,</li> <li>- Social Impact Assessment (SIA) Report,</li> <li>- Occupational Health and Safety Management Plan,</li> <li>- Corporate Social Responsibility (CSR)</li> <li>- Continuous Improvement Plan</li> </ul>	<p>the request on information from the public. The coverage of request on information as stated in the procedure including information on legal documents, environmental documents, social activities documents, occupational health and safety programme documents and continual improvement documents.</p> <p>All monitoring reports publicly available such as environmental management and monitoring report (RKL and RPL implementation reports), reports of P2K3, HCV monitoring report and etc.</p>	

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	<p>the requirements of 6.13</p> <p>d. Do the management documents contain monitoring plans and reports?</p> <p>e. Are all monitoring reports publicly available?</p>			
1.3 <sup>1</sup>	<p>Growers and millers commit to ethical conduct in all business operations and transactions.  <i>*1 New Criteria - Growers and millers commit to ethical conduct in all business operations and transactions.</i></p>			
1.3.1	<p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions along with the documentation of socialisation process of the policy to all levels of the workers and operations.</p> <p><b>Guidance:</b>  <i>All levels of the operations will include contracted third parties (e.g those involved in security).  The policy of ethical conduct and integrity should include:</i></p> <ul style="list-style-type: none"> <li>• <i>A respect for fair conduct of business;</i></li> <li>• <i>A prohibition of all forms of corruption, bribery and fraudulent use of funds and resources;</i></li> <li>• <i>A proper disclosure of information in accordance with applicable regulations and accepted industry practices.</i></li> </ul> <p><i>The policy should be set within the framework of the UN Convention Against Corruption, in particular Article 12.</i></p> <p><i>Regulations that are related to eradication of corruption are as followings:</i></p> <ol style="list-style-type: none"> <li>1. <i>Act No. 7 year 2006 regarding Ratification of United Nations Convention Against Corruption</i></li> <li>2. <i>Act No.8 year 2010 regarding Prevention and Eradication of Money Laundry.</i></li> <li>3. <i>Act No. 13 year 1999 regarding Eradication of Corruption.</i></li> <li>4. <i>Presidential Instruction No.1 year 2013 regarding Action for Corruption Prevention and Eradication</i></li> </ol> <p><i>Normal business is the business that complies with all existing regulations.</i></p> <p><i>This written policy should be communicated to the affected parties.</i></p>			



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	<p>a. Is there a written policy committing to a code of ethical conduct and integrity in all operations and transactions?</p> <p>b. Does the policy include as a minimum:</p> <ul style="list-style-type: none"> <li>• A respect for fair conduct of business?</li> <li>• A prohibition of all forms of corruption, bribery and fraudulent use of funds and resources?</li> <li>• A proper disclosure of information in accordance with applicable regulations and accepted industry practices?</li> </ul> <p>c. Is the policy documented and communicated to all levels of the workforce and operations, including contracted third parties? How is it communicated?</p> <p>d. Are the documentation and communication done in the appropriate languages?</p> <p><i>Note to auditor: The workforce should be interviewed to determine level of understanding of policy</i></p>	<ul style="list-style-type: none"> <li>- Policy "Principles of business ethics" PT Bumi Lestari Permai date August 1st 2014</li> <li>- Minutes and attendance dissemination of code of ethics policy on April – May 2017 in Bukit Perak Mill and Bukit Perak Estate</li> <li>- Minutes and attendance dissemination of code of ethics policy on 20 – 21 April 2017 in Bukit Permata Estate</li> <li>- Minutes and attendance dissemination of code of ethics policy on 4 March 2017 to local contractor in Bukit Perak Mill, Bukit Perak Estate and Bukit Permata Estate</li> </ul>	<p>Organization has established the policy "Principles of business ethics" PT Bumi Lestari Permai date August 1<sup>st</sup> 2014. PT BPL committed to continue practicing responsible business ethics referring to the shared values of the company i.e. integrity, positive attitude, commitment, continuous improvement, innovation and loyalty as well as in accordance with the rules, a proper disclosure of information in accordance with applicable regulations and accepted industry practices, principles and criteria of the SPO. Its consists of 5 policy can be summarized in :</p> <ul style="list-style-type: none"> <li>- Corporate practice and disseminating the shared values to all employees in the conduct of all business activities</li> <li>- Support the implementation of the 10 principles of UNGC in which there is a core value of the device i.e. human rights, labour, environment and anti-corruption</li> <li>- The Company does not provide for any tolerance of corruption in business practices undertaken by employees</li> <li>- The Company is committed to the ethical standards of behaviour in the management of all activities of business practices including</li> <li>- Company implement good corporate governance and respect fair conduct of business</li> </ul> <p>Code of ethics available in Bahasa. Dissemination of code of ethics policy has been carried out :</p> <ul style="list-style-type: none"> <li>a. On April – May 2017 in Bukit Perak Mill and Bukit Perak Estate</li> <li>b. On 20 – 21 April 2017 in Bukit Permata Estate</li> <li>c. On 4 March 2017 to local contractor in Bukit Perak Mill, Bukit Perak Estate and Bukit Permata Estate</li> <li>d. On 28 November 2016 socialization about policy, procedure and land compensation to head of villages, prominent figures and local authority.</li> </ul>	<p>YES</p>

**PRINCIPLE 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS**

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
2.1	<p>There is compliance with all applicable local, national and ratified international laws and regulations.</p> <p><b>Guidance:</b>  <i>Implementing all legal requirements is an essential baseline requirement for all growers and millers whatever their location or size. Relevant legislation includes, but is not limited to:</i></p> <ul style="list-style-type: none"> <li>a. Land use period and right</li> <li>b. Labour</li> <li>c. Agricultural practices (e.g. chemical use)</li> <li>d. Environment (e.g. wildlife, pollution, environmental management and forestry)</li> <li>e. Storage</li> <li>f. Transportation and processing practices.</li> </ul> <p><i>It also includes laws made pursuant to a country's obligations under international laws or conventions (e.g. the Convention on Biological Diversity (CBD), ILO core Conventions, UN Guiding Principles on Business and Human Rights). Furthermore, where countries have provisions to respect customary law, these will be taken into account.</i></p> <p><i>Key international laws and conventions are set out in Annex 1.</i>  <i>Legal requirements are existing laws and regulations some of which are set out in Annex 1.</i></p>			
2.1.1	(M) Evidence of compliance with relevant legal requirements shall be available.			
	<ul style="list-style-type: none"> <li>a. Is the complete list of legal requirements available? (Refer to relevant NIs or LIs for list of legal requirements)</li> <li>b. Does the company have copies of the legal requirements?</li> </ul> <p><i>Note to auditor: A due diligence on the company/area or management unit on legal compliance should be conducted prior to field audit. Any non-compliance should be verified during the field audit.</i>  <i>Relevant legislation includes, but is not limited to: regulations governing land tenure and land-use rights, labour, agricultural practices (e.g. chemical use), environment (e.g. wildlife laws, pollution, environmental management and forestry laws),</i></p>	<ul style="list-style-type: none"> <li>- Record of regulatory compliance evaluation called "Formulir Daftar Peraturan dan Persyaratan lainnya Bidang Ketenagakerjaa dan Lingkungan" updated on 27 January 2017.</li> <li>- Procedure "Regulations and Other Requirements" SOP/SMART/UMUM/SADV/II/002 , 1<sup>st</sup> July 2014.</li> <li>- List and evaluation of environment regulation and other requirements form (F/SMART/UMUM/SADV/II/002/0 02), last update 12 July 2017</li> </ul>	<p>The company have the complete list of legal requirement. It was available in hard and soft copy. includes:</p> <ul style="list-style-type: none"> <li>- Land use period and right</li> <li>- Labour (Safety implementation, OHS committee (P2K3), freedom of worker union, labour cooperation, minimum wage (UMSK), labour law, employee social benefit, Jamsostek (labour insurance) for employee, medical check-up, benefits for employee (THR) and etc.)</li> <li>- Agricultural practices (e.g. chemical use)</li> <li>- Environment (riparian buffer zone, wildlife laws, protected areas, etc.)</li> <li>- Storage</li> <li>- Transportation and processing practices.</li> </ul> <p>The legal requirement was evaluated and updated annually by SPO Officer and Region (BPRM on 05 January 2017, BPRE and BPTE on</p>	YES

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	<p><i>storage, transportation and processing practices. It also includes laws made pursuant to a country's obligations under international laws or conventions (e.g. the Convention on Biological Diversity (CBD), ILO core Conventions and UN Guiding Principles on Business and Human Rights.</i></p>	<ul style="list-style-type: none"> <li>- Hazardous waste manifest</li> <li>- Result of environmental monitoring and measurement</li> <li>- Evident of compliance:                             <ul style="list-style-type: none"> <li>o Hazardous waste manifest</li> <li>o Result of environmental monitoring and measurement</li> <li>o Valid permits (pressure vessels, lifting equipment, electric installation, etc.)</li> <li>o Certificate of personnel (AK3U, SIO, etc.)</li> <li>o Availability of MSDS</li> <li>o Periodic medical check up</li> </ul> </li> </ul>	<p>15 June 2017) and documented in the form No. F/SMART/UMUM/SADV/002/002. The new environment regulation was identified, such as PerMen LHK 68/2016 domestic waste water quality standard. The administrator/document control in charge at estates/mill were handled several licenses and reports as obligation on local requirements, such as:</p> <ul style="list-style-type: none"> <li>- License of hazardous waste temporary storage (TPS LB3) from Bangka Barat Regent No.188.45/260/1.08.02/2012 date 28 June 2012 valid for 5 years. There was renewal application letter sent to BLH Bangka Barat Regent No.013/EL/BPL-BLHD//2017 date 26 January 2017. Field verification has been held on 16 March 2017 by BLH Bangka Barat Regent.</li> <li>- License of waste water land application (LA) from Head of Bangka Barat Regent No.188.45/347/1.08.02/2015 dated 21 May 2015 valid for 2 years. There was renewal application letter sent to BLH Bangka Barat Regent No.052/EL/BPL-BLH/III/2017 date 23 March 2017. Field verification has been held from BLH Bangka Barat regent on 24 May 2017.</li> </ul>	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained.			
	<p>a. Is there a document system which includes the following?</p> <ul style="list-style-type: none"> <li>- Personnel in charge to manage</li> <li>- Set of legal documents</li> <li>- Comprehensive list of international, national, sub-national and provincial laws which details the requirements of specific to the mill and estate operations.</li> <li>- Relevant sections within the law that is identified and linked to activities</li> </ul> <p>b. Are the documents available to all levels of management?</p>	<ul style="list-style-type: none"> <li>• Procedure "Rules and other requirements" SOP/SMART/UMUM/SADV//002, 1<sup>st</sup> July 2014.</li> <li>• List and evaluation of environment regulation and other requirements form (F/SMART/UMUM/SADV//002/002), last update 12 July 2017</li> <li>• License of hazardous waste temporary storage (TPS B3)</li> <li>• License of waste water</li> </ul>	<p>The company has had a document system to monitor and evaluate the legal requirement, which includes:</p> <ul style="list-style-type: none"> <li>- Personnel in charge to manage</li> <li>- Set of legal documents</li> <li>- Comprehensive list of international, national, sub-national and provincial laws which details the requirements of specific to the mill and estate operations.</li> <li>- Relevant sections within the law that is identified and linked to activities</li> </ul> <p>Update and compliance review against change of law and regulation was conducted periodically (once a year or when there was new regulation update) by SPO officer use internet access, email and/or by direct visits to the government bodies. The evaluation of compliance was conducted together with the relevant functions</p>	YES

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		application (LA) <ul style="list-style-type: none"> <li>RKL/RPL (Environment monitoring and measurement reports)</li> </ul>	between SPO officer, SPO region and representative from estates and mill. The documents were available to all levels of management.	
2.1.3	A mechanism for ensuring compliance shall be implemented.			
	a. Is an internal audit for legal compliance conducted annually and documented?	<ul style="list-style-type: none"> <li>Internal audit of ISPO and RSPO on 2 – 6 January 2017</li> <li>Internal audit of OHS on 3 - 5 January 2017.</li> <li>PROPER evaluation from BLH Bangka Barat Regent and BLH Bangka Belitung Province on 3 – 4 May 2016.</li> </ul>	Internal audit for legal compliance are conducted periodically (once in year) internal audit against the requirement of ISPO and RSPO standards include the legal compliance evaluation and the last audit was held on 2 – 6 January 2017. There were 15 findings that all findings have been followed up with evidence. Other than that, from PROPER evaluation by KLHK Jakarta on period in 2015 – 2016 PT BPL got BLUE rank, it means the company has undertaken the required environmental management efforts in accordance with applicable rules or regulations. OHS internal audit were also planned annually and the last audit was conducted on 3 - 5 January 2017 for all estates and mill.  The audit checklist covered the implementation of the all applied regulations. Status of compliance with the applicable laws and regulations were evaluated, and evaluation of compliance result indicated that compliance status was justified with reference to the objective evidence of compliance.	YES
2.1.4	A system for tracking any changes in the law shall be available and implemented.  <b>Specific Guidance:</b> For 2.1.4: The systems used for tracking any changes in laws and regulations should be appropriate to the scale of the organisation.			
	a. Is there a documented methodology (e.g.: personnel in charge (PIC), source of info, frequency of update) for tracking changes and communication of changes to relevant sections of the legislation?	<ul style="list-style-type: none"> <li>SOP/SMART/UMUM/SADV/I/002</li> <li>F/SMART/UMUM/SADV/002/003 – Contact list for updating of regulation</li> <li>F/SMART/UMUM/SADV/002/004 – Monitoring of regulation</li> </ul>	Established procedure (Regulation and Other requirements SOP/SMART/UMUM/SADV/I/002, 1 <sup>st</sup> July 2014), it was described mechanism for updating latest laws and regulations and requires regular access to regulatory bodies to update information of laws and regulations. Update regulation was done by: <ul style="list-style-type: none"> <li>- Collecting relevant legislation</li> <li>- Determination of the referenced regulations</li> <li>- Distribution of regulations to related parties</li> </ul>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
		updating <ul style="list-style-type: none"> <li>• Documented procedure (SOP/SMART/UMUM/SADV/I/O 02 dated 1<sup>st</sup> July 2014) regulation and other requirement compliances</li> </ul>	<ul style="list-style-type: none"> <li>- Implementation of regulations and requirements</li> <li>- Maintain of renewal rules</li> </ul> Update and compliance review against change of law and regulation was conducted annually by Sustainability Division in related department coordination with Mill and Estate Manager and SPO officer. Organization has been review and update regulation on 12 July 2017.  Recording updates related regulations applied by the company are available in the document "list and evaluation of regulatory compliance".	
2.2				

The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.

**Guidance:**  
 The company has SOP for Land Acquisition to ensure that there is no removal of legal, customary or user rights (see 6.4.1 & 6.4.2)  
 Descriptions of those rights are as follows:

- a. Legal Right may be in the form of Land Certificates (Ownership Right / Hak Milik, User Right /Hak Guna Usaha), Registration Letter / Surat Keterangan Terdaftar, Letter of Inheritor Right / Surat Keterangan Hak Waris, and or Letter of Girik Right/Surat Keterangan Hak Girik.
- b. Customary Right in the Local Regulation/Perda (based on Constitution Court Decision No. 35/PUU-X/2012 regarding Customary Forest) determined through participatory mapping of customary land by the legitimate customary law community who are recognized by the surrounding customary law community and refers to Regulation of the Minister of Home Affairs (Permendagri) No. 52 year 2014 regarding Guideline of Recognition and Protection of Customary Law Community and Regulation of the State Minister of Agrarian Affairs/Head of National Land Agency (BPN) No. 5 year 1999 regarding Guidelines for the Settlement of Problems Related to the Communal Reserved Land of the Customary Law Abiding Community.
- c. User Right may be in the form of evidence of land leasing from the legal right holder, and/or official letter from the Village Head based upon testimony of communities or individual where their areas are adjacent to that land.

Customary area is customary land, including soil, water and or waters and natural resources with certain boundaries, owned, utilized and preserved for generations and on sustainable basis to fulfill the needs of their livelihood that was acquired from their ancestor or claimed ownership of communal land or customary forest.

Where there is a conflict on the condition of land use as per land title, growers should show evidence that necessary actions have been taken to resolve the conflict with relevant parties

A mechanism should be in place to resolve any conflict (Criteria 6.3 and 6.4).

Where operations overlap with other rights holders, companies should resolve the issue with the appropriate authorities, consistent with Criteria 6.3 and 6.4.

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)																								
			<p><i>Historical data of land ownership should be provided by the company for a minimum of one period of ownership/control.</i></p> <p><i>If there is a claim on customary right, this shall be legally demonstrated.</i></p>																									
2.2.1	<p>(M) Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.</p> <p><b>Specific Guidance:</b>  <i>For 2.2.1: The documents required to demonstrate legal ownership, lease or control and use of land shall include those related to getting the land permit or transfer of land right and up to the operational right.</i></p>																											
	<p>a. Are there documents showing legal ownership or lease of the land available? (e.g. land titles, lease documents)</p> <p>b. Are there documents showing history of land tenure available? (e.g. legal documents showing land status change, SIA and EIA reports, HCV assessment reports)</p> <p>c. Are there documents showing the actual legal use of the land available?</p> <p>d. Are the documents complete?</p>	<ul style="list-style-type: none"> <li>• Location Permit</li> <li>• Plantation Permit</li> <li>• Documents of land use title (HGU decree/certificate).</li> <li>• Building Permit (IMB)</li> <li>• Area Statement of BPRE and BPTE, PT. Bumi Permai Lestari</li> <li>• SIA report</li> <li>• HCV Report</li> <li>• Letter Number of 140/4.1.8.1/2017, date on 13 July 2017 from Pemerintahan Kecamatan Kelapa, Kabupaten Bangka Barat</li> </ul>	<p>Documents that showing legal ownership or lease of the land were available as follows:</p> <ul style="list-style-type: none"> <li>- Decree of Ministry of Landform (Head of Landform Agency-BPN) #26/HGU/BPN/95 dated April 12<sup>th</sup>, 1995 regarding land use title, covering area of 3,418.52 Ha valid until December 31<sup>st</sup>, 2030. Already extended until December 31<sup>st</sup>, 2090 according to Decree of BPN #134/HGU/BPN/2004 dated November 2<sup>nd</sup>, 2004</li> <li>- Decree of Ministry of Landform (Head of Landform Agency-BPN) #58/HGU/BPN/95 dated August 25<sup>th</sup>, 1995 regarding land use title, covering area of 10,900.54 Ha, valid until December 31<sup>st</sup>, 2030. Already extended until March 5<sup>th</sup>, 2092 according to Decree of BPN #127/HGU/BPN/2004 dated October 28<sup>th</sup>, 2004.</li> </ul> <p>In both the HGU is owned by 4 estates, among others: Bukit Perak Estate (BPRE), Bukit Permata Estate, Bukit Intan Estate (BINE), and Bukit Mas Estate (BMSE). For more details, the following is the division:</p> <table border="1" data-bbox="1169 1136 1662 1399"> <thead> <tr> <th colspan="2"></th> <th>Area (ha)</th> </tr> </thead> <tbody> <tr> <td colspan="2"><b>HGU / Land Title</b></td> <td></td> </tr> <tr> <td>1)</td> <td>No. 26/HGU/BPN/95</td> <td>3,418.52</td> </tr> <tr> <td>2)</td> <td>No. 58/HGU/BPN/95</td> <td>10,900.54</td> </tr> <tr> <td colspan="2"><b>Total</b></td> <td><b>14,319.06</b></td> </tr> <tr> <td colspan="2"><b>Land Use</b></td> <td></td> </tr> <tr> <td colspan="2"><b>Certified area</b></td> <td></td> </tr> <tr> <td>•</td> <td>BPRE</td> <td>4,111.50</td> </tr> </tbody> </table>			Area (ha)	<b>HGU / Land Title</b>			1)	No. 26/HGU/BPN/95	3,418.52	2)	No. 58/HGU/BPN/95	10,900.54	<b>Total</b>		<b>14,319.06</b>	<b>Land Use</b>			<b>Certified area</b>			•	BPRE	4,111.50	YES
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			<table border="1"> <tr> <td>• BPTe</td> <td>1,973.45</td> </tr> <tr> <td>• Sub Total (A)</td> <td>6,084.95</td> </tr> <tr> <td colspan="2"><b>Others area</b></td> </tr> <tr> <td>• BMSE</td> <td>3,183.51</td> </tr> <tr> <td>• BINE</td> <td>5,050.60</td> </tr> <tr> <td>• Sub Total (B)</td> <td>8,234.11</td> </tr> <tr> <td><b>Total (A+B)</b></td> <td><b>14,319.06</b></td> </tr> </table> <p>Documents that showing history of land tenure were also available, as follows:</p> <ul style="list-style-type: none"> <li>- Location Permit #218/SK/I/1993, dated March 20<sup>th</sup>, 1993, for ±14,000 Ha from Governor of South Sumatera given to PT. Bumi Permai Lestari.</li> <li>- Plantation Permit (SPUP) from Ministry of Agriculture #HK.350/183/BUN.5/ III/2001, dated March 16<sup>th</sup>, 2001, a total of 12,992.55 Ha for oil palm plantation.</li> <li>- SIA report “<i>Identifikasi Dampak Sosial Perkebunan dan Pabrik Kelapa Sawit</i>” (Identification of Social Impact of Plantation and Palm Oil Mill) PT. Bumi Permai Lestari”, SIGS Team, 2014.</li> <li>- HCV report “<i>Laporan Identifikasi dan Analisis Keberadaan Kawasan Bernilai Konservasi Tinggi</i>” (Report of Identification and Analysis of HCV) PT. Bumi Permai Lestari, 2012.</li> </ul> <p>Documents that showing building permit were also available among others:</p> <ul style="list-style-type: none"> <li>- Building Permit (Izin Mendirikan Bangunan) from the Regent of Bangka #SK.648/693/XIV/1994 dated December 13<sup>th</sup> 1994 to establish palm oil mill in Dendang Village, Kelapa District, Bangka Regency.</li> <li>- Building Permit (Izin Mendirikan Bangunan) from the Regent of Bangka #SK.648/694-697/XIV/1994 dated December 13<sup>th</sup> 1994</li> </ul>	• BPTe	1,973.45	• Sub Total (A)	6,084.95	<b>Others area</b>		• BMSE	3,183.51	• BINE	5,050.60	• Sub Total (B)	8,234.11	<b>Total (A+B)</b>	<b>14,319.06</b>	
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NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>to establish office, bicycle shelter, toilet and workshop in Dendang Village, Kelapa District, Bangka Regency.</p> <p>Documents that showing actual legal use of the land were available as follows:</p> <ul style="list-style-type: none"> <li>- Area Statement of PT. Bumi Permai Lestari, Bukit Perak Estate (BPRE), in January 2017.</li> <li>- Area Statement of PT. Bumi Permai Lestari, Bukit Permata Estate (BPTE) in January 2017.</li> </ul> <p>Those documents are complete and available during audit.</p> <p>During public consultation with there was request response that sent through email, namely Letter Number of 140/4.1.8.1/2017, date on 13 July 2017 from Pemerintahan Kecamatan Kelapa, Kabupaten Bangka Barat. For more details, please see results of public consultation on Appendix D.</p>	
2.2.2	<p>Legal boundaries are demonstrated clearly and maintained.</p> <p><b>Specific Guidance:</b>  <i>For 2.2.2: Grower should cease operations on land planted beyond the legally determined area and there should be specific plans in place to address such issues for associated smallholders.</i></p>			
	<p>a. Is there a legal map showing location of boundary markers?</p> <p>b. Is there physical presence of boundary markers?</p> <p>c. Is there an SOP for boundary demarcation and maintenance?</p> <p><i>Note to auditor: Ground verification of boundary markers using GPS should be conducted. Priority should be on boundaries with other estates, community areas, protected area and rivers</i></p>	<ul style="list-style-type: none"> <li>• <i>Peta Posisi Patok</i> (Map of peg position) PT. Bumi Permai Lestari (BPRE and BPTE).</li> <li>• Field observation in BPRE and BPTE, date on 11 – 12 July 2017.</li> </ul>	<p>Legal map showing location of boundary marker are available in <i>Peta Posisi Patok</i> (Map of peg position) PT. Bumi Permai Lestari (BPTE and BPRE), scale 1:30.000, projection: Mercator, Grid system: Geographyc, Datum: WGS 84, source: situation map of HGU #14/1994 and 32/1991 PT. Bumi Permai Lestari, Bangka Regency, Bangka Belitung Province.</p> <p>Boundary markers were physically present and observed during audit using GPS, among others:</p> <p><u>BPRE</u></p> <ul style="list-style-type: none"> <li>- No. 26 (01° 50' 21.3" S and 105° 34' 10.9" E)</li> <li>- No. 33 (01° 49' 01.0" S and 105° 33' 41.2" E)</li> </ul>	<p>NO (minor NCR 2017-01)</p>



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p><u>In the case of Associated Smallholders:</u></p> <p>d. Are there documents showing that the boundaries of associated smallholders have been recorded and verified by the mill?</p> <p>e. In case of boundary breach, is there proof of a mitigation plan being implemented?</p>		<ul style="list-style-type: none"> <li>- No. 94 (01° 32' 31.4" S and 105° 32' 31.4" E)</li> </ul> <p><u>BPTE</u></p> <ul style="list-style-type: none"> <li>- No. 122 (01° 50'02.5" S and 105° 30' 51.0" E)</li> <li>- No. 130 (01° 50' 21.6" S and 105° 28' 59.9" E)</li> <li>- No. 139 (01° 52' 16.5" S and 105° 30' 50.2" E)</li> </ul> <p>There is no smallholder associated with PT. Bumi Permai Lestari.</p> <p><b>Minor Non-conformance 2017-01:</b></p> <p>Maintenance of the HGU pegs was not conducted overall. It was not found / seen HGU pegs of No. 130 in the river area (Bumi Permata Estate).</p>	
2.2.3	<p>In the event that there is a dispute or a dispute has occurred, adequate evidence of legitimate acquisition and compensation or compensation settlement process through conflict resolution which has been received through Free, Prior and Informed Consent by all related parties shall be provided.</p>			
	<p>a. Are there, or have there been any land disputes?</p> <p><i>Note to auditor: Due diligence should be conducted on the management to provide evidence that there has been no historical or current land dispute</i></p> <p>b. If there are or have been disputes, are there:</p> <ul style="list-style-type: none"> <li>- Documents to proof legal acquisition?</li> <li>- Records of FPIC process?</li> </ul> <p>c. If there has been acquisition involving compensation, are there:</p> <ul style="list-style-type: none"> <li>- Records that Fair compensation has been provided and accepted by parties involved?</li> <li>- Records that all affected parties are consulted and represented?</li> </ul>	<ul style="list-style-type: none"> <li>- Public consultation result with stakeholder on 13 July 2017.</li> <li>- Letter form Head of Kelapa Sub-District No. 140/4.1.8.1/2017 date on 13 July 2016</li> </ul>	<p>Land clearing was done in 1991 and 1998. Organizations have established procedures of land compensation SOP SOP/NP/SMART/VII/D&amp;L002 dated 1 July 2010. Describes the mechanism of compensation before clearing land and land conflict resolution mechanisms between companies and land owners. The land cleared for oil palm plantations should ensure not be a problem and there is no dispute over land ownership. Procedure was presented to the head of the village around the plantation. Last socialization regarding procedure was held on 28 November 2016.</p> <p>Based on public consultation, there are no land disputes inside PT Bumi Permai Lestari plantation. Other than that, there was response from external stakeholders (from head of Kelapa Sub-District) through email regarding request for the release of school land within the PT. BPL's HGU area and response form the company has been conducted. For more detail, please refer to Appendix D - Stakeholder's issues and comment.</p>	NA

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	<ul style="list-style-type: none"> <li>- Documents of negotiations/discussion available?</li> </ul> <p><i>Note to auditor: There should be direct verification of above with the affected parties.</i></p>			
2.2.4	(M) There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved.			
	<p>a. Does the company have cases of significant land conflict? (i.e. preventing the company from operating normally)</p> <p>b. If the company has cases of conflict, are records of the following available?</p> <ul style="list-style-type: none"> <li>- Status of conflict</li> <li>- SOP/ mechanism for conflict resolution</li> <li>- Implementation of SOP/mechanism</li> <li>- Acceptance of the procedures by all parties</li> <li>- Records of conflict resolution</li> </ul>	<ul style="list-style-type: none"> <li>- Public consultation result with stakeholder on 13 July 2017.</li> <li>- Letter form Head of Kelapa Sub-District No. 140/4.1.8.1/2017 date on 13 July 2016</li> </ul>	<p>There was no problem of land disputes at PT. Bumi Permai Lestari. Land clearing was done in 1991 and 1998. Organizations have established procedures of land compensation SOP SOP/NP/SMART/VII/D&amp;L002 dated 1 July 2010. Describes the mechanism of compensation before clearing land and land conflict resolution mechanisms between companies and land owners. The land cleared for oil palm plantations should ensure not be a problem and there is no dispute over land ownership. Procedure was presented to the head of the village around the plantation. Last socialization regarding procedure was held on 28 November 2016.</p> <p>Based on public consultation, there are no land disputes inside PT Bumi Permai Lestari plantation. Other than that, there was response from external stakeholders (from head of Kelapa Sub-District) through email regarding request for the release of school land within the PT. BPL's HGU area and response form the company has been conducted. For more detail, please refer to Appendix D - Stakeholder's issues and comment.</p>	NA
2.2.5	For any conflict or dispute over the land, the evidence of the extent of disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities and local government where applicable), shall be available.			
	<p>a. Is there an SOP for participatory mapping of disputed area?</p> <p>b. Is a dispute map available?</p> <p>c. Is there documented evidence of involvement and acceptance by the affected parties?</p>	<ul style="list-style-type: none"> <li>- No land dispute based on public consultation result with stakeholder on 13 July 2017</li> <li>- SOP Land Compensation No : SOP/NP/SMART/VII/D&amp;L002 dated 1 July 2010</li> </ul>	<p>There was no problem of land disputes at PT. Bumi Permai Lestari. Land clearing was done in 1991 and 1998. Organizations have established procedures of land compensation SOP SOP/NP/SMART/VII/D&amp;L002 dated 1 July 2010. Describes the mechanism of compensation before clearing land and land conflict resolution mechanisms between companies and land owners. The land cleared for oil palm plantations should ensure not be a problem</p>	NA

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p><i>Note to auditor: Actual ground verification showing the accuracy of the dispute map should be conducted</i></p>	<ul style="list-style-type: none"> <li>- SOP Social Conflict Management No : SOP/SMART/SENS-CSR/SADV/II/002 dated 1 July 2014</li> <li>- Letter form Head of Kelapa Sub-District No. 140/4.1.8.1/2017 date on 13 July 2016</li> </ul>	<p>and there is no dispute over land ownership. Procedure was presented to the head of the village around the plantation. Last socialization regarding procedure was held on 28 November 2016.</p> <p>Based on public consultation, there are no land disputes inside PT Bumi Permai Lestari plantation. Other than that, there was response from external stakeholders (from head of Kelapa Sub-District) through email regarding request for the release of school land within the PT. BPL's HGU area and response form the company has been conducted. For more detail, please refer to Appendix D - Stakeholder's issues and comment.</p>	
2.2.6	<p>(M) To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations.</p> <p><b>Specific Guidance:</b>  <i>For 2.2.6: The company policy should require the use only of legally recognized private security personnel in their operations and prohibit extra-judicial interference and intimidation by the security personnel as mentioned above (see Criterion 6.13).</i></p>			
	<p>a. Does the company have a policy to circumvent instigated violence to maintain peace and order in current and planned operations?</p> <p>b. Is there any evidence of:</p> <ul style="list-style-type: none"> <li>- The use of confrontation and intimidation by the company to maintain peace and order?</li> <li>- Use of para-militaries and mercenaries in the plantation?</li> </ul>	<ul style="list-style-type: none"> <li>- SOP Land Compensation No. SOP/NP/SMART/VII/D&amp;L002 dated 1 July 2010</li> <li>- SOP Social Conflict Management No. SOP/SMART/SENS-CSR/SADV/II/002 dated 1 July 2014.</li> <li>- Public consultation result with stakeholder on 13 Juli 2017</li> <li>- Letter form Head of Kelapa Sub-District No. 140/4.1.8.1/2017 date on 13 July 2016</li> </ul>	<p>The company's policy not to be applies military means and or using intimidation in land dispute resolution procedures available in SOP SOP/NP/SMART/VII/D&amp;L002 dated 1 July 2010. Describes the mechanism of compensation before clearing land and land conflict resolution mechanisms between companies and land owners. The land cleared for oil palm plantations should ensure not be a problem and there is no dispute over land ownership. Procedure was presented to the head of the village around the plantation</p> <p>Also available SOP Social Conflict Management No: SOP/SMART/SENS-CSR/SADV/II/002 dated 1 July 2014, which describes land conflict resolution process through dialogue mechanism and explanation verbally/in writing, the remedies by facilitating local government if the first method does not find an agreement, the process to level court to obtain legal certainty if the way 1 until 3 is not reached.</p> <p>During public consultation with village head, public figure and other stakeholder informed that so far company did not apply military means and or using intimidation in land dispute resolution. The</p>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>company emphasizes deliberations ways and mediation if it necessary to reach agreement. It was confirmed that there was no problem of land disputes and land conflict at PT. Bumi Permai Lestari. Other than that, there was response from external stakeholders (from head of Kelapa Sub-District) through email regarding request for the release of school land within the PT. BPL's HGU area and response form the company has been conducted. For more detail, please refer to Appendix D - Stakeholder's issues and comment.</p>	
2.3	<p>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><b>Guidance:</b>  <i>All indicators are applied to all oil palm plantations developed after November 2005, with exception to plantations developed prior to November 2005 that may not have records dating back to the time of decision making, in particular for compliance with Indicators 2.3.1 and 2.3.2.</i></p> <p><i>Where there are legal or customary rights over land, the grower should demonstrate that these rights are understood and are not being threatened or reduced. This Criterion should be considered in conjunction with Criteria 6.4, 7.5 and 7.6. Where customary rights areas are unclear these should be established through participatory mapping exercises involving affected parties (including neighbouring communities and local authorities).</i></p> <p><i>This Criterion allows for sales and negotiated agreements to compensate other users for lost benefits and/or relinquished rights. Negotiated agreements should be non-coercive and entered into voluntarily, carried out prior to new investments or operations, and based on an open sharing of all relevant information. The representation of communities should be transparent and in open communication with other community members. Adequate time should be given for customary decision making and iterative negotiations allowed for, where requested. Negotiated agreements should be binding on all parties and enforceable in the courts. Establishing certainty in land negotiations is of long-term benefit for all parties.</i></p> <p><i>Growers and millers should refer to the RSPO approved FPIC guidance (RSPO endorsed Free, Prior and Informed Consent Guide for RSPO Members, November 2015).</i></p> <p><i>Companies should be especially careful where they are offered lands acquired from the State by its invoking the national interest (also known as 'eminent domain').</i></p>			
2.3.1	<p>(M) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>			
	<p>a. Does the company have an SOP on FPIC?</p> <p>b. Is there evidence that the identification of legal, customary or user rights has been done through FPIC process?</p> <p>c. Is there evidence that the FPIC process has</p>	<p>- SOP Free Prior Informed Consent No SOP/SMART/SENS-CSR/SADV/003</p> <p>- Public consultation result with</p>	<p>The company have developed a procedure about FPIC and available on SOP FPIC No SOP/SMART/SENS-CSR/SADV/003 dated 1 July 2014. Based on public consultation result with stakeholder, it was confirmed there was no existence of customary land and local communities in the concession area of PT. BPL.</p> <p>Maps have been developed for each estate indicating Legal</p>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>been implemented in accordance to the company SOP? Where is this evidence recorded? (E.g.: Documents, Minutes of meeting, Records, Agreements, Maps etc.)</p> <p>d. Is there a map of the extent of legal, customary or user rights? Is this map of appropriate scale (1: 10,000)?</p> <p>e. Was the map produced through participatory mapping with reference to SIA and HCV assessment?</p> <p>f. Does the map have a title, legend, source, scale and projections/georeference?</p> <p>g. Are the maps accepted by the relevant communities?</p>	<p>stakeholder on 13 July 2017</p>	<p>demarcation and planted areas. Planted areas of the Estate are wholly on Government land, leased under HGU. Organization has a legitimate concession extension SK and through the stages in accordance with applicable regulations. Installation of HGU stakes has also involved the surrounding villages. The company emphasizes deliberations ways and mediation if it necessary to reach agreement inland acquisition.</p>	
2.3.2	<p>Copies of negotiated agreements including the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and these include:</p> <p>a. Evidence of consultation</p> <p>b. Statement of transfer of rights</p> <p>c. Evidence of compensation</p> <p>See specific guidance 2.3.2</p> <p><b>Specific Guidance:</b> <b>For 2.3.2 :</b> <i>Copies of negotiated agreements shall include at minimum:</i></p> <p>a. <i>A plan that should be developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making;</i></p> <p>b. <i>Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;</i></p> <p>c. <i>Evidence that the company has ensured that affected communities have understood and accepted the legal, economic, environmental and social implications for permitting operations on their land, including the implications for the legal status of their land at the expiry of the company's title or concession. The company shall inform the legal implication based upon, but not limited to, Act No. 50 year 1960 and Government Regulation No. 40 year 1996 regarding Land-Use Right (HGU), Building-Use Right (HGB), and User Right, where the land will be owned by the state if HGU right is expired, not be extended and or updated.</i></p> <p>d. <i>Evidence that the company has informed the plan for partnership program.</i></p>			
	<p>a. Are copies of negotiated agreements with affected parties available?</p>	<p>Public consultation result with stakeholder on 13 July 2017</p>	<p>FPIC was not applicable in this case, company was established in 1991, and acquisition and land clearing process was done in 1991</p>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>b. Is there evidence that the agreement is prepared through proper FPIC process?</p> <p>c. Does the agreement contain the following:</p> <ul style="list-style-type: none"> <li>- An action plan developed through consultation with affected parties, is inclusive and evidence that members of affected parties are well informed and involved in the decision making process</li> <li>- Evidence of options to give or withhold consent for development</li> <li>- Evidence that members of the affected communities understand and accept the implication involved in permitting/rejecting oil palm development on their land (E.g.: legal status, social, environmental, economic)</li> <li>- Evidence that the negotiated agreement was entered voluntarily without coercion by all parties</li> <li>- Evidence that adequate time was given for customary decision making and iterative negotiations</li> <li>- Clause which states that the negotiated agreement is legally binding</li> </ul>		<p>and 1998. During public consultation with local government, village head, public figure and other stakeholder informed that so far company did not apply military means and or using intimidation in land dispute resolution. The company emphasizes deliberations ways and mediation if it necessary to reach agreement. It was confirmed that there was no problem of land disputes and land conflict at PT. Bumi Permai Lestari.</p> <p>Organizations have established procedures of land compensation SOP SOP/NP/SMART/VII/D&amp;L002 dated 1 July 2010. Describes the mechanism of compensation before clearing land and land conflict resolution mechanisms between companies and land owners. The land cleared for oil palm plantations should ensure not be a problem and there is no dispute over land ownership. Procedure was presented to the head of the village around the plantation.</p>	
2.3.3	<p>Relevant information shall be available in appropriate forms and languages, including analysis of impacts, proposed benefit sharing, and legal arrangements.</p>			
	<p>a. Is there evidence that all the information (maps, agreement, records, impact assessment, benefit sharing and legal arrangements) is available in appropriate forms and languages, understood and accessible to affected parties?</p> <p><i>Note to auditor: this should be cross checked to a sample of the affected parties</i></p>	<ul style="list-style-type: none"> <li>- Public consultation result with stakeholder on 13 July 2017.</li> <li>- Letter form Head of Kelapa Sub-District No. 140/4.1.8.1/2017 date on 13 July 2016</li> </ul>	<p>Before performing land clearing, the company ensures that all of land that will be cultivated have a clear status. The company has a land map according to the location permit given by the government. If there was land that become community ownership within the area of location permit, companies will frees the land with compensation as agreed both parties.</p> <p>There is no element of coercion and violence that performed by companies. This was also confirmed when the public consultation on</p>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>13 Juli 2017 with community leaders, around village heads (Air Bulin Village, Kacung Village, Dendang Village and Tugang Village) and public figure.</p> <p>Planted areas of the Estate are wholly on Government land, leased under HGU. Maps have been developed for each estate indicating Legal demarcation and planted areas.</p> <p>Organizations have established procedures of land compensation SOP SOP/NP/SMART/VII/D&amp;L002 dated 1 July 2010. Describes the mechanism of compensation before clearing land and land conflict resolution mechanisms between companies and land owners. The land cleared for oil palm plantations should ensure not be a problem and there is no dispute over land ownership. Procedure was presented to the head of the village around the plantation.</p> <p>There was response from external stakeholders (from head of Kelapa Sub-District) through email regarding request for the release of school land within the PT. BPL's HGU area and response form the company has been conducted. For more detail, please refer to Appendix D - Stakeholder's issues and comment.</p>	
2.3.4	<p>(M) Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel.</p> <p><b>Specific Guidance:</b>  <i>For 2.3.4: Evidence of proxy letter from the community group, individual and/or company to the institution which represents community at the negotiation process, shall be demonstrated.</i></p>			
	<p>a. Who is the representative of the community in the negotiation process?</p> <p>b. Is the representative accepted by the community?</p> <p>c. Is the record of appointment to represent the community available and shared with other parties?</p>	<p>Public consultation result with stakeholder on 13 July 2017</p>	<p>Evidence shows that people have determined their representatives through the local village chief. Based on the proof of compensation delivery also visible signature of the head of the village which is also accompanied by current photo handover compensation.</p>	<p>YES</p>



**PRINCIPLE 3: COMMITMENT TO LONG-TERM ECONOMIC AND FINANCIAL VIABILITY**

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
3.1	<p>There is an implemented management plan that aims to achieve long-term economic and financial viability.</p> <p><b>Guidance:</b>  <i>Whilst it is recognised that long-term profitability is also affected by factors outside their direct control, top management should be able to demonstrate attention to economic and financial viability through long-term management planning. There should be longer term planning for plantations on peat, particularly in regards to subsidence and flooding issues (see Indicator 4.3.5).</i></p> <p><i>Consideration of smallholders should be inherent in all management planning where applicable (see also Criteria 6.10 and 6.11). For scheme smallholders, the company should refer to RSPO Guidance On Scheme Smallholders, July 2009 or endorsed final revision.</i></p> <p><i>Growers should have a system to improve practices in line with new information and techniques. For smallholder schemes, the scheme management should be expected to provide their members with information on significant improvements.</i></p> <p><i>This Criterion is not applicable to independent smallholders (refer to RSPO Guidance for Independent Smallholders under Group Certification, June 2010)</i></p>			
3.1.1	<p>(M) A documented management plan, a minimum of three years shall be available, including, where appropriate, plan for scheme smallholders.</p> <p><b>Specific Guidance:</b>  <i>For 3.1.1: The business or management plan should contain:</i></p> <ul style="list-style-type: none"> <li>• <i>Attention to quality of planting materials;</i></li> <li>• <i>Crop projection = Fresh Fruit Bunches (FFB) yield trends;</i></li> <li>• <i>Mill extraction rates = Oil Extraction Rate (OER) trends;</i></li> <li>• <i>Cost of Production = cost per tonne of Crude Palm Oil (CPO) trends;</i></li> <li>• <i>Forecast prices;</i></li> <li>• <i>Financial indicators.</i></li> </ul> <p><i>Suggested calculation: trends in 3-year running mean over the last decade (FFB trends may need to allow for low yield during major replanting programmes).</i></p>			
	<p>a. Does the company have a documented business or management plan with a minimum planning period of 3 years?</p> <p>b. Does it include the following:</p> <ul style="list-style-type: none"> <li>- Land area statement (planting years, non-planted areas, i.e. HCV, conservation areas, fragile soils, enclaves) with updated location maps. Maps should have title, legend, source,</li> </ul>	<ul style="list-style-type: none"> <li>- Economic Feasibility Analysis of 5-year plantation of PT. Bumi Permai Lestari period 2017 - 2021.</li> <li>- Field observation, date on 11 – 12 July 2017.</li> </ul>	<p>The company has a documented business or management plan with planning period of 5 (five) years on Economic Feasibility Analysis of 5 years plantation of PT Bumi Permai Lestari period 2017 – 2021.</p> <p>The Management Plan has include:</p> <ul style="list-style-type: none"> <li>- Land area statement (planting years, non-planted areas, i.e. HCV, conservation areas, enclaves) with updated location maps. Maps area completed with title, legend, source, scale and projections/georeferenced.</li> </ul>	<p>YES</p>



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul style="list-style-type: none"> <li>- scale and projections/georeferenced</li> <li>- Plan for management of scheme smallholders (where appropriate)</li> <li>- Quality of planting materials</li> <li>- Crop projection = Fresh Fruit Bunches (FFB) yield trends</li> <li>- Mill extraction rates = Oil Extraction Rate (OER) trends</li> <li>- Cost of Production = cost per tonne of Crude Palm Oil (CPO) trends</li> <li>- Forecast prices</li> <li>- Financial indicators – profitability forecast (income vs cost)</li> <li>- Projected expansion (area, mill capacity, infrastructure, social amenities)</li> <li>- General strategy and allocation for environmental and social management (refer to P5, P6 and P8)</li> </ul> <p>c. Is this management document subjected to an annual review?</p> <p>d. For plantations on peat, is there a long term viability plan – e.g. flooding, drainability assessments and subsidence issues? (see 4.3.5)</p> <p>e. Does the grower have a system to improve practices in line with new information and techniques?</p> <ul style="list-style-type: none"> <li>- Has the personnel in charge (PIC) been identified?</li> <li>- How is the information updated?</li> <li>- Is there a documented SOP which requires monitoring and updating information to improve practices?</li> </ul>		<ul style="list-style-type: none"> <li>- Plan for management of third party FFB</li> <li>- Quality of planting materials</li> <li>- Crop projection = Fresh Fruit Bunches (FFB) yield trends</li> <li>- Mill extraction rates = Oil Extraction Rate (OER) trends</li> <li>- Cost of Production = cost per tonne of Crude Palm Oil (CPO) trends</li> <li>- Forecast prices</li> <li>- Financial indicators – profitability forecast (income vs cost)</li> <li>- Projected expansion (area, mill capacity, infrastructure, social amenities)</li> <li>- General strategy and allocation for environmental and social management (refer to P5, P6 and P8)</li> </ul> <p>The management plan was subjected to an annual review and was reviewed annually by top management including Regional Controller, Production Controller, Estate Manager and Mill Manager, and revised as appropriate; based on the achievement against the plan and other parameters may change.</p> <p>Based on field visit, document review, and interview with stakeholders, that there is no peat area in BPRE and BPTE.</p> <p>The grower has a system to improve practices in line with new information and techniques. Estate Manager is the personnel in charge (PIC) to improve practices based on new information and technique. Information is updated through structural system, e.g. President Director to VPA, VPA to Regional Controller, Regional Controller to Estate Manager, Estate Manager to Field Assistant, then Field Assistant to Mandore and worker. Estate Manager communicated to Field Assistant through meeting, and then Field Assistant communicated to worker through morning briefing.</p>	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)																												
	<ul style="list-style-type: none"> <li>- Is new information communicated to workers and scheme smallholders (where appropriate)? How is it communicated?</li> </ul>																															
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.																															
	<ul style="list-style-type: none"> <li>a. Is there an annual replanting programme projected for a minimum of five years?</li> <li>b. Has it been documented?</li> <li>c. Is the progress of implementation documented?</li> <li>d. How does the programme take into consideration fragile soils such as peat? Is there a longer projection period (see C4.3)?</li> <li>e. Is there evidence of a yearly review of the replanting programme?</li> </ul>	<ul style="list-style-type: none"> <li>- Economic Feasibility Analysis of 5-year plantation of PT. Bumi Permai Lestari period 2017 - 2021.</li> <li>- Field observation, date on 11 – 12 July 2017.</li> </ul>	<p>Replanting Program is available and documented on Economic Feasibility Analysis of 5-year plantation of PT. Bumi Permai Lestari period 2017 - 2021. Replanting Program of PT. Bumi Permai Lestari is as follows:</p> <table border="1" data-bbox="1111 627 1852 794"> <thead> <tr> <th>Estate</th> <th>2017</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>TOTAL</th> </tr> </thead> <tbody> <tr> <td>BPRE (ha)</td> <td>-</td> <td>-</td> <td>859.00</td> <td>862.74</td> <td>971.51</td> <td>2,693.26</td> </tr> <tr> <td>BPTE (ha)</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Total (ha)</td> <td>-</td> <td>-</td> <td>859.00</td> <td>862.74</td> <td>971.51</td> <td>2,693.26</td> </tr> </tbody> </table> <p>According to the program, until now there is still no realisation of replanting in PT. Bumi Permai Lestari. Replanting will be starts in 2019.</p>	Estate	2017	2018	2019	2020	2021	TOTAL	BPRE (ha)	-	-	859.00	862.74	971.51	2,693.26	BPTE (ha)	-	-	-	-	-	-	Total (ha)	-	-	859.00	862.74	971.51	2,693.26	YES
Estate	2017	2018	2019	2020	2021	TOTAL																										
BPRE (ha)	-	-	859.00	862.74	971.51	2,693.26																										
BPTE (ha)	-	-	-	-	-	-																										
Total (ha)	-	-	859.00	862.74	971.51	2,693.26																										

**PRINCIPLES 4: USE OF APPROPRIATE BEST PRACTICES BY GROWERS AND MILLERS**

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
4.1	<p>Operating procedures are appropriately documented, consistently implemented and monitored.</p> <p><b>Specific Guidance:</b>  <b>For 4.1.1 and 4.1.4:</b> SOPs and documentations for mills should include relevant supply chain requirements (see RSPO Supply Chain Certification Standard, Nov 2011).                      Mechanisms to check implementations could include documentation management systems and internal control procedures.                      These procedures refer to the Best Management Practices for Oil Palm in Indonesia, such as Technical Guideline for Oil Palm Development, Directorate General of Estate Crops, Ministry of Agriculture, 2006.</p>			
4.1.1	(M) Standard Operating Procedures (SOPs) for estates (land clearing to harvesting) and SOP for mills (reception of FFB to dispatch of CPO and PKO) shall be available.			
	<p>a. Have the SOPs for mills and plantation been documented?</p> <p>b. Does the SOP cover key processes, harvesting, transportation, manuring, IPM, GAP, Supply Chain requirements for the mill, etc.?</p> <p>c. Is a copy of the SOP available on site and is it documented in an appropriate language?</p> <p>d. Is there evidence that SOPs are implemented and understood by workers?</p> <p>e. Are the SOPs appropriate and adequately cover all estate and mill processes and activities?</p> <p>f. How are the SOPs made available at the point of use?</p>	<ul style="list-style-type: none"> <li>• Standard Operational Procedure for Estate operation, dated on 01 September 2012.</li> <li>• Standard Operational Procedure of Palm Oil Process PT. Bumi Permai Lestari revision 6, 2013</li> </ul>	<p>Standard Operating Procedures (SOP) for Estates were developed in SOP which revised dated on 1 September 2012. The procedures were includes new area and replanting planning, nursery, land clearing, preparation before planting, fertilising, upkeep, pest management, road maintenance, peat land management, drainage system, mature and immature upkeep, integrated pest management and harvesting. Other than there were also other procedures for several processes including riparian zone management, application of agrochemical. Procedure also described required PPE and other safe working practices.</p> <p>Standard Operational Procedure for Estate are as follows:</p> <ul style="list-style-type: none"> <li>- SOP/SMART/MCAR/II/TA-PPA (<i>Perencanaan Penanaman Areal Baru</i>)</li> <li>- SOP/SMART/MCAR/III/TA-PRP (<i>Perencanaan Replanting</i>)</li> <li>- SOP/SMART/MCAR/III/TA-BBT (<i>Pembibitan</i>)</li> <li>- SOP/SMART/MCAR/IV/TA-PLB (<i>Pembukaan Lahan Baru</i>)</li> <li>- SOP/SMART/MCAR/V/TA-TNM (<i>Penanaman</i>)</li> <li>- SOP/SMART/MCAR/VI/TA-RPL (<i>Replanting</i>)</li> <li>- SOP/SMART/MCAR/VII/TA-HPT (<i>Pengendalian Hama dan Penyakit Tanaman</i>)</li> <li>- SOP/SMART/MCAR/VIII/TA-PGM (<i>Pengendalian Gulma</i>)</li> <li>- SOP/SMART/MCAR/IX/TA-PPK (<i>Pemupukan</i>)</li> <li>- SOP/SMART/MCAR/X/TA-PTB (<i>Pemeliharaan Tanaman Belum</i></li> </ul>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p><i>Menghasilkan</i></p> <ul style="list-style-type: none"> <li>- SOP/SMART/MCAR/XI/TA-PMP (<i>Persiapan Menjelang Panen</i>)</li> <li>- SOP/SMART/MCAR/XII/TA-PTM (<i>Pemeliharaan Tanaman Menghasilkan</i>)</li> <li>- SOP/SMART/MCAR/XIII/TA-PNN (<i>Panen</i>)</li> <li>- SOP/SMART/MCAR/XIV/TA-PPT (<i>Pemuatan dan Pengangkutan TBS</i>)</li> <li>- SOP/SMART/MCAR/XV/TA-PCH (<i>Pengukuran Curah Hujan dengan Ombrometer</i>)</li> </ul> <p>Procedure of best practice operation of the Bukit Perak mill was available in document of MCMD-2013, Standard Operational Procedure of Palm Oil Process PT SMART Tbk revision 6 issued by Head Office.</p> <p>The procedure describes operation instruction from FFB receiving through production, processing (grading, sterilization, threshing, pressing, clarification, nut and kernel processing) and dispatch of CPO and PK. Quality control check, sampling methods including its reporting from reception of FFB up to dispatch of CPO and PK was mentioned in the Laboratory procedure.</p> <p>Work Instructions has been developed and posted at work stations within the mill. Records of receiving FFB, sterilization, pressing, clarification and delivery (December 2014) were evident.</p> <p>Standard Operational Procedure of Palm Oil Process PT Bumi Permai Lestari; Revision 6; 2013 which is included :</p> <ul style="list-style-type: none"> <li>- Grading</li> <li>- Loading Ramp</li> <li>- Weighing Bridge</li> <li>- Sterilisation Station</li> <li>- Threshing Station</li> <li>- Pressing Station</li> <li>- Clarification Station</li> <li>- Recycling CPO</li> <li>- Nut and Kernel</li> </ul>	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<ul style="list-style-type: none"> <li>- Engine Room</li> <li>- Boiler</li> <li>- Water Treatment</li> <li>- Final Effluent</li> <li>- Laboratorium</li> <li>- Etc</li> <li>- Work Instructions of Palm Oil Process PT SMART</li> <li>- Recapitulation Report of FFB Received on 1/12/2014.</li> <li>- CPO Tank Maintenance Records</li> <li>- Station Operational Records sheet 5-12 January 2015.</li> <li>- Lab Daily Inspection Report of CPO Product on 1 December 2014.</li> </ul> <p>Hardcopy of procedure are documented in <i>Bahasa Indonesia</i> and available in the estate office and controlled. Interviews with the employees indicate satisfactory level of understanding and implementation in relation to their respective job function. All SOPs are appropriate and adequately cover all estate and mill processes and activities. All SOPs are available at the point of use.</p>	
4.1.2	Checking or monitoring of operations procedures is conducted at least once a year.			
	<p>a. Is there a master list of all SOPs?</p> <p>b. How does the company keep track of revisions?</p> <p>c. Is there mechanism for:</p> <ul style="list-style-type: none"> <li>- Translation of SOP into work instructions in appropriate languages?</li> <li>- Records of training for all levels?</li> <li>- Internal control (e.g. audit and review, field inspection) procedure in place to monitor consistent implementation of SOPs?</li> <li>- Trained and competent personnel assigned to carry out internal control activities?</li> <li>- Implementation audits to be carried out</li> </ul>	<ul style="list-style-type: none"> <li>- Standard Operational Procedure for Estate operation in Management Committee Agronomy Research (MCAR)</li> <li>- RSPO Internal Audit Report, 2017</li> <li>- OIA visit report, date on 16 November 2016 (BPRE) and 20 December 2016 (BPTE).</li> <li>- <i>Buku Potong Buah</i> (BPtH)</li> <li>- Field visit report on 25 May 2017 at Block D53-54 Division 3, BPRE and 11 April 2017 at</li> </ul>	<p>Master list of all SOP was available in Management Committee Agronomy Research (MCAR). The company keep track of revisions using register number. The mechanism include as follows:</p> <ul style="list-style-type: none"> <li>- Translation of SOP into work instructions in appropriate languages.</li> <li>- Records of training for all levels.</li> <li>- Internal control (e.g. audit and review, field inspection) procedure in place to monitor consistent implementation of SOPs.</li> <li>- Trained and competent personnel assigned to carry out internal control activities.</li> <li>- Implementation audits to be carried out regularly covering implementation of all the SOPs.</li> <li>- Procedure to address non-compliance and corrective action for</li> </ul>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>regularly covering implementation of all the SOPs?</p> <ul style="list-style-type: none"> <li>- Procedure to address non-compliance and corrective action for continuous improvement?</li> </ul>	<p>Block G37-38 Division 1, BPTe.</p>	<p>continuous improvement.</p> <p>RSPO Internal audit of PT. BPL was performed on June 6<sup>th</sup>, 2016 by a team consist of 1 lead auditor and 3 member auditors. Audit conducted to BPRM, BPRE and BPTe. Several non conformities were rose during internal audit, but corrective actions have been taken and non conformities were closed on July 4<sup>th</sup>, 2016.</p> <p>The company has also audit system to check operational performance which is Operation Internal Audit (OIA). OIA visit in BPRE and BPTe was performed on 16 November 2016 (BPRE) and 20 December 2016 (BPTe). The report contain visit result and action plan to follow up.</p>	
4.1.3	Records of monitoring and any follow-up actions shall be available.			
	<p>a. Have the records been maintained on the following?</p> <ul style="list-style-type: none"> <li>- Measurements or results of internal control and monitoring activities (refer 4.1.2)</li> <li>- Records of corrective actions and improvement undertaken</li> </ul>	<ul style="list-style-type: none"> <li>- BKM (<i>Buku Kegiatan Mandor</i> - Log book of group leader activity). BKM of several activities was reviewed, e.g. manuring, manual road maintenance, manual weeds control, census of diseases, circle and path spraying.</li> <li>- BPTB (<i>Buku Potong Buah</i> – Logbook of harvesting activity)</li> <li>- BKtB (<i>Buku Kutip Brondolan</i> – Logbook of loose fruit collecting activity)</li> <li>- OIA visit report, date on 16 November 2016 (BPRE) and 20 December 2016 (BPTe)</li> </ul>	<p>Record of monitoring and any action taken were maintained and available for BPRE and BPTe, e.g. :</p> <ul style="list-style-type: none"> <li>- BKM (<i>Buku Kegiatan Mandor</i> - Log book of group leader activity). BKM of several activities was reviewed, e.g. manuring, manual road maintenance, manual weeds control, census of diseases, circle and path spraying.</li> <li>- BPTB (<i>Buku Potong Buah</i> – Logbook of harvesting activity)</li> <li>- BKtB (<i>Buku Kutip Brondolan</i> – Logbook of loose fruit collecting activity)</li> <li>- Shift Report book to control and monitor daily work activity of mill, record number of attendance employee, starting hour, throughput, oil and kernel production, issue/trouble in process activity.</li> <li>- Logsheets every station from loading ramp, sterilizer, threshing, press, clarification, boiler and effluent. Record daily activity of processs in each station and process performance in each station.</li> <li>- Breakdown report and repair request Logbook, supervisor check the machine condition and report to maintenance section to</li> </ul>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>repair if there was a breakdown condition.</p> <p>The actions raised were monitored and followed up in estate and mill. The records were maintained and distributed to the related parties. Several actions were related to: EFB application, harvesting control, overtime payment, documentation of stakeholder information and training, biodiversity dissemination, etc. The action plans with target date were evident and all of them were considered closed.</p>	
4.1.4	(M) Records of the origins of all third-party FFB sourced (collector, deliver, Cooperative, Farmers Association and out-grower) shall be available.			
	<p>a. Is there an SOP for third-party FFB sourcing?</p> <p>b. Is there a list of approved third-party FFB suppliers?</p> <p>c. Is there proof of observed implementation of SOP?</p> <p>d. Is there daily and summary records of volume and origins of third-party FFB received?</p> <p>e. Have these records been verified against the available document?</p>	<ul style="list-style-type: none"> <li>- Document "Rekap TBS Kebun Luar Tahun 2016 - 2017" which contained the FFB tonnage delivery - PT. Bumi Bangka Lestari and PT. Bumi Permai Surya Lestari in July 2016 – June 2017 period.</li> <li>- Grading records of the third parties</li> </ul>	<p>BPRM recorded the origins of all third-party sourced FFB. A record of FFB received from external sources was stated on form Recapitulation of FFB Received Report. There were third party suppliers such as from PT. Bumi Bangka Lestari and PT. Bumi Permai Surya Lestari involved during in July 2016 – June 2017. FFB tonnage delivery from the third party was well documented daily and monthly in the document "Rekap TBS Kebun Luar Tahun 2016 – 2017".</p> <p>Daily records of FFB received consist of Unit code; bruto (Kg); Tarra (Kg) and Netto (Kg) conducted by weighing staff. The report also established for non-certified FFB received during year period July 2016 – June 2017 from third parties. The sample grading percentage was different between third party and own estate; for third party FFB shortage was 100%, while owned estate FFB was only 10% shortage.</p>	YES
4.2	<p>Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p> <p><b>Guidance:</b>  <i>Long-term fertility depends on maintaining the structure, organic matter content, nutrient status and microbiological health of the soil. Growers should ensure that they follow the best practices. Nutrient efficiency should take account of the age of plantations and soil conditions.</i></p> <p><i>The nutrient recycling strategy should include any use of biomass for by-products or energy production.</i></p> <p><i>One of the guidance may be used as a reference to the Technical Guideline for Oil Palm Development, Directorate General of Estate Crops, Ministry of Agriculture (2006)</i></p>			
4.2.1	(M) A record of SOP implementation to maintain soil fertility that ensures optimal and sustained yield, shall be available			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)																																		
	a. Are there SOPs for Good Agricultural Practices in managing soil fertility? b. Is there evidence that the SOPs have been implemented and monitored?	- SOP/SMART/MCAR/IX/TA-PPK ( <i>Pemupukan</i> ). - Field observation 11 – 12 July 2017, in BPTe and BPRe.	The company has determined SOP for Good Agricultural Practices in managing soil fertility in SOP/SMART/MCAR/IX/TA-PPK ( <i>Pemupukan-Manuring</i> ). Good agricultural practices in managing soil fertility as contained in the SOPs are implemented. Field observation demonstrated that Estates activities are carried out based on Division Work Program which generated from annual budget. Interview with employees working in those activities showed that procedures were implemented. Activities have been performed at defined interval.	YES																																		
4.2.2	Records of fertilizer inputs shall be available.																																					
	a. Is records of fertiliser inputs maintained? b. Is there records to proof that the fertiliser program is linked to the agronomic report? c. Is there records of fertilizer usage per tonne of FFB production (>in Summary Table, specific types of fertilizers)?	<ul style="list-style-type: none"> <li>• “<i>Rencana dan Realisasi Pemupukan</i>” (Plan and Realisation of Manuring).</li> <li>• Monthly Report</li> </ul>	Annual fertilizer recommendation has been implemented and monitored. Fertilizer/manuring programme was developed by SMARTRI for all Division.  Records of fertiliser inputs are well maintained in document “ <i>Rencana dan Realisasi Pemupukan</i> ” (Plan and Realisation of Manuring). Fertiliser inputs recorded each semester. Record of manuring planning and actual in Semester II 2016 and Semester I 2017 show that the realisations are not completely in accordance with the planning/recommendation. In BPTe, types of fertilizer were not completely realized of SM II 2016 due to high rainfall and rainy days so that it cannot be applied. The company has applied rest of SM II 2016 in SM I 2017. These also happen to realize SM I 2017 in BRPE and BPTe and was applied in SM II 2017. For more detail, please see the table below.  <u>BPRe</u> <table border="1" data-bbox="1171 1150 1816 1422"> <thead> <tr> <th rowspan="2">Type of fertiliser</th> <th colspan="2">2016 SM II</th> <th colspan="2">2017 SM I</th> </tr> <tr> <th>Plan (Ton)</th> <th>Actual (Ton)</th> <th>Plan (Ton)</th> <th>Actual (Ton)</th> </tr> </thead> <tbody> <tr> <td>HGFB</td> <td>-</td> <td>-</td> <td>17.118</td> <td>17.119</td> </tr> <tr> <td>Kieserite G</td> <td>-</td> <td>-</td> <td>309.5</td> <td>0</td> </tr> <tr> <td>Kieserite P</td> <td>0.85</td> <td>0.85</td> <td>0.9</td> <td>0.45</td> </tr> <tr> <td>MOP</td> <td>320.55</td> <td>320.55</td> <td>634.55</td> <td>411</td> </tr> <tr> <td>TSP</td> <td>1.45</td> <td>1.45</td> <td>353.1</td> <td>1.45</td> </tr> </tbody> </table>	Type of fertiliser	2016 SM II		2017 SM I		Plan (Ton)	Actual (Ton)	Plan (Ton)	Actual (Ton)	HGFB	-	-	17.118	17.119	Kieserite G	-	-	309.5	0	Kieserite P	0.85	0.85	0.9	0.45	MOP	320.55	320.55	634.55	411	TSP	1.45	1.45	353.1	1.45	YES
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			Urea	0.00839	MOP	0.00436	
					TSP	0.00019	
					Urea	0.00457	
					RP	-	
4.2.3	Records of periodical leaf, soil and visual analysis shall be available						
	<p>a. Is there SOPs for tissue and soil sampling?</p> <p>b. Is there evidence of implementation of the SOPs, including availability of records?</p> <p>c. Is there records of tissue and soil analysis?</p> <p>d. Is the results of the study incorporated into the fertilizer program?</p>	<p>Document of "Memorandum Hasil Analisa Laboratorium" (Laboratory Analysis Result) of SMARTRI for soil sample analysis and leaf sample analysis in BPRE and BPTE year 2014, 2015 and 2016</p>	<p>SOP for tissue and soil sampling have been defined in SOP/SMART/MCAR/IX/TA-PPK (<i>Pemupukan-Manuring</i>).</p> <p>Soil and leaf sampling was analysed regularly by SMARTRI to determine the nutritional status of soil, to assist and to be guided in the preparation of annual fertilising programme recommendation. Soil is analysed when the age of the plant is 3, 5, 8 years and continued with age of the plant is added by 5 years and 1 year before replanting. Leaf was analysed annually. Leaf sampling was taken from each division. The following are fertilizer recommendation based on LSU analysis:</p> <ul style="list-style-type: none"> <li>- Letter of LSU Result in BPRE; No. 227/DAUN/LAB-SMARTRI/V/2017 date on 13 May 2017 from SMARTRI Laboratory; 33 samples; Analysist of Nitrogen, Phosphor, Kalum, Calcium, Magnesium Chloride and Boron.</li> <li>- Letter of LSU Result in BPTE; No. 141/DAUN/LAB-SMARTRI/IV/2017 date on 04 April 2017 from SMARTRI Laboratory; 61 samples; Analysist of Nitrogen, Phosphor, Kalum, Calcium, Magnesium Chloride and Boron.</li> </ul> <p>Leaf and soil analysis done by Field Coordinator Riset (Analitical Laboratory. Section of SMARTRI). Head laboratory analysis results it is shown in the form of leaf nutrients content (Nitrogen, Phosphor, Kalum, Calcium, Magnesium Chloride and Boron) and soils (pH (H<sub>2</sub>O) and KCl, C-organik, N, P, K, Na, Ca, Mg, KTK, etc.). Last report of leaf analysis in 2017 will be used as a reference for fertilizer recommendation in 2018. Soil sampling done in 5 year intervals, with the age of the plant used as a reference method of soil sampling. The last SSU conducted date on 26 January 2017 of 96 samples</p>				YES

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			(BPRE) and 25 January 2016 of 60 samples (BPTe).																							
4.2.4	A nutrient recycling strategy is recorded, including use of Empty Fruit Bunches (EFB), land application, and palm residues after replanting																									
	<p>a. Is there a nutrient recycling strategy in place?</p> <p>b. Does the strategy include the following?</p> <ul style="list-style-type: none"> <li>• Clear objectives and time-bound targets</li> <li>• Inventory of                             <ul style="list-style-type: none"> <li>- EFB</li> <li>- POME</li> <li>- Fibre</li> <li>- Boiler ash</li> <li>- Kernel shell</li> <li>- Palm residues from replanting</li> </ul> </li> <li>• Biomass recycling program</li> <li>• Implementation and monitoring records</li> </ul> <p><i>Note to auditor: Ground verification required</i></p>	<p>Document of "Rencana dan Realisasi Aplikasi JJK" (Plan and Realisation of EFB Application) year 2015 and 2016 in BPRE and BPTe. Field Observation in BPRE and BPTe</p>	<p>Some strategies for recycling nutrients contained in the soil by using:</p> <ul style="list-style-type: none"> <li>- Organic Fertilization empty fruit bunch (EFB)</li> <li>- Preparation of the midrib on the path in the block</li> </ul> <p>The strategy does include the following:</p> <ul style="list-style-type: none"> <li>▪ Clear objectives and time-bound targets</li> <li>▪ Inventory of                             <ul style="list-style-type: none"> <li>- EFB</li> <li>- POME</li> <li>- Fibre</li> <li>- Boiler ash</li> <li>- Kernel shell</li> </ul> </li> <li>▪ Biomass recycling program</li> <li>▪ Implementation and monitoring records</li> </ul> <p>There was no replanting activity in 2016 – 2017.</p> <p>Record of EFB application are as follows:</p> <p><u>2016</u></p> <table border="1" data-bbox="1171 1026 1559 1161"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="2">Ha</th> </tr> <tr> <th>Plan</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>BPRE</td> <td>945.42</td> <td>499.28</td> </tr> <tr> <td>BPTe</td> <td>349.91</td> <td>273.89</td> </tr> </tbody> </table> <p><u>2017</u></p> <table border="1" data-bbox="1171 1257 1559 1393"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="2">Ha</th> </tr> <tr> <th>Plan</th> <th>Actual*</th> </tr> </thead> <tbody> <tr> <td>BPRE</td> <td>795.53</td> <td>485.70</td> </tr> <tr> <td>BPTe</td> <td>274.71</td> <td>273.89</td> </tr> </tbody> </table>	Estate	Ha		Plan	Actual	BPRE	945.42	499.28	BPTe	349.91	273.89	Estate	Ha		Plan	Actual*	BPRE	795.53	485.70	BPTe	274.71	273.89	YES
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			<p>Note: *) up to June 2017.</p> <p>POME is applied only in BPRE. Record of POME application are as follows:</p> <table border="1" data-bbox="1171 485 1839 655"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="2">Ha</th> <th colspan="2">M<sup>3</sup></th> </tr> <tr> <th>Plan</th> <th>Actual</th> <th>Plan</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>785.19</td> <td>758.51</td> <td>94,773.75</td> <td>94,773.75</td> </tr> <tr> <td>2017 (January – June)</td> <td>785.19*</td> <td>368.71</td> <td>94,773.75*</td> <td>46,089</td> </tr> </tbody> </table> <p>Note: *) These figures for 3 rotations.</p>	Year	Ha		M <sup>3</sup>		Plan	Actual	Plan	Actual	2016	785.19	758.51	94,773.75	94,773.75	2017 (January – June)	785.19*	368.71	94,773.75*	46,089														
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4.3	<p>Practices minimise and control erosion and degradation of soils.</p> <p><b>Guidance:</b> Techniques that minimize soil erosion are well known and should be adopted, where appropriate. These should include practices such as ground cover management, biomass recycling, terracing, and natural regeneration or restoration instead of replanting.</p>																																			
4.3.1	(M) Maps of any fragile soils shall be available.																																			
	<p>a. Is there soil maps showing presence of fragile soils and problem soils (refer to 4.3.6)?</p> <p>b. Are maps georeferenced and of appropriate scale (1:50,000)?</p>	<ul style="list-style-type: none"> <li>Semi-detail Maps of Soil in BPRE and BPTe were available in scale 1:50.000</li> <li>Field observation in BPRE and BPTe</li> </ul>	<p>Based on Semi-detail Maps of Soil, soil characteristic in BPRE and BPTe were presented in table below:</p> <p><b>BPRE</b></p> <table border="1" data-bbox="1171 1043 1839 1394"> <thead> <tr> <th>Soil Type</th> <th>Slope (°)</th> <th>Area (Ha)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Typic Dystropepts</td> <td>0-8</td> <td rowspan="3">1.449,19</td> <td rowspan="3">35,3</td> </tr> <tr> <td>Typic Dystropepts</td> <td>0-2</td> </tr> <tr> <td>Aquic Dystropepts</td> <td>0-3</td> </tr> <tr> <td>Typic Dystropepts</td> <td>8-15</td> <td rowspan="2">704,04</td> <td rowspan="2">17,1</td> </tr> <tr> <td>Typic Dystropepts</td> <td>8-15</td> </tr> <tr> <td>Typic Tropopsamments</td> <td>0-8</td> <td rowspan="2">1.855,39</td> <td rowspan="2">45,1</td> </tr> <tr> <td>Aquic Tropopsamments</td> <td>0-3</td> </tr> <tr> <td>Typic Tropaquepts</td> <td>0-3</td> <td>102,78</td> <td>2,5</td> </tr> <tr> <td colspan="2"><b>Total</b></td> <td><b>4.111,50</b></td> <td><b>100,0</b></td> </tr> </tbody> </table>	Soil Type	Slope (°)	Area (Ha)	%	Typic Dystropepts	0-8	1.449,19	35,3	Typic Dystropepts	0-2	Aquic Dystropepts	0-3	Typic Dystropepts	8-15	704,04	17,1	Typic Dystropepts	8-15	Typic Tropopsamments	0-8	1.855,39	45,1	Aquic Tropopsamments	0-3	Typic Tropaquepts	0-3	102,78	2,5	<b>Total</b>		<b>4.111,50</b>	<b>100,0</b>	YES
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			<p>BPTE</p> <table border="1" data-bbox="1169 408 1845 762"> <thead> <tr> <th>Soil Type</th> <th>Slope (°)</th> <th>Area (Ha)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Typic Dystropepts</td> <td>0-8</td> <td rowspan="3">707,44</td> <td rowspan="3">35,8</td> </tr> <tr> <td>Typic Dystropepts</td> <td>0-8</td> </tr> <tr> <td>Aquic Dystropepts</td> <td>0-3</td> </tr> <tr> <td>Typic Dystropepts</td> <td>8-15</td> <td rowspan="2">68,37</td> <td rowspan="2">3,5</td> </tr> <tr> <td>Typic Dystropepts</td> <td>8-15</td> </tr> <tr> <td>Typic Tropopsamments</td> <td>0-8</td> <td rowspan="2">1.109,38</td> <td rowspan="2">56,2</td> </tr> <tr> <td>Aquic Tropopsamments</td> <td>0-3</td> </tr> <tr> <td>Typic Tropaquepts</td> <td>0-3</td> <td>27,23</td> <td>1,4</td> </tr> <tr> <td>Typic Tropaquepts</td> <td>0-3</td> <td>61,03</td> <td>3,1</td> </tr> <tr> <td colspan="2"><b>Total</b></td> <td><b>1,973.45</b></td> <td><b>100,0</b></td> </tr> </tbody> </table> <p>Based on the table and map there are sandy soil 1,855.39 Ha in BPTE and 1,109.38 Ha in BPRE. The maps have described the sandy soil clearly with boundary.</p>	Soil Type	Slope (°)	Area (Ha)	%	Typic Dystropepts	0-8	707,44	35,8	Typic Dystropepts	0-8	Aquic Dystropepts	0-3	Typic Dystropepts	8-15	68,37	3,5	Typic Dystropepts	8-15	Typic Tropopsamments	0-8	1.109,38	56,2	Aquic Tropopsamments	0-3	Typic Tropaquepts	0-3	27,23	1,4	Typic Tropaquepts	0-3	61,03	3,1	<b>Total</b>		<b>1,973.45</b>	<b>100,0</b>	
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<b>Total</b>		<b>1,973.45</b>	<b>100,0</b>																																					
4.3.2	<p>A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific).</p> <p><b>Specific Guidance:</b>  <i>For 4.3.2: Management strategy on areas planted with steep slope may refer to the Technical Guidance for Oil Palm Development, Directorate General of Estate Crops, Agriculture Ministry (2006). Area with slope of &gt;40% shall be avoided</i></p>																																							
	<p>a. Is there a management strategy in place for plantings on slopes?</p> <p>b. Does the management strategy include the following?</p> <ul style="list-style-type: none"> <li>- Identification of steep areas not suitable for planting</li> <li>- Policy of planting on slopes</li> <li>- SOPs to minimise soil erosion based on local soil and climate conditions, e.g. ground cover management, biomass</li> </ul>	<ul style="list-style-type: none"> <li>• Semi-detail Maps of Soil in BPRE and BPTE in scale 1 : 50.000</li> <li>• Preparation of new area planting procedure SOP/SMART/MCAR/I/TA-PPA</li> <li>• Procedure 03/VPA-RSPO/03/2010 "Management of Riparian Area"</li> </ul>	<p>Based on maps of soil unit, there are no slopes above certain limit in BPRE and BPTE, maximum slopes in BPRE and BPTE was 15°.</p> <p>The procedure SOP/SMART/MCAR/I/TA-PPA "Preparation of new area planting" describes procedure for minimising and controlling erosion, and peat land management. The procedure has include:</p> <ul style="list-style-type: none"> <li>• Identification of steep areas not suitable for planting</li> <li>• Policy of planting on slopes</li> <li>• Strategy to minimise soil erosion based on local soil and climate conditions, e.g. ground cover management,</li> </ul>	YES																																				

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	recycling, terracing, and natural regeneration or restoration instead of replanting  c. Is there proof of records of field inspection on SOP implementation?	<ul style="list-style-type: none"> <li>Field observation in BPRE and BPTe, date on 11 – 12 July 2017.</li> </ul>	biomass recycling, terracing, and natural regeneration or restoration instead of replanting.  The organisation does not recommend plantings on slopes >40% or >22°. When the slope area was planted, system for planting on slopes area was provided by considering soil and climate specific through terracing, determining of base line, levelling of terrace, and determining of planting space. To minimise and control erosion in slope area, several practices have been implemented such as terracing, growing of legume cover crops (LCC).  Procedure 03/VPA-RSPO/03/2010 “Management of Riparian Area” has been established to control area around riparian. Planting of “vetiver” grass and natural riparian plant have been performed to minimize stream and river bank erosion.  Records of field inspection on SOP implementation were available.												
4.3.3	A road maintenance programme shall be in place.														
	a. Is there a road maintenance programme in place with supporting budget and resources?  b. Is there road maintenance records?	<ul style="list-style-type: none"> <li>Document of “Detail Pekerjaan Pengerasan Pertama dan Pengerasan Ulang” for year 2017 and 2017 in BPRE and BPTe.</li> <li>Field observation in BPRE and BPTe, date on 11 - 12 July 2017.</li> </ul>	BPRE and BPTe have established road maintenance programme for main road, collection road and access road by manual and mechanical maintenance. Road maintenance includes manual, grading and compact and road hardening. Road hardening budget for 2017 has been verified including the realisation.  <table border="1" data-bbox="1171 1013 1646 1145"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="2">Material volume (m<sup>3</sup>)</th> </tr> <tr> <th>Planning</th> <th>Realization</th> </tr> </thead> <tbody> <tr> <td>BPRE</td> <td>8,225.47</td> <td>3,203.60</td> </tr> <tr> <td>BPTe</td> <td>3,618.40</td> <td>1,300.13</td> </tr> </tbody> </table> Mechanical road maintenance uses heavy equipment – motor grader and compactor. The mechanical road maintenance programme was provided for all division and detailed in Blocks.  Manual road maintenance programme was provided in Division Work Programme. Manual road maintenance was implemented based on Division Work Programme or road condition. Manual and mechanical road maintenance realisation was recorded including complex area maintained, distance of road maintained, diesel fuel consumption	Estate	Material volume (m <sup>3</sup> )		Planning	Realization	BPRE	8,225.47	3,203.60	BPTe	3,618.40	1,300.13	YES
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NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>and quantity of gravel. During audit it was observed that road passed was in good condition.</p> <p>During observation can be proven that all the main roads and collection road was in good condition and well maintained.</p>	
4.3.4	<p>(M) Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.</p> <p><b>Specific Guidance:</b>  <i>For 4.3.4: For existing plantings on peat, the water table should be maintained at an average of 50cm (between 40 - 60cm) below ground surface measured with groundwater piezometer readings, or an average of 60cm (between 50 - 70cm) below ground surface as measured in water collection drains as per the Manual Best Management Practices for existing oil palm cultivation on peat, June 2012 or as per existing regulation if equal or shallower measured through a network of appropriate water control structures e.g. weirs, sandbags, etc. in fields, and watergates at the discharge points of main drains (Criteria 4.4 and 7.4).</i>  <i>Regulations regarding water table on peat may refer, but not limited, to:</i>                      1. Government Regulation No. 71 year 2014 regarding Protection and Management of Peat Ecosystem                      2. Regulation of Minister of Agriculture No. 14 year 2009 regarding Guideline of Oil Palm Cultivation on Peat                      3. Regulation of Minister of Agriculture No. 11 year 2015 regarding Guideline of Indonesia Sustainable Palm Oil Plantation (ISPO)</p>			
	<p>a. Is there an SOP to provide guidance on subsidence management?</p> <p>b. Does the SOP make reference to the RSPO BMPs on peat?</p> <p>c. How is subsidence being monitored?</p> <p>d. Are there records of subsidence monitoring?</p> <p>e. How is subsidence being minimised?</p> <p>f. Is there a water management programme and evidence of implementation?</p> <p><i>For existing plantings on peat, the water table should be maintained at an average of 50cm (between 40 - 60cm) below ground surface measured with groundwater piezometer readings, or an average of 60cm (between 50 - 70cm) below ground surface as measured in water collection drains, through a network of appropriate water control structures e.g. weirs,</i></p>	<ul style="list-style-type: none"> <li>• Semi-detail Maps of Soil in BPRE and BPTe in scale 1:50.000</li> <li>• Area statement in BPRE and BPTe</li> <li>• Field observation in BPRE and BPTe, date on 11 – 12 July 2017</li> </ul>	<p>Based on Semi-detail Maps of Soil and field observation in BPRE and BPTe there are no peat soils in PT. Bumi Permai Lestari.</p>	NA

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p><i>sandbags, etc. in fields, and watergates at the discharge points of main drains (Criteria 4.4 and 7.4).</i></p> <p>g. Is there a ground cover management programme and is there evidence of implementation?</p>			
4.3.5	<p>Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.</p> <p><b>Specific Guidance:</b>  <i>For 4.3.5: Where drainability assessments have identified areas unsuitable for oil palm replanting, plans should be in place for appropriate rehabilitation or alternative use of such areas. If the assessment indicates high risk of serious flooding and/or salt water intrusion within two crop cycles, growers and planters should consider ceasing replanting and implementing rehabilitation.</i></p> <p><i>Plantations on peat should be managed at least to the standard set out in the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', June 2012 (especially water management, fire avoidance, fertilizer use, subsidence and ground surface management).</i></p>			
4.3.6	<p>a. Was a drainability assessment conducted before replanting on peat?</p> <p>b. Was a flood risk map provided as a result of the drainability assessment?</p> <p>c. If the drainability assessment shows that an area is unsuitable for replanting, are there alternative plans in place for rehabilitation and alternative use in accordance to the RSPO BMPs?</p>	<ul style="list-style-type: none"> <li>• Semi-detail Maps of Soil in BPRE and BPTE in scale 1:50.000</li> <li>• Field observation in BPRE and BPTE</li> </ul>	<p>Based on Semi-detail Maps of Soil and field observation in BPRE and BPTE there are no peat soils in PT. Bumi Permai Lestari.</p>	NA
4.3.6	<p>A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils).</p>			
	<p>a. Is there a management strategy in place for other fragile and problem soils?</p> <p>b. Does the management strategy include SOPs for the management of other fragile and problem soils?</p> <p>c. Is inspection and implementation records available?</p>	<ul style="list-style-type: none"> <li>• Semi-detail Maps of Soil in BPRE and BPTE in scale 1:50.000</li> <li>• Field observation in BPRE and BPTE</li> <li>• Fertilizer recommendation and realisation of BPRE and BPTE</li> </ul>	<p>Based on field observation and Semi-detail Maps of Soil there are fragile soil which is sandy soil 1,855.39 Ha in BPRE and 1,109.38 Ha in BPTE. Management strategy has been implemented in the area of sandy soil, which is stated in the fertilizer recommendation. The strategy is to add rotation in fertilizing activity of Urea and MOP, e.g. 2 rotations for mineral soil while 3 rotations for sandy soil. The recommendation has implemented and monitored monthly, includes records of inspection from staff.</p>	YES









NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
		2016 and 2017.		
4.4	Practices maintain the quality and availability of surface and ground water.			
4.4.1	<p>An implemented water management plan shall be in place.</p> <p><b>Specific Guidance:</b>                      For 4.4.1: The water management plan will:</p> <ol style="list-style-type: none"> <li>Take account of the efficiency of use and renewability of sources;</li> <li>Ensure that the use and management of water by the operation does not result in adverse impacts on other users within the catchment area, including local communities and customary water users;</li> <li>Aim to ensure local communities, workers and their families have access to adequate, clean water for drinking, bathing, cleaning and latrine purposes;</li> <li>Avoid contamination of surface and ground water through run-off of soil, nutrients or chemicals, or as a result of inadequate disposal of waste including Palm Oil Mill Effluent (POME).</li> </ol>			
	<ol style="list-style-type: none"> <li>Is there a water management plan in place for mill and plantation with identified actions?</li> <li>Does the plan include the following?                             <ul style="list-style-type: none"> <li>Identification of water sources</li> <li>Efficient use of water</li> <li>Renewability of water source</li> <li>Impacts on catchment area and local stakeholders</li> <li>Access of clean drinking water all year round for stakeholders</li> <li>Avoidance of surface and ground water contamination</li> </ul> </li> <li>Have the identified actions in the plan been implemented?</li> </ol>	<ul style="list-style-type: none"> <li>Documented procedure regarding SOP Management and Monitoring Water Resources (SOP/SMART/BCOS-EHSD/SADV/II/004 dated 1 July 2014)</li> <li>Procedure SOP/SMART/LEMS-EHSD/SADV/II/003 – environment monitoring</li> <li>Records of water consumption period 2016 and 2017 (YTD June)</li> <li>Water analysis measurement for period semester I&amp;II 2016 and semester I 2017 by MAL laboratory and Kehati Laboratory</li> <li>Water management programme</li> </ul>	<p>Water management programme defined the method of water management plan include water source and distribution identification, volume of water utilization, parameter/standards of water utilization, identify the impacts include water effluents/wastes and also the method to reduce and control. Water management program create based on environment monitoring procedure (SOP/SMART/LEMS-EHSD/SADV/II/003) and management and monitoring water resources procedure (SOP/SMART/BCOS-EHSD/SADV/II/004).</p> <p>Water supplies for Bukit Perak Mill were from Lagok River and rain water reservoir while estates were using ground water. The licence of water source utilization was not mandatory because there was no obligation from local government. PT BPL paid the retribution payment monthly to “Dinas Pendapatan, Pengelolaan Keuangan dan Asset Daerah” Bangka Barat Regent. The records of retribution payment were sighted for period 2016 and January – May 2017. The water was utilize for mill operations (include boilers, processes and domestics usage) that through the water treatment plant (using physicals and chemicals method) and for estate operations (include housing, pesticides mixings and office operations).</p> <p>Flow meters were installed to monitor water usage. The monitoring of</p>	YES

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		<p>2017</p> <ul style="list-style-type: none"> <li>Field observation at Bukit Perak Mill, Bukit Perak Estate, and Bukit Permata Estate</li> </ul>	<p>water volume utilization was conducted, records was also sighted that water usage was majority from Bukit Perak Mill and supply base as below:</p> <table border="1" data-bbox="1171 448 1778 639"> <thead> <tr> <th>Site</th> <th>Water usage 2016 (m<sup>3</sup>)</th> <th>Water usage (to June 2017) (m<sup>3</sup>)</th> </tr> </thead> <tbody> <tr> <td>Bukit Perak Estate</td> <td>112,375</td> <td>56,800</td> </tr> <tr> <td>Bukit Permata Estate</td> <td>69,494</td> <td>17,435</td> </tr> <tr> <td>Bukit Perak Mill</td> <td>77,429.85</td> <td>36,656</td> </tr> </tbody> </table> <table border="1" data-bbox="1171 687 1787 847"> <thead> <tr> <th></th> <th>2015</th> <th>2016</th> <th>2017 (June)</th> </tr> </thead> <tbody> <tr> <td>Water (m<sup>3</sup>)</td> <td>279,022.50</td> <td>188,264.70</td> <td>96,231.89</td> </tr> <tr> <td>FFB process</td> <td>260,768.69</td> <td>146,567</td> <td>77,565</td> </tr> <tr> <td>M<sup>3</sup>/ton FFB</td> <td>1.07</td> <td>1.28</td> <td>1.24</td> </tr> </tbody> </table> <p>Water consumption for mill activity was under the budget for year by year. Water consumption budget was 1.60 every year. Water consumption depend on FFB process. It was shown that water consumption (m<sup>3</sup>) decrease from 2015 to 2016 and 2017 but the m<sup>3</sup>/ton FFB increase from 1.07 at 2015 to 1.28 at 2016 because of increased quantity of FFB proceed.</p> <p>There were evident to ensure local communities, workers, and their families have access to adequate, clean water for drinking, cooking, bathing, and cleaning purposes by report of clean water analysis annually at Bukit Perak Estate (wheel I and II), Bukit Permata Estate (wheel at Division I emplacement), and Bukit Perak Mill. As the required government regulation related to water quality shall be refer to Regulation the ministry of health (Permenkes) No.416/MEN.KES/PER/IX/1990. Analysis completed by MAL laboratory, last analysis on 18 October 2016.</p> <p>Surface water quality is monitored every six months for Lagok Atas</p>	Site	Water usage 2016 (m <sup>3</sup> )	Water usage (to June 2017) (m <sup>3</sup> )	Bukit Perak Estate	112,375	56,800	Bukit Permata Estate	69,494	17,435	Bukit Perak Mill	77,429.85	36,656		2015	2016	2017 (June)	Water (m <sup>3</sup> )	279,022.50	188,264.70	96,231.89	FFB process	260,768.69	146,567	77,565	M <sup>3</sup> /ton FFB	1.07	1.28	1.24	
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			<p>river, Lagok Bawah river, and Lambur Hilir river against the standar PP 82/2001. Measurement was done by third party laboratory (Kehati Laboratory), last checked on 11 April 2017. Review was done to measurement result for period semester I and II 2016 and semester I 2017. From the result shows that all parameter were conformed within the standard.</p> <p>The organisation has program to reduce water consumption, e.g. arranging water distribution to staff housing, reusing water from PPE and hazardous waste cleaner for spraying, reusing water from turbine for clarification, and flowmeter installation for all water utilization at mill. The program has been implemented and it was shown on water consumption trend year by year. Water distribution to staff housing conduct twice a day in the morning and evening; water from PPE washing was reused for dilution chemical spraying based on field observation.</p>	
4.4.2	<p>(M) Protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones, at the time of or prior to replanting shall be demonstrated.</p> <p><b>Specific Guidance:</b> For 4.4.2: Refer to the 'RSPO Manual On Best Management Practices (BMP) for management and rehabilitation of natural vegetation associated with oil palm cultivation on peat', July 2012.</p> <p><i>Growers and millers should address the effects of their use of water and the effects of their activities on local water resources.</i></p>			
	<p>a. Is there a map identifying water courses and wetlands?</p> <p>b. Are the water courses and wetlands protected?</p> <p>c. Are the riparian and buffer zones maintained and restored in existing plantation and replanting areas?</p> <p>d. Is there SOP for riparian and buffer zone protection?</p>	<p>- Procedure for riparian area management SOP/SPO/SMART/LH-07 and Protection of riparian zones SOP/SPO/SMART/LH-06.</p> <p>- Program of management and monitoring of high conservation value areas year 2016 and 2017</p> <p>- Site observation</p>	<p>Company has established the procedure for riparian area management SOP/SPO/SMART/LH-07 and Protection of riparian zones SOP/SPO/SMART/LH-06.</p> <p>Estate has made efforts to protect water sources such as rivers, streams and reservoirs/lakes which were designated as high conservation value areas. Protection and management efforts that have been made by the company established in the program of management and monitoring of high conservation value areas, such as :</p> <p>- Installation the attribute of high conservation value areas in</p>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>e. Has the SOP been implemented?</p>		<p>riparian zone, springs and reservoirs/lakes</p> <ul style="list-style-type: none"> <li>- Installation of signboard/mark for riparian areas, springs and reservoirs/lakes</li> <li>- Marking boundaries application ban pesticides/herbicides along the riparian zone</li> <li>- Dissemination application ban pesticides/herbicides in riparian zones to all employees</li> <li>- Monitoring and maintenance of riparian areas regularly</li> <li>- Planting plants barriers to erosion</li> <li>- Monitoring and maintenance of erosion control plants</li> </ul> <p>It was observe that riparian zone was maintain appropriately, signboard was installed, boundaries marking for riparian zone was well maintain and there was no chemist application in riparian zone. Also there was a planting of native plants and vetiver grass to protect the riparian zone from the erosion. Monitoring of riparian zone, springs and reservoir/lakes was documented and evident. Dissemination to employee to protect the riparian zone, springs and reservoir/lake also documented and evident.</p>	
<p>4.4.3</p>	<p>Records for monitoring of effluent especially BOD (Biochemical Oxygen Demand) and efforts to comply with legal requirements, shall be available (see criteria 2.1 and 5.6)</p> <p><b>Specific Guidances:</b>  <i>For 4.4.3 :</i>  <i>The references and standard may refer, but not limited to:</i></p> <p>a. Decree of the Minister of Environment No. 51 year 1995 regarding Industrial Effluent Quality            b. Decree of the Minister of Environment No. 28 year 2003 regarding Technical Guidance Assessment Effluent Usage from Industry to Soil in Palm Oil Plantation.            c. Regulation of the Minister of Environment No. 12 year 2006 regarding Requirements and Mechanism of Legal Permit to Discharge Effluent to the Sea.</p> <p><i>National regulations relate to riparian strip are, such as:</i></p> <ol style="list-style-type: none"> <li>1. Government Regulation No. 38 year 2011 regarding River.</li> <li>2. Government Regulation No. 37 year 2012 regarding Management of Riparian Strip.</li> <li>3. Government Regulation No. 26 year 2008 regarding National Landscape, clause 56 (2) riparian strip outside settlement area is divided with following criteria:</li> </ol>			

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	<ul style="list-style-type: none"> <li>- Riparian strip of at least 5 meter width from the outer dike along the river bank with dike</li> <li>- Riparian strip of at least 100 meter from river side along main river bank without dike outside settlement area,</li> <li>- Riparian strip of at least 50 meter from river side along sub-main river bank without dike outside settlement area</li> </ul> <p>4. Presidential Decree No. 32 year 1990 clause 16, regarding Criteria of Riparian Strip:</p> <ul style="list-style-type: none"> <li>a. At least 100 meter from outer main river and 50 meter from sub-main river, which is located outside settlement area.</li> <li>b. For river in settlement area, the riparian strip should be appropriate to build inspection path between 10 to 15 meters width.</li> </ul>																																																																			
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th data-bbox="248 501 331 579">No</th> <th data-bbox="331 501 685 579">River Type</th> <th data-bbox="685 501 943 579">Cross-Section Projection</th> <th colspan="2" data-bbox="943 501 1451 544">Outside Settlement</th> <th colspan="2" data-bbox="1451 501 1854 544">Inside Settlement</th> <th data-bbox="1854 501 2029 579">Article</th> </tr> <tr> <td colspan="3"></td> <th data-bbox="943 544 1240 579">Criteria</th> <th data-bbox="1240 544 1451 579">Minimum Riparian</th> <th data-bbox="1451 544 1650 579">Criteria</th> <th data-bbox="1650 544 1854 579">Minimum Riparian</th> <td colspan="1"></td> </tr> </thead> <tbody> <tr> <td data-bbox="248 579 331 735">1</td> <td data-bbox="331 579 685 735">River with dike (measured from outer dike side)</td> <td data-bbox="685 579 943 735"></td> <td data-bbox="943 579 1240 735" style="text-align: center;">-</td> <td data-bbox="1240 579 1451 735" style="text-align: center;">5 m</td> <td data-bbox="1451 579 1650 735" style="text-align: center;">-</td> <td data-bbox="1650 579 1854 735" style="text-align: center;">3 m</td> <td data-bbox="1854 579 2029 735" style="text-align: center;">Article 6</td> </tr> <tr> <td data-bbox="248 735 331 930" rowspan="2">2</td> <td data-bbox="331 735 685 930" rowspan="2">River without dike (measured from river edge)</td> <td data-bbox="685 735 943 930" rowspan="2"></td> <td data-bbox="943 735 1240 810" style="text-align: center;">Main River (river cross-sectional area &gt; 500 km<sup>2</sup>)</td> <td data-bbox="1240 735 1451 810" style="text-align: center;">100 m</td> <td data-bbox="1451 735 1650 810" style="text-align: center;">Depth: &gt; 20 m</td> <td data-bbox="1650 735 1854 810" style="text-align: center;">30 m</td> <td data-bbox="1854 735 2029 810" style="text-align: center;">Article 7 &amp; 8</td> </tr> <tr> <td data-bbox="943 810 1240 930" style="text-align: center;">Sub-main River (river cross-sectional area &lt; 500 km<sup>2</sup>)</td> <td data-bbox="1240 810 1451 930" style="text-align: center;">50 m</td> <td data-bbox="1451 810 1650 930" style="text-align: center;">Depth: 3 m to 20 m</td> <td data-bbox="1650 810 1854 930" style="text-align: center;">15 m</td> <td data-bbox="1854 810 2029 930" style="text-align: center;">Article 7 &amp; 8</td> </tr> <tr> <td data-bbox="248 930 331 1015">3</td> <td data-bbox="331 930 685 1015">Lake/dam (measured from highest water tide to land)</td> <td data-bbox="685 930 943 1015"></td> <td data-bbox="943 930 1240 1015" style="text-align: center;">-</td> <td data-bbox="1240 930 1451 1015" style="text-align: center;">50 m</td> <td data-bbox="1451 930 1650 1015" style="text-align: center;">-</td> <td data-bbox="1650 930 1854 1015" style="text-align: center;">50 m</td> <td data-bbox="1854 930 2029 1015" style="text-align: center;">Article 10</td> </tr> <tr> <td data-bbox="248 1015 331 1058">4</td> <td data-bbox="331 1015 685 1058">Spring (around Spring)</td> <td data-bbox="685 1015 943 1058"></td> <td data-bbox="943 1015 1240 1058" style="text-align: center;">-</td> <td data-bbox="1240 1015 1451 1058" style="text-align: center;">200 m</td> <td data-bbox="1451 1015 1650 1058" style="text-align: center;">-</td> <td data-bbox="1650 1015 1854 1058" style="text-align: center;">200 m</td> <td data-bbox="1854 1015 2029 1058" style="text-align: center;">Article 10</td> </tr> <tr> <td data-bbox="248 1058 331 1121">5</td> <td data-bbox="331 1058 685 1121">River that influenced by tidal (from river edge)</td> <td data-bbox="685 1058 943 1121"></td> <td data-bbox="943 1058 1240 1121" style="text-align: center;">-</td> <td data-bbox="1240 1058 1451 1121" style="text-align: center;">100 m</td> <td data-bbox="1451 1058 1650 1121" style="text-align: center;">-</td> <td data-bbox="1650 1058 1854 1121" style="text-align: center;">100 m</td> <td data-bbox="1854 1058 2029 1121" style="text-align: center;">Article 10</td> </tr> </tbody> </table>	No	River Type	Cross-Section Projection	Outside Settlement		Inside Settlement		Article				Criteria	Minimum Riparian	Criteria	Minimum Riparian		1	River with dike (measured from outer dike side)		-	5 m	-	3 m	Article 6	2	River without dike (measured from river edge)		Main River (river cross-sectional area > 500 km <sup>2</sup> )	100 m	Depth: > 20 m	30 m	Article 7 & 8	Sub-main River (river cross-sectional area < 500 km <sup>2</sup> )	50 m	Depth: 3 m to 20 m	15 m	Article 7 & 8	3	Lake/dam (measured from highest water tide to land)		-	50 m	-	50 m	Article 10	4	Spring (around Spring)		-	200 m	-	200 m	Article 10	5	River that influenced by tidal (from river edge)		-	100 m	-	100 m	Article 10						
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		5. Regulation of the Minister of Public Work No. 63 year 1993 regarding Riparian Strip, River Usage Area, River Authorization Area, Criteria of Riparian Strip Line.																																																																		
	<ul style="list-style-type: none"> <li>a. Is the mill effluent treatment process in place?</li> <li>b. Is there a process in place for checking and monitoring water discharge quality, particularly BOD?</li> <li>c. Is the water discharge quality in compliance with national regulations?</li> </ul>	<ul style="list-style-type: none"> <li>• Waste water analysis measurement period 2016 and January – June 2017 by UPTB Environment Laboratory South Sumatra</li> <li>• License of waste water Land Application (LA) from Head of</li> </ul>	<p>Bukit Perak Mill waste water (POME) was processed through a series of waste water treatment ponds: four anaerobic ponds. POME is monitored monthly as required by permit. The results of POME monitoring were reviewed including measurement of BOD, COD, pH, N Total, TSS, oil and fat for January to December 2016 and January to June 2017.</p> <p>The Environment Ministry Decree No. 28/2003 requires that BOD of</p>	YES																																																																

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	<p>d. Does the mill have a license for treatment, discharge or land application of mill effluent, and is the mill in compliant with the requirements of the license?</p>	<p>Bangka Barat Regent No.188.45/347/1.08.02/2015 dated 21 May 2015 valid for 2 years</p> <ul style="list-style-type: none"> <li>• Site visit to WWTP ponds at Bukit Perak Mill</li> <li>• Mill monthly report</li> </ul>	<p>POME is less than 5.000 mg/litre, pH 6 – 9. The result of POME quality during this period was under 5.000 mg/litre (average 1,300 – 4,500 mg/L) for BOD and pH average 7.5 – 8.5. Quality of waste water effluent is monitored monthly by third party (UPTB Environment Laboratory South Sumatra).</p> <p>There is sighted the license of land application from Head of Bangka Barat Regent No.188.45/347/1.08.02/2015 dated 21 May 2015 valid for 2 years. There was renewal application letter sent to BLH Bangka Barat Regent No.052/EL/BPL-BLH/III/2017 date 23 March 2017. Field verification has been held from BLH Bangka Barat regent on 24 May 2017. Land application valid for 252.73 Ha at Bukit Perak Estate. Based on observation to WWTP, land application, and wells control organization has been compliant with the license and regulation.</p>																	
4.4.4	Monitoring of mill water use per ton of FFB shall be recorded																			
	<p>a. Are there procedures to measure mill water usage, and are the procedures implemented?</p> <p>b. Are there records of mill water use per tonne of Fresh Fruit Bunches (FFB)?</p>	<ul style="list-style-type: none"> <li>• Monthly report December 2016</li> <li>• Monthly report June 2017</li> <li>• Water management programme 2017</li> </ul>	<p>Water management programme defined the method of water management plan include water source and distribution identification, volume of water utilization, and the method to reduce and control. Mill water use per tonne of FFB is monitored monthly as well as raw water and domestic water supply. Actual mill water use was well recorded. Result of monitoring of mill water use per tonne of FFB was sighted for 2016 and 2017 (June).</p> <table border="1" data-bbox="1171 1043 1798 1297"> <thead> <tr> <th>Type</th> <th>2015</th> <th>2016</th> <th>2017 (YTD June)</th> </tr> </thead> <tbody> <tr> <td>Water consumption (m<sup>3</sup>)</td> <td>279,022.50</td> <td>188,264.70</td> <td>96,231.89</td> </tr> <tr> <td>FFB process (ton)</td> <td>260,768.69</td> <td>146,567</td> <td>77,565</td> </tr> <tr> <td>M<sup>3</sup>/ton FFB</td> <td>1.07</td> <td>1.28</td> <td>1.24</td> </tr> </tbody> </table> <p>Water consumption for mill activity was under the budget for year by year. Water consumption budget was 1.60 every year. Water</p>	Type	2015	2016	2017 (YTD June)	Water consumption (m <sup>3</sup> )	279,022.50	188,264.70	96,231.89	FFB process (ton)	260,768.69	146,567	77,565	M <sup>3</sup> /ton FFB	1.07	1.28	1.24	YES
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			<p>consumption depend on FFB process. It was shown that water consumption (m<sup>3</sup>) decrease from 2015 to 2016 and 2017 but the m<sup>3</sup>/ton FFB increase from 1.07 at 2015 to 1.28 at 2016 because of increased quantity of FFB proceed.</p> <p>The organisation has program to reduce water consumption, e.g. arranging ground water abstraction by not all pumps are operated, arranging water distribution to staff housing, reusing water cooler turbine for process, reusing sterilizer condensate water for press station, vacuum water discharge reuse for domestics water. The program has been implemented and it was shown on water consumption trend year by year. Water distribution to staff housing conduct twice a day in the morning and evening; water from PPE washing was reused for dilution chemical spraying based on field observation.</p>	
4.5	<p>Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p> <p><b>Guidance:</b>  <i>Growers should apply recognised IPM techniques, incorporating cultural, biological, mechanical and physical methods to minimise the use of chemicals. Native species should be used in biological control where possible.</i>  <i>Regulations to be referred are such as:</i>  <i>a. Guidance for Advancement of Pesticides usage, Directorate General of Infrastructure and Facilities, Ministry of Agriculture (2011)</i>  <i>b. Technical Guidance for the Development of Oil Palm Plantation, Directorate General of Estate Crops, Ministry of Agriculture (2006)</i></p>			
4.5.1	(M) Monitoring of Integrated Pest Management (IPM) plan implementation shall be available.			
	<p>a. Is there a documented IPM plan?</p> <p>b. Does the IPM plan include the following?</p> <ul style="list-style-type: none"> <li>• Identification of potential pests and thresholds</li> <li>• What are the techniques used (cultural, biological, mechanical and physical methods)?</li> <li>• What are the native species used as part of the biological control method?</li> <li>• Does it help in reducing the use of chemicals over a period of time?</li> </ul>	<ul style="list-style-type: none"> <li>- Procedures Integrated Pest Management (IPM) SOP/SMART/MCAR/VII/TA-HPT and SOP/SMART/MCAR/VIII/TA-PGM</li> <li>- Census records of leaf eater caterpillar (<i>Ulat Pemakan daun kelapa sawit</i>) performed monthly, observed records for period July 2016 – June 2017.</li> </ul>	<p>IPM Plan is defined in Procedures SOP/SMART/MCAR/ VII/TA-HPT and SOP/SMART/MCAR/ VIII/TA-PGM. The procedures were established to confirm that IPM to control pests, diseases, weeds and invasive introduced species. The procedures have include:</p> <ul style="list-style-type: none"> <li>- Identification of potential pests and thresholds</li> <li>- The techniques were used (cultural, biological, mechanical and physical methods).</li> <li>- The native species was as part of the biological control method.</li> <li>- Reducing of the use of chemicals over a period of time.</li> <li>- Prophylactic use of pesticides.</li> </ul>	YES

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	<ul style="list-style-type: none"> <li>• Prophylactic use of pesticides</li> <li>• Minimization of pesticide use</li> <li>• Review on the plans to suit the present condition such as replanting?</li> </ul> <p>c. Is there an SOP to implement the plan and monitor its effectiveness?</p> <p>d. Is there records of pest occurrence and control?</p>	<ul style="list-style-type: none"> <li>- Census records of rats performed monthly, observed records for period 2016-2017</li> <li>- Recapitulation data of leaf eater Caterpillar (<i>Ulat Pemakan Daun Kelapa Sawit</i>, e.g. <i>Setora nitens</i>, <i>Setothosea asigna</i>, <i>Darna trima</i>, <i>Metisa plana</i>, <i>Mahasena Corbetti</i>, etc) consist of census result.</li> </ul>	<ul style="list-style-type: none"> <li>- Minimization of pesticide use.</li> <li>- Review on the plans to suit the present condition such as replanting.</li> <li>- Setting out of technique to be implemented, chemical to be used, locations to be applied, and time frame for implementation.</li> </ul> <p>BPRE and BPRE have established Division Work Program annually for IPM for each division. IPM programme includes detection and census of pest and diseases, weeds controlling, planting and upkeep of beneficial plant, use of pesticide and herbicide.</p> <p>Based on Division Work Program period in SM II 2016 – SM I 2017 (all Division in BPRE and BPRE) it was observed that all IPM program has been performed based on determined schedule. Activity audited among others detection of pest (rodent, caterpillar, <i>Tirataba</i>), detection of leaf eater caterpillar, upkeep of biological controller, monitoring of rat population, monitoring of barn owl, spraying circle and path, circle manual, weeding manual, etc.</p> <p>Pest detection is an early warning system for pests; if the results of the detection exceed a predetermined threshold (e.g. 20% for rodents and 5% for the caterpillars) then conducted a pest's census and advanced control actions (e.g. the application of natural predator for rodents). It was observed during July 2016 – June 2017 there was no result in BPRE and BPRE pest detection that exceeds the threshold.</p> <p>Census of rodent (<i>Rattus</i> sp) performed monthly, observed records for period in January - July 2017 with average attack of rats was &lt; 5%. Summary data leaf eater caterpillar (<i>Ulat Pemakan Daun Kelapa Sawit</i>), consist of census result (every 2 month) and control such as the application <i>Cordyceps militaris</i> fungi, hand picking and use of light traps.</p> <p>Development of barn owl (<i>Tyto alba</i>) has been maintained and controlled. Monitoring of Gupon (owl nest) per June 2017 described that there were 423 active owl nest in BPRE and 222 active owl nest</p>	



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>in BPTE.</p> <p>During field observation, it was verified that no evidence of trees attacked by pest or disease. There were no chemical and mechanical handling.</p>	
4.5.2	Training records of Integrated Pest Management (IPM) shall be available.			
	<p>a. Is there records of training provided to those involved in the implementation of IPM?</p>	<p>Training module and attendance register.</p>	<p>Trainings have been provided to those involve in the implementation of IPM, several training records show that the following were conducted, among others:</p> <ul style="list-style-type: none"> <li>- Integrated Pest Management on 13 May 2017 by SMARTRI staff</li> <li>- Manuring on May 19<sup>th</sup>, 2016 by SMARTRI staff</li> <li>- Pesticide use on July 1<sup>st</sup>, 2016</li> </ul>	<p>YES</p>
4.6	<p>Pesticides are used in ways that do not endanger health or the environment.</p> <p><b>Guidance:</b>  <i>The RSPO has identified some examples of alternatives to pesticide use, which include those listed in the 'Research project on Integrated Weed Management Strategies for Oil Palm; CABI, April 2011'.</i></p> <p><i>Pesticides application on peatland and swamp may use IPM methods, such as in the RSPO Manual on Management Practices (BMPs) for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat.</i></p>			
4.6.1	<p>(M) Documented evidence shall be available to show that pesticide used based on regulations and the use of pesticide is specific to target species with appropriate dosage which have minimal impact on non-target species.</p> <p><b>Specific Guidance:</b>  <i>For 4.6.1: Measures to avoid resistance on target species (such as application of pesticide rotations) should be applied, which consider less harmful alternatives and IPM.</i></p>			
	<p>a. Does the organization have a policy on safe use of chemicals?</p> <p>b. Does the organization have SOPs for use of selective products that are specific to target pests, weeds, or diseases and which have minimal effect on non-target species?</p> <p>i. Measures to avoid the development of</p>	<ul style="list-style-type: none"> <li>- GAR Social and Environment Policy, dated September 8<sup>th</sup>, 2015</li> <li>- Memorandum from President Director dated August 13<sup>th</sup>, 2015.</li> </ul>	<p>The company has policy on safe use of chemical including pesticides which sated in GAR Social and Environment Policy, dated September 8<sup>th</sup>, 2015. The company has also established memorandum that the use of paraquat is prohibited. It was verified that no paraquat been used for weed control.</p> <p>The procedures SOP/SMART/MCAR/VII/TA-HPT (<i>Pengendalian Hama dan Penyakit Tanaman-Pest and Disease Control</i>) and</p>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	resistance (such as pesticide rotation) should be applied. ii. Is there a list of all pesticide with target species and justification of use? iii. The justification should consider less harmful alternatives and IPM. c. Is there evidence of implementation of SOP on the ground?	<ul style="list-style-type: none"> <li>- List of Agrochemicals used by PT. Bumi Permai Lestari 2016 which approved and registered by Agriculture Department</li> <li>- Register number refer to Pesticide Commission Book "Buku Komisi Pestisida"</li> </ul>	SOP/SMART/MCAR/VIII/TA-PGM ( <i>Pengendalian Gulma-Weed Control</i> ) has mentioned the use of selective products that are specific to target pests, weeds, or diseases and which have minimal effect on non-target species and measures to avoid the development of resistance (such as pesticide rotation) should be applied.  The company only used approved and registered agrochemical, permitted by the relevant authority issued by The Pesticides Commission of the Agricultural Ministry of the Republic of Indonesia. As seen on the records, agrochemicals used by BPRE and BPTE (July 2016 – June 2017) were include the following: <ul style="list-style-type: none"> <li>• Rolifos 150 SL, active ingredient Glufosinate Ammonium 150 g/l, license No. RI.01030120103683, valid until on May 13<sup>th</sup>, 2020.</li> <li>• Erkafuron 20 WG, active ingredient Metil Metsulfuron 20 %, license No. RI.032012277, valid until on December 12<sup>th</sup>, 2018.</li> <li>• Garlon 670 EC, active ingredient Triklopir, license No. RI.0103011984695, valid until on September 25<sup>th</sup>, 2018.</li> <li>• Roll Up 480 SL, active ingredient Isoprofilamina glifosat 480 g/l, license No. RI.01030120042133, valid until on December 31<sup>st</sup> 2018.</li> <li>• Starane 290 EC, active ingredient Fluroksipir 1 – MHE: 288 g/l, license no. RI.0103011988854, valid until on April 15<sup>th</sup>, 2019.</li> </ul> Based on field observation, it was noted that there were no agrochemicals being used which were not registered during this audit.	
4.6.2	(M) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be available.			
	a. Does the company have a pesticide application program? b. Is record of pesticides use available? c. Do the records detail the active ingredients used and their LD50, area treated, amount of	<ul style="list-style-type: none"> <li>- Annual Plan 2016 - 2017</li> <li>- Monthly Report</li> <li>- Pesticides Toxicity Data</li> </ul>	The company have detail pesticide application program for a year period in Annual Plan (Budget). Pesticides uses are recorded in Monthly report. Detail record contain active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications. Below is pesticide record for period	YES

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Type of Pesticide	LD50	% Active Ingredient	Volume	Area treated (Ha)	Amount of active ingredients applied per ha																																																											
Roll Up 480 SL	5000	41	1,889.88 ltr	7,559.53	0.102 ltr																																																											
Starane 480 EC	2000	30	219.53 ltr	3,484.57	0.019 ltr																																																											
Rolifos 150 SL	2000	15	166.60 ltr	47.60	0.525 ltr																																																											
Erkafuron 20 WG	5000	60	16.77 kg	1,341.28	0.008 kg																																																											
Type of Pesticide	LD50	% Active Ingredient	Volume	Area treated (Ha)	Amount of active ingredients applied per ha																																																											
Roll Up 480 SL	5000	41	434.68 ltr	1,738.72	0.103 ltr																																																											
Starane 480 EC	2000	30	16.26 ltr	258.02	0.019 ltr																																																											
Rolifos 150 SL	2000	15	15.20 ltr	4.34	0.525 ltr																																																											
Erkafuron 20 WG	5000	60	16.78 kg	1,342.00	0.008 kg																																																											
4.6.3	(M) Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in Indonesia Best Practice guidelines.  <b>Specific Guidance:</b> <b>For 4.6.3:</b> Justification of the use of such pesticides will be included in the public summary report.																																																															
	a. Does the company have an IPM plan?	<ul style="list-style-type: none"> <li>Annual Plan 2016 - 2017</li> </ul>	The company have detail pesticide application program for a year	YES																																																												

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	b. Has that plan been implemented? c. Is the effectiveness of the IPM plan monitored? d. Are there records showing that the use of pesticides have been minimised in accordance with Integrated Pest Management (IPM) plan? e. Has there been prophylactic use of pesticides? If so, justification must be provided in accordance to National Best Practices.	<ul style="list-style-type: none"> <li>Monthly Report</li> <li>Pesticides Toxicity Data</li> </ul>	period in Annual Plan (Budget). Pesticides uses are recorded in Monthly report. Detail record contain active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications.  The use of pesticides has been minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans:  It shows that the company's commitment to always reduce pesticide usage and give priority to the prevention of mechanical, biological and integrated pest management.  No pesticides usage for pest control. This indicates that the use of natural enemies of owls ( <i>Tyto alba</i> ) was quite effective to control rats.  There was no evidence of prophylactic use of pesticides, all pesticides only used for certain targets of weeds or pests accordance to the plan and best agriculture practice.	
4.6.4	The evidence shall be available to demonstrate that use of Pesticides, categorized in Class 1A or 1B by World Health Organization, or those are listed in the Stockholm and Rotterdam Conventions, and paraquat are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances.  <b>Specific Guidances:</b> For 4.6.4: Use of paraquat, as one of the restricted use pesticides, shall refer to the Regulation of the Minister of Agriculture No. 24 year 2011. Operators involve in the use of restricted pesticides must be certified by Pesticide Commission (Komisi Pestisida).			
	a. Does the company have a complete listing of WHO class 1A, class 1B, and Stockholm or Rotterdam Conventions pesticide? b. Is there a policy, procedure or management plan committing to minimise and eliminate use of these pesticides and paraquat? c. Are there records of minimisation of pesticides and paraquat use? d. Where there is the use of the above pesticides or paraquat, has justification in line with	<ul style="list-style-type: none"> <li>GAR Social and Environment Policy, dated September 8<sup>th</sup>, 2015</li> <li>Memorandum from President Director dated August 13<sup>th</sup>, 2015.</li> <li>Field observations to spraying activities in (pesticide/herbicide usage) Block G-64 Div. 1 (BPRE) and Block H-40 Div. 1 (BPTE)</li> </ul>	The company has policy on safe use of chemical including pesticides which sated in GAR Social and Environment Policy, dated September 8 <sup>th</sup> , 2015. The company has also established memorandum that the use of paraquat is prohibited. There was no pesticide application of categorized in Class 1A or 1B by WHO or paraquat. It was verified in the field and pesticide storage that there was no using and stock for weed control for the types of pesticides.	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	national best practice guidelines been documented?  e. Does physical verification of inventory in the chemical store agree back to the inventory records?	date on 11 – 12 July 2017  • Field observation in the chemical storage date on 11 – 12 July 2017		
4.6.5	<p>(M) Evidence of pesticide application by trained person and in accordance with application guidelines in product label and storage guidelines shall be available. Appropriate safety equipment shall be provided and utilized. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7)</p> <p><b>Specific Guidance :</b>                      For 4.6.5: Requirement pertaining to Personal Protected Equipment (PPE) shall refer to the Regulation of the Minister of Manpower No.8 year 2010 regarding PPE and Material Safety Data Sheet. Use of pesticides must follow guidance stated on the product's label. If there are gaps between the use of pesticides and the guidance, documented justification should be provided,</p>			
	a. Is there SOP for chemicals/pesticides handling? b. Is there a training plan and training records for workers who apply or handle pesticides? c. Is there evidence that training has been conducted in an appropriate language understood by the workers? d. Are pesticides handled, used or applied only by persons who have completed the necessary training? e. Are the workers involved in chemical handling or application able to demonstrate understanding of the hazards and risks related to chemicals used when interviewed? f. Are pesticides always applied in accordance with the product label? g. Are MSDS for pesticides used readily available for easy reference? h. Is appropriate safety and application	<ul style="list-style-type: none"> <li>• Training record and certificates of limited pesticides uses for sprayer worker.</li> <li>• Field observations to spraying activities in (pesticide/herbicide usage) Block G-64 Div. 1 (BPRE) and Block H-40 Div. 1 (BPTe)</li> <li>• Field observation in the chemical storage and emplacement area date on 11 – 12 July 2017</li> <li>• MSDS of all type Agrochemical</li> </ul>	<p>The site has had SOP for agrochemical handling, such as SOP/SMART/MCAR/VII/TA-HPT (<i>Pengendalian Hama dan Penyakit Tanaman</i>), SOP/SMART/MCAR/VIII/TA-PGM (<i>Pengendalian Gulma</i>), ect. Agrochemicals have been applied and handled by trained spraying workers who have received usage of limited pesticide training. Training was delivered by SMARTRI Staff on July 1<sup>st</sup>, 2016 for BPRE and BPTe spraying worker. Training record and certificates were sighted for all sprayers interviewed in BPRE and BPTe. Training covered handling of concentrate agrochemical and spraying method including pesticide hazard.</p> <p>Pesticides always applied in accordance with the product label and storage instruction. All spraying personnel have known well the target of each pesticide, e.g. Glyphosate is for narrow-leafs weeds, Metil Metsulfuron is for wide-leaf weeds.</p> <p>Agrochemicals storage was locked areas with limited access. The storage was ventilated. MSDS and hazard symbol label were provided nearby of agrochemicals. Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. The possible spill was managed. Secondary containment</p>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>equipment provided and used?</p> <p>i. Is PPE used appropriate according to recommendations in any risk assessments done?</p> <p>j. Is appropriate PPE provided and used, and can it be easily replaced if damaged?</p> <p>k. Does the management checked the workers usage of appropriate PPEs?</p>		<p>was provided around the chemical storage area. Spill kit was also provided in the area.</p> <p>Site visit in BPRE and BPTTE has been done to observe the spraying and pesticide application in field. Interview with spraying workers were evident that all of them has a good knowledge regarding the pesticide usage and its material usage and toxicity. All the workers has used the personal protective equipment meet with the safety rules and work instruction such as: Apron, safety goggles, chemical mask, hand gloves (2 type: cotton inside and rubber outside) and safety shoes. All precautions attached to the products properly observed, applied, and understood by workers. All applications of agrochemicals were in accordance with the product label and storage instruction. MSDS of all product was understood by workers.</p> <p>After the spray work was complete, the PPEs was cleaned in a special wash site and stored in its storage. There was not found sprayer PPEs in the emplacement area during field observation.</p>	
4.6.6	<p>(M) Storage of pesticides shall be according to recognised best practices. All pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers (see criterion 5.3).</p> <p><b>Specific guidance:</b>  <i>For 4.6.6: Some regulations regarding pesticides are:</i></p> <p>a. Government Regulation No. 18 year 1999 regarding Toxic and Hazardous Materials Management</p> <p>b. List of Toxic &amp; Hazardous Materials from specific source, unspecific source, expired chemical, leaked chemical, residue, container, or product disposal which does not comply with the specification of Government Regulation No. 85 year 1999 regarding changes of Government Regulation No. 18 year 1999 regarding the Management of Hazardous and Poisoned Waste.</p> <p>c. FAO International Code of Conduct on the distribution and use of pesticides and it guidance and supported by relevant industrial guidance (see Annex 1).</p> <p>d. Regulation of the Minister of Agriculture No. 01/ Permentan/OT.140 /1/2007 regarding List of Banned and Restricted Pesticide (based on active ingredients).</p> <p>e. Regulation of the Minister of Agriculture No. 24/Permentan/SR.140/4/2011 regarding Requirement and Mechanism to Register Pesticide.</p> <p>f. Stockholm Convention regarding Consistent Organic Pollutant which had been ratified with Act No. 19 year 2009</p> <p>g. Guidance for Advancement of Pesticides usage, Directorate General of Infrastructure and Facilities, Ministry of Agriculture (2011)</p>			
	<p>a. Has the SOP for pesticide storage been documented and implemented?</p> <p>b. Are all pesticides stored according to</p>	<ul style="list-style-type: none"> <li>Documented work instruction ex-pesticide containers handling (IK/SMART/LEMS-EHSD/SADV/002/001 dated 2</li> </ul>	<p>Documented procedure (IK/SMART/LEMS-EHSD/SADV/002/001 dated 2 July 2014) describes best practices for pesticides handling and storage. Pesticides were stored in the determined area separated from fertiliser and other chemicals. Pesticides storage was</p>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>recognised best practices?</p> <p>c. Is there evidence that empty pesticide containers are properly stored and disposed off and not used for other purposes?</p> <p>d. Is there evidence observed in the field that pesticide containers are indiscriminately disposed (in dump site) or used for other purposes, .e.g. as waste containers, flower pots?</p>	<p>July 2014)</p> <ul style="list-style-type: none"> <li>The training list of attendance and training material</li> <li>Field observation at warehouse Bukit Perak Mill and Estate, Bukit Permata Estate</li> <li>Hazardous waste manifest records and logbook records</li> </ul>	<p>provided in warehouse each estate. Pesticides storage was locked areas with limited access. The storage was ventilated through cross flow ventilation. MSDS and hazard symbol label were provided nearby of pesticides. Emergency shower and eyewash were also provided to anticipate in case of an emergency of chemical handling. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. The possible spill was managed. Secondary containment was provided around the pesticides storage area. Spill kit was also provided in the area. Based on field observation and interview with pesticides operator in the chemical storage that empty pesticides containers stored in the hazardous wastes temporary storage and its records was maintained.</p> <p>All empty pesticides containers were triple rinsed at specific area; some of the jerry cans were reused for spraying activities, while the others are collected in the temporary storage of hazardous waste. Pesticides containers were transported by authorised transporter, PT. Primanru Jaya. Records of pesticides containers quantity were evident. Liquid waste from pesticides was reused for the next spraying applications also there are several ex-containers "jerry can" that may re-use for field application.</p> <p>Valid licence of hazardous waste temporary storage (TPS LB3) was available from Bangka Barat Regent No.188.45/260/1.08.02/2012 date 28 June 2012 valid for 5 years. There was renewal application letter sent to BLH Bangka Barat Regent No.013/EL/BPL-BLHD//2017 date 26 January 2017. Field verification has been held on 16 March 2017 by BLH Bangka Barat Regent. Records of TPS B3 log book, periodical report, received notes from each division to central TPS B3 and manifest was available, sighted and complied.</p>	
4.6.7	Application of pesticides shall be by proven methods that minimise risk and negative impacts.			
	<p>a. Is there work instruction for pesticide application?</p> <p>b. Is there training provided on work instruction</p>	<ul style="list-style-type: none"> <li>Procedure SOP/SMART/MCAR/ XII/TA-PTM (Mature Upkeep)</li> <li>Procedure</li> </ul>	<p>Interviewed personnel can clearly explain the type of work including work methods and goals, materials used (pesticides) including the dosage and danger, personal protective equipment and first aid. Several <i>BKM</i> of circle weeding spray using agrochemicals was</p>	YES



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	including risk and impacts of pesticide applications?	<p>SOP/SMART/MCAR/VIII/TA-PGM (Control of Weeds)</p> <ul style="list-style-type: none"> <li>• Field observations to spraying activities in BPRE (Block G-64, Div. 1) and BPTE (H-40, Div. 1).</li> <li>• Foreman's Logbook of Activity (BKM)</li> </ul>	<p>sighted. It was noted that agrochemicals (Garlon, Roll Up, Rollifos and Erkafuron) use were approved and registered agrochemical.</p> <p>Dosage of agrochemical use, target species was in line with the procedure (SOP/SMART/MCAR/XII/TA-PTM "Mature Upkeep" and SOP/SMART/MCAR/VIII/TA-PGM "Control of Weeds"). BKM recorded target species, dosage and trained spraying officer.</p> <p>Pesticide application performed with strict supervision of the field supervisors and assistants. Application of pesticides based on plant maintenance work program that has been scheduled. Application of pesticides considers various factors such as the environment, safety and weather. In the area of pesticide applied there was warning boards installed for 2 weeks.</p>	
4.6.8	(M) Pesticides may only be applied aerially where there is a documented justification. Surrounding communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application			
	<p>a. Has aerial spray been applied? If yes, is there documented justification?</p> <p>b. Is the impact and risk associated with aerial application documented and made available?</p> <p>c. Are the identified affected communities informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application?</p>	<ul style="list-style-type: none"> <li>• Interview with management</li> <li>• Field observation</li> </ul>	Based on interview with management and field observation, there are no pesticides applied aerially in BPRE and BPTE.	N/A
4.6.9	Evidence of training on handling pesticide for workers and scheme smallholder (if any) shall be available			
	<p>a. Has the company provided information materials on pesticide handling to all employees and associated smallholders (if any) (see Criterion 4.8)?</p> <p>b. Is there evidence of periodic training (in appropriate language) of employees and associated smallholders on pesticide handling?</p>	<ul style="list-style-type: none"> <li>• Training records (attendance list, certificate and module) of Pesticides Uses Training on July 1<sup>st</sup>, 2016.</li> <li>• MSDS of all agrochemical used</li> <li>• Pesticide application area warning signs, installed for two</li> </ul>	<p>Employee knowledge and skill are maintained. Training records (attendance list, certificate and module) regarding to maintain working skill with pesticides are available. MSDS, warning sign are available during field observation to keep appropriate information regarding pesticides handling.</p> <p>There was no smallholder associated with PT. Bumi Permai Lestari. MSDS was available at spraying location brought by the foreman; each spraying worker interviewed understood active material in pesticides and its danger. Applications of pesticides have considered</p>	YES



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<i>Note: Interview with workers and smallholders on their knowledge and skills in pesticides handling.</i>	weeks in area applied <ul style="list-style-type: none"> <li>Interview with sprayer in BPTTE and BPRE on 11 – 12 July 2017</li> </ul>	various factors such as the environment, safety and weather. Warning sign as restricted area available at the spraying location so that anyone can't enter the location.	
4.6.10	<b>Proof that pesticide waste has been handled as per legal regulations and understood by worker and manager, shall be demonstrated</b>			
	a. Is there an SOP for proper disposal of waste material? b. Is there training provided to workers and managers on proper waste disposal? c. Is there evidence of implementation of proper ways for waste disposal by the company?	<ul style="list-style-type: none"> <li>SOP/SPO/SMART-18 – Waste handling</li> <li>SOP/SMART/LEMS-EHSD/SADV/I/002 – Waste handling</li> <li>The training list of attendance and training material</li> <li>Field observation at warehouse, hazardous temporary storage at Bukit Perak Mill and Estate, Bukit Permata Estate</li> </ul>	Documented procedure (SOP/SPO/SMART-18) described all empty pesticides containers were triple rinsed and collected in the temporary storage of hazardous waste. Pesticides containers can reused for spraying activities. Pesticides containers were transported by authorised transporter, PT. Primanru Jaya. Records of pesticides containers quantity were evident. Liquid waste from pesticides was reused for the next spraying applications also there are several ex-containers "jerry can" that may re-use for field application. Based on field observation that liquid waste and its ex container stored in the appropriate place (hazardous wastes temporary storage) and its records was also maintained.  Training/briefing regarding disposal of waste material has been conducted to all workers and staffs. Based on interview with workers (sprayer, harvester, warehouse clerk, hazardous waste temporary storage clerk), they understood the disposal of waste material. There were records regarding pesticide packaging washing in each division and logbook of empty pesticides that used and sent to central hazardous temporary storage.	YES
4.6.11	<b>(M) Annual medical records of pesticide operators, and follow-up treatment of medical results, shall be available</b>			
	a. Is there an updated list of pesticide operators? b. Is there record of annual medical surveillance of pesticide operators? c. Is there medical and treatment record of all pesticide operators?	<ul style="list-style-type: none"> <li>MCU Recapitulation Report</li> <li>List Of Pesticides Operator 2017</li> </ul>	List of pesticides operator was shown and updated periodically. There were 21 operators listed at BPRE and 8 operators listed at BPTTE estate.  Specific health surveillance has been performed on 7 March 2017 for BPRE and 8 March 2017 for BPTTE for all pesticide operators included cholinesterase, and spirometry. The surveillance was planned to be conducted twice in a year. The result of last health	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			surveillance showed that all workers were in healthy condition. Medical records for all workers were available at polyclinic. Socialization of health surveillance results have also been conducted to the workers.	
4.6.12	(M) Records shall be available to show that spraying is not conducted by pregnant or breast-feeding women.			
	<p>a. Is there a policy statement preventing pregnant and breast-feeding women from handling pesticides?</p> <p>b. Is there a lists of female workers handling pesticides available?</p> <p>c. Does the company have a system to identify pregnant and breast-feeding women?</p> <p>d. Is there evidence showing that pregnant and breast-feeding women are not allowed to handle pesticides?</p>	<ul style="list-style-type: none"> <li>- Memorandum from VPA, No. 01/VPA-RSPO/03/2010 date 3 Maret 2010 concerning pregnant and lactating women workers.</li> <li>- Field observation and interview to sprayers worker in BPRE and BPTE</li> </ul>	<p>Based on list of worker and focus group discussion with several worker. The Pregnancy analyze was conducted by organization to ensure that there are no pregnant sprayers. It was carried out based on monthly menstruation leave records. It was observed that menstruation leave was taken by female sprayer. According to pregnancy analysis result was indicate that there are no pregnant female pesticide-sprayer.</p> <p>Estate has establish the policy for pesticide spraying is only done by male workers and its prohibited for pregnant and lactating mothers to work spraying pesticides / herbicides.</p> <p>Memorandum of VPA PSM Bangka Belitung no. 01/VPA-RSPO/03/2010 dated March 3, 2010 regarding the employee is pregnant and breast-feeding:</p> <p>For the implementation the RSPO standards in the PSM Region Bangka Belitung in this case we announced :</p> <ul style="list-style-type: none"> <li>- Pregnant and lactating women employee are not allowed to work as a pesticide/herbicide sprayers</li> </ul> <p>This provision applies since announcement of this memorandum.</p>	YES
4.7	<p>An occupational health and safety plan is documented, effectively communicated and implemented.</p> <p><b>Guidance:</b>  <i>Growers and millers should ensure that the workplace, machinery, equipment, transport and processes under their control are safe and without undue risk to health. Growers and millers should ensure that the chemical, physical and biological substances and agents under their control are without undue risk to health, and appropriate measures are taken if needed. All indicators apply to all workers regardless of status.</i></p> <p><i>The health and safety plan should also refer to the Government Regulation No. 50 year 2012 regarding Application of Occupational Health and Safety Management System.</i></p>			
4.7.1	(M) A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored.			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>a. Is there a health and safety policy in place?</p> <ul style="list-style-type: none"> <li>• Is it written in an appropriate language?</li> <li>• Has the policy been approved by an authorized personnel and dated?</li> <li>• Does the policy cover mitigation of risks to workers health and safety at all workplace activities?</li> <li>• Are the workers aware of and understand the policy?</li> </ul> <p>b. Is there a health and safety plan in place?</p> <ul style="list-style-type: none"> <li>• Does the plan include targets for improving occupational health and safety?</li> <li>• Does the plan reflect guidance provided in the ILO Convention 184 (see Annex 1)?</li> </ul> <p>c. Is there evidence of implementation of the plan?</p> <p>d. Is the effectiveness of the health and safety plan monitored?</p> <p>e. Is the health and safety plan made publicly available?</p> <p>f. Is there an action plan if targets are not achieved?</p>	<ul style="list-style-type: none"> <li>• Occupational Health and Safety Policy dated 01 November 2013</li> <li>• OHS Target and Plan 2016 and 2017</li> <li>• Notes of Safety Committee Meeting</li> <li>• Risk Assessment mill and estates (ISBPR)</li> <li>• Annual OHS plans and work programmes year-2016 (F/SMART/HESS-EHSD/SADV/004/001)</li> <li>• OHS Training Records</li> <li>• OHS Performance Report</li> <li>• Observations of OHS implementation</li> </ul>	<p>Occupational health and safety policy is remained unchanged. The Health and safety policy was approved / signed by organization director on 1 November 2013; written in Bahasa Indonesia, the content of policy includes risk mitigation (Hazard Identification and Risk Assessment Control has been established for all activities both in estates and mill) , regulation compliance and continual improvement. The policy was displayed at strategic locations of estate and mill and communicated to employees including contractor workers; the records of socialization were also evident. Base on interview to mill workers and estate workers they were aware of the health and safety policy and already benefited the result of the policy.</p> <p>OHS Target and Plan 2017 for mill and estates were evident and the records and monitoring form were maintained. Several plans intended to improving OHS performance were evident such as: safety trainings, safety inspection, safety parameters monitoring, MCU, Handling of incidents, emergency simulation, safety report, safety committee meeting etc. The OHS Target and Plan has already reflect the ILO Convention 184.</p> <p>The implementations of the programs were evident such as:</p> <ul style="list-style-type: none"> <li>• Monthly Safety Committee meeting</li> <li>• Safety Performance Report to local authority period October – December 2016 and January-March 2017</li> <li>• Safety Training</li> <li>• Emergency Simulation</li> <li>• etc.</li> </ul> <p>Monitoring of the safety plan was conducted by regular safety meeting once in a month. Several action plans were raised for the unachieved safety targets and plans. The safety target and plan was also publicly available via company website.</p>	<p>YES</p>
<p>4.7.2</p>	<p>(M) A documented risk assessment shall be available and its implementation shall be recorded.</p> <p><b>Specific Guidance:</b>  <i>For 4.7.2: All precautions attached to products shall be properly observed, understood, and applied.</i></p>			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>a. Have risk assessments been conducted for all operations where health and safety is an issue?</p> <p>b. Does the risk assessment cover all the organization's processes and activities?</p> <p>c. If any accidents had occurred, were these included in the risk assessments with action plans to prevent further recurrence?</p> <p>d. Have the procedures and action plans been documented and implemented to address the identified issues?</p> <p>e. Have all precautions attached to products been properly observed and applied to the workers?</p>	<ul style="list-style-type: none"> <li>• Documented procedure (SOP/SMART/HESS-EHSD/SADV/I/002) Hazard identification and risk assessment</li> <li>• Documented procedure (SOP/SMART/HESS-EHSD/SADV/I/015) Safe work permit.</li> <li>• Documented procedure (SOP/SMK3/SMART/LH-19) Lock out tag out (LOTO)</li> <li>• Risk Assessment mill and estates (ISBPR)</li> </ul>	<p>Risk Assessment for all operations regarding to health and safety was available within the scope of oil palm mill processes activities and agricultural estate activities has already conducted, as it was considered the stages of OHS risk control hierarchy such as elimination, substitution, engineering, administrative and PPE (Personnel Protective Equipment) in order to OHS risk precautions.</p> <p>Mill risk assessment cover processes and activities attached to the realisation of product CPO such as: weighing bridge, boiler, engine room, loading ramp, sterilizer, threshing, pressing, kernel operation, clarification, office, lab, dispatch CPO, firefighting simulation, water treatment, chemical warehouse, etc.</p> <p>Estates risk assessment covers processes and activities such as: spraying, fertilizing, weeding, replanting, road maintenance, firefighting simulation harvesting, transportation, warehouse, workshop, infrastructure, policlinic, etc. It also covered all the risk attached to the products.</p> <p>The risk assessment were reviewed yearly and should any accident has occurred. The last reviewed for was on 5 January 2017 for BPRE, 2 January 2017 for BPTTE and 9 January 2017 for BPRM.</p> <p>Several OHS procedures related to the risk assessment were established such as:</p> <ul style="list-style-type: none"> <li>• Fire Fighting Procedure</li> <li>• LOTO procedure</li> <li>• Emergency Response Procedure</li> <li>• Chemical Handling Procedure</li> <li>• Etc.</li> </ul> <p>OHS induction was performed by Safety Officer at mill and estates.</p> <p>Utility equipment were available and installed such as boilers, sterilised, steam vessel, compressors, generator, heavy equipment and lifting equipment. This equipment has been inspected by local authority and the records were evident. Periodic monitoring was also performed internally such as boiler parameter monitoring (pressure,</p>	<p>YES</p> <p>(Major NCR 2017-02 closed)</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>temperature, water quality, water level, etc. Moving parts of machine/equipment generally has been covered or guarded. Safety sign was provided to make workers aware on this hazard and risk. Electrical hazard symbol was provided at electrical panel however during audit the electrical panel in Bukit Perak mill workshop was found in open condition without any protection and warning sign at it. Inspection regarding to electrical installation has been made. Lock out tag out has also been established and implemented especially intended for risk control of maintenance activities. Access for workers to workplace in general also good e.g. stair was provided with hand rail and platform at height was provided with border to prevent fall risk.</p> <p>There was also detailed working instruction which described process for conducting activities including requirement concerning to OHS aspects such as requirement of PPE. Working instructions were sighted such as spraying, harvesting, pesticide preparation, etc.</p> <p>OHS control for working in confined space (e.g. cleaning of storage tank), working at height and welding. Work permit system has been implemented for these works. The cleaning of storage tank activity conducted on 31 March 2017 implemented the safety working permit process. The records were shown and maintained properly.</p> <p>The PPE for each activity has been established, e.g. working at mill, working at generator set, welder, working at laboratory, harvester, sprayer, fertilizer storage, chemical storage, etc. Observation during this audit generally concluded that PPE has been well provided and implemented. Workers were interview during this audit and generally they understood the risk of their work and the purpose of using PPE.</p> <p>Emergency Response Team has been defined and the emergency flow charts have been established for any kind of emergency situation such as earthquake, fire, flood etc. The awareness of employee was gained with the simulation of emergency response conducted on 3 June 2017 for BPRE and BPTTE and 6 February 2017 for BPRM. Evacuation routes and emergency flowcharts have been</p>	

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			<p>socialized during simulation. Emergency signs and boards were provided in several areas. Muster points for each area such as workshop, warehouse, office etc. were sighted.</p> <p>All precautions attached to products been properly observed and applied to the workers. Several controls such as providing PPE and administration control were applied to workers in some activities such as: mill maintenance process, spraying activities, handling of pesticides etc.</p> <p><b>Major Non-conformance 2017-02:</b></p> <p>Electrical panel in Bukit Perak mill workshop was found in open condition without any protection and warning sign at it.</p> <p><b>Verifying of effectiveness:</b></p> <p>The site has conducted revision to inspection period in the several locations / stations by Safety Officer and related PIC. It has been implemented effectively. This NCR was closed out.</p>	
4.7.3	<p>(M) Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.</p> <p><b>Specific Guidance:</b>  <b>For 4.7.3: Adequate and appropriate Personal Protective Equipment (PPE) shall be available to all workers at the workplace based on the result of Identification of Sources of Hazard and Risk Control including all potentially hazardous operations, such as the use of pesticides, operating machinery, land preparation, harvesting and if it is used, burning.</b></p>			
	<p>a. Are all workers involved in the operation appropriately trained in safe working practices (see Criterion 4.8)?</p> <p>b. Are OSH training programs and training records available and conducted by qualified persons?</p> <p>c. Is adequate and appropriate protective equipment available to all workers at the place of work to cover all potentially hazardous</p>	<ul style="list-style-type: none"> <li>• List Attendance of Basic Safety Training</li> <li>• PPE Checklist Maintenance</li> <li>• PPE Distribution Records</li> </ul>	<p>All workers involved in the operation have been appropriately trained in safe working practices/Basic Safety Training. The training was conducted by Safety Officer who has been qualified as Safety Officer by the government.</p> <p>OHS training program 2017 and training records was available and conducted by qualified persons such as First Aid training on 5 May 2017 (BPRE), Safe Working Practices on 1 May 2017, Emergency Respond Procedure on 3 June 2017, and Fire Fighting training on 6 February 2017 etc.</p>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning?</p> <p>d. Is PPE provided to workers and replaced when damaged?</p> <ul style="list-style-type: none"> <li>• Does the organization maintain a list of PPE distribution?</li> <li>• Are workers observed wearing appropriate PPE?</li> </ul>		<p>Adequate and appropriate protective equipment was available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. The needs of PPE were determined from HIRAC document or related SOP of activity.</p> <p>The type of PPE used for each activity has been determined, e.g. working at Mill, working at generator set, welder, working at laboratory, harvester, sprayer, fertilizer storage, chemical storage, etc. It also covered the expired time of each PPE.</p> <p>PPE was provided by organisation to workers and replaced when damaged. The evidence was sighted. The stock of PPE was listed in warehouse stock card such as googles, mask, gloves etc.</p> <p>Organization maintains a list of PPE distribution in form "List of PPE Distribution". Several records were reviewed such as:</p> <ul style="list-style-type: none"> <li>• Distribution of safety gloves, mask and safety shoes to pesticides worker on 13 April 2017 at BPRE</li> <li>• Distribution of safety shoes, helm and googles to workshop worker on 15 May 2017 at BPTTE</li> </ul> <p>Observation during this audit (spraying area and harvesting area) generally concluded that PPE has been well provided and implemented however the safety mask provided for fertilizer workers were not appropriate for only used the dusk mask. Workers were interview during this audit and generally they were understood the risk of their work and the purpose of using PPE.</p> <p>It was observed that workers were wearing appropriate PPE such as gloves, goggles, shoes and chemical mask for pesticides operators.</p>	
4.7.4	<p>(M) The responsible person(s) for occupational health and safety shall be identified and there shall be records of periodical meetings on health and safety issues</p> <p><b>Specific Guidance:</b>  <b>For 4.7.4 :</b> <i>Workers shall be represented in the Advisory Committee for Occupational Safety and Health (P2K3) based on the Regulation of the Minister of Manpower No. 4 year 1987.</i></p>			



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>a. Has the company identified the responsible person/persons to implement OSH?</p> <p>b. Are meetings between the responsible persons and workers conducted on a regular basis, or as required by law, if any?</p> <p>c. Are minutes of meeting recording attendees and issues discussed available?</p> <p>d. Are concerns of all parties about health, safety and welfare discussed at these meetings?</p> <p><i>Note to Auditor: Interviews with workers reflect compliance to a-d above.</i></p>	<ul style="list-style-type: none"> <li>Approval Letter of Safety Committee (P2K3) from local government</li> <li>Notes of Meeting Safety Committee (P2K3) January – May 2017</li> </ul>	<p>Company has identified the responsible person to monitor the implementation of OHS at BPRE that was Mr. Suharto as Safety Committee Leader and Mr Andri P. Ginting as AK3U (OHS expert) with approval letter for Safety Committee (P2K3) from local government Pemkab Bangka Barat. Mr Andri P. Ginting has been certified as AK3U (OHS Expert) based on Appointment Letter from Ministry of Manpower and Transmigration as below: No. KEP.3421/NAKER-BINWASK3/VI/2016 on 20 June 2016 and valid for 3 years.</p> <p>Company has identified the responsible person to monitor the implementation of OHS at BPRE that was Mr. Mahadi Purba as Safety Committee Leader and Mr Adi Irawan as AK3U (OHS expert) with approval letter for Safety Committee (P2K3) from local government Pemkab Bangka Barat. Mr Adi Irawan has been certified as AK3U (OHS Expert) based on Appointment Letter from Ministry of Manpower and Transmigration as below: No. KEP.14372/M/DJPPK/VII/2015 on 14 July 2015 and valid for 3 years.</p> <p>Company has identified the responsible person to monitor the implementation of OHS at BPRM that was Mr. Abdul Kahliq as Safety Committee Leader and Mr Risyad Lingga Pangestu as AK3U (OHS expert) with approval letter for Safety Committee (P2K3) from local government Pemkab Bangka Barat. Mr Risyad Lingga Pangestu has been certified as AK3U (OHS Expert) based on Appointment Letter from Ministry of Manpower and Transmigration as below: No. KEP.14372/M/DJPPK/VII/2015 on 14 July 2015 and valid for 3 years.</p> <p>The safety committee (P2K3) regular meeting has been performed each month, discussed regarding OHS plan program achievement and it corrective action. Notes of Safety Committee Regular Meeting (mill and estate) with workers were evident. Sample reports were reviewed for meeting during January – May 2017. The actions were monitored for realisation and reported to management and local authority. Concerns of all parties about health, safety and welfare were discussed at the meeting. Several concerns were discussed</p>	<p>YES</p>



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>such as: review of accident, PPE Checklist update, result of internal audit, incident investigation, etc.</p> <p>Base on interview to workers (spraying workers at BPRE block G64 Div.01 and harvesting workers at BPTe block H30 Div.02) during audit they have benefited the actions taken from the result of safety committee such as: the availability of Personal Protective equipment and incident socialization.</p>	
4.7.5	<p>A procedure for emergency and work accident shall be available in Indonesian Language; and the workers, who have attended First Aids training, are available in the working areas.</p> <p><b>Specific Guidance:</b>  <b>For 4.7.5:</b> Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p>			
	<p>a. Are there SOPs for accidents and emergencies?</p> <ul style="list-style-type: none"> <li>• Do these cover all major potential emergencies, such as, but not limited to fire, chemical spillage, and potential natural disasters specific for the region, e.g. earthquakes, volcanoes, etc.?</li> <li>• Are accidents investigated and action taken to prevent recurrence?</li> <li>• Are accident records provided to the local authority in accordance with local legal requirements, if any?</li> <li>• Available in the appropriate language of the workforce?</li> </ul> <p>b. Are the instructions on emergency procedures clearly understood by all workers?</p> <p>c. Are assigned operators trained in First Aid present in both field and other operations?</p> <p>d. Is there records of training of the first aiders?</p> <p>e. Is first aid equipment available at worksites? Is</p>	<ul style="list-style-type: none"> <li>• List attendance of First Aid Training</li> <li>• List Attendance of Emergency Simulation</li> <li>• Records of accident investigation</li> <li>• List attendance of procedure socialization</li> <li>• Training Certificate of First Aid Officer</li> <li>• SOP/SMART/UMUM/SADV/II/2015/REV.00/01-Jul-14) emergency response procedure</li> <li>• SOP/SMART/HESS-EHSD/SADV/1/005/Rev.00/01-Jul-14) accident and occupational disease handling</li> <li>• Incident investigation reports</li> </ul>	<p>Emergency Respond procedure written in Bahasa Indonesia was described in procedure SOP/SMART/UMUM/SADV/II/2015/REV.00/01-Jul-14 and covered reporting, responsibility of all members of ERP Team, handling of ERP situation, mitigating of ERP situation, etc. Some scenarios were identified such as accident, fire earthquake, and chemical spillage.</p> <p>The procedure described the roles and responsibilities of each emergency response team include the mechanism how to conduct medical evacuation to near hospital/local health centre, also it was available the emergency contact number of each internal emergency team and external related parties. Evacuation route and muster point are available and made known to the employee.</p> <p>The structure of Emergency Response Team (ERT) have been established and consist of ERT commander, Fire Fighting Commander, Community Team, Fire Fighting Team, Transportation Team, Communication Team and Evacuation Team. The list of protection equipment for emergency was available such as fire extinguisher, fire engine etc.</p> <p>Emergency respond procedure has been socialized to workers on 3 June 2017 for BPRE and BPTe and 6 February 2017 for BPRM. The list of attendance was available. From workers interview it was</p>	<p>NO (minor NCR 2017-03)</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>the equipment available during conduct of field manual work?</p> <p>e. Are first aid kits adequately stocked and regularly checked in accordance with local legal requirements?</p> <p>f. Are records of all accidents kept and periodically reviewed for continuous improvement?</p>	<p>form (F/SMART/HESS-EHSD/SADV//005/002)</p>	<p>observed that all workers were clearly understood of what is required in the procedure.</p> <p>Accident investigation procedure was documented in related procedure. Accident and investigation reports described the accident chronology, cause and impacts of the accident and also to find the root causes of the accident happened and establish the corrective and preventive action.</p> <p>Accident investigation has been documented. There was none accident recorded during year 2017 at BPRE and there were 1 accident at BPRE and 4 accidents at BPRM.</p> <p>Last accident recorded was on behalf Mr. Bangau on 19 April 2017. The accident is categorized as Lost Time Accident (LTA). The accident has been investigated and corrective action has been conducted. The accident has been reported to the local authority. All records were available and sighted. Records of all accidents were kept and periodically reviewed for continuous improvement.</p> <p>First Aid operators were available at working area as paramedic and foreman. First aid training was conducted on 1 May 2017. The First Aid kits carried by foreman were available at worksites and comply with the regulation Permenaker 15/2008. However the MSDS for pesticides materials were not available at harvesting area BPRE.</p> <p><b>Minor Non-conformance 2017-03:</b></p> <p>There was no MSDS for Rollup and starane available at working area in the spraying operation Bukit Perak Estate.</p>	
4.7.6	All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).			
	<p>a. Is there evidence that all workers are provided with medical care (refer to Criterion 6.5.3), and covered by accident insurance by the company? For contract workers, the contract between the company and the contractor shall be in compliance.</p>	<ul style="list-style-type: none"> <li>• Bank Slip Payment</li> <li>• Worker Medical Records</li> </ul>	<p>All workers (permanent and contract) have been provided with medical care and accident insurance. Several insurance payments were reviewed such as:</p> <p>BPJS Kesehatan (medical care) June 2017</p> <p>- Bank slip payment on 6 July 2017 for BPRE workers.</p>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>b. For accidents that have occurred, is there evidence that the affected workers received appropriate medical treatment, and was able to claim and receive compensation under the insurance policy (if relevant)?</p> <p>c. Is there evidence that the insurance policies are valid?</p>		<ul style="list-style-type: none"> <li>- Bank slip payment on 6 July 2017 for BPTe workers.</li> <li>- Bank slip payment on 6 July 2017 for BPRM workers.</li> </ul> <p>BPJS Ketenagakerjaan (accident Insurance) May 2017</p> <ul style="list-style-type: none"> <li>- Bank slip payment on 8 June 2017 for 112 BPRM workers.</li> <li>- Bank slip payment on 8 June 2017 for 539 BPRe workers.</li> <li>- Bank slip payment on 8 June 2017 for 247 BPTe workers.</li> </ul> <p>The benefit of those insurances have been verified as sample below:</p> <ul style="list-style-type: none"> <li>- Mr. Zarhumaidi as pesticide operator BPRe for medical care insurance (BPJS Kesehatan) in May 2017.</li> <li>- Mr. Bangau as mill operator BPRM for accident insurance (BPJS Naker) in May 2017</li> </ul>	
4.7.7	<p>Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.</p> <p><b>Specific Guidance</b>  <i>For 4.7.7: Lost Time Accident requirements should refer to Decree of the Minister of Manpower and Transmigration No. 609 year 2012 regarding Guidance to Solve Working Accident Case and work-related Illness.</i></p>			
	<p>a. Are occupational injuries recorded using Lost Time Accident (LTA) metrics?</p>	<p>- Frequency Rate and Severity Rate Calculation Table</p>	<p>Lost Time Accidents metrics were using to record the accidents and injuries during year 2017. The Lost Time accidents and injuries were determined according to Decree of the Minister of Manpower and Transmigration No. 609 year 2012. Safety performance for both mill and estates was calculated using frequency rate (FR) and severity rate (SR).</p> <p>The calculation for FR and SR as below:</p> <ul style="list-style-type: none"> <li>• <math>FR = \text{total lost time accident} \times 1.000.000 / \text{total man hour}</math></li> <li>• <math>SR = \text{total lost time hours} \times 1.000.000 / \text{total man hour}</math></li> </ul> <p>The calculated FR (frequency rate) and SR (severity rate) for mill and estates 2017 were stated as below:</p> <p><b>BPRM</b></p>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>FR=26; SR=173; LT=12</p> <p><b>BPRE</b> FR=0; SR=0; LTD=0</p> <p><b>BPTE</b> FR=7.12; SR=28.51; LTD=8</p> <p>The calculation for frequency rate and severity rate was generated from lost time accident (LTA) data, employee working hour's data and lost time hours/lost time day (LTD) data. The timesheet calculation for each month was shown during audit. Sampling was taken for last incident in April 2017 for Mr. Bangau as mill operator with 3 lost time days.</p>	
4.8	<p>All staff, workers, smallholders and contract workers are appropriately trained.</p> <p><b>Guidance:</b> <i>Workers should be adequately trained on: the health and environmental risks of pesticide exposure; recognition of acute and long-term exposure symptoms including the most vulnerable groups (e.g. young workers, pregnant women); ways to minimise exposure to workers and their families; and international and national instruments or regulations that protect workers' health.</i></p> <p><i>The training programme should include productivity and best management practice, and be appropriate to the scale of the organisation.</i></p> <p><i>Training should be given to all staff and workers by growers and millers to enable them to fulfil their jobs and responsibilities in accordance with documented procedures, and in compliance with the requirements of these Principles, Criteria, Indicators and Guidance.</i></p> <p><i>Contract workers should be selected for their ability to fulfil their jobs and responsibilities in accordance with documented procedures, and in compliance with the requirements of the RSPO Principles, Criteria, Indicators and Guidance.</i></p> <p><i>Growers and millers should demonstrate training activities for schemes smallholders who provide Fresh Fruit Bunches (FFB) on a contracted basis.</i></p> <p><i>Workers on smallholder plots also need adequate training and skills, and this can be achieved through extension activities of growers or millers that purchase fruit from them, This training may be conducted through smallholders' organizations, or through collaboration with other institutions and organizations (See Guidance on Scheme Smallholders', July 2009)</i></p> <p><i>The contract workers in Indonesia refer to the Fixed Term Contract (PKWT) and Non-fixed Term Contract (PKWTT) based on the Decree of the Minister of Manpower No. 100 year 2004; and the Regulation of the Minister of Manpower &amp; Transmigration No. 19 year 2012 regarding Requirements for Transfer of Parts of Work to Other Company(ies).</i></p>			
4.8.1	(M) Records of training program related to the aspects of RSPO Principles and Criteria shall be available.			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>a. Does the company maintain a list of staff, workers, smallholders and contract workers whom training must be provided to?</p> <p>b. Is there a formal training programme in place that covers all aspects of the RSPO Principles and Criteria? Does the formal training program include:</p> <ul style="list-style-type: none"> <li>• Regular assessment of training needs of all staff, workers, smallholders and contract workers;</li> <li>• Training for workers on smallholder plots;</li> <li>• Documentation of all the training assessment needs, formal training conducted and the list of participants attending these formal training;</li> <li>• Does the training for workers cover, at minimum, to the following:               <ul style="list-style-type: none"> <li>○ The health and environmental risks of pesticide exposure;</li> <li>○ recognition of acute and long-term exposure symptoms including the most vulnerable groups (e.g. young workers, pregnant women);</li> <li>○ ways to minimise exposure to workers and their families;</li> <li>○ International and national instruments or regulations that protect workers' health; and</li> <li>○ Productivity and best management practice.</li> </ul> </li> </ul> <p><i>Note to auditor: To interview staff, workers, smallholders and contract workers to verify that the training has been conducted effectively.</i></p>	<ul style="list-style-type: none"> <li>- Training Programme 2017</li> <li>- Training Identification Matrix</li> <li>- Training Records (List Attendance, evaluation, etc.)</li> </ul>	<p>Training need identification matrix 2017 were evident and covered staff, workers and contract worker. Training programme 2016 and 2017 were sighted and established based on the training needs identification and covered all aspects of the RSPO criteria such as safety, environment, social, best practice, human rights, management program, HCV and ethical.</p> <p>The list of attendance and the training handout were evident such as:</p> <ul style="list-style-type: none"> <li>• First Aid Training: 5 May 2017</li> <li>• Chemical Material Handling on 12 May 2017</li> <li>• Fire Fighting Training on 3 June 2017</li> <li>• Safe Working Practices on 1 May 2017</li> <li>• Emergency Response Training on 66 February 2017</li> <li>• RSPO, ISPO, ISCC Awareness Training on 3 May 2017</li> <li>• Worker Complaint SOP Training on 3 May 2017</li> <li>• Business Ethic Training on 9 May 2017</li> <li>• HCV Training 3 May 2017</li> <li>• Etc.</li> </ul> <p>Based on interview to workers (spraying workers at BPRE block G64 Division 01 and harvesting workers at BPTe block H30 Div. 02) during audit they were aware the need of the training and they were assisted by information provided during training.</p>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
4.8.2	Records of training for each employee shall be maintained.			
	a. Are training records maintained for each employee?	Personal Training Records	<p>Evidence of training for key persons were verified and sighted and the hard copy records were maintained for each employee such as for Mr Andry P. Ginting as AK3U (OHS expert) for BPRE and Mr Adi Irawan as AK3U (OHS expert) for BPT. The records were back-up internally by the local computer system.</p> <p>The training which has been completed by each person was recorded in Personnel Training Records. Training realisation records are sighted such as hazardous substance handling training, safety officer, pesticides training, etc.</p>	YES

**PRINCIPLES 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY**

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
5.1	<p>Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p> <p><b>Guidance:</b>  <i>Report on environmental management and monitoring may be in the form of RKL &amp; RPL reports in accordance with the provisions of AMDAL and/or other documents as required in the Environmental Management System (ISO 14000). For environmental aspects which have not yet been included in the Environmental Impact Analysis document (in accordance with government regulation), such as Greenhouse Gas, High Conservation Value, a study may be conducted separately and in accordance with the requirements of the RSPO Principles and Criteria.</i>  <i>If there are impacts identified, that may change the on-going operations, the company should implement corrective actions on the operational practices within this specified period.</i>  <i>Document of environment impact assessment is the environment document based on the existing regulations, such as:</i></p> <ol style="list-style-type: none"> <li>a. <i>Environmental Impact Assessment (Analisis Mengenai Dampak Lingkungan Hidup/AMDAL) for plantation with areas of &gt; 3000 Ha</i></li> <li>b. <i>Environmental Management Effort (Upaya Pengelolaan Lingkungan Hidup/UPL) and Environmental Monitoring Effort (Upaya Pemantauan Lingkungan Hidup/UKL) for plantation with areas of &lt; 3000 Ha.</i></li> <li>c. <i>Environmental Management Document (Dokumen Pengelolaan Lingkungan Hidup/DPLH)</i></li> <li>d. <i>Environmental Evaluation Document (Dokumen Evaluasi Lingkungan Hidup/DELH)</i></li> <li>e. <i>Environmental Information Performance (Penyajian Informasi Lingkungan Hidup/PIL)</i></li> <li>f. <i>Environmental Evaluation Performance (Penyajian Evaluasi Lingkungan Hidup/PEL)</i></li> <li>g. <i>Environmental Evaluation Study (Studi Evaluasi Lingkungan Hidup/SEL)</i></li> <li>h. <i>Environment Management and Monitoring Document (Dokumen Pengelolaan dan Pemantauan Lingkungan Hidup/DPPL)</i></li> <li>i. <i>Declaration Letter for Managing and Monitoring Environment (Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL)</i></li> <li>j. <i>And others recognised by the government.</i></li> </ol> <p><i>Bearing in mind the potential impacts of the development activities to the environment, it is important for the following environmental characteristics to be taken into consideration:</i></p> <ol style="list-style-type: none"> <li>a. <i>Environment components where their functions will be sustainably preserved and protected, particularly:</i> <ul style="list-style-type: none"> <li>• <i>Protected forest, conservation forest, and biosphere reserve;</i></li> <li>• <i>Water sources;</i></li> <li>• <i>Biodiversity;</i></li> <li>• <i>Air quality;</i></li> <li>• <i>Natural and cultural heritage;</i></li> <li>• <i>Environmental comfort;</i></li> <li>• <i>Cultural values in harmony with the environment</i></li> </ul> </li> <li>b. <i>Environment components which may structurally change and these changes are considered significant by the communities surrounding the operational areas, such as:</i> <ul style="list-style-type: none"> <li>• <i>Ecosystem function(s);</i></li> <li>• <i>Land ownership and tenure;</i></li> </ul> </li> </ol>			



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	<ul style="list-style-type: none"> <li>• Job and business opportunities;</li> <li>• Community's standard of living;</li> <li>• Public health</li> </ul>		<p>The company shall submit the required periodical environmental management implementation and monitoring report to the relevant authorities. The company is responsible for providing sufficient objective evidence to the audit team demonstrating full compliance to the Environmental Impact Assessment (AMDAL) requirement covering all aspects of plantation and mills operations, as well as incorporating all changes recorded over that period of time.</p> <p>The environmental impact assessment should cover the following activities, where they are undertaken:</p> <ol style="list-style-type: none"> <li>a. Building new roads, processing mills or other infrastructure;</li> <li>b. Putting in drainage or irrigation systems;</li> <li>c. Replanting and/or expansion of planting areas;</li> <li>d. Management of mill effluents (Criterion 4.4);</li> <li>e. Clearing of remaining natural vegetation;</li> <li>f. Management of pests and diseases by controlled burning (referred to clause 11 of Government Regulation No. 4 year 2001 (Criteria 5.5 and 7.7).</li> </ol> <p>Impact assessment can be a non-restrictive format e.g. ISO 14001 EMS and/or EIA report incorporating elements spelt out in this Criterion and raised through stakeholder consultation.</p> <p>Environmental impacts may be identified on soil and water resources (criteria 4.3 and 4.4), air quality (criterion 5.6), greenhouse gases calculation analysis, biodiversity and ecosystems, and people's amenity (Criterion 6.1), both on and off-site.</p> <p>Stakeholder consultation has a key role in identifying environmental impacts. The inclusion of consultation should result in improved processes to identify impacts and to develop any required mitigation measures.</p> <p>For smallholder schemes, the scheme management has the responsibility to undertake impact assessment and to plan and operate in accordance with the results (refer to 'Guidance on Scheme Smallholders', July 2009 or its endorsed final revision).</p> <p>The Strategic Environment Study Result (KLHS) by the government, shall be placed as main consideration while conducting replanting</p> <p>Regulations related to the environment documents, are such as:</p> <ol style="list-style-type: none"> <li>1. Government Regulation (PP) No. 27 of 2012 regarding Environment Permit</li> <li>2. Regulation of the Minister of Environment No. 13 year 2010 regarding Environment Management and Monitoring Effort (UKL-UPL) and Environment Management and Monitoring Effort (UKL-UPL) and Declaration Letter for Managing and Monitoring Environment (SPKL)</li> <li>3. Regulation of the Minister of Environment No. 5 year 2012 regarding Environment Evaluation Document (DELH)</li> <li>4. Regulation of the Minister of Environment No. 14 year 2010 regarding Environment Management and Monitoring Document (DPPL)</li> <li>5. Regulation of the Minister of Environment No. 12 year 2007 regarding Environment Management and Monitoring Document for Business and or Activities, with Absence of Environment Management Document.</li> <li>6. Regulation of the Minister of Environment No. 5 year 2012 regarding Types of Business Obligated to Have AMDAL</li> <li>7. Regulation of the Minister of Environment No. 17 year 2012 regarding Involvement of Community and Information Transparency in the AMDAL Process</li> <li>8. Regulation of the Minister of Environment No. 8 year 2006 regarding Guidance for AMDAL Preparation</li> <li>9. Decree of the Head of Bapedal No. No. 299 of 1996 regarding Technical Guidance of Social Aspects Study in Establishing AMDAL</li> <li>10. Regulation of the Minister of Environment No. 11 year 2008 regarding Competence Requirements for AMDAL Preparation Documents and Requirements for Training Institutions</li> </ol>	



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	<p><i>in Conducting Training for AMDAL competence.</i></p> <p>11. Regulation of the Minister of Environment No. 15 year 2013 regarding Measurement, Reporting and Verification for Mitigation Action of Climate Change                      In the Regulation of the Minister of Environment No. 14 year 2010, the environment document is a document covering environment management and monitoring, and may be in the form of AMDAL, Environment Management and Monitoring Efforts (UKL-UPL), Declaration Letter for Managing and Monitoring Environment (SPKL), Environment Management and Monitoring Document (DPPL), Study to Evaluation on the Environment Impacts (SEMDAL), Environment Evaluation Study (SEL), Environment Information Performance (PIL), Environment Evaluation Performance (PEL), Environment Management Document (DPLH), Environment Management and Monitoring (RKL-RPL), Environment Evaluation Document (DELH), and Environment Audit.</p>			
5.1.1	(M) Environmental impact assessment document(s) shall be available.			
	<p>a. Has an EIA been conducted according to the scope of operation covering at minimum the following:</p> <ul style="list-style-type: none"> <li>• Building new roads, processing mills or other infrastructure;</li> <li>• Putting in drainage or irrigation systems;</li> <li>• Replanting and/or expansion of planting areas;</li> <li>• Management of mill effluents (Criterion 4.4);</li> <li>• Clearing of remaining natural vegetation;</li> <li>• Management of pests and diseased palms by controlled burning (Criteria 5.5 and 7.7).</li> </ul> <p>b. Has the EIA been conducted and documented according to local requirements?</p> <p>c. Does the assessment include consultation with relevant stakeholders to identify impacts and to develop any mitigation measures?</p>	<ul style="list-style-type: none"> <li>• Document ANDAL and RKL RPL approved by Ministry of Agriculture No.046/ANDAL/RKL-RPL/BA/II/1996 date 16 February 1996</li> <li>• Environmental aspect identification and evaluation procedure - SOP/SMART/LEMS-EHSD/SADV/II/001</li> <li>• Environmental aspect and impact identification and evaluation form (F/SMART/LEMS-EHSD/SADV/001/001) updated 8 July 2017</li> <li>• RKL RPL report per semester that consist of analysis of waste water quality, flow rate, air emissions measured by third party</li> </ul>	<p>Initial Environmental Impact Assessment Document (ANDAL) of Bukit Perak Mill and Estates was approved by Ministry of Agricultural on 18<sup>th</sup> of February 1996, covered Bukit Perak Estate, Bukit Permata Estate, and Bukit Perak Mill.</p> <p>The EIA has been conducted and documented according to local requirements and include consultation with relevant stakeholders to identify impact and to develop any mitigation measures. The result of consultation and the mitigation measures were stated at EIA. Bukit Perak Mill and Estates have ensured that all activities with significant environmental impacts were managed. Control measure were defined and implemented for ensuring that negative environmental impact were prevented or mitigated. The implementation of those control measures are monitored during monthly environmental patrol and also round of internal audits. The evident sighted regarding stakeholder consultations include government and public as the minutes of meeting within the documented of EIA.</p> <p>For internal environmental aspect and evaluated its impact document, the information of environmental aspect and impact was reviewed and updated at least once a year based on Environmental Management System ISO 14001:2004. Last review and update of environmental aspect and impact register was performed on 8 July 2017.</p> <p>Document of environmental impact assessment covered:</p> <ul style="list-style-type: none"> <li>• Water resources</li> <li>• Biological diversity</li> </ul>	YES

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			<ul style="list-style-type: none"> <li>• Air quality</li> <li>• Environment quality</li> <li>• Economic, social and culture</li> <li>• Building new roads, processing mills or other infrastructure;</li> <li>• Putting in drainage or irrigation systems;</li> <li>• Replanting and/or expansion of planting areas;</li> <li>• Management of mill effluents;</li> <li>• Clearing of remaining natural vegetation;</li> <li>• Management of pests and diseases palms by controlled burning;</li> <li>• Result of stakeholder consultation</li> </ul> <p>Implementation of EIA is reported six monthly and sent to Bangka Barat District Environmental Agency, Bangka Belitung Province Environmental Agency, and Ministerial Office Environment. Receipt note was also sighted. Observation was sighted for semester I and II 2016 and semester I 2017.</p>	
5.1.2	Environment management plan document to prevent negative impacts, its implementation report and revision (if the identification of impact requires changes in current company's practices) shall be available. The company's management shall appoint the responsible person(s) for the implementation of the document.			
	<p>a. Is there an environmental management plan in place?</p> <p>b. Is the environmental management plan documented to include the following:</p> <ul style="list-style-type: none"> <li>• Identification of responsible person(s);</li> <li>• Potential impacts from current practices;</li> <li>• Measures to mitigate negative impacts;</li> <li>• Timetable for change (where changes in current practices are required).</li> </ul> <p>c. Has the environmental management plan been implemented?</p>	<ul style="list-style-type: none"> <li>• SOP/SMART/LEMS-EHSD/SADV/II/003 Environmental Monitoring</li> <li>• Environmental aspect and impact identification and evaluation form (F/SMART/LEMS-EHSD/SADV/001/001) updated 8 July 2017</li> <li>• Environmental management plan 2017</li> <li>• EIA document of Bukit Perak</li> </ul>	<p>Bukit Perak Mill and Estates implemented procedure for identifying environmental aspect and evaluating its impact based on Environmental Management System ISO 14001. As required by the procedure, the information of environmental is reviewed and updated regularly. Last review and update of environmental aspect and impact register was performed on 8 July 2017. The responsible person appointed was Environmental Officer.</p> <p>Bukit Perak Mill and Estates has ensured that all activities with significant environmental impacts were managed. Control measure were defined and implemented for ensuring that negative environmental impact were prevented or mitigated. There were several types of control measures defined: engineering control, administrative control and end of treatment. The implementation of those control measures are monitored during monthly environmental</p>	YES

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		<p>Mill and Estates</p> <ul style="list-style-type: none"> <li>RKL RPL report semester I and II 2016 and semester I 2017</li> </ul>	<p>patrol and also round of internal audits.</p> <p>There were environmental management plan year 2017, some program has been implemented such as WWTP management with mud dredging regularly, circulation of POME, POME treatment; planted vetiver grass in river border; regular maintenance to heavy equipment to reduce air pollution; control domestic waste water, etc. There were no significant changes required in current practices as a result of identification and evaluation of environmental aspect and impact. The environmental management plan (RKL-RPL) was reported periodically to BLH Bangka Barat Regency, BLH Bangka Belitung Province and cc to Ministry of Environmental (KLH). Receipt note was also sighted.</p> <p>The company was conducting the RKL RPL revision related to monitoring period of river water quality, but it still under reviewed by local government.</p>	
5.1.3	Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly basis.			
	<p>a. Does the plan incorporate a monitoring protocol?</p> <p>b. Is the monitoring protocol adaptive to operational changes?</p> <p>c. Is the monitoring protocol implemented to monitor the effectiveness of the mitigation measures?</p> <p>d. Is the plan reviewed at a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts?</p>	<ul style="list-style-type: none"> <li>Environmental management plan 2017</li> <li>SOP/SMART/LEMS-EHSD/SADV/II/003 Environmental Monitoring</li> <li>Environmental Aspect Impact Register 2017</li> <li>EIA document of Bukit Perak Mill and Estates</li> <li>RKL RPL report semester I and II 2016 and semester I 2017</li> </ul>	<p>Bukit Perak Mill and Estates has identification the environmental aspect and impact assessment and reviewed regularly (last reviewed 8 July 2017). The plan was include monitoring that adaptive to operational changes and effective of the mitigation measures. The plan based on RKL RPL that covered:</p> <ul style="list-style-type: none"> <li>Monitoring air ambience quality and noise 6 monthly</li> <li>Monitoring surface water quality of Lagok river every 3 months</li> <li>Monitoring erosion rate at area with slope &gt;16% and sedimentation annually</li> <li>Potential of fire every 6 months</li> <li>Air emission quality from vehicle</li> <li>Monitoring control wheel every 6 months</li> </ul>	<p>NO</p> <p>(minor NCR 2017 – 04)</p>

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			<ul style="list-style-type: none"> <li>• Monitoring society perception annually</li> <li>• Monitoring flora and fauna</li> </ul> <p><b>Minor Non-conformance 2017-04:</b></p> <p>It was observed that monitoring surface water quality (river quality) was done every 6 months and it was not in accordance with RKL RPL matrix that river quality must be monitor every 3 months.</p>	
5.2				

The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.

**Guidance:**

*This information gathering should include checking available biological records and consultation with relevant government departments, research institutes and interested NGOs if appropriate. Depending on the biodiversity values that are present, and the level of available information, some additional field survey work may be required.*

*Wherever HCV benefits can be realised outside of the management unit, collaboration and cooperation between other growers, governments and organisations should be considered.*

*Sanctions in the protected wildlife case, may be taken through law enforcement in line with the existing regulations. The company should determine type of sanctions, based upon SOP or policy of the company, considering level of violations (capture, harm, keep, and kill) and category of the species (rare, endangered, and threatened).*

*National regulations related to the protection of habitat and species, such as:*

1. Act No. 5 year 1990 regarding Conservation on Biodiversity and its Ecosystems
2. Act No. 16 year 1992 regarding Quarantine for Animals, Fish and Plants
3. Act No. 5 year 1994 regarding Ratification of the United Nations on Convention to Biodiversity
4. Government Regulation No. 13 year 1994 regarding Wildlife Hunting
5. Government Regulation No. 68 year 1998 regarding Areas of Natural Sanctuary and Natural Conservation
6. Government Regulation No. 7 year 1999 regarding Preservation of Flora and Fauna (List of Protected Flora and Fauna is on the annex).
7. Regulation of the Minister of Forestry No.: P.48/Menhut-II/2008 regarding Guideline of Conflict Resolution between Human and Wildlife
8. Presidential Decree No. 43 year 1978 regarding Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) ratification.

*Growers need to consider a variety of land management and tenure options to secure HCV management areas in ways that also secure local people's rights and livelihoods. Some areas are best allocated to community management and secured through customary or legal tenures in certain period. In other cases, co-management options can be considered. Where communities are asked to relinquish rights so that HCVs can be maintained or enhanced by the companies or State agencies, then great care needs to be taken to ensure that communities retain access to adequate land and resources to secure their basic needs; all such relinquishment of rights must be subjected to their free, prior, and informed consent (see Criteria 2.2 and 2.3).*

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5.2.1	<p>(M) Record(s) on the results of High Conservation Value (HCV assessment) that includes both the planted area and the relevant wider landscape-level considerations (such as wildlife corridors) shall be available</p> <p><b>Specific Guidance:</b> This information will cover:</p> <ul style="list-style-type: none"> <li>• Presence of protected areas that could be significantly affected by the grower or miller;</li> <li>• Conservation status (e.g. IUCN status), legal protection, population status and habitat requirements of rare, threatened, or endangered (RTE) species that could be significantly affected by the grower or miller;</li> <li>• Identification of HCV habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower or miller;</li> </ul> <p>HCV Identification may be conducted internally (by the company, where the team leader shall be registered in the HCVRN-Assessors Licensed Scheme (ALS), through peer-review by the competent experts, prepared in accordance to the common Guidance for the identification of HCV 2013. If the company has no expert for assessing certain HCV type(s), then it may use the external assessor(s). The HCV assessor team needs to have experience in the assessed ecosystem to minimise inaccuracy risk of the HCV assessment. If possible, each external assessor who comes from outside the assessed areas should cooperate with the local or regional expert(s). The HCV report shall describe the composition and qualification of the assessor team in biological and social aspects.</p>			
	<p>a. Has a High Conservation Value (HCV) assessment been conducted and cover the following:</p> <ul style="list-style-type: none"> <li>• Presence of protected areas that could be significantly affected by the grower or miller;</li> <li>• Conservation status (e.g. IUCN status), legal protection, population status and habitat requirements of rare, threatened, or endangered (RTE) species that could be significantly affected by the grower or miller.</li> <li>• Identification of HCV habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower or miller;</li> </ul> <p>b. Was the HCV assessment performed by a qualified HCV assessor?</p>	<ul style="list-style-type: none"> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Field visit in HCV area</li> <li>- Evidences of public consultation to stakeholder in 2017</li> </ul>	<p>HCV assessment has been conducted and documented in the "Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</p> <p>HCV Assessment was conducted on 26 to 28 November 2010 internally using HCV Toolkit Indonesia 2008. The team consist of four members as following :</p> <ol style="list-style-type: none"> <li>1. Norman FM (Team leader: Ecological habitat)</li> <li>2. Nugroho Revelation W (Environmental Services)</li> <li>3. Dede M. Nasir (Ecology of flora and fauna)</li> <li>4. Yosaphat Ardilla (Social, economic and cultural)</li> </ol> <p>All of them list as HCV RSPO approved assesor.</p> <p>Based on the assessment report, in Bukit Perak and Bukit Permata Estate there are three (3) types of HCV been identified such as HCV 1.2 (Endangered Species), HCV 4.1 (riparian area) and HCV 6 (cemetery) cover total area of 116.38 Ha.</p>	YES

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	<p>c. Was the HCV assessment performed in consultation with relevant stakeholders?</p> <p>d. Does the HCV assessment include checking of available biological records?</p> <p>e. Does the HCV assessment include both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors)?</p> <p>f. Was the HCV assessment performed in accordance to the latest methodology available at global and national level?</p> <p>g. Are identified HCVs mapped?</p>		<p>Has been identified seven (7) protected wildlife species (based on PP No. 7/1999) such as Cekakak sungai (<i>Todirhampus chloris</i>), Kuntul kerbau (<i>Bubulcus ibis</i>), Elang tikus (<i>Elaenus caeruleus</i>), Cangak laut (<i>Ardea sumatrana</i>), Pelanduk (<i>Tragulus javanicus</i>), Macan akar (<i>Prionailurus bengalensis</i>) and Kijang (<i>Muntiacus muntjak</i>); five (5) wildlife species are listed as Appendix II (based on Appendix CITES) such as Monyet ekor-panjang (<i>Macaca fascicularis</i>), Biawak (<i>Varanus salvator</i>), Ular kobra (<i>Naja sumatrana</i>), Ular sanca (<i>Python reticulatus</i>) and Macan akar (<i>Prionailurus bengalensis</i>); one species that listed as Vulnerable in redlist IUCN, Babi hutan (<i>Sus barbatus</i>). HCV assesments results have been compared to <i>Peta Penutupan Lahan dan Deforestasi Provinsi Kep. Bangka Belitung tahun 2003-2006</i>, Bidoiversity status of Kep. Bangka Belitung and Citra Landsat of PT. Bumi Permai Lestari plantation area.</p> <p>HCV public consultation was held in May, 11<sup>st</sup> 2012 in Long house Bukit Intan Estate, PT. BPL. Attended by 25 peoples such as local authorities, local communities and company representative.</p> <p>HCV area has been mapped into "<i>Peta Nilai Konservasi Tinggi Areal PT Bumi Permai Lestari Bukit Perak dan Bukit Permata Estate</i>" scale : 1:55.000</p> <p>Reports the identification results have been reviewed by internal management and peer review by Resit Sozer (Independent Consultant). Records of the results of the review and improvement recorded in the report (annex).</p> <p>Assessment conducted on the whole plantation that has been embedded and the areas around the plantation include rivers, forests, and others.</p> <p>In accordance to RSPO P&amp;C INA-NI 2016, Executive Summary of HCV Assessment PT Bumi Sawit Permai have been socialized to :</p> <ul style="list-style-type: none"> <li>• Bangka Belitung University on 11 April 2017</li> <li>• Environmental Agency of Bangka Barat District on 8 March</li> </ul>	

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			2017 <ul style="list-style-type: none"> <li>• Forestry and Plantation Agency of Bangka Barat on 1 March 2017</li> <li>• Police Sectoral Office Kecamatan Kelapa on 2 March 2017</li> <li>• Koramil Kecamatan Kelapa on 2 March 2017</li> <li>• Camat Kelapa on 2 March 2017</li> <li>• BKSDA Province on 4 April 2017</li> </ul> It was informed that in Bangka Belitung no local NGO.	
5.2.2	<p>(M) Where rare, threatened or endangered (RTE) species or other HCVs are present or affected by the plantation and mill operations, an appropriate measures that are expected to maintain or enhance them shall be implemented through a management plan.</p> <p><b>Specific Guidance:</b>  <i>These measures will include:</i></p> <p>a. Ensuring that any legal requirements relating to the protection of the species or habitat are met;</p> <p>b. Avoiding damage to and deterioration of HCV habitats such as by ensuring that HCV areas are connected, corridors are conserved, and buffer zones around HCV areas are created;</p> <p>c. Controlling any illegal or inappropriate hunting, fishing or collecting activities, and developing responsible measures to resolve human-wildlife conflicts (e.g. incursions by elephants)</p> <p>d. Improving HCV, if possible, through management options, such as habitat enrichment.</p>			
	<p>a. Are HCVs and/or RTEs present?</p> <p>b. If HCVs and/or RTEs are present, has a management plan containing appropriate measures that are expected to maintain and/or enhance them been prepared? The measures should include the following:</p> <ul style="list-style-type: none"> <li>• Ensuring that any legal requirements relating to the protection of the species or habitat are met;</li> <li>• Avoiding damage to and deterioration of HCV habitats such as by ensuring that HCV areas are connected, corridors are conserved, and buffer zones around HCV areas are created;</li> </ul>	<ul style="list-style-type: none"> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Monitoring reports</li> <li>- Patrol reports</li> <li>- Sozialitation records to employees and stakeholder</li> </ul>	HCV assessment results in the area of PT BPL identified HCV areas as follows: <ol style="list-style-type: none"> <li>1. HCV 1.1 Areas that Contain or Provide Biodiversity Support Function to Protection or Conservation Areas and HCV 4.1 Areas or Ecosystems Important for the Provision of Water and Prevention of Floods for Downstream communities                             <ul style="list-style-type: none"> <li>• BPTe : Keranak River (32.83 ha), Kabu River and Duku River (28.06 ha);</li> <li>• BPRe: Legok River (28.41 ha), Melanjai River (15.74 ha), Reservoir in block D49 (11.34 ha)</li> </ul> </li> <li>2. HCV 1.2 area that contains critically endangered species such as:</li> </ol>	YES



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	<ul style="list-style-type: none"> <li>• Controlling any illegal or inappropriate hunting, fishing or collecting activities, and developing responsible measures to resolve human-wildlife conflicts (e.g. incursions by elephants).</li> </ul> <p>c. Are the measures contained in the management plan actively implemented to maintain and/or enhance HCV values?</p> <p>d. Are the HCV values and the presence of RTEs periodically monitored?</p> <p>e. Are the field inspections conducted regularly to ensure implementation of mitigation plan (especially along areas bordering natural area)?</p>		<ul style="list-style-type: none"> <li>• Keranak River in BPTe, there was a protected species identified namely Cekakak (<i>Todirhampus chloris</i>)</li> <li>• Reservoir in Block D-49 BPRE, there was a protected species, namely: Kuntul kerbau (<i>Bubulcus ibis</i>), Cangak abu (<i>Ardea cinerea</i>)</li> </ul> <p>3. HCV 6, the area of local cultural identity in the form of sacred tombs in Block H24 BPTe, Block E50, G53 and F67 in BPRE</p> <p>The area of HCV identified in BPTe was 60.89 ha and 55.49 ha in BPRE.</p> <p>To manage and monitor the areas identified HCVs in PT BPL, the company has establish the management plan HCV which created yearly in the "Management plan annual HCV" BPRE and BPTe 2016 and 2017. HCV management program BPRE and BPTe such as :</p> <ul style="list-style-type: none"> <li>✓ Monitoring and maintenance of HCV attributes (All HCV area)</li> <li>✓ Install and repair boundary markers of HCV (HCV 4.1)</li> <li>✓ Dissemination of HCV to employees and contractors (All HCV area)</li> <li>✓ Dissemination of HCV to the public stakeholders (All HCV area)</li> <li>✓ Training HCV (All HCV area)</li> <li>✓ Monitoring and maintenance of HCV areas (All HCV area)</li> <li>✓ Routine Patrol (All HCV area)</li> <li>✓ Monitoring protected species (HCV 1.2)</li> <li>✓ Planting plants barriers to prevent erosion (HCV 4.1)</li> <li>✓ Monitoring and maintenance of erosion control plants (HCV 4.1)</li> </ul> <p>Evidence of the implementation of the management plan can be demonstrated and well documented. Parameters and indicators of success in achieving HCV management and monitoring program have been established. Some evidence that programs have been</p>	



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			implemented such as: <ul style="list-style-type: none"> <li>- Report of HCV Areas Management and Monitoring PT BPL Semester 1 and 2 year 2016. For semester 1 Y2017, monitoring is in progress.</li> <li>- Report of triwulan HCV monitoring in BPRE period September – December 2016 and period January – June 2017.</li> <li>- Report of triwulan HCV monitoring in BPRE period September – December 2016 and period January – June 2017.</li> <li>- Monthly report of HCV patrol in BPRE period January – July 2017</li> <li>- Monthly report of HCV patrol in BPRE period January – July 2017</li> <li>- Dissemination of HCV to employees on 4 March 2017 and 16 April 2017 (BPRE), attendance and minutes of socialization was available.</li> <li>- Dissemination of HCV to employees on 4 February 2017 and 11 February 2017 (BPRE), attendance and minutes of socialization was available</li> <li>- Dissemination of HCV and protected species to stakeholder in PT BPL on 12 – 14 June 2017 in Balai Desa Dendang, Balai Desa Air Bulin, Balai Desa Kacung,</li> </ul>	
5.2.3	Program(s) to socialize the status of protected, rare, threatened or endangered (RTE) to all workers shall be available, including records of appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species.			
	a. Does the company have policies or rules to protect RTE species? b. Is there a programme to regularly educate the workforce about the status of the RTE species? c. Is there evidence or action taken to implement the rules and programs? E.g. Inspections conducted to check no	<ul style="list-style-type: none"> <li>- Company policy No 002/SMD OPS/II/2009 date 6 January 2009 about Protection of Riparian Buffer Zone</li> <li>- Circulate Letter No 002/SE-SMD OPS/IX/2010 date 20 September 2010 about Protected Wildlife</li> <li>- Internal Memo No 1231/M-</li> </ul>	Internal Memo No 1231/M-Int/MDSP-VIC/XI/11 date 25 November 2011 about Zero Tolerance Policy For Endangered Animal stated: <ul style="list-style-type: none"> <li>a. No keeping, hurting and killing protected wildlife that found in estate and mill</li> <li>b. If anyone keeping the protected wildlife than he/she should report and hand over it to BKSDA</li> <li>c. Violation to this policy will be punish with maximum disciplinary sanction up to authority.</li> </ul>	YES

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	<p>traps/snares put up within or nearby areas.</p> <p>d. Have appropriate disciplinary measures been imposed in accordance with company rules and national law, should any individual working for the company is found to have captured, harmed, collected or killed any RTE species?</p>	<p>Int/MDSP-VIC/XI/11 date 25 November 2011 about Zero Tolerance Policy For Endangered Animal</p>	<p>Penalties under the UU No.5 / 1990 "person who deliberately capture, injure, kill, keep, possess, maintain, transport, and trade in protected animals alive or dead can shall be punished with imprisonment of 5 years and a maximum fine Rp. 100.000.000, - (one hundred million rupiah). Based on field observation and workers interview, they know about this rule.</p> <p>HCV Monitoring Form has been filled monthly by a skilled and trained HCV operators. In PT BPL, there are three HCV operators, such as :</p> <ul style="list-style-type: none"> <li>a. Mr. Dwi Listiawan (HCV PIC BPRE), assignment letter assigned by Estate Manager, Mr. Suharto, letter No. 012/EM-BPRE/VIII/2015 dated 9 November 2015</li> <li>b. Mr. Duwi Syahputra (HCV PIC BPTE), assignment letter by Estate Manager, Mr. Riyanto, letter No. 001/EM-BPTE/I/2016 dated 9 January 2016</li> <li>c. Mr. Sukarno Sanipan (HCV Security), assignment letter by Estate Manager, Mr. Suprpto and Mr. H Kolyubi Maurie, letter No. 014/EM-BPTE/VIII/2014 dated 12 August 2014 and letter No. 012/EM-BRTE/VIII/2014 dated 12 August 2014</li> </ul> <p>Job descriptions for HCV operators are :</p> <ul style="list-style-type: none"> <li>a. Make HCV areas monitoring program</li> <li>b. Make monitoring program for protected flora fauna</li> <li>c. Coordinate with HCV field officer in HCV management and monitoring</li> <li>d. Reporting of HCV management and monitoring to Manager</li> <li>e. Evaluate the compliance of laws and other requirements</li> </ul> <p>HCV operators have been trained by Mr. Harun Surbekti (EHSD JKT) in 18 January 2016 and every year re-trained. For Y2017, HCV operators have been trained on 3 February 2017. The realization of programme was well recorded and has been verified during the</p>	

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			assessment.	
5.2.4	<p>Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan.</p> <p><b>Specific Guidance:</b>  <b>For 5.2.4:</b> <i>The result of HCV monitoring may become considerations while reviewing HCV management plan.</i></p>			
	<p>a. Does the management plan contain ongoing monitoring of status of HCV and RTE species that are affected by plantation or mill operations?</p> <p>b. Is the status documented and reported?</p> <p>c. Are the outcomes of monitoring fed back into the management plan?</p>	<ul style="list-style-type: none"> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Monitoring reports</li> <li>- Patrol reports</li> <li>- Sozialitation records to employees and stakeholder</li> </ul>	<p>Monitoring of HCV was conducted once a week, such as :</p> <ul style="list-style-type: none"> <li>- Monitoring of HCV attributes (Sign Boards Conditions)</li> <li>- Monitoring of HCV conditions from any disturbance both internal and external factor (HCV area conditions)</li> <li>- Monitoring of Animals and protected animals (recapitulation encounter animals in 1 month)</li> <li>- HCV Patrol Schedule (Schedule team to monitor the condition and attributes HCV)</li> </ul> <p>The status of HCV and RTE species that are affected by plantation or mill operations was well monitored, documented and reported routinely.</p> <p>Monitoring results show that the conditions of HCV area and HCV attributes were in good condition and there were no destructive activities in HCV area.</p> <p>Monitoring results of proteceded animals (PP No. 7 year 1999, RTE species, Apendix 1 CITES) was well documented every month. Recapitulation of wildlife existence semester 1 and 2 year 2015 :</p> <ul style="list-style-type: none"> <li>- Cekakak sungai (<i>Todirhamphus chloris</i>) was seen in Semester 1 and 2</li> <li>- Elang tikus (<i>Elanus caeruleus</i>) was seen in Semester 1 and 2</li> <li>- Kuntul Kerbau (<i>Bubulcus ibis</i>) was seen in Semester 1 and 2</li> <li>- Cangak Abu (<i>Ardea cinerea</i>) was seen in Semester 1 and 2</li> <li>- Cekakak belukar (<i>Halcyon smyrnensis</i>) was seen in Semester 1</li> </ul>	YES

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			and 2 - Raja-udang meninting ( <i>Alcedo meninting</i> ) was seen in Semester 1 and 2 - Monyet-ekor panjang ( <i>Macaca fascicularis</i> ) was seen in Semester 1 and 2 - Macan akar ( <i>Felis bengalensis</i> ) was seen in Semester 1 and 2 - Biawak ( <i>Varanus salvator</i> ) was seen in Semester 1 and 2  Result of monitoring gives the feedback into the management plan improvement. The results from monitoring of wildlife, environmental, and socio-cultural services gives feedback advice and recommendations to the management plan, i.e.: - Fauna monitoring need to support by adequate equipment such as GPS, binocular and field guide - Riparian buffer zone rehabilitation with local plant and prepare nursery for rehabilitation - Improve the socialization to the employees and local community	
5.2.5	Where HCV areas overlapped with an identified local community's land, there shall be evidence of a negotiated agreement that optimally safeguard their HCVs and the local community's rights  <b>Specific Guidance:</b> For 5.2.5: If a negotiated agreement cannot be reached, there should be evidence of sustained efforts to achieve such an agreement. These could include third party arbitration (see Criteria 2.3, 6.3 and 6.4).			
	a. Is there HCV set-asides with existing rights of local communities? b. Who are the affected communities? c. Is the identified HCV areas mapped? d. Is there evidence of stakeholder consultation and negotiated agreement, in accordance to	Document management cooperation with the local community (figure from Kacung village, Air Bulin Village, Dendang Village and Terentang Village) for management shrine grave in 2014 and 2015.	There was HCV 6 identified in the concessions PT BPL in the form of shrine graves. Maintenance and protection of graves area has been agreed with the local community. PT BPL facilitating to conduct care and maintenance of graves and community were not forbidden to visit or access the areas of HCV (shrine graves).  Company has made an agreement with the villagers and public figure from Kacung village, Air Bulin Village and Dendang Village for	YES

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	<p>FPIC principles, with local community to optimally safeguard both the HCVs and rights of local communities?</p> <p>e. If a negotiated agreement cannot be reached, is there evidence of sustained efforts to achieve an agreement? Refer to specific guidance for 5.2.5.</p>		<p>maintenance and management of graves in block F50, G53, F67, H24 PT BPL. It was evident by cooperation document for maintain shrine graves in 2014 and 2015 between company and community leaders. Also, verified again during public consultation.</p>	
5.3	<p>Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p> <p><b>Guidance:</b>  <i>The waste management and disposal plan should include measures for:</i></p> <ol style="list-style-type: none"> <li><i>Identifying and monitoring sources of waste and pollution.</i></li> <li><i>Improving the efficiency of resource utilisation and recycling potential wastes as nutrients or converting them into value-added products (e.g. through animal feeding programmes).</i></li> <li><i>Appropriate management and disposal of hazardous chemicals and their containers. Surplus chemical containers should be reused, recycled or disposed of in an environmentally and socially responsible way based on best available practices (e.g. returned to the vendor or cleaned using a triple rinse method) and existing regulations. This is to prevent pollutions to the water sources and risk to human health. The disposal instructions on the manufacturer's labels should be adhered to.</i></li> </ol> <p><i>Use of open fire for waste disposal should be avoided.</i></p> <p><i>Regulations relate to waste management, such as:</i></p> <ol style="list-style-type: none"> <li><i>Government Regulation No. 18 year 1999 regarding Management of Toxic and Hazardous Waste (B3)</i></li> <li><i>Government Regulation No. 85 year 1999 regarding Amendment of Government Regulation No. 18 year 1999 regarding Management of B3 (the annex shows a list of B3 from specific and non-specific sources, expired chemicals, leakage, remaining containers and waste of unspecified products).</i></li> <li><i>Government Regulation No. 82 year 2001 regarding Management of Water Quality and Control of Water Pollution. This includes criteria for water quality, and requirements for utilising and disposing waste water)</i></li> <li><i>Government Regulation No. 81 year 2012 regarding Management of Domestic Waste</i></li> <li><i>Decree of the Minister of Environment No. 51 year 1995 regarding Waste Water Standard for Industries</i></li> <li><i>Decree of the Minister of Environment No. 28 year 2003 regarding Technical Guidance for Study for Utilising Palm Oil Mill Effluent (POME) on Oil Palm Plantation.</i></li> <li><i>Decree of the Minister of Environment No. 29 year 2003 regarding Guidance for Permit Requirements and Administration for Utilising POME on Oil Palm Plantation</i></li> <li><i>Decree of the Minister of Environment No. 112 year 2003 regarding Domestic Waste Water Standard</i></li> <li><i>Decree of the Head of Bapedal No. 255/Bapedal/08/1996 regarding Procedure and Requirements for Storing and Collecting Used Oil</i></li> <li><i>Guidance for Use of Pesticides, Directorate General of Infrastructure and Facilities, Ministry of Agriculture, 2011</i></li> </ol>			
5.3.1	(M) A documented identified source of all waste and pollution, shall be available.			
	<p>a. Is there a registry/list of waste products produced?</p>	<ul style="list-style-type: none"> <li>SOP/SMART/LEMS-EHSD/SADV/II/002 – Waste</li> </ul>	<p>Identification of waste and pollution sources from Bukit Perak Mill and Estates activities was evident. The source of pollution, type and</p>	<p>YES</p>

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	<p>b. Is there a registry/list of pollution sources?</p>	<p>Management Procedure</p> <ul style="list-style-type: none"> <li>List of environmental aspect and evaluation year 2017</li> </ul>	<p>control method of waste was recorded at SOP/SMART/LEMS-EHSD/SADV/II/002 – waste management procedure.</p> <p>The waste products from estate generally were domestics waste and also several hazardous waste from estate operations activities as detailed below (but not limited):</p> <ul style="list-style-type: none"> <li>✓ Ex-pesticides containers (bottles and jerry cans)</li> <li>✓ Used battery from the heavy vehicles</li> <li>✓ Plastics</li> <li>✓ Medical waste (first aid usage)</li> <li>✓ Polybag</li> <li>✓ Rags and fertilizer containers</li> <li>✓ Emissions from vehicles</li> <li>✓ Welding materials from workshop activities</li> <li>✓ Lubricants from workshop materials</li> <li>✓ Contaminated rags from workshop activities</li> <li>✓ Usage lamps</li> <li>✓ Tires</li> </ul> <p>While at the Mill it was several hazardous waste generated from the mill operations, in detailed below (but not limited):</p> <ul style="list-style-type: none"> <li>✓ POME</li> <li>✓ Palm shell</li> <li>✓ Fibre</li> <li>✓ Empty bunch</li> <li>✓ Boiler ash</li> <li>✓ Chemicals jerry can and bottles</li> <li>✓ Gunny sacks from chemicals materials</li> <li>✓ Sacks resulted from fertiliser materials</li> <li>✓ Welding materials from workshop activities</li> <li>✓ Lubricants from workshop materials</li> <li>✓ Contaminated rags from workshop activities</li> <li>✓ Usage lamps</li> <li>✓ Tires</li> <li>✓ Usage batteries</li> </ul>	

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			<ul style="list-style-type: none"> <li>✓ Usage oil filters</li> <li>✓ Emissions from vehicles and other engines (generator, boilers)</li> </ul> <p>In addition, sources of pollution and waste were also documented in the list of environmental aspects and environmental impacts evaluation year 2017. The document described the sources of waste and pollution and the control techniques for significant impacts on important environmental aspects.</p>	
5.3.2	(M) There shall be evidence that all chemicals and their empty containers are disposed of responsibly			
	<p>a. Is there an inventory of chemicals and their containers that are used and kept on site?</p> <p>b. How are chemicals and their containers stored and disposed off? Is it in accordance to best practices? (as prescribed by manufacturers' labels, local requirement, national or international best practice)</p> <p>c. Are collection and disposal records of chemicals and their containers maintained?</p>	<ul style="list-style-type: none"> <li>• SOP/SMART/LEMS-EHSD/SADV/II/002 – Waste Management Procedure</li> <li>• SOP/SPO/SMART/LH-18 Rev 1 – hazardous waste management procedure</li> <li>• Record of hazardous and non-hazardous waste</li> <li>• Hazardous waste manifests</li> <li>• Observation to temporary storage of hazardous waste at mill and estates</li> <li>• Permit of temporary storage of hazardous waste for Bukit Perak Mill and Estates</li> <li>• Contract documents with PT Primanru Jaya as the transporter No.237/EHSD/SPK/Pengelolaan LB3/BPL-PJ/XII/2014 date 1 December 2014 valid until 31 December 2017 and processor PT Holcim Indonesia, PT Non</li> </ul>	<p>The disposal methods (hazardous and non-hazardous) were described on documented procedure SOP/SMART/LEMS-EHSD/SADV/II/002 – waste management procedure and SOP/SPO/SMART/LH-18 Rev 1 – hazardous waste management procedure, detailed as follows:</p> <p>Waste category such as:</p> <ol style="list-style-type: none"> <li>1. Hazardous waste (solid and liquid waste)</li> <li>2. Non-hazardous waste, separated for non-organics (economic and non-economic value) and organics</li> </ol> <p>Hazardous waste separated for:</p> <ul style="list-style-type: none"> <li>• Solid waste, such as used rags, used battery, used toner and cartridge, used lamp, used chemical/agrochemical container, medical waste</li> <li>• Liquid waste, such as used oil, chemical expiry</li> </ul> <p>Waste management program was described on F/SMART/LEMS-EHSD/SADV/002/007. Waste management principally:</p> <ol style="list-style-type: none"> <li>1. Reduce, reuse, recycle</li> <li>2. Zero burning</li> <li>3. Disposal</li> </ol> <p>Hazardous waste was stored at hazardous waste temporary storage and managed by licenced vendors/transporter.</p> <p>Disposed methods:</p>	YES

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		<p>Ferindo Utama, PT PPLI, PT Sinkona Indonesia Lestari, PT Karya Nusa Bumi Persada as collector/exploiter of hazardous wastes</p> <ul style="list-style-type: none"> <li>• Contract documents with Bakti Timah Hospital as exploiter medical waste No.26/RSBT/SPK-1200/2017 date 8 June 2017</li> <li>• Permit temporary collect of hazardous waste for PT Primanru Jaya from KLH</li> <li>• Permit of hazardous waste processor for PT PPLI, PT Holcim Indonesia, PT Non Ferindo Utama, PT Sinkona Indonesia Lestari</li> <li>• Permit of hazardous waste transporter recommendation for PT Primanru Jaya from KLH No.S-2197/PSLB3-VPLB3/2015 date 21 October 2015 valid for 5 years</li> <li>• Manifest of disposal hazardous waste for period 2016 and semester I 2017</li> <li>• Log book of empty pesticides and chemical containers period 2016 and semester I 2017</li> <li>• Field observation to</li> </ul>	<ol style="list-style-type: none"> <li>1. TPA/landfill (organics and non-organics)</li> <li>2. TPS B3 managed by licensed vendors</li> <li>3. Reuse</li> <li>4. Burnt as boiler fuel</li> </ol> <p>All empty agrochemical containers were triple rinsed, the jerry can were reused to spraying activities, while bottles containers were stored in the designated area and categorized as hazardous waste (B3). Records of chemical containers quantity disposed were evident. Liquid waste from agrochemical was reused for the next spraying application.</p> <p>Several ex-chemicals materials containers that use at mills and estates operations such as laboratory chemicals ex-containers, boiler additive liquids, lubricants, workshop materials, use battery, medical waste, ex-agrochemical container, used filter, etc. were categorized as hazardous wastes that stored at hazardous waste temporary warehouse (TPS B3) that will be managed by licensed vendor PT. Primanru Jaya for transporter and collector.</p> <p>License of hazardous wastes temporary storage (TPS B3) available for Bukit Perak Mill and Estates from Head of Bangka Barat Regent No.188.45/260/1.08.02/2012 date 28 June 2012 valid for 5 years. There was renewal application letter sent to BLH Bangka Barat Regent No.013/EL/BPL-BLHD//2017 date 26 January 2017. Field verification has been held on 16 March 2017 by BLH Bangka Barat Regent.</p> <p>Manifest of disposal were sighted for 24 February 2016, 19 May 2016, 23 August 2016, 16 November 2016, and 28 February 2017. Others records sighted, such as "Laporan pengelolaan LB3" Period January - December 2016, January – March, and April – June 2017.</p>	



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		<p>Division warehouse, central warehouse, pesticides containers cleaning area, temporary storage of hazardous waste</p>		
5.3.3	A documented waste management plan to avoid or reduce pollution and its implementation shall be available			
	<p>a. Is there a documented waste management and disposal plan to avoid or reduce pollution?</p> <p>b. Does the waste management and disposal plan, at minimum, include measures for:</p> <ul style="list-style-type: none"> <li>• Identifying and monitoring sources of waste and pollution?</li> <li>• Improving the efficiency of resource utilisation and recycling potential of wastes as nutrients or converting them into value-added products (e.g. through animal feeding programmes)?</li> <li>• Appropriate management and disposal of hazardous chemicals and their containers?</li> <li>• Reduction, re-use and recycle of waste?</li> </ul> <p>c. Is there evidence that the plan has been implemented?</p> <p>d. Is there evidence that waste has not been disposed off using open fire?</p>	<ul style="list-style-type: none"> <li>• SOP/SMART/LEMS-EHSD/SADV/I/002 – Waste Management Procedure</li> <li>• Documented Work instruction (F/SMART/LEMS-EHSD/SADV/002/001) regarding hazardous waste and instruction of disposal</li> <li>• Temporary storage of hazardous waste valid permit</li> <li>• Contract documents with PT Primanru Jaya as the transporter and processor PT PPLI, PT Holcim Indonesia, PT Non-Ferindo as collector/exploiter of hazardous wastes</li> <li>• Manifest of disposal hazardous waste for period 2016 and semester I 2017.</li> <li>• Hazardous Waste Balance sheet of LB3 Period 2016, January – March 2017, and April – June 2017</li> <li>• Site visit to estate divisions</li> </ul>	<p>Procedure waste handling including hazardous waste handling has been established and implemented. The procedure required waste to be segregated from point of sources. In addition Mill and Estates also established waste register, which described wastes sources from each activity/location, its classification (organic, inorganic or hazardous), and its disposal, reusing or recycling. EFB was used for fertiliser by composting in Bukit Perak Estate. Fibre and Shell from Bukit Perak Mill was used for boiler feed.</p> <p>It was observed that organic and inorganic waste was segregated at point of source. Mill and Estate including housing has provided waste bin for each type of waste. Organic and inorganic wastes from Mill and Estates including housing were disposed to landfill in the Estate area. Areas of organic and inorganic wastes disposal was far from housing, in the flood-free area and not in swamp area and completed with warning sign not burning wastes. Based on observation there was open and close date at landfill. Landfill was available and observed during audit at block G36 Division II Bukit Permata Estate.</p> <p>Management plan of hazardous waste and instruction of disposal was described in work instruction F/SMART/LEMS-EHSD/SADV/002/001. Hazardous wastes were segregated from point of source prior to be transferred to temporary storage of hazardous waste. Temporary storage of hazardous waste was provided in Bukit Perak Mill, Bukit Perak Estate, and Bukit Permata Estate to collect hazardous waste prior being disposed to licensed vendor. Mill and Estates have had permit of temporary storage of hazardous waste for used oil, used oil filter, and used battery, contaminated goods, chemical and agrochemical packaging and medical waste from Head of Bangka Barat Regent and valid until 3</p>	<p>NO</p> <p>(minor NCR 2017 – 05)</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
		offices and mill operations	<p>years.</p> <p>All empty agrochemical containers were triple rinsed, the jerrycan were reused to spraying activities, while bottles containers were send to the temporary hazardous waste storage (TPS B3). Records of chemical containers quantity disposed were evident. Liquid waste from agrochemical was reused for the next spraying application. While the ex-fertilizer sacks was also rinsed and reuse for harvesting activities. The documented work instruction (F/SMART/LEMS-EHSD/SADV/002/001) was available to define the mechanism how to dispose the ex-agrochemicals containers. Several ex-chemicals materials containers that use at mills operations such as boiler additive liquids, laboratories chemicals was categorized as toxic materials (B3) and send to the temporary hazardous waste storage (TPS B3).</p> <p>Last manifest records were sighted for 24 February 2016, 19 May 2016, 23 August 2016, 16 November 2016, and 28 February 2017 at Bukit Perak Mill, Bukit Perak Estate, and Bukit Permata Estate by transporter PT Primanru Jaya.</p> <p><b>Minor Non-conformance 2017-05:</b></p> <p>Evidence of hazardous waste report to PPE Sumatra period July – September, October – December 2016, January – March, April – June 2017 cannot be shown during audit</p>	
5.4	<p>Efficiency of fossil fuel use and the use of renewable energy is optimised.</p> <p><b>Guidance:</b>  <i>Renewable energy use per tonne of Crude Palm Oil (CPO) or palm product in the mill should be monitored. Direct fossil fuel use per tonne of CPO or Fresh Fruit Bunches (FFB) should be monitored. Energy efficiency should be taken into account in the construction or upgrading of all operations.</i></p> <p><i>Growers and millers should assess the direct energy use of their operations, including fuel and electricity, and energy efficiency of their operations. This should include estimation of fuel use by on-site contract workers, including all transport and machinery operations.</i></p> <p><i>If possible, the feasibility of collecting and using biogas should be studied.</i></p>			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)									
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.												
	<p>a. Is there a plan for improving efficiency of the use of fossil fuels and to optimise renewable energy?</p> <p>b. Has the plan been implemented and is it monitored?</p> <p>c. Does the monitoring system encompass the following :</p> <ul style="list-style-type: none"> <li>• Renewable energy use/tCPO or palm product;</li> <li>• Direct fossil fuel use/tCPO or tFFB;</li> <li>• Estimated fuel use by on-site contract workers and transport and machinery operations;</li> <li>• Electricity use in operations.</li> </ul> <p>d. Was energy efficiency taken into account during the construction or upgrading of all operations?</p> <p>e. Has studies on the feasibility of collecting and using biogas been carried out?</p>	<ul style="list-style-type: none"> <li>• Records of fossil fuel consumption 2016 and 2017</li> <li>• Records of renewable energy (fibre and shell) consumption 2016 and 2017</li> <li>• Report of environmental monitoring implementation</li> </ul>	<p>Bukit Perak mill and estates has been develop the programme/plan on how to conduct efficiency for utilization of fossil fuel by develop the standard to manage the consumption each of vehicles and electricity generator within litre per hours both for organization owned and contractors; the monitoring conducted by monthly and reported to technical department.</p> <p>There are evident the measurement periodical report include air ambience quality; emissions of vehicles and other engines (boilers, generators, etc.). There was some action to reduce the fuel usage such as with use the fibre and shell for boiler feed. The last measurement was performed on semester I 2017 by Kehati Laboratory. Boiler emission in accordance to PermenLH 7/2007, generator emission in accordance to PermenLH 13/2009, vehicle emission in accordance to PermenLH 5/2006.</p> <p>Also it was developed the plan/programme regarding optimization of renewable energy known as fibre and shell as boiler fuels at mills, monitoring also conducted monthly by calculate the fibre and shell and utilize as boiler fuels whether during the construction or upgrading of all operations.</p> <p>There are monitoring records sighted regarding the utilization of fossils fuels and fibre shell that presented as below:</p> <table border="1" data-bbox="1171 1058 1756 1225"> <thead> <tr> <th>Renewable Energy (Fibre and shell)</th> <th>2016</th> <th>Jan – June 2017</th> </tr> </thead> <tbody> <tr> <td>Fibre (ton)</td> <td>18,320.91</td> <td>9,695.67</td> </tr> <tr> <td>Shell (ton)</td> <td>8,427.62</td> <td>4,460</td> </tr> </tbody> </table> <p>Based on the table it was shown that fibre and shell used for period 2017 (YTD June) is half then period 2016, fibre and shell utilisation was vary depends on FFB processed.</p> <p>Fossil fuel was used for heavy equipment, diesel generator, FFB</p>	Renewable Energy (Fibre and shell)	2016	Jan – June 2017	Fibre (ton)	18,320.91	9,695.67	Shell (ton)	8,427.62	4,460	<p>YES</p>
Renewable Energy (Fibre and shell)	2016	Jan – June 2017											
Fibre (ton)	18,320.91	9,695.67											
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NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)												
			<p>transportation, and contractor user.</p> <table border="1" data-bbox="1171 363 1798 563"> <thead> <tr> <th>Unit Consumer</th> <th>2016</th> <th>Jan – June 2017</th> </tr> </thead> <tbody> <tr> <td>Bukit Perak Estate</td> <td>261,033</td> <td>86,444</td> </tr> <tr> <td>Bukit Permata Estate</td> <td>76,144</td> <td>38,365</td> </tr> <tr> <td>Bukit Perak Mill</td> <td>201,867</td> <td>81,648</td> </tr> </tbody> </table> <p>From the table it was shown that fossil fuel consumption period 2017 (YTD June) is decreased than 2016, it was less than 50% from last year consumption.</p> <p>So far there is a plan regarding feasibility of collecting and using biogas, however it still on management discussion.</p>	Unit Consumer	2016	Jan – June 2017	Bukit Perak Estate	261,033	86,444	Bukit Permata Estate	76,144	38,365	Bukit Perak Mill	201,867	81,648	
Unit Consumer	2016	Jan – June 2017														
Bukit Perak Estate	261,033	86,444														
Bukit Permata Estate	76,144	38,365														
Bukit Perak Mill	201,867	81,648														
5.5	<p>Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p> <p><b>Guidance:</b>  <i>Clause 11 of the Government Regulation No. 4 year 2001 regarding Control of Environmental Damage and or Pollution associated with Forest and or Land Fire, describes that the activities causing forest and or land fire are including land clearing in forestry, plantation, agriculture, transmigration, mining, tourism which are carried out through burning. Therefore, the use of fire is prohibited in those activities, unless for unavoidable circumstances or specific purposes, such as forest fire control, pest and disease control, and habitat management of flora and fauna. Implementation of restricted burning shall be authorised by the relevant agency.</i></p>															
5.5.1	(M) Records of land clearing with zero burning shall be available, referring to the ASEAN Policy on Zero Burning (2003) or other recognized techniques based on the existing regulations.															
	<p>a. Does the company have a zero burning policy or any statement on zero burning?</p> <p>b. Does the company have SOPs for land preparation which mentions zero burning?</p> <p>c. Was land prepared using the burn method? If yes, was it based on the specific situations identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions?</p>	<ul style="list-style-type: none"> <li>• GAR social and environment policy dated 8 September 2015</li> <li>• Procedure SOP/SMART/MCAR/II/TA-PRP – Replanting Preparation</li> <li>• Procedure SOP/SMART/MCAR/VI/TA-RPL – Replanting</li> </ul>	<p>Zero burning policy was described in “GAR Social and Environment Policy” dated 8 September 2015 that mentioned: “1.4 there was no burning to open new land/land preparation, replanting, or another expansion”. Zero burning in replanting was documented in procedure of replanting – SOP/SMART/MCAR/VI/TA-RPL, the procedure mention that land preparation of replanting is conducted by cutting and chipping.</p> <p>Realisation of land preparation for replanting activities was well documented and reported including activities of felling, uprooting, stacking, ploughing, making terrace, making road. The procedure of</p>	YES												

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	d. Has the policy been implemented throughout the operations?  e. Is there training programmes for associated smallholders on zero burning where appropriate?		replanting mentioned that field assistant should do an inspection to ensure that the contractor does not doing burning for land preparation for replanting. It was observed that there was no evidence of replanting yet.	
5.5.2	<p>Where fire has been used for eradication of pest during replanting, the records of the analysis of the use of fire and permit from the authorised agency shall be available</p> <p><b>Specific Guidance:</b>  <i>Fire should be used only where an assessment has demonstrated that it is the most effective and least environmentally damaging option for minimizing the risk of severe pest and disease outbreaks, and exceptional levels of caution should be required for use of fire on peat. This should be subject to regulatory provisions under respective national environmental legislation. This should refer to the ASEAN Policy on Zero Burning (2003) and existing national environment regulations.</i></p> <p><i>The company shall have procedure and records of emergency response to ground fire, including the means and facilities.</i></p>			
	a. Where fire has been used for preparing land for replanting, is there evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions?  b. What was the justification for using fire?	Not Applicable	Not Applicable	N/A
5.6	<p><b>Preamble:</b></p> <p><i>Growers and millers commit to report greenhouse gas emissions from their operations. However, it is recognised that these significant emissions cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognized that to reduce or minimise these emissions is not always practical or feasible. Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this commitment with the support of all other stakeholder groups of the RSPO.</i></p>			
5.6	<p>Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p> <p><b>Guidance:</b>  <i>Where practically feasible, operations should follow best management practices to measure and reduce emissions. Advice on this is available from the RSPO.</i></p>			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
5.6.1	<p>(M) Document(s) assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent, shall be available (see Criterion 4.4)</p> <p><b>Specific Guidance:</b>  <i>For 5.6.1: Assessment document covers identification of pollutant and emission sources, and evaluation of potential pollution level.</i></p>			
	<p>a. Has an assessment of all polluting activities been conducted including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4)?</p> <p>b. Is there a documented list of all identified polluting activities?</p>	<ul style="list-style-type: none"> <li>• Documented procedure (SOP/SPO/SMART/LH-09).</li> <li>• Environmental aspect and impact identification updated 8 July 2017</li> <li>• Report of analysis for boiler emission, generator emission, air ambience quality, noise quality from third party</li> </ul>	<p>Identification of pollution and emission sources at Bukit Perak Mill activities was evident. The source of pollution, type of pollution and its control was documented, e.g. stack of boiler, electricity generator and heavy equipment, methane from WWTP, and fertiliser. The information of pollution and emission sources at Bukit Perak mill and estates was reviewed and updated on 8 July 2017.</p> <p>Monitoring of pollution and emission quality of sources identified has been programmed. Monitoring and measurement results for 1<sup>st</sup> and 2<sup>nd</sup> semester 2016 and semester I 2017 were sighted for boiler emission against Environment Ministry Decree #07/2007, diesel electricity generator against Environment Ministry Decree #Per13/Menlh/2009, vehicle and heavy equipment emission against Environment Ministry Decree #05/2006, odour emission against Environment Ministry Decree #50/Menlh/11/96, ambient noise against Environment Ministry Decree #48/Menlh/11/96, also ambient air quality against Government Regulation #41/1999. Measurement was done by Kehati Laboratory. For vehicle and heavy equipment emission was held annually, last measurement on 19 October 2016 to 20 vehicles and 11 heavy equipment such as dump truck, bachoe loader, tractor, compactor, road grader by MAL Laboratory.</p>	YES
5.6.2	<p>(M) Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.</p> <p><b>Specific Guidance:</b>  <i>For 5.6.2: Plans will include objectives, targets and timelines. These should be responsive to context and any changes should be justified. Examples of reducing greenhouse gas emission are including empty bunch application, effluent land application, efficiency of fertilizer use, fuel efficiency, compost application and or methane capture.</i></p> <p><i>For 5.6.2 and 5.6.3: The treatment methodology for POME will be recorded.</i></p>			
	<p>a. Is there a documented list of all identified significant pollutants and GHG emissions?</p> <p>b. Are there plans to reduce or minimise the</p>	<p>- Environmental aspect and impact identification updated 8 July 2017</p>	<p>The source of greenhouse gas emission has identified on Environmental aspect and impact identification, updated on 8 July 2017, as listed below:</p>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>identified pollutants and GHG emissions?</p> <p>c. Do the plans include objectives, targets and timelines for reduction that are responsive to context?</p> <p>d. Are the plans being implemented? Was there any changes? Is it justified?</p> <p>e. Is the treatment methodology for POME recorded? (refer to C 4.4.3)</p>	<p>- Monitoring report of waste water effluent</p>	<ol style="list-style-type: none"> <li>1. Methane from POME and composting at mill</li> <li>2. Fossil fuels emissions from vehicles and engines (generator)</li> <li>3. Chemical fertilizer</li> <li>4. Electricity usage</li> <li>5. Chemical spraying</li> </ol> <p>Several effort to reduce GHG emissions is prepared as follows:</p> <ol style="list-style-type: none"> <li>1. Zero burning</li> <li>2. Utilization of waste fibre and shell as boiler fuel and electricity from turbines</li> <li>3. Reduce chemical fertilizer using EFB composting</li> </ol> <p>The records of each programme were sighted as evident implementation. The program was include objectives, targets, and timelines for a year. There was monitoring and evaluation every 6 months to ensure target was achieved.</p> <p>Bukit Perak Mill waste water was processed through a series of waste water treatment ponds four anaerobic ponds. Process parameter monitoring and maintenance of the ponds were sighted. Quality of waste water effluent is monitored monthly in line with the requirements KepMen LH No.29/2003. The results of monitoring of waste water effluent were reviewed including measurement of BOD, COD, oil and fat, N total result of discharge effluent conforms to the limits for parameters period 2016 and January – June 2017.</p>	
5.6.3	<p>A monitoring plan and results of regular reporting on emission and pollutants from estate and mill operations using appropriate methods, shall be available.</p> <p><b>Specific Guidance:</b>  <b>For 5.6.2 and 5.6.3:</b> <i>The treatment methodology for POME (Palm Oil Mill Effluent) will be recorded.</i></p> <p><b>For 5.6.3 (GHG):</b> <i>For the implementation period until December 31<sup>st</sup>, 2016, an RSPO-endorsed modified version of PalmGHG which only includes emissions from operations (including land use practices) can be used as a monitoring tool.</i></p> <p><i>In addition, during the implementation period, growers will start to assess, monitor and report emissions arising from changes in carbon stocks within their operations, using the land use in November 2005 as the baseline. The implementation period for Indicator 5.6.3 is the same implementation period for Criterion 7.8.</i></p>			



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)												
<p><i>During the implementation period, reporting on GHG will be to a relevant RSPO working group (composed of all membership categories) which will use the information reported to review and fine tune the tools, emission factors and methodologies, and provide additional guidance for the process. Public reporting is desirable, but remains voluntary until the end of the implementation period. During the implementation period the RSPO working group will seek to continually improve PalmGHG, recognising the challenges associated with measuring GHG and carbon stock.</i></p> <p><i>PalmGHG or RSPO-endorsed equivalent will be used to assess, monitor and report GHG emissions. Parties seeking to use an alternative to PalmGHG will have to demonstrate its equivalence to the RSPO for endorsement. Methodology for calculating GHG refers to 7.8.1.</i></p>																
	<p>a. Is there a system in place to monitor emission of pollutants including greenhouse gases from estate (plantation) and mill operations?</p> <p>b. Is there regular reporting of the monitoring outcomes? How often and to whom is reporting done?</p> <p>c. Is the monitoring and reporting conducted using appropriate tools? What tool is being used to assess, monitor and report on GHG emissions?</p> <p><i>Please refer to specific guidance for GHG requirements.</i></p>	<p>Email and calculation of GHG RSPO calculation Year assessment 2016 reporting date 7 July 2017</p>	<p>The GHG emission calculation for Bukit Perak Mill uses PalmGHG V 3.0.1. As RSPO requirement. The reporting was conducted periodically to the RSPO interest (Ms. Devala Devi S and Javintan). Reports was sighted that summarized as below:</p> <table border="1" data-bbox="1171 719 1839 884"> <thead> <tr> <th>(tCO<sub>2</sub>e)</th> <th>Own Crop</th> <th>Group</th> <th>Out grower</th> </tr> </thead> <tbody> <tr> <td><b>Total field emissions</b></td> <td>3,583.45</td> <td>0</td> <td>0</td> </tr> <tr> <td><b>Total mill emissions</b></td> <td>11,993.34</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	(tCO <sub>2</sub> e)	Own Crop	Group	Out grower	<b>Total field emissions</b>	3,583.45	0	0	<b>Total mill emissions</b>	11,993.34	0	0	<p>YES</p>
(tCO <sub>2</sub> e)	Own Crop	Group	Out grower													
<b>Total field emissions</b>	3,583.45	0	0													
<b>Total mill emissions</b>	11,993.34	0	0													



**PRINCIPLES 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND INDIVIDUALS AND COMMUNITIES AFFECTED BY GROWERS AND MILLERS**

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
6.1	<p>Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p> <p><b>Guidance:</b>  <i>Identification of social impacts may use AMDAL as part of the process, however it is the company's responsibility to provide objective and proper evidence to the audit team that entire requirements in the social impact assessment cover all aspects of estate and mill operations, and their changes along the time.</i></p> <p><i>Identification of social impacts should be carried out by the grower with the participation of affected parties, including women and migrant workers as appropriate to the context. The involvement of independent experts should be sought where this is considered necessary to ensure that all impacts (both positive and negative) are identified.</i></p> <p><i>Participation in this context means that affected parties are able to express their views through their own representative institutions, or freely chosen spokespersons, during the identification of impacts, reviewing findings and plans for mitigation, and monitoring the success of implemented plans.</i></p> <p><i>Potential social impacts may result from activities such as: building new roads, processing mills or other infrastructure; replanting with different crops or expansion of planting area; disposal of mill effluents; clearing of remaining natural vegetation; changes in employee numbers or employment terms; smallholder schemes.</i></p> <p><i>Plantation and mill management may have social impacts (positive or negative) on factors such as:</i></p> <ul style="list-style-type: none"> <li>a. Access and use rights;</li> <li>b. Economic livelihoods (e.g. paid employment) and working conditions;</li> <li>c. Subsistence activities;</li> <li>d. Cultural and religious values;</li> <li>e. Health and education facilities;</li> <li>f. Other community values, resulting from changes such as improved transport /communication or arrival of substantial migrant labour force.</li> <li>g. Traditional or customary rights owned by the local community, if identifiable</li> <li>h. Welfare of workers/labour and women, children and vulnerable group</li> <li>i. Contribution to the local development, including improvement of human resources, local and customary communities.</li> </ul> <p><i>Regulations relating to identification of environmental and social key issues including indigenous rights and methodology to collect data and utilize the results, adopted from related regulations, such as:</i></p> <ul style="list-style-type: none"> <li>1. Government Regulation No. 27 year 2012 regarding Environment Permit</li> <li>2. Regulation of the Minister of Environment No. 17 year 2012 regarding Involvement of Community and Information Transparency in AMDAL Process</li> <li>3. Regulation of the Minister of Environment No. 8 year 2006 regarding Guidance for AMDAL Preparation</li> <li>4. Decree of the Head of Bapedal No. No. 299 year 1996 regarding Technical Guidance for Social Aspect Study in AMDAL Preparation</li> <li>5. Regulation of Minister of Home Affairs No.52 year 2014 regarding Guidance on the Recognition and Protection of the Indigenous People</li> <li>6. Regulation of the State Minister of Agrarian Affairs/Head of the Land National Agency No. 5 year 1999 on Guidelines for the Settlement of Problems Related to the Communal</li> </ul>			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
<i>Reserved Land of the Customary Law Abiding Community</i>				
6.1.1	(M) A social impact assessment (SIA) including records of meetings shall be documented.			
	<p>a. Has an SIA been conducted? When was the last SIA conducted?</p> <p>b. Is the process in conducting the SIA and the findings documented?</p> <p>c. Does the SIA cover all of the potential impact factors, including:</p> <ul style="list-style-type: none"> <li>• Access and use rights;</li> <li>• Economic livelihoods (e.g. paid employment) and working conditions;</li> <li>• Subsistence activities;</li> <li>• Cultural and religious values;</li> <li>• Health and education facilities;</li> <li>• Other community values, resulting from changes such as improved transport /communication or arrival of substantial migrant labour force.</li> </ul>	<ul style="list-style-type: none"> <li>- Document of Social Impact Assessment PT Bumi Permai Lestari, 2014</li> <li>- Public consultation notulen, October 17<sup>th</sup> 2014.</li> <li>- Review Report of Management and Monitoring of Social Impact in Mill and Estate PT Bumi Sawit Permai Period 2014 – 2016</li> </ul>	<p>Organization has conducted a survey of Social Impact Assessment (SIA) in period January 2012 - March 2013, the results of these activities recorded in the SIA report and the “Review of Rencana Pengelolaan dan Pemantauan Dampak Sosial”.</p> <p>Social Impact Assessment implementation team comprised of:</p> <ul style="list-style-type: none"> <li>- Yosaphat Ardhilla Renato S.Ant (Team Leader - Researcher Anthropology)</li> <li>- Nazlya Syahputri, SP (Researcher Socio economic of Agriculture)</li> </ul> <p>Village where the implementation of Social Impact Assessment were: Dendang village, Air Bulin village, Kacung village, Tugang village and Pangkal berasa village.</p> <p>SIA have covered all the RSPO requirement such as :</p> <ul style="list-style-type: none"> <li>• Access and use rights;</li> <li>• Economic livelihoods (e.g. paid employment) and working conditions;</li> <li>• Subsistence activities;</li> <li>• Cultural and religious values;</li> <li>• Health and education facilities;</li> <li>• Other community values, resulting from changes such as improved transport /communication or arrival of substantial migrant labour force</li> </ul> <p>Social impacts for internal parties :</p> <ol style="list-style-type: none"> <li>a. Economy, employees have a permanent salary</li> <li>b. Education, employee's kids can go to school nearby plantation</li> </ol>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>c. Employees reduction because of inadequate competency and skill</p> <p>d. Employees reduction because of replanting</p> <p>e. Health, ISPA is the majority disease suffered by the employees</p> <p>f. Public facilities</p> <p>Records of meeting with stakeholders and public consultation was sighted, attendance register in meeting stakeholder also available. Public consultation was performed in October 17<sup>th</sup>, 2014. Resume of public consultation and stakeholder meeting was documented in "Public consultation notulen".</p> <p>Action plan to implement and monitor social impact with community has been determined. Positive impacts were maintained with organisation and necessary action was planned by the organization.</p> <p>The organisation has developed Review Report of Management and Monitoring of Social Impact in Mill and Estate PT Bumi Sawit Permai Period 2014 – 2016, issued in April 2017 (<i>Laporan Review Rencana Pemantauan dan Pengelolaan Dampak Sosial Perkebunan dan Kelapa Sawit PT Bumi Sawit Permai periode 2014 – 2016</i>). Report has included input from internal workers and housing resident. Interview with internal workers and housing resident was conducted on 8 – 10 April 2017. Result of interview and attendance list was attached in the report.</p>	
6.1.2	(M) There shall be evidence that the assessment has been conducted with the participation of affected parties.			
	<p>a. Does the assessment involve consultation with the affected parties? Who are the affected parties?</p> <p>b. Is there record of how the participatory assessment has been conducted? Were the affected parties able to express their views through their own representative institutions, or</p>	<ul style="list-style-type: none"> <li>- Document of Social Impact Assessment PT Bumi Permai Lestari, 2014</li> <li>- Record of questionnaires and interview with stakeholder</li> <li>- Record of Public consultation</li> </ul>	<p>Based on the results of the Social Impact Assessment report, it appears that the assessment also includes stakeholders, community leaders figure, and related government agencies etc. through a public consultation which visible on participant attendance at SIA report.</p> <p>Assessment was conducted through PRA (Participatory Rural Appraisal) and involved the local community. And also some</p>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>freely chosen spokespersons, during the identification of impacts, review of findings and planning for mitigation?</p>	<p>with all stakeholder</p> <ul style="list-style-type: none"> <li>- Review Report of Management and Monitoring of Social Impact in Mill and Estate PT Bumi Sawit Permai Period 2014 – 2016</li> </ul>	<p>interview was conducted with leaders' community. This assessment was conducted during period January 2012 - March 2013. Scope of assessment covered villages: Dendang village, Air Bulin village, Kacung village, Tugang village and Pangkal berasa village. Evidence of participatory action from local communities was also sighted in related SIA documentation including photos, questionnaires, etc.</p> <p>SIA assessment involving the communities around the estate and all relevant stakeholders, this can be viewed from the evidence of attendance list of public consultation and a list of names of the respondents, the informant at the time of interview and assessment SIA.</p> <p>Noted there are 48 sample respondents from communities affected by the activities of PT BPL (Village Dendang, Kacung, Air Bulin, Tugang, Pangkal Beras), the informant in the SIA process. Affected parties been able to express their views through their own representative institutions, or freely chosen spokespersons, during the identification of impacts, reviewing findings and plans for mitigation, and monitoring the success of implemented plans.</p> <p>The organisation has developed Review Report of Management and Monitoring of Social Impact in Mill and Estate PT Bumi Sawit Permai Period 2014 – 2016, issued in April 2017 (<i>Laporan Review Rencana Pemantauan dan Pengelolaan Dampak Sosial Perkebunan dan Kelapa Sawit PT Bumi Sawit Permai periode 2014 – 2016</i>). Report has included input from internal workers and housing resident. Interview with internal workers and housing resident was conducted on 8 – 10 April 2017. Result of interview and attendance list was attached in the report.</p>	
<p>6.1.3</p>	<p>(M) Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties, shall be available, documented and timetabled, including responsibilities for implementation.</p> <p><b>Specific Guidance:</b>  <b>For 6.1.3 and 6.1.4:</b> <i>Plan for management and monitoring of social impacts shall be established to avoid or reduce negative impacts and promote the positive ones, and monitoring of identified impacts shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.</i></p>			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p><i>Methodology to identify customary right and local community and social impacts assessment can be made with the following:</i></p> <p>a. <i>Document review</i>                      b. <i>Field observation</i>                      c. <i>Interview</i>                      d. <i>FGD (Focus Group Discussion)</i>                      e. <i>Participatory mapping</i></p> <p><i>These involve participation of the community to define potential social impacts and management recommendation. The process refers to Regulation of the Minister of Environment No. 17 year 2012 regarding Community involvement and Information Transparency in the Process of Environment Impact Assessment (SEIA).</i></p>			
	<p>a. Is there any documented record to outline the plan on mitigation, implementation and monitoring according to the SIA report?</p> <p>b. Have plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts been developed?</p> <p>c. Have these plans been documented, with clear timetables? Is the timeline reasonable?</p> <p>d. Have the persons responsible for implementation of the plans been identified?</p>	<ul style="list-style-type: none"> <li>- Document of Social Impact Assessment PT Bumi Permai Lestari, 2014</li> <li>- Document of RKS and RPS report PT Bumi Permai Lestari 2014</li> <li>- Review Report of Management and Monitoring of Social Impact in Mill and Estate PT Bumi Sawit Permai Period 2014 – 2016</li> <li>- Interview with stakeholder on 13 July 2017</li> </ul>	<p>Action plan to implement and monitor social impact with community has been determined. Positive impacts were maintained with organisation and necessary action was planned by the organization. The positive impacts were identified such as:</p> <ul style="list-style-type: none"> <li>- Helps reduce unemployment around</li> <li>- Improved employee welfare</li> <li>- The development of the economic potential of the community through the empowerment of local contractors</li> <li>- Increased level of economic and incomes</li> <li>- Development of rural economy</li> <li>- Mobilization of society more smoothly with the opening of the road</li> <li>- Increased public awareness of the educational</li> <li>- Increased educational facilities</li> <li>- Increase public religious activities with the help of religious facilities</li> <li>- Respect for the cultural heritage of the local community</li> <li>- Increased public health</li> </ul> <p>Overall of negative impacts were followed up with corrective action. Some negative impact were identified such as :</p>	<p>YES</p>

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			<ul style="list-style-type: none"> <li>- Trends in employment is tends to decline</li> <li>- Less harmonious social relations because of the lack of communication</li> <li>- CSR programs which is less targeted</li> </ul> <p>Management plan for avoidance or mitigation of the negative impact which undertaken by the company such as:</p> <ul style="list-style-type: none"> <li>- Inform the labor needs/vacancies through around village officials.</li> <li>- Improving positive cooperation between communities and companies to be directly involved in community activities.</li> <li>- Develop CSR program by conducting together mapping community needs as well as optimizing the role of communities in every activites.</li> </ul> <p>Management plan for avoidance or mitigation of the negative impact outlined the timetable and PIC which is responsible for to handle it. Organization has appointed a liaison officer to deal specifically with issues related to social issue including mitigation the social negative impact, each managers unit also has responsible for it. According to public interview, they explained that the organisation has done some positive actions in regard with SIA result.</p> <p>Evidence of participatory action from local communities was also sighted in related SIA documentation including photo and also management and monitoring social impact report which is verified by head village of around estate and mill. Effectiveness analysis of negative impact management was conducted by organization and described in the report of Social management and monitoring plan (RKS-RPS). Its report was sighted and it was indicated that SIA management program has effective to manage negative impact.</p>	
6.1.4	The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties.			

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	<p><b>Specific Guidance:</b>  <b>For 6.1.3 and 6.1.4:</b> Plan for management and monitoring of social impacts shall be established to avoid or reduce negative impacts and promote the positive ones, and monitoring of identified impacts shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.                      Methodology to identify customary right and local community and social impacts assessment can be made with the following:</p> <ul style="list-style-type: none"> <li>a. Document review</li> <li>b. Field observation</li> <li>c. Interview</li> <li>d. FGD (Focus Group Discussion)</li> <li>e. Participatory mapping</li> </ul> <p>These involve participation of the community to define potential social impacts and management recommendation. The process refers to Regulation of the Minister of Environment No. 17 year 2012 regarding Community involvement and Information Transparency in the Process of Environment Impact Assessment (SEIA).</p>			
	<ul style="list-style-type: none"> <li>a. Is the plan reviewed every two years?</li> <li>b. Has the plan been updated as necessary (i.e. in cases where the review has concluded that changes should be made to current practices)?</li> <li>c. Have the changes to the plan been implemented?</li> <li>d. Is there evidence that the review has been done with the participation of the affected parties?</li> <li>e. Has the process been recorded/documentated?</li> </ul>	<ul style="list-style-type: none"> <li>- SOP/SMART/SIGS-CSR/SADV/II/002 dated 1 July 2014</li> <li>- Review Report of Management and Monitoring of Social Impact in Mill and Estate PT Bumi Sawit Permai Period 2014 – 2016</li> </ul>	<p>Review of Social Management Plan (RKS) and Social Monitoring Plan (RPS) was conducted minimum one times in 2 year period. Improvement and corrective action regarding RKS and RPS would be performed as soon as possible based on the relevant and actual condition. It's explained in procedure SOP <i>Pengelolaan dan Pemantauan dampak sosial</i> SOP/SMART/SIGS-CSR/SADV/II/002 dated 1 July 2014.</p> <p>Management and monitoring social impact was conducted involving the local community and affected parties. Review of management and monitoring social impact also involving the affected parties (internal and external).</p> <p>During the audit there was no changes regarding RKS and RPS, the management and monitoring plan of social impact was still relevant with the actual condition.</p>	<p>YES</p>
6.1.5	<p>Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme).</p>			
	<ul style="list-style-type: none"> <li>a. Are there schemed smallholders involved?</li> <li>b. Have they been considered and involved in the whole process of the SIA?</li> <li>c. What are the main impacts affecting these smallholders?</li> </ul>	<p>Interview with unit head of the PT BPL</p>	<p>In according interview with unit head during audit, there were no out grower schemes in Bukit Perak Estate and Bukit Permata Estate. However company already has a program and a plan for the development smallholdings to the community and waiting for information from government about the availability of land that can use for smallholder.</p>	<p>NA</p>



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6.2	<p>There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.</p> <p><b>Guidance:</b>  <i>Decisions that the growers or mills are planning to make should be made clear, so that local communities and other interested parties understand the purpose of the communication and/or consultation.</i></p> <p><i>Communication and consultation mechanisms should be designed in collaboration with local communities and other affected or interested parties. These should consider the use of appropriate existing local mechanisms and languages. Consideration should be given to the existence/formation of a multi-stakeholder forum. Communications should take into account differential access to information by women as compared to men, village leaders as compared to day labourers, new versus established community groups, and different ethnic groups.</i></p> <p><i>In these communications, consideration should be given to involve third parties, such as disinterested community groups, NGOs, or government (or a combination of these), to facilitate smallholder schemes and communities, and others as appropriate.</i></p>			
6.2.1	(M) Communication and consultation procedures shall be documented			
	<p>a. Does the company maintain a list of local communities and other affected or interested parties?</p> <p>b. Is there SOP being developed by the company for communication and consultation between the company and the local communities and other affected or interested parties?</p> <p>c. Is the FPIC approach incorporated in the SOP for communication and consultation with the local communities and other affected or interested parties?</p> <p>d. Has the SOP been developed together with the local communities and other affected or interested parties using appropriate existing local mechanisms and in languages understood by these parties?</p> <p>e. Has the SOP been socialized with the local communities and other affected or interested parties taking into account the differential access to information by women as compared</p>	<ul style="list-style-type: none"> <li>- SOP/SMART/UMUM/SADV//I/004 dated 1 July 2014</li> <li>- SOP/SMART/SENS-CSR/SADV//I/003 dated 1 July 2014</li> <li>- Logbook Stakeholder aspiration PT Bumi Permai Lestari " <i>Buku komunikasi dan konsultasi BPRE and BPTe</i>"</li> <li>- Minutes of Public consultation with stakeholder in 28 November 2016</li> <li>- Public consultation on 13 July 2017</li> </ul>	<p>Organization has established and implemented a mechanism for receiving and providing information in the procedure - SOP <i>Komunikasi dan Konsultasi</i> SOP/SMART/UMUM/SADV//I/004 dated 1 July 2014 which explain the mechanism of response to requests for information by referring to the list of stakeholders and stakeholder information according to the principles and criteria for sustainable palm oil.</p> <p>Beside that, the company have develop a procedure about FPIC and available on SOP FPIC No SOP/SMART/SENS-CSR/SADV//I/003 dated 1 July 2014</p> <p>The company facilitates the delivery of this communication through incidental meetings of stakeholders and provision of suggestion boxes placed in all division office, large office and office security.</p> <p>The procedure was made already accommodate all stakeholders and with understandable language (Indonesian). Procedures are written and communicated with affected local communities through public consultation was held on 28 November 2016.</p> <p>Result of communication and consultation was recorded in the 'log book', e.g. road maintenance, donation, facilities support, invitation for memorial, etc. Most of requests were an invitation to follow the</p>	YES



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>to men, village leaders as compared to day labourers, new versus established community groups, and different ethnic groups?</p> <p>f. Have interviews with affected parties been carried out to verify that the SOPs are effective?</p>		<p>event held by the stakeholders, for example: invitation for memorial of religious holidays, invitation for area meeting from Camat, etc. Communication and consultation has considered differential access to information for male/ female, workers, villagers representative both old and new villagers including ethnics.</p> <p>Community aspirations were kept and recorded by the RSPO Officer in Logbook Stakeholder aspiration, e.g. road maintenance, donation, facilities support, invitation for memorial, etc. Most of requests were an invitation to follow the event held by the stakeholders, for example: invitation for memorial of religious holidays, invitation for area meeting from Camat, etc. Records and interview result indicated that aspiration from community was followed up by the organisation.</p>	
6.2.2	The company shall have official(s) who is responsible for consultation and communications with parties.			
	<p>a. Who in the company is appointed to be responsible for communication and consultation with the affected parties?</p> <p>b. Has the position been made official with clear and proper job description?</p> <p>c. Have the affected parties been made aware and have access to the person in charge?</p>	<ul style="list-style-type: none"> <li>- Assignment Letter as PIC Social in BPRM, BPRE and BPTTE</li> <li>- Jobs descriptions of PIC Social</li> <li>- Interview with stakeholder on 13 July 2017</li> </ul>	<p>PT Bumi Permai Lestari has appointed one of its staff in each site to become PIC Social :</p> <ul style="list-style-type: none"> <li>a. Mr. Abdul Khalig (Factory Manager) as BPRM PIC Social, assignment letter No 001/PC-BABEL/VI/2016 date January 2016</li> <li>b. Mr. Suharto (Estate Manager) as BPRE PIC Social, assignment letter No 002/PC-BABEL/VI/2016 date 2 January 2016</li> <li>c. Mr. Mahadi Purba (Estate Manager) as BPTTE PIC Social, assignment letter No 004/RC-BABEL/II.2017 date 28 February 2017</li> </ul> <p>Job description <i>Penanggung Jawab Sosial</i> are :</p> <ul style="list-style-type: none"> <li>a. Accommodate and participate in social impact analysis</li> <li>b. Responsibility to Top Management about communication and consultation process with stakeholder</li> <li>c. Build good relationship with local communities, public figure,</li> </ul>	YES

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			social organization and governance body.  d. Coordinate with HR Ops about manpower  During interview with stakeholder, it was verified that stakeholder know, aware and have access to Social PIC.	
6.2.3	The company shall have a list of stakeholders, records of communications, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders.			
	a. Is the following maintained? <ul style="list-style-type: none"> <li>• List of stakeholders (local communities and other affected or interested parties etc.);</li> <li>• Records of all communication, including confirmation of receipt or endorsement;</li> <li>• Evidence that efforts have been made to ensure understanding by affected parties;</li> <li>• Record of actions taken in response to input from stakeholders.</li> </ul>	<ul style="list-style-type: none"> <li>- Stakeholder list of PT Bumi Permai Lestari, updated January 2017</li> <li>- Public consultation result with stakeholder on 13 July 2017</li> </ul>	The organization documented and maintained stakeholder list on document "Daftar Stakeholder PT Bumi Permai Lestari" updated on January 2017. Stakeholder consists of governance agency, village chief, prominent figure, workers organization, local contractor and NGO's. Data and information will be update by SPO Region Bangka if there are changes. Stakeholder verification conducted by Stakeholder Analysis and Mapping as mention in SOP <i>Keberperanan Pemangku Kepentingan</i> SOP/SMART/SENS-CSR/SADV/001.  Community aspirations were kept and recorded by by the RSPO Officer on logbook "stakeholder aspiration" e.g. road maintenance, donation, scholarship, invitation for memorial, etc.  Stakeholder was able to deliver communications to the company in the form of requests for information, expression of aspiration, demands / claims, complaints / grievances against the plantation and processing plant palm oil. The company facilitates the delivery of this communication through incidental meetings of stakeholders and provision of suggestion boxes placed in all division office, large office and office security. A procedure which regulates communications has been socialized to village heads and community leaders as well as the relevant stakeholders on 28 November 2016.  If there are aspirations or input from stakeholders, companies provide feedback by sending a reply or follow up directly. This can be evidenced in the logbook evidence incoming mail from stakeholders and responses mail out from the company. Communication and responses given by the company is in Indonesian language and can be understood by all stakeholders. It's evident by public consultation	YES

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			with stakeholder on 13 July 2017.	
6.3	<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> <p><b>Guidance:</b> See also to Criterion 1.2.</p> <p>Dispute resolution mechanisms should be established through open and consensual agreements with relevant affected parties.</p> <p>Complaints should be dealt with by mechanisms such as Joint Consultative Committees (JCC), with gender representation as necessary. Grievances may be internal (employees) or external.</p> <p>For scheme and independent smallholders, refer to 'Guidance for Independent Smallholders under Group Certification', June 2010, and 'Guidance on Scheme Smallholders', July 2009.</p> <p>Where a resolution is not found mutually, complaints can be brought to the attention of the RSPO Complaints System. This refers to United Nations Commission on Human Rights (UNCHR) document to support 'Guiding Principles on Business and Human Right' to implement UN framework to "Protect, Respect and Remedy" 2011. If all the above stages of conflict resolution have been carried out but the conflict cannot be resolved, then the next process is done through legal proceedings in court.</p> <p>Conflict resolution process with the community is still continued although transfer of company's ownership occurs.</p>			
6.3.1	<p>(M) The mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested, as long as that information is supported with adequate initial evidence.</p> <p><b>Specific Guidance:</b> <b>For 6.3.1:</b> The system should aim to reduce the risks of reprisal. <b>For 6.3.2:</b> Records can be in the form of evidence from process or end-result of the resolution</p>			
	<p>a. Is there an system in place to deal with complaints and grievances for all affected parties?</p> <p>b. Who in the company is responsible to receive complaints and grievances?</p> <p>c. Is the existence of the system been made known and communicated to all parties?</p> <p>d. Is there evidence that the system is understood by all parties?</p> <p>e. Is training provided to the workers on the</p>	<ul style="list-style-type: none"> <li>- SOP/SMART/SIGS-CSR/SADV/II/03 date 1 July 2014</li> <li>- Public consultation with stakeholder during audit</li> <li>- PKB Chapter XII Article 42 of the Settlement laments</li> <li>- Form Monitoring Penanganan Keluhan dan Ketidakpuasan</li> </ul>	<p>Documented procedure for complaints and grievances was established SOP <i>Penanganan Keluhan dan Ketidakpuasan</i> (grievance) SOP/SMART/SIGS-CSR/SADV/II/03 date 1 July 2014. Administration Head (KTU) is the one who responsible to receive complaints and grievances, internal and external.</p> <p>Company guarantee the anonymity of the reporter and whistle blower. If, can't be settle internally then will be settle in bipartit negotiation. For external complaints will be respond in 1 month time after the complaint receive.</p> <p>SPO Region monitor the handling of complaints and grievances</p>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>procedures/systems?</p> <p>f. Is the system effective to ensure that complaints or grievances are addressed or resolved in an effective, timely and appropriate manner?</p> <p>g. Does the mechanism or procedure provide a way for workers to report a grievance against a supervisor to someone other than the supervisor?</p> <p>h. How is a complaint or grievance investigated, addressed and resolved? Are complaints dealt with by mechanisms such as JCC?</p> <p>i. Is there a non-retaliation or non-reprisal policy that protects complainants or whistle-blowers?</p> <p>j. Is the privacy of parties protected?</p> <p>k. Where a resolution is not found mutually, is there a process for complaints to be brought to the RSPO Complaints System?</p>	<p><i>Periode Januari – Juni 2017</i></p>	<p>every month and recorde it in “<i>Form Monitoring Penanganan Keluhan dan Ketidakpuasan</i>” and report it to Estate/Factory Manager, after that the form will send to Head Office. Period January – June 2017, there are no complaints and grievances recorded.</p> <p>The procedure was made already accommodate all stakeholders and with understandable language (Indonesian). Dissemination of code of ethics policy has been carried out :</p> <p>a. On April – May 2017 in Bukit Perak Mill and Bukit Perak Estate</p> <p>b. On 20 – 21 April 2017 in Bukit Permata Estate</p> <p>c. On 4 March 2017 to local contractor in Bukit Perak Mill, Bukit Perak Estate and Bukit Permata Estate</p> <p>d. On 28 November 2016 socialization about policy, procedure and land compensation to stakeholder.</p> <p>Mechanisms of complaints and grievances of workers described in Chapter XII PKB Article 42 of the Settlement laments.</p> <p>In the event of employee complaints of employment, working conditions and employment situation will be resolved amicably by direct supervisor no later than 3 days and if unresolved forwarded to higher management hierarchy longer than 7 days. If the settlement is not bringing results, the worker may submit the matter to the SPSI for being discussed with the company, if it cannot be resolved as well as internal (bipartite) the settlement efforts are channelled through the procedure of Law No. 2 in 2004.</p>	
6.3.2	<p>(M) There shall be records of process and outcome of dispute resolution.</p> <p><b>Specific Guidance:</b>  <b>For 6.3.2:</b> <i>Records can be in the form of evidence from process or end-result of the resolution</i></p>			
	<p>a. Is the complaints or grievance resolution process documented?</p> <p>b. Are outcomes or decisions reported to the</p>	<p>- <i>Form Monitoring Penanganan Keluhan dan Ketidakpuasan Periode Januari – Juni 2017</i></p>	<p>SPO Region monitor the handling of complaints and grievances every month and recorde it in “<i>Form Monitoring Penanganan Keluhan dan Ketidakpuasan</i>” and report it to Estate/Factory Manager, after that the form will send to Head Office. Period January</p>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>parties?</p> <p>c. Who has access to the documentation of the process and/or outcomes?</p>	<p>- Notulent of bipartit negotiations</p>	<p>- June 2017, there are no complaints and grievances recorded.</p> <p>For bipartit negotiation refer to clause 6.6.2.</p>	
6.4	<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><b>Guidance:</b>  <i>This criterion should be considered in conjunction with Criteria 2.2 and 2.3, and the associated Guidance</i></p>			
6.4.1	<p>(M) A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be available, referring to decision of the Constitution Court.</p> <p><b>Specific Guidance:</b>  <i>For 6.4.1: Customary Right in the Local Regulation/Perda (based on Constitution Court Decision No. 35/PUU-X/2012 regarding Customary Forest) determined through participatory mapping of customary land by the customary law community who are recognized by the surrounding customary law community and refers to Regulation of the Minister of Home Affairs (Permendagri) No. 52 year 2014 regarding Guideline of Recognition and Protection of Legitimate Customary Community and Regulation of the State Minister of Agrarian Affairs/Head of National Land Agency (BPN) No. 5 year 1999 regarding Guidelines for the Settlement of Problems Related to the Communal Reserved Land of the Customary Law Abiding Community.</i></p>			
	<p>a. Are procedures for identifying legal, customary or user rights in place?</p> <p>b. Are procedures for identifying people entitled to compensation in place?</p> <p>c. Are those procedures jointly developed, agreed and accepted by local communities?</p>	<p>- SOP/NP/SMART/VII/D&amp;L002 dated 1 July 2010</p> <p>- SOP/SMART/SENS-CSR/D/SADV/II/003 dated 1 July 2014</p> <p>- Letter form Head of Kelapa Sub-District No. 140/4.1.8.1/2017 date on 13 July 2016</p>	<p>The company have developed a procedure about FPIC and available on SOP FPIC No SOP/SMART/SENS-CSR/D/SADV/II/003 dated 1 July 2014. Based on public consultation result with stakeholder, it was confirmed there was no existence of customary land and local communities in the concession area of PT. BPL</p> <p>Organizations have established procedures of land compensation SOP SOP/NP/SMART/VII/D&amp;L002 dated 1 July 2010. Describes the mechanism of compensation before clearing land and land conflict resolution mechanisms between companies and land owners. The land cleared for oil palm plantations should ensure not be a problem and there is no dispute over land ownership. Procedure was presented to the head of the village around the plantation.</p> <p>The procedure was made already accommodate all stakeholders and with understandable language (Indonesian). Dissemination of code of ethics policy has been carried out :</p>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>a. On April – May 2017 in Bukit Perak Mill and Bukit Perak Estate</p> <p>b. On 20 – 21 April 2017 in Bukit Permata Estate</p> <p>c. On 4 March 2017 to local contractor in Bukit Perak Mill, Bukit Perak Estate and Bukit Permata Estate</p> <p>d. On 28 November 2016 socialization about policy, procedure and land compensation to stakeholder.</p> <p>There was response from external stakeholders (from head of Kelapa Sub-District) through email regarding request for the release of school land within the PT. BPL's HGU area and response form the company has been conducted. For more detail, please refer to Appendix D - Stakeholder's issues and comment.</p>	
6.4.2	<p>A procedure for calculating and distributing fair compensation shall be established, implemented, monitored and evaluated in a participatory way. Corrective actions are taken as a result of this evaluation.</p> <p><b>Specific Guidance:</b>  <b>For 6.4.2:</b> Companies should make best efforts to ensure that equal opportunities have been provided to the heads of family, both female and male, to hold land titles in smallholder schemes if the land ownership is individual.</p> <p>The calculation procedure shall consider:</p> <p>a. Gender differences in the power to claim rights, ownership and access to land;</p> <p>b. Differences of transmigrants and long-established communities;</p> <p>c. Differences between legal ownership evidence with communal ownership of ethnical group (customary community)</p>			
	<p>a. Has a procedure for calculating and distributing fair compensation (monetary or otherwise) been established and implemented?</p> <p>b. Are the procedures jointly developed, agreed, accepted and clearly understood by affected parties?</p> <p>c. Is the procedure monitored and evaluated in a participatory way? Have corrective actions been taken as a result of this evaluation?</p>	<ul style="list-style-type: none"> <li>- SOP/NP/SMART/VII/D&amp;L002 dated 1 July 2010</li> <li>- Public consultation results with stakeholder on 13 July 2017</li> <li>- Minutes of meeting and attendance list of public consultation on 28 November 2016</li> </ul>	<p>Organizations have established procedures of land compensation SOP SOP/NP/SMART/VII/D&amp;L002 dated 1 July 2010. Describes the mechanism of compensation before clearing land and land conflict resolution mechanisms between companies and land owners. The land cleared for oil palm plantations should ensure not be a problem and there is no dispute over land ownership (transmigrant, communal, gender differences in ownership and ethnic group). Procedure was presented to the head of the village around the plantation.</p> <p>Dissemination of policy, procedure and land compensation to</p>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>d. Does this procedure take into account the following:</p> <ul style="list-style-type: none"> <li>• Gender differences in the power to claim rights;</li> <li>• Ownership and access to land;</li> <li>• Differences of transmigrants and long-established communities;</li> <li>• Differences in ethnic groups' proof of legal versus communal ownership of land.</li> </ul> <p>e. Where there are schemed smallholders, is there effort to ensure equal opportunity has been provided to.</p>		<p>stakeholder to stakeholder was held on 28 November 2016.</p>	
6.4.3	(M) Compensation claims, process and outcome of any negotiated agreements shall be documented, with evidence of the participation of affected parties.			
	<p>a. Is the process and outcome of negotiated agreements and compensation claims documented?</p> <p>b. Does this documentation include evidence of the participation of affected parties? Is there any approval/signed by effected parties?</p> <p>c. Was consent obtained from all parties to make the documents publicly available?</p>	<p>- Procedure of Land Compensation SOP/NP/SMART/VII/D&amp;L002, dated 1 July 2010</p>	<p>Procedure for calculating and distributing fair compensation (monetary or otherwise) has been established and implemented by estate. Procedure monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. It's evident through public consultation with stakeholder. Equal opportunities have been provided to both female and male in the power to claim rights, ownership and access to land, differences of transmigrants and long-established communities, differences in ethnic groups.</p> <p>It was noted that there was no ongoing progress of new land acquisition during interview with sampled villager's representative, all previous land acquisition was solved before Land Use Title / Hak Guna Usaha (HGU).</p>	<p>YES</p>
6.5	<p>Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.</p> <p><b>Guidance:</b>  <i>Labor union agreement or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official or Labor Union if any.</i></p> <p><i>Regulation related to the minimum wage such as, Regulation of the Minister of Manpower &amp; Transmigration No. 7 year 2013 regarding Minimum Wage, shall be implemented.</i></p>			



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<i>Definition of Decent Living Wage refers to the Act No. 13 year 2003 (Manpower Act) is a set of standard necessities that must be fulfilled by a worker in order to have a decent physical and social living for a month.</i>			
6.5.1	(M) Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.			
	<p>a. What types of employment arrangements are there in the company? (E.g. contractual, outsourced, apprenticeships, direct hires, piecemeal basis, etc.)</p> <p>b. Is there documentation of pay and conditions for each employee?</p> <p>c. Is there a definition for living wage in the country? If not, how was the decision on wage for employees and contract workers made?</p>	<ul style="list-style-type: none"> <li>- PKB (Perjanjian Kerja Bersama) PT BPL PT MPLWI dan PUK SPPP SPSI PT PBL-PT LWI October 2016 - 2018</li> <li>- Employee payment slip</li> <li>- <i>SK Gubernur Kepulauan Bangka Belitung</i> No : No : 188.44/1106/TK.T/2016 date 25 October 2016</li> <li>- Circulate Letter PSM 002/CEO 2/HR PSM 2/12/2016 dated 1 January 2017 regarding wages adjustment for permanent workers</li> <li>- Public consultation on 13 July 2017</li> </ul>	<p>Payment of wages in 2017 based on the <i>SK Gubernur Kepulauan Bangka Belitung</i> No: 188.44/1106/TK.T/2016 date 25 October 2016 on the establishment of province minimum wages 2017 with value Rp. 2.534.674 per month. Circulate Letter PSM 002/CEO 2/HR PSM 2/12/2016 dated 1 January 2017 regarding wages adjustment for permanent workers stated that permanent workers will get 2.534.674 per month exclude rice portion.</p> <p>In Bukit Perak Mill, Bukit Perak Estate and Bukit Permata Estate there are 3 types of worker status, SKU-H, SKU-B and PKWT. There are no BHL or casual workers since January 2017. All casual workers (PHL) have been terminated (contract) since December 2016 where the termination process is accompanied by workers union dan has been in compliance to regulations. Evidences were sighted during audit from document review and stakeholder interview (workers union, workers and local communities).</p> <p>SKU-H and SKU-B will receive payment slip in the end of month, meanwhile PKWT will signed a document called "<i>Daftar Detail Gaji Besar</i>" in order to acknowledge their income.</p> <p>The minimum wage consists of basic wage plus a fixed allowance. Fixed allowance given is rice given in the form of money (cash). With details of workers 15 kg, wife and children 9 kg 7.5 kg at a price determined by the price of rice Bulog taking into account local prices and be reviewed annually by the company and the union.</p> <p>Recordings are available in the employee's salary slip salary payment. Salary payments are divided into two times a month is a big payday every 25th and small payday every 10th of each month.</p> <p>Overtime wages stipulated in Article 7 PKB which regulates the calculation of overtime and overtime pay under the rules of Kepmenaker No. 232. Overtime hourly wage = wage a month / 173</p>	YES



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			and premium pruning based on the calculation set by the company in SE Dept. Agro. PSM II/SE/244/I/2014 date January 28, 2014.	
6.5.2	<p>(M) Collective Labor Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the workers.</p> <p><b>Specific Guidance:</b>  <b>For 6.5.2:</b> Collective Labor Agreement (Perjanjian Kerja Bersama/PKB) and or Company Regulation are developed by the company together with the Labor Union, if any, in the company referring to the manpower regulations, such as the Regulation of the Minister of Manpower No. 6 year 2011 regarding Procedure for Establishing and Endorsing the Company Regulation, and Developing and Registering Collective Labor Agreement.</p>			
	<p>a. Is the pay and conditions of employment clearly detailed in the employment or service contracts? (E.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.)</p> <p>b. Is the contract prepared in languages understood by the workers, explained carefully to workers by management officials, and signed by both the authorised signatory of the company and employee?</p> <p>c. Does the pay and conditions provided in labour laws, union agreements or direct contracts of employment comply with:</p> <ul style="list-style-type: none"> <li>• The decent living wage as provided in the National Interpretation for the country; or</li> <li>• The local legal requirements in meeting the minimum wage; or</li> <li>• The industry minimum standard for a similar position or work responsibilities</li> </ul>	<ul style="list-style-type: none"> <li>- PKB (Perjanjian Kerja Bersama) PT BPL PT MPLWI dan PUK SPPP SPSI PT PBL-PT LWI October 2016 - 2018</li> <li>- Contract for PKWT workers</li> <li>- List of employees SKU and PKWT Period 2017</li> <li>- Interview of workers on 11 – 13 July 2017</li> </ul>	<p>Agreement / contract of employment for workers, has been included in the PKB (Perjanjian Kerja Bersama). PKB has been endorsed by Disnakertrans District of Bangka Barat. In the agreement regulates the : working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.).</p> <p>The agreement written in Bahasa, the agreement was signed by worker and company, and based on interview with worker, they have understood their working agreement.</p> <p>SKU-H and SKU-B will receive payment slip in the end of month, meanwhile PKWT will signed a document called “<i>Daftar Detail Gaji Besar</i>” in order to acknowledge their income.</p> <p>The minimum wage consists of basic wage plus a fixed allowance. Fixed allowance given is rice given in the form of money (cash). With details of workers 15 kg, wife and children 9 kg 7.5 kg at a price determined by the price of rice Bulog taking into account local prices and be reviewed annually by the company and the union.</p> <p>Recordings are available in the employee's salary slip salary payment. Salary payments are divided into two times a month is a big payday every 25th and small payday every 10th of each month.</p>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>d. Is the pay received by the employee consistent with the terms of the contract and the law (relates to P2)?</p> <p>e. Have there been any cases recorded of breach by the company, or complaint made by employees against the company on unjust pay and conditions?</p>		<p>This payment condition was above the minimum wages (based on SK Gubernur Kepulauan Bangka Belitung No: 188.44/1106/TK.T/2016 date 25 October 2016)</p> <p>Based on interview with workers and labour union, there are no records of breach by the company. Salaries have been delivered routine in each month without problem</p>	
6.5.3	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p><b>Specific Guidance:</b>  <b>For 6.5.3: Incentives to the employees refer to Act No. 13 year 2003 regarding Manpower.</b></p>			
	<p>a. Have growers and millers provided adequate housing and other basic necessities such as that listed below to national standards or above, where no such public facilities are available or accessible?</p> <ul style="list-style-type: none"> <li>• adequate housing;</li> <li>• adequate electricity;</li> <li>• clean water supplies (availability of clear water all year round);</li> <li>• medical services (distance to health care facility i.e. clinic, hospital);</li> <li>• children education (distance to school and schooling attendance (%) of children under 12)</li> <li>• welfare amenities.</li> </ul>	<ul style="list-style-type: none"> <li>- List of public facilities of BPRE, BPTe and BPRM</li> <li>- Site visit and field observation in emplacement BPRE, BPTe and BPRM</li> <li>- Certificate water consumption analysis</li> </ul>	<p>Public facilities were provided by the organisation and covered residential facilities, day care, kindergarten, building for prayers, sports facility (e.g. volley ball, badminton, futsal, and tennis), etc. Housing for workers and medical facilities (clinics) were provided by the organisation with basic facilities.</p> <p>If the clinic can not handle, it will be referred to Puskesmas to be treated. If, Puskesmas can not handle it, it will be referred to RSUD Pangkalpinang, Bangka.</p> <p>List of public facilities :</p> <p>a) BPRE &amp; BPRM : 191 unit houses, 3 units mosque, 1 unit guest house, 2 units child care, 3 units workers public hall, 1 unit meeting hall, 5 units sports field, 1 unit clinic and 1 unit elementary school</p> <p>b) BPTe: 57 unit houses, 1 unit mosque, 1 unit child care, 2 unit workers public hall and 3 unit sports field.</p> <p>The uses of water for the daily needs of employees are met by utilizing rainwater catchment ponds, and in the event of prolonged drought in the pond so that the water does not meet, then use water from the plant. Checking the water is routinely performed in the laboratory and found to comply with clean water standards based on</p>	YES

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			PERMENKES No: 416/MENKES/PER/IX/1990 about: standards of water quality and drinking water.	
6.5.4	<p>There shall be demonstrable efforts to improve workers' access to adequate, sufficient and affordable food</p> <p><b>Specific Guidance:</b>  <i>For 6.5.4: This applies if public facility is unavailable or inaccessible to provide adequate, sufficient and affordable food. The examples of the efforts are provision of transportation, employee cooperative shop, weekly market, etc.</i></p>			
	<p>a. Have growers and millers made demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food?</p>	<ul style="list-style-type: none"> <li>- Interview with employees on 11 - 13 July 2017</li> <li>- Field visit in emplacement/housing employee</li> </ul>	<p>Markets in Kecamatan Kelapa with the range of +/-2 Km, every payday traders will be closer to the location of the estate to trade the basic needs. Access to the market is always taken care of by graders regularly, so that during the rainy season can still be passable.</p> <p>In Emplacement/employee housing there are also some stalls and small shops seller staple necessities. Employees are not difficult to obtain basic commodities everyday. Employee housing access to the main road is less than 1 km with road conditions were pretty good, the market which provide food and basic goods needs easily found not far from the location of the company.</p>	YES
6.6	<p>The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p> <p><b>Guidance:</b>  <i>The right of workers, including migrant and transmigrant workers (Angkatan Kerja Antar Daerah/AKAD) and contract workers, to form associations and bargain collectively with their employer should be respected, in accordance with The Act No. 21 year 2000 regarding Labor Union.</i></p> <p><i>Labour laws and collective labor agreements, or in their absence direct contracts of employment detailing payments and other conditions, should be available in the languages understood by the workers or explained comprehensively to them by a management official.</i></p> <p><i>Definition of Employer refers to the Act No. 13 year 2003 regarding Manpower.</i></p>			
6.6.1	(M) A record of the company's policy in understandable language recognising freedom of association, shall be available			

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	<p>a. Has the company published a statement in local languages recognising the rights of employees to freedom of association?</p> <p>b. Are the employees, including migrant and transmigrant workers and contract workers, allowed to form associations and bargain collectively with their employer?</p> <p>c. Was the outcome, if any, from the collective bargaining process between the company and the association respected, implemented and adopted in full or partially by the company?</p> <p>d. Are there Labour laws and union agreements, or in their absence direct contracts of employment detailing payments and other conditions, made available in the languages understood by the workers or explained carefully to them by a management official?</p>	<ul style="list-style-type: none"> <li>- Circular Letter/Surat Edaran No. 094/CEO2-SE/12/2010 dated December 14, 2010</li> <li>- Public consultation with workers union on 13 July 2017</li> <li>- Interview with employees on 11 - 13 July 2017</li> </ul>	<p>The company has a written policy “the freedom of association” in PKB Article 3 “the recognition of the rights of the company and the union labour” and in Article 4 “leeway for trade union labour officials”.</p> <p>The company also issued a policy through circulars letter (SE) No. 094/CEO2-SE/12/2010 dated December 14, 2010 which concerning the freedom of association in the organization of workers/labourers. Referring to the UU No. 21 years 2000 about the union/labour unions, companies respect to the rules and regulations which applicable in the law, including matters of the freedom of association in the organization of workers/labourers who are the basic rights of workers as stipulated in the law.</p> <p>Based on interview, the workers know that they can be a member of organization, association and etc as long as it is not against the rules.</p>	<p>YES</p>
<p>6.6.2</p>	<p>Records of meetings with labor unions or workers representatives shall be available.</p>			
	<p>a. Are there documented minutes of meetings between the company and main trade unions or workers representatives?</p> <p>b. Are the minutes made readily available to employees upon request?</p>	<ul style="list-style-type: none"> <li>- Notulent of bipartit negotiations</li> <li>- Public consultation with workers union on 13 July 2017</li> </ul>	<p>Worker Union has been registered on Labour Department of Bangka Barat District.</p> <p>Periodic meeting was also held to discuss any issues as necessary and recorded in minutes of meeting. Several issues discussed at meetings were not limited to labour issues. Meetings here also discussed cleanness, safety of housing areas and work equipment.</p> <p>Gathering/meeting evidence are available in the minutes of meeting record Labor Unions with the company management such as:</p> <ul style="list-style-type: none"> <li>a. Notulent of bipartit negotiations on June 2017 about workers welfare</li> <li>b. Notulent of bipartit negotiations on February 2017 about rice portion</li> <li>c. Notulent of bipartit negotiations on December 2016 about</li> </ul>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			casual workers severance pay	
6.7	<p>Children are not employed or exploited.</p> <p><b>Guidance:</b>  <i>Growers and millers clearly define the minimum working age and working hours, based on existing regulations, such as:</i></p> <ol style="list-style-type: none"> <li>1. <i>Act No. 13 year 2003 regarding Manpower.</i></li> <li>2. <i>Act No. 20 year 1999 regarding Ratification of International Labour Organization (ILO) Convention No. 138 year 1973 on Allowable Minimum Age for Work.</i></li> <li>3. <i>Regulation of the Minister of Manpower and Transmigration No. 235 year 2003 regarding Types of Work Endangering Child Health, Safety or Morale</i></li> </ol> <p><i>It is advisable to do socialisation to all level of operations regarding prohibition on employing children.</i></p>			
6.7.1	(M) There shall be documented evidence that minimum age requirements are met.			
	<ol style="list-style-type: none"> <li>a. Is the minimum working age for workers together with working hours clearly defined in the company's recruitment policy?</li> <li>b. Are workers employed above the minimum school leaving age of the country or who are at least 15 years of age?</li> <li>c. Is there evidence that the nature of work for workers under 18 is in accordance with International Labour Organisation (ILO) Convention 138?</li> <li>d. Does ground verification show evidence of employment of workers below the minimum working age?</li> </ol>	<ul style="list-style-type: none"> <li>- Circular Letter/Surat Edaran No. 002/SE-HRDV/03/09 date 31 March 2009</li> <li>- Interview with employees on 11 - 13 July 2017</li> <li>- List of employee data per July 2017</li> </ul>	<p>Organisation has policy for minimum age for worker and mentioned in the 'Circular Letter/Surat Edaran No. 002/SE-HRDV/03/09 dated 31 March 2009' and also was described in PP (Company Regulation). In relation with the implementation of UU No. 13 year 2003 concerning the employment of article 68, the minimum age for worker is 18 years. In according to list of worker and related document was verified and there is no worker under 18 years old. According to observation in the estates and mill, there is no worker under 18 years old.</p> <p>"Family harvesting" or in definition bring member of family to help in work area is prohibited especially for children. This was mention in Surat Edaran and PP and was disseminated to all workers.</p>	YES
6.8	<p>Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p> <p><b>Guidance:</b>  <i>Examples of compliance can be appropriate documentation (e.g. job advertisements, job descriptions, appraisals, etc.), and/or information obtained via interviews with relevant stakeholders such as affected groups which may include women, local communities, foreign workers, and migrant workers, etc.</i></p> <p><i>Notwithstanding national legislation and regulation, medical conditions should not be used in a discriminatory way.</i></p> <p><i>The grievance procedures detailed in Criterion 6.3 apply. Positive discrimination to provide employment and benefits to specific communities is acceptable as part of negotiated</i></p>			

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<i>agreements.</i>				
6.8.1	<b>(M) A company's policy on equal opportunity and treatment for work shall be available and documented.</b>			
	<p>a. Is there a company policy on non-discrimination and equal opportunities? Does it at least cover the items mentioned in the criteria (6.8)?</p> <p>b. Is the policy made publicly available for the relevant stakeholders?</p> <p>c. Is there evidence that the policy has been implemented?</p>	<ul style="list-style-type: none"> <li>- Circular letter No. 096/CEO2-SE/12/2010, 14 December 2010</li> <li>- Circular letter No. 268/CEO2/HR PSM 2/10/2015, 1 October 2015</li> <li>- List of information F/SMART/UMUM/SADV/004/003</li> </ul>	<p>Policies on equal opportunities and treatment to get the job described in the Circular No.096/CEO2-SE/12/2010, 14 December 2010, on the implementation in relation industrial Unit. Explained that in order to realize harmonious industrial relations, dynamic and fair company implemented industrial relations of each operational unit without distinction of race, religion, race and gender in all types of field work.</p> <p>Circular letter No. 268/CEO2/HR PSM 2/10/2015, 1 October 2015 is revision of Circular letter No. 096/CEO2-SE/12/2010, stated that "in order to realize harmonious industrial relations, dynamic and fair company implemented industrial relations of each operational unit without distinction of race, religion, race, physical condition, gender, sexual orientation, membership of union, political affiliation and age in all types of field work".</p> <p>This policy is publicly available and stakeholder can access it upon request.</p>	YES
6.8.2	<b>(M) Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated.</b>			
	<p>a. Is there evidence that employees and groups including local communities, women, and migrant workers have not been discriminated against?</p> <p>b. Are the employees and groups including local communities, women, and migrant workers happy with the way the company is treating them?</p> <p>c. Are there complaints against the company on issues relating to discrimination?</p> <p>d. What is the nature of complaints employees and groups including local communities, women, and migrant workers have lodged</p>	<ul style="list-style-type: none"> <li>- List of employee BPRE, BPRE and BPRM per July 2017</li> <li>- Circular No.096/CEO2-SE/12/2010, 14 December 2010</li> <li>- Interview with workers representative</li> </ul>	<p>Worker list of Mill and Estate mentioned that all workers came from different back grounds (race, religion, gender). Worker proportion based on ethnic among others: Javanese, Sundanese, Nias, Flores, Batak, Melayu and Bugis. There are no migrant workers in PT BPL.</p> <p>Ethnic diversity of worker and also during interview with workers, no discrimination was identified based on religion, ethnic, gender. During interview with workers (local worker and migrant worker), no discrimination was identified based on religion, ethnic, gender.</p>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	against the company, if any?			
6.8.3	Records of evidence that equal opportunity and treatment for work shall be available <b>Specific Guidance:</b> <i>For 6.8.3: Recruitment and promotion are based on skills, capabilities, qualities and health conditions</i>			
	<p>a. Does the company keep and maintain a record of their employees' work credentials and medical history?</p> <p>b. Does the company explicitly state the indiscriminatory policy during the recruitment selection, hiring and promotion process?</p> <p>c. Is the company's indiscriminatory policy reviewed regularly?</p> <p>d. Are the company's employees recruited and promoted based on skills, capabilities, qualities, and medical fitness necessary for the job? How is this evidenced?</p>	<ul style="list-style-type: none"> <li>- Document of Job Description, Job competencies</li> <li>- Job vacancy announcement</li> <li>- Recorded of recruitment process from job announcement, selection process and test, medical test and admission</li> <li>- Interview workers.</li> </ul>	<p>In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness.</p> <p>Job opportunities were communicated and given to surrounding villagers at first priority where no discrimination found observed during interview and related records of workers being employed. All workers are treated equally in accordance with company regulation including rights of worker as well. The compliance in accordance with national laws has been evaluated by the organisation as described in criterion 2.1.</p> <p>Sample was reviewed :</p> <ul style="list-style-type: none"> <li>a. SKU Appointment Letter No: 038/BPRE – EM/ /2017 on behalf of Andi Widiyanto dated1 January 2017, Tractor Operator</li> <li>b. SKU Appointment Letter No: 007/BPTE – EM/SK/Jan/2017 – SKU-H on behalf of. Suwito dated 2 January 2017, Harvester</li> </ul>	YES
6.9	There is no harassment or abuse in the work place, and reproductive rights are protected. <b>Guidance:</b> <i>There should be a clear policy developed in consultation with employees, contract workers and other relevant stakeholders, and the policy should be publicly available. Progress in implementing the policy should be regularly monitored, and the results of monitoring activities should be recorded.</i>  <i>Notwithstanding national legislation and regulation, reproductive rights are respected.</i>			
6.9.1	(M) A policy to prevent sexual and all other forms of harassment and violence, shall be documented, implemented and communicated to all levels of the workforce. <b>Specific Guidance:</b>			



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
<p><b>For 6.9.1 and 6.9.2:</b> These policies should include education for women and awareness of the workforce.</p> <p>There should be programmes provided for particular issues faced by women and men, such as violence and sexual harassment in the workplace.</p> <p>A gender committee specifically to address areas of concern to women will be used to comply with this Criterion. This committee, which should include representatives from all areas of work, will consider matters such as: training on women’s rights; counselling for women affected by violence; child care facilities to be provided by the growers and millers; women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks; and women to be given specific break times to enable effective breastfeeding.</p>				
	<p>a. Does the company have the policy to prohibit any form of sexual and all other forms of harassment and violence?</p> <p>b. Has this policy been documented, implemented and communicated clearly to all levels of the workforce?</p> <p>c. Is there a clear protocol for the company to deal/handle such issues/complaints received from the workforce?</p> <p>d. Is there a list of awareness programs or training provided to the workforce in relation to these issues?</p> <p>e. Has the company formed a Gender Committee to address areas of concern to women? Is there a list of the members sitting in the committee? What are the Terms of Reference of the committee? Does it include the handling of issues such as:</p> <ul style="list-style-type: none"> <li>• training on women’s rights;</li> <li>• counselling for women affected by violence;</li> <li>• child care facilities to be provided by the growers and millers;</li> <li>• women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks; and</li> <li>• women to be given specific break times to</li> </ul>	<ul style="list-style-type: none"> <li>- SE No.003/CEO2-SE/01/2011 date January 10 year 2011</li> <li>- Interview with Gender Committee</li> <li>- SOP/NP/SMART/XII/MCAR001, complaint mechanism for sexual harassment</li> <li>- Notulen of Socialization of sexual harassment</li> </ul>	<p>Policy on the prevention of sexual harassment written in SE No.003/CEO2-SE/01/2011 date January 10 year 2011 regarding the sexual harassment prevention.</p> <p>Organization also establishes the sexual harassment handling procedures SOP/NP/SMART/XII/MCAR001. Describes the workflow of sexual harassment handling. Complaints and grievance can submitted orally and written addressed to gender committee --- gender and Persis (Persatuan istri staff) then --- performed victim accompaniment and inform/report to unit head--- based on information, data and evidence obtained and witnesses, the unit head verify and examination in order to obtain a decision, after found a guilty offender unit head may impose appropriate sanctions or company regulations through legal action.</p> <p>Socialization of sexual harassment policy was performed to all employees on February – March 2017.</p> <p>Based on workers interview and group discussion, it was concluded that there was no sexual harassment and violence within the organisation.</p> <p>Gender committee was established by the organisation. Each estate and mill has appointed representative for gender committee. The committee consider matters such as; socialization on women’s rights, child care facilities to be provided by the growers and millers, women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks, and women to be given specific break times to enable effective breastfeeding. Organization has also setting several signboards about breastfeed up to nine months before resuming chemical spraying or usage tasks. It was observed</p>	<p>YES</p>



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	enable effective breastfeeding. f. Is the policy regularly reviewed?		that has been assembled on main access road and crowd locations such as: division office and housing area.	
6.9.2	<p>(M) A policy to protect the reproductive rights, shall be documented, implemented and communicated to all levels of the workforce</p> <p><b>Specific Guidance:</b>  <b>For 6.9.1 and 6.9.2:</b> These policies should include education for women and awareness of the workforce.  <i>There should be programmes provided for particular issues faced by women and men, such as violence and sexual harassment in the workplace.</i>  <i>A gender committee specifically to address areas of concern to women will be used to comply with this Criterion. This committee, which should include representatives from all areas of work, will consider matters such as: training on women’s rights; counselling for women affected by violence; child care facilities to be provided by the growers and millers; women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks; and women to be given specific break times to enable effective breastfeeding.</i>  <b>For 6.9.2:</b> see Indicator 4.6.12</p>			
	<p>a. Is there a policy to protect the reproductive rights of all, especially of women?</p> <p>b. Has this policy been documented, implemented and communicated clearly to all levels of the workforce?</p> <p>c. How is this policy communicated to all levels of the workforce?</p>	<ul style="list-style-type: none"> <li>- Circular Letter/Surat Edaran” (SE No.266/HR-OPS/08/2010)</li> <li>- Gender committee BPRE, BPTTE and BPRM</li> <li>- Work program Gender committee 2016 and 2017</li> </ul>	<p>Policy to protect women reproduction rights has been also stated in “Circular Letter/Surat Edaran” (SE #.266/HR-OPS/08/2010). Menstruation leave are given to female worker for 2 days-off without any salary deduction.</p> <p>Gender committee was established by the organisation since 2013. The committee has representatives from all areas of work. The committee consider matters such as; trainings on women’s rights, counselling for women affected by violence, women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks, and women to be given specific break times to enable effective breastfeeding.</p> <p>Communication to all workers pertinent to prevent sexual harassment and protect women reproduction was conducted by the gender committee team and attended by the organisation.</p> <p>Complaint handling procedure for sexual harassment was determined. All complaints can be issued verbal and or written and informed to all administrator, gender committee and Mill/Estate Manager.</p>	YES
6.9.3	A specific grievance mechanism which respects anonymity of complainants where requested, and as long as they are supported with adequate information, shall be documented, implemented, and communicated to all workforce.			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>a. Does the company have a mechanism to handle employment grievances, that respects anonymity and protects complainants where requested?</p> <p>b. Does the mechanism provide a way for workers to report a grievance against a supervisor to someone other than that supervisor?</p> <p>c. Is the mechanism documented, implemented and communicated clearly to all levels of the workforce?</p> <p>d. Has the company identified personnel who will be responsible to receive and manage complaints received from the workforce?</p> <p>e. Has the company received any reports or complaints of harassment or abuse? How was it addressed or resolved?</p> <p>f. Is the policy reviewed regularly?</p>	<ul style="list-style-type: none"> <li>- SOP/SMART/SIGS-CSR/SADV/II/03 date 1 July 2014</li> <li>- Public consultation with stakeholder during audit</li> <li>- PKB Chapter XII Article 43 of the Settlement laments</li> <li>- <i>Form Monitoring Penanganan Keluhan dan Ketidakpuasan Periode January – June 2017</i></li> </ul>	<p>Documented procedure for complaints and grievances was established SOP <i>Penanganan Keluhan dan Ketidakpuasan</i> (grievance) SOP/SMART/SIGS-CSR/SADV/II/03 date 1 July 2014. Administration Head (KTU) is the one who responsible to receive complaints and grievances, internal and external.</p> <p>Company guarantee the anonymity of the reporter and whistle blower. If, can't be settle internally then will be settle in bipartit negotiation. For external complaints will be respond in 1 month time after the complaint receive.</p> <p>SPO Region monitor the handling of complaints and grievances every month and recorde it in "<i>Form Monitoring Penanganan Keluhan dan Ketidakpuasan</i>" and report it to Estate/Factory Manager, after that the form will send to Head Office. Period January – June 2016, there are no complaints and grievances recorded.</p> <p>The procedure was made already accommodate all stakeholders and with understandable language (Indonesian). Dissemination of code of ethics policy has been carried out :</p> <ul style="list-style-type: none"> <li>a. On April – May 2017 in Bukit Perak Mill and Bukit Perak Estate</li> <li>b. On 20 – 21 April 2017 in Bukit Permata Estate</li> <li>c. On 4 March 2017 to local contractor in Bukit Perak Mill, Bukit Perak Estate and Bukit Permata Estate</li> <li>d. On 28 November 2016 socialization about policy, procedure and land compensation to stakeholder.</li> </ul> <p>Mechanisms of complaints and grievances of workers described in Chapter XII PKB Article 43 of the Settlement laments.</p> <p>In the event of employee complaints of employment, working conditions and employment situation will be resolved amicably by direct supervisor no later than 3 days and if unresolved forwarded to higher management hierarchy longer than 7 days. If the settlement is not bringing results, the worker may submit the matter to the SPSI to discussed with the company, if it cannot be resolved as well as</p>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			internal (bipartite) the settlement efforts are channelled through the procedure of Law No. 2 in 2004.	
6.10	<p>Growers and millers deal fairly and transparently with smallholders and other local businesses.</p> <p><b>Guidance:</b>  <i>Transactions with smallholders should consider issues such as the role of middle men, transport and storage of FFB, quality and grading. The need to recycle the nutrients in FFB (see Criterion 4.2) should also be considered; where it is not practicable to recycle wastes to smallholders, compensation for the value of the nutrients exported may be considered through the FFB price.</i></p> <p><i>Smallholders should have access to the grievance procedure under Criterion 6.3 if they consider that they are not receiving a fair price for FFB, whether or not middle men are involved.</i></p> <p><i>The need for a fair and transparent pricing mechanism is particularly important for outgrowers who are contractually obliged to sell all FFB to a particular mill.</i></p> <p><i>If mills require smallholders to change practices to meet the RSPO Principles and Criteria, consideration should be given to the costs of such changes, and the possibility of advance payments for FFB can be considered.</i></p>			
6.10.1	<p>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p><b>Specific Guidance:</b>  <b>For 6.10.1: FFB pricing in Indonesia refers to the Regulation of the Minister of Agriculture No. 14/Permentan/OT.140/2/2013</b></p>			
	<p>a. How is the price of FFB determined?</p> <p>b. Is current and past prices paid for Fresh Fruit Bunches (FFB) publicly available? How?</p> <p>c. Was there any complaint on FFB pricing?</p> <p>d. How was the complaint handled?</p> <p>e. What was the solution?</p>	<ul style="list-style-type: none"> <li>- Price FFB determined monthly from government (Disbun Provinsi Bangka Belitung)</li> <li>- Public consultation with stakeholders</li> <li>- Contractual agreement with the third parties of supplier FFB</li> <li>- Field visit</li> </ul>	<p>Current and past prices paid for Fresh Fruit Bunches (FFB) was publicly available. FFB price based on Letter Price (Berita Acara Perhitungan indeks "K" dan harga TBS kelapa sawit), issued by the local provincial from local commission team Province Bangka Belitung and revised every monthly, such as CPO and PK average prices and Index K.</p> <p>Everyone or third party who will sell FFB to the Bukit Perak Mill can see and access price fixing which issued by plantation agency authority (Disbun) west Bangka Regent each month and it available in mill office and posted on the information board in the area of mill.</p> <p>Mechanisms, explanations, and complaint handling related to the buying and selling of FFB contained in the purchase agreement letter (SPK). Receiving of external FFB suppliers during in July 2016 – June 2017 came from PT. Bumi Bangka Lestari and PT. Bumi</p>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			Permai Surya Lestari. During audit, it was observed that there was no complaint on FFB pricing.	
6.10.2	(M) Pricing mechanisms for Fresh Fruit Bunches (FFB) and inputs/services shall be explained and documented (where these are under the control of the mill or plantation).			
	<p>a. What is the mode of recording/documenting transactions between millers with middlemen and/or smallholders?</p> <p>b. Is there evidence that growers/millers have explained FFB pricing and pricing mechanisms for FFB?</p> <p>c. Are there any inputs/services rendered by the millers to smallholders/middle men? Are these inputs/services having any influence to the pricing and pricing mechanisms for FFB?</p> <p>d. Have inputs/services been documented (where these are under the control of the mill or plantation)?</p> <p>e. Where it is not practicable to smallholders to recycle waste (i.e. EFB), is there compensation for the value of the nutrients of EFB given to the smallholders? Is this translated into the pricing factors of FFB?</p>	<ul style="list-style-type: none"> <li>- Price FFB determined monthly from government (Disbun Provinsi Bangka Belitung)</li> <li>- Public consultation with stakeholders</li> <li>- Contractual agreement with the third parties of supplier FFB</li> <li>- Field visit</li> </ul>	<p>Pricing mechanisms for FFB was described in FFB purchase procedure. Price mechanism of FFB, CPO and palm kernel was determined by province government and reviewed in monthly basis. The price was applied for all growers in the province. The company updates the information on the FFB pricing formula that includes details of transport, milling and shipping costs, each month and provides it to out growers. Annual contract are made between FFB suppliers and mill, describing FFB specification required, contract period, determination of FFB pricing, and term of payment. Information of FFB set was available to the FFB suppliers and the commitment was stated in the procedure.</p>	YES
6.10.3	<p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p><b>Specific Guidance:</b>  <b>For 6.10.3 :</b> Referring to Regulation of the Minister of Agriculture No. 14/Permentan/OT.140/2/2013, requirements to be considered in the contract are such as:</p> <ol style="list-style-type: none"> <li>1. K Index, which is open and transparent to the smallholders or their institutions</li> <li>2. Distributing the information about the decision of the Pricing Team to the smallholders institutions</li> <li>3. Method of fruit sortation</li> <li>4. Involvement of smallholders institutions on the evaluation of weigh instrument by authorised local agency.</li> </ol>			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul style="list-style-type: none"> <li>a. Is there a contractual agreement between the miller and smallholders/ middle men?</li> <li>b. Do all parties understand the contractual agreements they have entered into?</li> <li>c. Are all contractual agreements fair, legal and transparent?</li> <li>d. Who keeps the contractual agreements?</li> </ul>	<ul style="list-style-type: none"> <li>- Price FFB determined monthly from government (Disbun Provinsi Bangka Belitung)</li> <li>- Public consultation with stakeholders</li> <li>- Contractual agreement with the third parties of supplier FFB</li> <li>- Field visit</li> </ul>	<p>Annual contract were made between FFB suppliers and mill, describing FFB specification required, contract period, determination of FFB pricing, and term of payment. Information of FFB set was available to the FFB suppliers and the commitment was stated in the procedure. The selection and evaluation of supplier/vendor was based on capability of supplier and vendor to supply required inputs and or services. Specification of inputs and or services required was communicated to the supplier/vendor through tender document or request for quotation.</p> <p>It is also performed to the non FFB suppliers and contractors who cooperate with the company. All parties who cooperate with companies both suppliers and contractors work according to the agreements, the rights and liabilities all parties written and agreed in the contract (SPK) which signed together. The contract was fairly, legal and transparent. Contract copy kept by each party.</p> <p>Regarding the boiler overhaul services executed by boiler manufacturer (PT Maxiterm Boiler Indonesia) that the contract agreement created by the head office Jakarta, BPRM was only created the PO (Purchase order) submitted to the head office. All of the precautions regarding the rights and liabilities all parties were kept at the head office and the vendor it self.</p>	<p>YES</p>
6.10.4	Agreed payments shall be made in a timely manner.			
	<ul style="list-style-type: none"> <li>a. How are all payments made to the smallholders/middle men?</li> <li>b. What is the mode of recording/documenting transactions between millers with middlemen and/or smallholders?</li> <li>c. Have agreed payments been made in a timely manner?</li> </ul>	<ul style="list-style-type: none"> <li>- Price FFB determined monthly from government (Disbun Provinsi Bangka Belitung)</li> <li>- Contractual agreement with the third parties of supplier FFB</li> </ul>	<p>A review to the current FFB purchase records shows that the price set was consistently used as recorded in the record of FFB receiving. The payment of FFB received were planned and executed in timely manner in line with term of payment agreed within the contract</p> <p>The payments method was described within contractual agreements (SPK) that describe the unit price and warranty include the payment duration. An application for funds transfer was evident as proof that payment has been made in accordance with the agreement in the contract.</p>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
6.11	<p>Growers and millers contribute to local sustainable development where appropriate.</p> <p><b>Guidance:</b>  <i>Contributions to local development should be based on the results of consultation with local communities and social impact assessment. See also Criterion 6.2 for consultation process. Such consultation should be based on the principles of transparency, openness and participation, and should encourage communities to identify their own priorities and needs, including the different needs of men and women.</i></p> <p><i>Where candidates for employment are of equal merit, preference should always be given to members of local communities. Positive discrimination should not be recognised as conflicting with Criterion 6.8.</i></p> <p><i>Private plantations refer to the Act No. 40 year 2007 regarding Limited Company (PT), clause 74 (1&amp;2) and their explanations; Government Regulation No. 47 year 2012 regarding Environment and Social Responsibilities, clause 5 (1) and explanation whereas social and environment responsibilities shall be executed.</i></p> <p><i>State plantations refer to Act No. 19 year 2003 regarding State Owned Company (BUMN) clause 9 (1).</i></p>			
6.11.1	Records of Contributions to local development based on the results of consultation with local communities shall be available.			
	<p>a. Have the local development needs and priorities been identified in consultation with local communities? (refer also to C 6.2)</p> <p>b. What are the contributions made to local development? Are they in accordance with the results of consultation?</p> <p>c. Are there efforts to improve or maximise employment opportunities at the company for local communities?</p>	<ul style="list-style-type: none"> <li>- CSR Program PT BPL year 2016 and 2017</li> <li>- Realization of CSR Program year 2016 and 2017</li> <li>- Social Impact Monitoring Report PT BPL tahun 2016</li> <li>- Public consultation on 13 July 2017</li> </ul>	<p>Records of organization contribution to regional development were evident, among either: agreement contract, and social assistance list.</p> <p>CSR program was provided by the organization and deployed in to CSR program. Activity of CSR was identified by the estate/mills (Rekapitulasi Laporan Kegiatan CSR), including: repairs the village road, low-cost market, mosques renovation in surrounding villages, checks and medical for free, etc. Implemented document was recorded within photo and minutes of aid delivery. Evidence of the implementation of CSR program is also evidenced by confirmation from the stakeholders during the public consultation on 13 July 2017. However company have to keep trying to improve and develop CSR programs based on the needs of local communities.</p> <p>Company's contribution towards improving the local economy around is also quite large it can be seen by the number of local employees who work in the company. Where candidates for employment are of equal merit, organization has preference always been given to members of local communities.</p> <p>Another local business was supported for growers and mills, main supports were pertinent to procurement spare parts and vehicle maintenance. The local business is assigned and controlled by</p>	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>central purchasing in Head Office.</p> <p>To improve the manpower recruitment for local communities, company through Manager conduct communication to head of village. In social impact monitoring, CSR program was evaluated with participation of villagers.</p> <p>Realization of CSR program in 2016 and mid 2017 are :</p> <ul style="list-style-type: none"> <li>a. Education</li> <li>b. Health</li> <li>c. Economy</li> <li>d. Maintenance of infrastructure</li> <li>e. Religion activities</li> <li>f. Social, recreation and sports activities</li> </ul>	
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve scheme smallholder productivity.			
	<ul style="list-style-type: none"> <li>a. Is there a complete registry of independent smallholders in the supply base?</li> <li>b. Have efforts been made to improve the farming practices of independent smallholders?</li> <li>c. Where there are schemed smallholders, have efforts and/or resources been allocated to improve smallholder productivity?</li> </ul>	<ul style="list-style-type: none"> <li>- Interview with management of the PT. BPL</li> <li>- Public consultation with stakeholders</li> <li>- Field visit</li> <li>- <i>Izin Usaha Perkebunan (IUP)</i></li> </ul>	Based on interview with management of the PT. BPL, Public consultation with stakeholders, field visit, and document review (IUP) that there were no smallholders in the PT. BPL.	NA
6.12 <sup>1</sup>	<p>No forms of forced or trafficked labour are used.</p> <p><b>Guidance</b>  <i>Migrant workers should be legalised, and a separate employment agreement should be drawn up to meet immigration requirements for foreign workers and international standards. Any regulated deductions made should not jeopardise a decent living wage.</i></p> <p><i>Passports should only be voluntarily surrendered.</i></p> <p><i>There should be evidence of due diligence in applying these indicator and guidance to all sub-contract workers and suppliers.</i></p> <p><i>Definition of types of worker refers to Acts No.13 year 2003 regarding Manpower.</i></p>			



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
6.12.1	<p>(M) There shall be evidence that no forms of forced or trafficked labour are used.</p> <p><b>Specific Guidance:</b>  <b>For 6.12.1:</b> <i>Workers should enter into employment voluntarily and freely, without the threat of a penalty, and should have the freedom to terminate employment without penalty given reasonable notice or as per agreement.</i></p>			
	<p>a. What is the company's policy on forced or trafficked labour?</p> <p>b. How does the company define forced or trafficked labour?</p> <p>c. What is the process of recruiting foreign/ migrant workers directly and/or through licenced outsourcing agencies/ labour suppliers?</p> <p>d. Who is the person responsible for selecting/ screening labour suppliers/ outsourcing agents?</p> <p>e. Do the foreign workers have to pay a fee to the employment recruitment agency or labour suppliers in the workers' countries of origin? If yes, does it jeopardise decent living wage?</p> <p>f. Are there restrictions on workers from leaving the mill or estate or their housing facilities outside working hours?</p> <p>g. What is the process if a worker wants to terminate their employment before their contract expires? In this case, who pays for the return transportation?</p> <p>h. What are the penalties imposed if the workers were terminated or fired before their contract expires?</p> <p>i. Who keeps the workers passports or identity documents?</p>	<ul style="list-style-type: none"> <li>- Social and Environment Policy dated 8 September 2015</li> <li>- Interview with employee on 11 - 13 July 2017</li> <li>- PKB and PKWT contract</li> </ul>	<p>Organization has established and documented policy about force or trafficked labour in Social and Environment Policy article 3.1 stated " Acknowledge, Respect, and Strengthen workers right. Company forbid child labour, forced labour, provide work contract in language that understand by workers and make sure the payment give to workers in simpe ways, on time and clear.</p> <p>There was no forced labour in Bukit Perak Estate, Bukit Permata Estate and Bukit Perak Mill. All the labour/employment has the right conform to their contract. The contract contains no forcing to the labour. The contract was agreed between labour and company. The form of labour contract such as: <i>Perjanjian Kerja Bersama</i> (PKB) and PKWT contract.</p> <p>Interview with the employment concluded that there was no compliant and any grievances regarding the contract and their right.</p> <p>During the audit there was no migrant workers in Bukit Perak Estate, Bukit Permata Estate and Bukit Perak Mill</p>	<p>YES</p>



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	j. If workers do not keep their passports or identity documents, is this legally allowed? k. What is the process for workers' to hand over their passports or identity documents to the company? l. Do workers have unrestricted access to their passports or identity documents? Describe how workers are able to access their documents?			
6.12.2	It shall be demonstrated that no contract substitution has occurred. <b>Specific Guidance:</b> <i>For 6.12.2: Contract substitution is the change of initial contract without prior consultation and agreement from the workers.</i>			
	a. Is there evidence of contract substitution occurring? b. Are foreign workers asked to sign a contract upon arriving in the receiving country? If yes, is that contract identical to the one signed in the country of origin? c. Are workers given a copy of their employment contracts? If yes, is the contract identical to the one signed at the time of recruitment?	- Interview with employees on 11 - 13 July 2017	There was no substitution contract occurred. Workers get the job and contract conform to agreement between company and its workers.	N/A
6.12.3	(M) Where migrant/foreign/honorary workers are employed, a special worker policy and procedures and the evidence of implementation shall be available. <b>Specific Guidance:</b> <i>For 6.12.3: The special labour policy should include:</i> a. <i>Statement of the non-discriminatory practices;</i> b. <i>No contract substitution;</i> c. <i>Post-arrival orientation programme to focus especially on language, safety, labour laws, cultural practices etc.;</i> d. <i>Decent living conditions to be provided.</i>			
	a. What is the company's policy and procedures for temporary or foreign/migrant workers? Does the special labour policy include: <ul style="list-style-type: none"> <li>• Statement of the non-discriminatory</li> </ul>	- List of Employee (BPRE, BPTTE and BPRM) - Interview with employees on 11	There was no substitution contract occurred. Workers get the job and contract conform to agreement between company and its workers.	N/A

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	practices? • No contract substitution? • Post-arrival orientation programme with emphasis on language, safety, labour laws, cultural practices etc.? • The provision of decent living conditions? b. Have the policies and procedures been implemented?	- 13 July 2017		
6.13 <sup>2</sup>	Growers and millers respect human rights. <b>Guidance:</b> See Criteria 1.2, 2.1 and 6.3 All levels of operations include contracted third parties (e.g. those involved in security). Regulations related to the Human Rights refer to the Act No. 39 year 1999 regarding Human Rights.			
6.13.1	(M) A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations.			
	a. Is there a company policy on human rights? b. How is this communicated to all employees, including outsourced workers, customers and suppliers? If by training, how often is the training conducted? c. Who has the task of communicating the policy internally and externally? d. Does the company have any outstanding cases of human rights violations?	- Social and Environment Policy dated 8 September 2015	Organization has established and documented policy about human rights in Social and Environment Policy dated 8 September 2015 article 2.2.3 stated that “We commitment to upheld and promote General Requirements of Human Rights PBB to all wokers, contractor, local communities in all company operation unit.  Policy has been socialized to workers and contractor by Mr. Damrah Thalib (SPO Region Babel) and Estate/Factory Manager in June 2016.  This policy has been disseminated to all employees and the community around of Companies. Evidence of dissemination, list of attendance of all employees and the community was sighted. There is no cases regarding human rights violation.	YES

**PRINCIPLES 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS**

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
7.1	<p>A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.</p> <p><b>Guidance:</b>  <i>The result of Strategic Environment Study (Kajian Lingkungan Hidup Strategis/KLHS) conducted by the authority shall be a major consideration in the new land development and planting.</i></p> <p><i>See also Criteria 5.1 and 6.1.</i>  <i>Implementation of independent social and environment impact assessment may use AMDAL as part of the process. However, it is the company's responsibility to provide objective and appropriate evidence to the audit team that the full requirements of a Social and Environment Impact Analysis (SEIA) are met for all aspects of plantation and mill operation, and captures all changes over time.</i></p> <p><i>The terms of reference should be defined and impact assessment should be carried out by accredited independent experts, in order to ensure an objective process. A participatory methodology including external stakeholder groups is essential to the identification of impacts, particularly social impacts. Stakeholders such as local communities, government and NGOs should be involved through interviews and meetings, and by reviewing findings and plans for mitigation.</i></p> <p><i>It is recognised that oil palm development can cause both positive and negative impacts. These developments can lead to some indirect/secondary impacts which are not under the control of individual growers and millers. To this end, growers and millers should seek to identify the indirect/secondary impacts within the SEIA, and where possible work with partners to explore mechanisms to mitigate the negative indirect impacts and enhance the positive impacts.</i></p> <p><i>Plans and field operations should be developed and implemented to incorporate the results of the assessment. One potential outcome of the assessment process is that the development, partially or entirely, may not proceed because of the magnitude of potential impacts.</i></p> <p><i>For smallholder schemes, the scheme management should address this criterion. For individual smallholders this criterion does not apply</i></p> <p><i>For new planting with areas ≤ 3000 Ha, the assessment may be conducted internally or externally. And for new planting with areas &gt; 3000 Ha, the assessment shall be conducted externally.</i></p> <p><i>For new planting with area &gt; 3000 Ha needs a comprehensive and independent assessment which may be in the form of AMDAL (SEIA) while areas ≤ 3000 Ha requires Upaya Pengelolaan Lingkungan Hidup (UKL) – Upaya Pemantauan Lingkungan Hidup (UPL). Social and Environment Assessment at minimum must cover:</i></p> <ol style="list-style-type: none"> <li><i>a. Assessment of the impacts of all major planned activities, including planting, mill operations, roads and other infrastructure;</i></li> <li><i>b. Assessment, including stakeholder consultation, of High Conservation Values (see Criterion 7.3) that could be negatively affected;</i></li> <li><i>c. Assessment of potential effects on adjacent natural ecosystems of planned developments, including whether development or expansion will increase pressure on nearby natural ecosystems;</i></li> <li><i>d. Identification of watercourses and wetlands and assessment of potential effects on hydrology and land subsidence of planned developments. Measures should be planned and implemented to maintain the quantity, quality and access to water and land resources;</i></li> <li><i>e. Baseline soil surveys and topographic information, including the identification of steep slopes, marginal and fragile soils, areas prone to erosion, degradation, subsidence, and</i></li> </ol>			

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	<p><i>flooding;</i></p> <p><i>f. Analysis of type of land to be used (forest, degraded forest, cleared land);</i></p> <p><i>g. Analysis of land ownership and user rights;</i></p> <p><i>h. Analysis of current land use patterns;</i></p> <p><i>i. Assessment of potential social impacts on surrounding communities of a plantation, including an analysis of potential effects on livelihoods, and differential effects on women versus men, ethnic communities, and migrant versus long-term residents;</i></p> <p><i>j. Identification of activities which may generate significant GHG emissions.</i></p> <p><i>If AMDAL or UKL-UPL documents still do not cover point a to j, additional social and environment impact assessment shall be conducted.</i></p> <p><i>If internal assessment identifies sensitive social and environment issues or areas, then independent assessment shall be conducted.</i></p> <p><i>Documents of environment impact assessment are the environment documents based on the regulations, such as:</i></p> <p><i>a. Environmental Impact Assessment (Analisis Mengenai Dampak Lingkungan Hidup/AMDAL) for plantation with areas of &gt; 3000 Ha</i></p> <p><i>b. Environmental Management Effort (Upaya Pengelolaan Lingkungan Hidup/UPL) and Environmental Monitoring Effort (Upaya Pemantauan Lingkungan Hidup/UKL) for plantation with areas of &lt; 3000 Ha.</i></p> <p><i>c. Environmental Management Document (Dokumen Pengelolaan Lingkungan Hidup/DPLH)</i></p> <p><i>d. Environmental Evaluation Document (Dokumen Evaluasi Lingkungan Hidup/DELH)</i></p> <p><i>e. Environmental Information Performance (Penyajian Informasi Lingkungan Hidup/PIL)</i></p> <p><i>f. Environmental Evaluation Performance (Penyajian Evaluasi Lingkungan Hidup/PEL)</i></p> <p><i>g. Environmental Evaluation Study (Studi Evaluasi Lingkungan Hidup/SEL)</i></p> <p><i>h. Environment Management and Monitoring Document (Dokumen Pengelolaan dan Pemantauan Lingkungan Hidup/DPPL)</i></p> <p><i>i. Declaration Letter for Managing and Monitoring Environment (Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL)</i></p> <p><i>j. And other documents required by the regulation.</i></p> <p><i>Regulations relate to the environment documents, such as:</i></p> <p><i>a. Government Regulation No. 27 year 2012 regarding Environment Permit</i></p> <p><i>b. Regulation of the Minister of Environment No. 13 year 2010 regarding Environmental Management and Monitoring Effort (UKL-UPL) and Declaration Letter for Managing and Monitoring Environment (SPKL)</i></p> <p><i>c. Regulation of the Minister of Environment No. 5 year 2012 regarding Environmental Evaluation Document (DELH)</i></p> <p><i>d. Regulation of the Minister of Environment No. 14 year 2010 regarding Environmental Management and Monitoring Document (DPPL)</i></p> <p><i>e. Regulation of the Minister of Environment No.12 year 2007 regarding Environmental Management and Monitoring Document for Business and or Activities, with No Environmental Management Document.</i></p> <p><i>f. Regulation of the Minister of Environment No. 5 year 2012 regarding Types of Business Obligated to Have Amdal</i></p> <p><i>g. Regulation of the Minister of Environment No. 8 year 2006 regarding Guidance for AMDAL preparation</i></p> <p><i>h. Regulation of the Minister of Environment No. 17 year 2012 regarding Involvement of Community and Information Transparency in the AMDAL Process</i></p> <p><i>i. Decree of the Head of Bapedal No. No. 299 year 1996 regarding Technical Guidance of Social Aspects for AMDAL preparation</i></p> <p><i>j. Regulation of the Minister of Environment No. 11 year 2008 regarding Competence Requirements for AMDAL preparation documents and Requirements for Training Institutions in</i></p>			

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<i>Conducting Training for AMDAL Competency</i>				
7.1.1	(M) An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented.			
	<p>a. Is there any new planting or operations, or expanding existing ones by the company? What is the size of the new planting area?</p> <p>b. Has an independent social and environmental impact assessment (SEIA) been documented for the new plantings?</p> <p>c. Are the impact assessments prepared by accredited independent experts?</p> <p>d. Are all environmental and social impacts adequately identified?</p> <p>e. Is the SEIA undertaken based on the scope of operation?</p> <p>f. Is the SEIA undertaken in a participatory manner, including the relevant affected stakeholders?</p> <p>g. Does the SEIA assessment include and as a minimum:</p> <ul style="list-style-type: none"> <li>• Assessment of the impacts of all major planned activities, including planting, mill operations, roads and other infrastructure?</li> <li>• Assessment, including stakeholder consultation, of High Conservation Values (see Criterion 7.3) that could be negatively affected?</li> <li>• Assessment of potential effects on adjacent natural ecosystems of planned developments, including whether development or expansion will increase pressure on nearby natural ecosystems?</li> </ul>	<ul style="list-style-type: none"> <li>- Initial Environmental Impact Assessment documents (ANDAL, RKL and RPL) approved by ministry of agriculture (No. 046/ANDAL/RKL-RPL/BA/II/1996) on 16<sup>th</sup> February 1996.</li> <li>- Documented RKL and RPL approved by ministry of agriculture (No046/ANDAL/RKL-RPL/BA/II/1996) on 16<sup>th</sup> February 1996.</li> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>	<p>The organisation did not acquire any new land after HGU in 1995. It was noted that there was no ongoing progress of new land acquisition during field observation and interview with stakeholders. At the time, plantation at Bukit Perak Estate and Bukit Permata Estate have the planting in 1991, 1992, 1993, 1994, 1995, 1996, and 1997. There was no new planting since November 2005.</p>	<p>NA</p>

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	<ul style="list-style-type: none"> <li>• Identification of watercourses and wetlands and assessment of potential effects on hydrology and land subsidence of planned developments. Measures should be planned and implemented to maintain the quantity, quality and access to water and land resources?</li> <li>• Baseline soil surveys and topographic information, including the identification of steep slopes, marginal and fragile soils, areas prone to erosion, degradation, subsidence, and flooding?</li> <li>• Analysis of type of land to be used (forest, degraded forest, cleared land)?</li> <li>• Analysis of land ownership and user rights?</li> <li>• Analysis of current land use patterns?</li> <li>• Assessment of potential social impacts on surrounding communities of a plantation, including an analysis of potential effects on livelihoods, and differential effects on women versus men, ethnic communities, and migrant versus long-term residents?</li> <li>• Identification of activities which may generate significant GHG emissions?</li> </ul> <p>h. What were the main findings of the assessment?</p> <p>i. Were secondary impacts of oil palm development identified in the SEIA?</p>			
7.1.2	Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts.			
	a. Does the finding of the SEIA uncover any negative impacts? If yes, has a management plan and operational procedures been developed to mitigate the negative impacts?	- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017	There was no new planting since November 2005.	NA

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	b. Has the management plan and operational procedures been implemented?	<ul style="list-style-type: none"> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>		
7.1.3	<p>Where the development includes an outgrower scheme (<i>skema kemitraan</i>), the impacts of the scheme and the implications of the way it is managed shall be given particular attention.</p> <p><b>Specific guidance:</b>  <b>For 7.1.3. :</b> <i>Outgrower scheme is a farmer selling the FFB through exclusive contract to the growers and millers. Schemed smallholders (plasma) included into this scheme.</i></p>			
	<p>a. Are any outgrowers involved in the new plantings?</p> <p>b. Has management prepared a plan for the outgrower scheme?</p> <p>c. Does the SEIA include an assessment of impacts and the implications of the way the outgrower scheme is managed?</p>	<ul style="list-style-type: none"> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>	There was no new planting since November 2005.	NA
7.2	<p>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> <p><b>Guidance:</b>  <i>These activities can be linked to the Social and Environmental Impact Assessment (SEIA) (see Criterion 7.1) but need not be done by independent experts.</i></p> <p><i>Soil surveys should be appropriate to identify soil suitability of oil palm cultivation for the scale of operation.</i></p> <p><i>Maps of Soil suitability or soil survey should be established in line with the operational scale and include information on soil types, topography, hydrology, rooting depth, moisture availability, stoniness and fertility to ensure long-term sustainability of the development. Soils requiring appropriate practices should be identified (see Criteria 4.3 and 7.4). This information should be used to plan planting programs, etc. Measures should be planned to minimize erosion through appropriate use of heavy machinery, terracing on slopes, appropriate road construction, rapid establishment of land cover, protection of riverbanks, etc. Areas located within the plantation perimeters that are considered unsuitable for long-term oil palm cultivation will be delineated in plans and included in operations for conservation or rehabilitation as appropriate (see Criterion 7.4).</i></p> <p><i>Assessing soil suitability is also important for smallholders, particularly where there are significant numbers operating in a particular location. Information should be collected on soil suitability by companies planning to purchase Fresh Fruit Bunches (FFB) from outgrowers scheme (<i>skema kemitraan</i>) in certain location. Companies should assess this information and provide information to smallholders involving in the outgrowers scheme, and/or in conjunction with relevant government/public institutions and other organizations (including NGOs) provide information in order to assist independent smallholders to grow oil palm sustainably.</i></p> <p><i>One of referred guidances is on the table 1 (page. 6) regarding Land Suitability Criteria for Oil Palm in the Technical Guidance for Developing Oil Palm Estate issued by Directorate General of Estate Crops, Ministry of Agriculture, 2006.</i></p>			

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7.2.1	(M) Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations.			
	<p>a. Are soil suitability/survey maps for the planted areas available or in place?</p> <ul style="list-style-type: none"> <li>• Is the map adequate to establish the long-term suitability of land for oil palm cultivation?</li> <li>• Are the soil suitability maps or soil surveys appropriate to the scale of operation?</li> <li>• Does the soil suitability maps or soil surveys include information on soil types, topography, and hydrology, rooting depth, moisture availability, stoniness and fertility?</li> <li>• Do the soil suitability maps or soil surveys identify soils requiring appropriate practices?</li> </ul> <p>b. Are there any areas located within the plantation perimeters that are considered unsuitable for long-term oil palm cultivation?</p> <ul style="list-style-type: none"> <li>• Are such areas delineated in the plans?</li> <li>• Are there areas set aside for conservation?</li> <li>• Or are there plans for rehabilitation as appropriate?</li> </ul> <p>c. Does the company plan to purchase Fresh Fruit Bunches (FFB) from potential developments of independent suppliers in a particular location?</p> <p>d. If yes, the following information should be obtained:</p> <ul style="list-style-type: none"> <li>• Is information on soil suitability collected and assessed?</li> </ul>	<ul style="list-style-type: none"> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>	<p>There was no new planting since November 2005.</p>	<p>NA</p>



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	<ul style="list-style-type: none"> <li>Has the company provided information on soil suitability to the independent smallholders in order to assist them to grow oil palm sustainably?</li> </ul>			
7.2.2	Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available.			
	<p>a. Does the area where plantings are done require drainage or irrigation?</p> <p>b. If yes, is there adequate topographic information to guide the planning of drainage and irrigation systems?</p> <p>c. Is the topographic information and best practices taken into consideration during the development of roads and infrastructure?</p>	<ul style="list-style-type: none"> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>	There was no new planting since November 2005.	NA
7.3	<p>New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.</p> <p><b>Guidance:</b>  <i>This Criterion applies to forests and other vegetation types. This applies irrespective of any changes in land ownership or farm management that have taken place since November 2005 unless if previous owner have conducted HCV assessment.</i></p> <p><i>HCVs may be identified in restricted areas of a landholding, and in such cases new plantings can be planned to allow the HCVs to be maintained or enhanced. This refers to the Guidance for HCV Management and Monitoring approved by the RSPO.</i></p> <p><i>The HCV assessment process requires appropriate training and expertise, and will include consultation with local communities, particularly for identifying social HCVs. HCV assessments should be conducted according to the Guidance for Identifying HCV in Indonesia (HCV Toolkit Indonesia) of 2008 or its revision.</i></p> <p><i>Developments should actively seek to utilise previously cleared and/or degraded land on mineral soil. Plantation development should not put direct or indirect pressure on primary forests and HCV through the use of all available agricultural land in an area.</i></p> <p><i>Although the planned development is consistent with the landscape planning by the local and national government, the requirements of protecting HCV still shall be met.</i></p> <p><i>For new planting with areas ≤ 3000 Ha, assessment of HCV can be conducted internally and externally. If the assessment of HCV is conducted internally, in accordance with the scheme of HCV RSPO using ALS system, assessor team leader of HCV shall be an assessor who has obtained license of HCV Assessor from HCVRN. Peer review from the competent party shall be conducted referring to the Common Guidance for the Identification of HCV 2013. For the new planting with the area &gt; 3000 Ha, the assessment of HCV shall be conducted by the external party who has obtained license of HCV Assessor from HCVRN.</i></p> <p><i>In case of small areas located either in hydrologically sensitive landscapes or in HCV areas where conversion can jeopardize large areas or species, the HCV assessment shall be conducted by independent assessor who has obtained license of HCV Assessor from HCVRN (see Guidance: Criterion 7.2). HCV areas can be very small. Once established, new</i></p>			

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	<i>development should comply with Criterion 5.2.</i>			
7.3.1	<p>(M) There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).</p> <p><b>Specific Guidance:</b>  <b>For 7.3.1:</b> Evidence should include historical remote sensing imagery which demonstrates that there has been no conversion of primary forest or any area required to maintain or enhance one or more HCV. HCV Assessment should apply satellite or aerial photographs, land use maps and vegetation maps should be used to inform the HCV assessment.</p> <p><i>Where land has been cleared since November 2005, and without a prior and adequate HCV assessment, it will be excluded from the RSPO certification programme until an adequate HCV compensation plan has been developed and accepted by the RSPO.</i></p>			
	<p>a. Since November 2005, have any new plantings replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs)? If yes, was an adequate HCV assessment carried out prior to the clearing of the land?</p> <p>b. Where HCVs have been identified on the land that is intended for new plantings, have new plantings been planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2)?</p> <p>c. Are there finalised HCV maps and areas endorsed/signed off by management showing type of HCV and area coverage (ha)?</p> <p>d. Has the company comply with NPP procedures? i.e. NPP documents was submitted and put for public notification.</p> <p>e. Is CB verification of NPP documents include field verification? If not, field verification of HCV is required during certification audit.</p> <p>f. Where land has been cleared since November 2005, and without a prior and adequate HCV</p>	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>	<p>There was no new planting since November 2005.</p>	<p>NA</p>

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	assessment, is there evidence that an adequate HCV compensation plan for the affected area has been developed and accepted by the RSPO?			
7.3.2	(M) Reports of comprehensive HCV assessment, which involves stakeholder consultation and includes record of land-use change since November 2005, shall be available. This HCV assessment shall be conducted prior to any conversion or new planting.			
	<p>a. Is the prepared HCV assessment comprehensive? Was the assessment prepared in consultation with the affected stakeholders prior to any conversion or new planting?</p> <p>b. Do the HCV assessments include land use change analysis to determine changes to the vegetation since November 2005? (This analysis shall be used, with proxies, to indicate changes to HCV status)</p>	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>	There was no new planting since November 2005.	NA
7.3.3	Records of land preparation and clearing dates shall be available.			
	a. Are the dates of land preparation and commencement recorded?	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata</li> </ul>	There was no new planting since November 2005.	NA

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		Estate) in 2017 - Public consultation with stakeholders on 13 July 2017 - Field observation		
7.3.4	(M) An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower's relevant operational procedures (see Criterion 5.2).			
	a. Has the company developed an action plan that describes operational actions consequent to the findings of the HCV assessment? b. Does the action plan reference the grower's relevant operational procedures (see Criterion 5.2)?	- Social Impact Assessment - PT Bumi Permai Lestari, 2014. - Identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012". - Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017 - Public consultation with stakeholders on 13 July 2017 - Field observation	There was no new planting since November 2005.	NA
7.3.5	Evidence of consultation with the affected community shall be available in order to identify the area required by such community to fulfill its basic needs, by considering the positive and negative changes to the livelihood as a result of plantation operations. Such matters shall be included in the HCV analysis and management plan (see Criteria 5.2). <b>Specific Guidance:</b> <b>For 7.3.5:</b> <i>The management plan will be adaptive to changes in HCV 5 and 6. Decisions will be made in consultation with the affected communities.</i>			
	a. Have areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, been identified in consultation with the communities?	- Social Impact Assessment - PT Bumi Permai Lestari, 2014. - Identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai,	There was no new planting since November 2005.	NA

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	<p>b. Have these areas been incorporated into HCV assessments and management plans (see Criterion 5.2)?</p>	<p>2012".</p> <ul style="list-style-type: none"> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>		
7.4	<p>Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.</p> <p><b>Guidance:</b>  <i>The process of identifying fragile and marginal soil should be conducted after getting Plantation Business Permit (IUP)</i></p> <p><i>Total area planting on fragile soils including peat within the new development shall not be greater than 100 Ha or 20% of the total area, whichever is smallest (see Criterion 4.3). Adverse impacts may include hydrological risks or significantly increased risks (e.g. fire risk) in areas outside the plantation (see Criterion 5.5). The legal aspect of compliance within this national interpretation document shall follow the changed laws and regulations but should at least meet the above minimum limit.</i></p> <p><i>Planting on peat soils should not be conducted on peat with ≥3 m depth. If planting conducted on peat with &lt;3 m depth, then the area (as regulated by Regulation of the Minister of Agriculture No. 14 year 2009: Guidance on Peatland Utilization for Oil Palm Cultivation) shall meet the following requirements:</i></p> <ol style="list-style-type: none"> <li><i>a. Within designated cultivation area</i></li> <li><i>b. Whereas the proportion of ≤ 3 m depth of peat and mineral soil (if any) is minimal 70% of the total concession area</i></li> <li><i>c. The mineral soil below peat layer is not quartz sand or acidic sulfate soil</i></li> <li><i>d. The peat soils maturity level is mature (sapric)</i></li> <li><i>e. The fertility level is eutropic</i></li> </ol> <p><i>Cultivation on peatland must also comply with Government Regulation No 71 year 2014 concerning the Protection and Management of Peatland Ecosystems</i></p> <p><i>Excessive slope is defined as slope more than 40% referring to Regulation of the Minister of Agriculture No.11/Permentan/OT.140/3/2015 regarding Guidance of Indonesia Sustainable Palm Oil and the Regulation of the Minister of Agriculture No. 47 year 2006 regarding General Guidance for Agriculture at Mountain Area.</i></p> <p><i>Soil conservation measures (such as terracing, individual terrace, legume cover crops, silt pit, frond stacking, etc.) should be conducted.</i></p> <p><i>Soil suitability should be determined using crop and environmental suitability criteria.</i></p> <p><i>Those identified as marginal and/or problematic should be avoided if the soil cannot be improved through agricultural cultivation.</i></p> <p><i>The risky and marginal soils may include sandy soils, low organic content soils, and potential or actual acid sulphate soils. Suitability of these soils is also influenced by other factors</i></p>			

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<p><i>including rainfall, terrain and management practices.</i></p> <p><i>These areas may only be developed for new plantations which have adequate management plans based on best management practices. Failure due to extensive plantings should be avoided on these soil types.</i></p> <p><i>Fragile soils on which extensive planting shall be avoided include peat soils, mangrove sites and other wetland areas.</i></p> <p><i>This activity should be integrated with the social and environmental impact assessment (SEIA) required by Criterion 7.1.</i></p> <p><i>Excessive planting on fragile soil refer to Annex 2 Generic RSPO P&amp;C, 2013.</i></p> <p><i>Wetland definition refers to RAMSAR.</i></p>				
7.4.1	(M) Indicative maps showing marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided.			
	<p>a. Are there maps identifying marginal and fragile soils, including excessive gradients and peat soils?</p> <p>b. If peat is present, does the map show the extent, nature, and depth of peat?</p> <p>c. Are the maps used to identify areas that are inappropriate for planting?</p> <p>d. Have the maps been incorporated for use in the social and environmental impact assessment (SEIA)?</p> <p>e. Is there evidence that planting on extensive areas of peat soils and other fragile soils have been avoided?</p>	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>	There was no new planting since November 2005.	NA
7.4.2	(M) Where limited planting on fragile and marginal soils, including peat, is proposed, a documented plan shall be developed and implemented to protect them without incurring adverse impacts.			
	<p>a. Are there plans to protect planted areas on fragile and marginal soils, including peat from adverse impacts?</p> <p>b. Does the plan take into consideration specific control and NI thresholds, including:</p>	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Report of the identification and analysis of the existence of high conservation value (HCV)</li> </ul>	There was no new planting since November 2005.	NA

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	<ul style="list-style-type: none"> <li>• Slope limits;</li> <li>• List of soil types that need to be avoided, especially peat soil;</li> <li>• Proportion of plantation areas that can include marginal / fragile soil.</li> </ul> <p>c. Has the plan been implemented?</p>	<p>area at PT Bumi Lestari Permai, 2012".</p> <ul style="list-style-type: none"> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>		
7.5				<p>No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p> <p><b>Guidance:</b>  <i>This activity should be integrated with the Social and Environmental Impact Assessment (SEIA) required by Criterion 7.1.</i></p> <p><i>Where new plantings are considered to be acceptable by the communities, management plans and operations should minimise the adverse impacts (such as disturbing sacred sites) and promote positive ones. Agreements with indigenous people, local communities and other stakeholders should be made without coercion or other undue influence (see Guidance for Criterion 2.3).</i></p> <p><i>Where communities decline to release lands rights on these terms the grower or miller must explore legal alternatives such as leasing or renting or securing community land or enclaving or other mutually agreed schemes or decide not to go ahead with its proposed development.</i></p> <p><i>Relevant stakeholders include those affected by or concerned with the new plantings.</i></p> <p><i>Free, prior and informed consent (FPIC) should be applied to all RSPO members throughout the supply chain. Please refer to FPIC guidelines approved by the RSPO (RSPO endorsed Free, Prior and Informed Consent Guide for RSPO Members, November 2015).</i></p> <p><i>Customary and user rights shall be demonstrated through participatory mapping as part of the FPIC process.</i></p> <p><i>Verification evidence may be in the form of documents on socialization to the affected community, agreement or disagreement from the community, communication and consultation with the community.</i></p>
7.5.1				<p>(M) Evidence shall be available that affected local peoples understand they have the right to say 'yes' or '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 grower/miller is signed and ratified by these local peoples (see Criteria 2.2, 2.3, 6.2, 6.4 and 7.6)</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul style="list-style-type: none"> <li>a. Does the new planting area include 'local people's land'?</li> <li>b. If yes, has the community given their consent?</li> <li>c. Is there evidence to demonstrate that the consent/agreement has been given?</li> <li>d. Has the community been given the opportunity to say 'no' to the proposed development?</li> <li>e. Are the principles of the FPIC process followed?</li> </ul>	<ul style="list-style-type: none"> <li>- Initial Environmental Impact Assessment documents (ANDAL, RKL and RPL) approved by ministry of agriculture (No. 046/ANDAL/RKL-RPL/BA/II/1996) on 16<sup>th</sup> February 1996.</li> <li>- Documented RKL and RPL approved by ministry of agriculture (No046/ANDAL/RKL-RPL/BA/II/1996) on 16<sup>th</sup> February 1996.</li> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>	<p>There was no new planting since November 2005.</p>	<p>NA</p>
<p>7.6</p>	<p>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 free, prior and informed consent and negotiated agreements.</p> <p><b>Guidance:</b>  <i>See Criteria 2.2, 2.3 and 6.4 and associated Guidance.</i>  <i>The requirements include indigenous people, as regulated by, such as, the Act No. 5 year 1994 regarding Endorsement of UN Convention on Biodiversity.</i></p>			



NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
<p>Please refer to FPIC guidelines approved by the RSPO (RSPO endorsed Free, Prior and Informed Consent Guide for RSPO Members, November 2015).</p>				
7.6.1	<p>(M) Records of identification and assessment of legal, customary and user rights shall be available.</p> <p><b>Specific Guidance:</b>  <b>For 7.6.1:</b> This activity shall be integrated with the social and environmental impact assessment (SEIA) required by Criterion 7.1.</p>			
	<p>a. Does the SEIA include the identification and assessment of legal, customary and user rights of the area?</p> <p>b. Does the company have SOPs to identify and assess any legal, customary and user rights of the local peoples?</p> <p>c. Is there any known notification from the stakeholders claiming to have legal, customary and/or user rights on the land for the new planting area?</p> <p>d. Has the claim been identified and assess according to the protocol/SOP? Does the process follow and respect the FPIC principles?</p> <p>e. Has the process of identification and assessment been recorded/ documented and made publicly available?</p>	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>	<p>There was no new planting since November 2005.</p>	<p>NA</p>
7.6.2	<p>(M) A procedure for identifying people entitled to compensation shall be available.</p>			
	<p>a. Does the company have a system in place to identify people and/or community groups entitled to compensation?</p> <p>b. Is the system documented?</p> <p>c. Does the system follow and respect the FPIC principles?</p>	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> </ul>	<p>There was no new planting since November 2005.</p>	<p>NA</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
		<ul style="list-style-type: none"> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>		
7.6.3	<b>(M) Records of calculation system and distribution of fair compensation shall be available</b>			
	<ul style="list-style-type: none"> <li>a. Does the company have a system in place to calculate and distribute fair compensation (monetary or otherwise)?</li> <li>b. Is the system documented and publicly made available?</li> <li>c. Does the system follow and respect the FPIC principles?</li> </ul>	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>	There was no new planting since November 2005.	NA
7.6.4	<b>Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development.</b>			
	<ul style="list-style-type: none"> <li>a. Does the company provide communities that have lost access and rights to land for plantation expansion opportunities to benefit from plantation development?</li> </ul>	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> </ul>	There was no new planting since November 2005.	NA

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
		<ul style="list-style-type: none"> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>		
7.6.5	The process and outcome of any compensation claims shall be documented and made available to the affected communities and their representatives.			
	a. Is the process and outcome of any compensation claims documented and made publicly available?	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>	There was no new planting since November 2005.	NA
7.6.6	<p>Evidence shall be available that the affected communities and rights holders have access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p><b>Specific Guidance:</b>  <b>For 7.6.6:</b> Growers and millers will confirm that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to Plantation Business Permit (Izin Usaha Perkebunan/IUP) and if requested, Land Title (Hak Guna Usaha (HGU)/Hak Guna Bangunan (HGB)) to the grower and miller.            There is documented evidence that communities were informed prior to being asked to release lands to growers and millers that a legal consequence of the grower or miller acquiring a HGU/HGB over their lands is that this will permanently extinguish their land rights within the same area.            Related to 7.6.6, the evidences can be a company's policy to give community freedom to get information, and also socialization to the affected community.</p>			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>a. Is there record to show that the community and rights holders have freedom to access information and independent advisor(s) concerning the legal, economic, environmental and social implications of the proposed operations on their lands?</p> <p>b. Is there evidence to show that the company has sought the community and the right holders' consent to the initial planning phases of the operations prior to the new issuance of a concession or land title?</p> <p>c. Did the communities (or their representatives) give consent to the initial planning phases of the operations prior to the new issuance of a concession or land title?</p>	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>	<p>There was no new planting since November 2005.</p>	<p>NA</p>
7.7	<p>No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.</p>			
7.7.1	<p>(M) Records of zero burning implementation on land clearing, referring to the ASEAN Policy on zero burning (2003) and recognised techniques based on the existing regulations shall be available.</p>			
	<p>a. Is there evidence of land preparation by burning?</p> <p>b. (The auditors shall conduct site verification of the newly planted site which will include interviews with workers).</p> <p>c. Was land prepared using the burn method due to reasons or specific situations, as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burnings' 2003, or comparable guidelines in other regions?</p> <p>d. If the burn method has been used for land preparation, has the company complied with the requirements of 'Guidelines for the Implementation of the ASEAN Policy on Zero</p>	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> </ul>	<p>There was no new planting since November 2005.</p>	<p>NA</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	Burning' 2003, or comparable guidelines in other regions?  e. Is document showing proper justification for such activity available?	- Field observation		
7.7.2	<p>In exceptional cases where fire has to be used for preparing land for planting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p><b>Specific guidance</b>  <b>For 7.7.2 :</b> Fire should be used only where an assessment has demonstrated that it is the most effective and least environmentally damaging option for minimizing the risk of severe pest and disease outbreaks, and exceptional levels of caution are required for use of fire on peat. This should also refer to the ASEAN Policy on Zero Burning (2003) and respective national environment regulations.</p>			
	a. In exceptional cases where fire has to be used for preparing land for planting, is there evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions?  b. Was the activity incorporated in the SEIA report?  c. What were the mitigation measures? Was it implemented?	- Social Impact Assessment - PT Bumi Permai Lestari, 2014.  - Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".  - Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017  - Public consultation with stakeholders on 13 July 2017  - Field observation	There was no new planting since November 2005.	NA
7.8	<p><b>Preamble</b></p> <p><i>It is noted that oil palm and all other agricultural crops emit and sequester greenhouse gases (GHG). There has already been significant progress by the oil palm sector, especially in relation to reducing GHG emissions relating to operations. Acknowledging both the importance of GHGs, and the current difficulties of determining emissions, the following new Criterion is introduced to demonstrate RSPO's commitment to establishing a credible basis for the Principles and Criteria on GHGs.</i></p> <p><i>Growers and millers commit to reporting on projected GHG emissions associated with new developments. However, it is recognised that these emissions cannot be projected with accuracy with current knowledge and methodology.</i></p>			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p><i>Growers and millers commit to plan development in such a way to minimise net GHG emissions towards a goal of low carbon development (noting the recommendations agreed by consensus of the RSPO GHG WG2).</i></p> <p><i>Growers and millers commit to an implementation period for promoting best practices in reporting to the RSPO, and after December 31st 2016 to public reporting. Growers and millers make these commitments with the support of all other stakeholder groups of the RSPO.</i></p>			
7.8		<p>New plantation developments are designed to minimise net greenhouse gas emissions.</p> <p><b>Guidance</b>  <i>This Criterion covers plantations, mill operations, roads and other infrastructure. It is recognised that there may be significant changes between the planned and final development area, hence the assessment may need to be updated before the time of implementation.</i></p> <p><i>Public reporting is desirable, but remains voluntary until the end of the implementation period.</i></p> <p><i>Once established, new developments should report on-going operational, land use and land use change emissions under Criterion 5.6.</i></p> <p><i>According to the recommendation from RSPO GHG Working Group 2, the total carbon emission (above and below ground) from new development area ideally is not bigger than carbon that can be absorbed in one rotation period of all new developments (i.e. average of oil palm trees, riparian buffer zone, and the set aside forest area). To help achieving this, the plantation should be developed in area with low carbon stock (i.e. mineral soil, area with low biomass, etc) or within area that currently is being utilized for agriculture or intensive plantation whose owner has agreed to convert the areas into oil palm. The agreed methodology to assess and report on carbon stock and emission sources as well as default number for the both estimation is now being developed by RSPO.</i></p> <p><i>As guidance, low carbon stock areas are defined as areas with (above and below ground) carbon stores, where the losses as a result of conversion are equal or smaller to the gains in carbon stock within the new development area, including set aside areas (non- planted area) for one rotation period.</i></p>		
7.8.1		<p>(M) The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated.</p> <p><b>Specific Guidance:</b>  <b>For 7.8.1:</b> <i>GHG identification and estimates can be integrated into existing processes such as HCV and soil assessments.</i></p> <p><i>The RSPO carbon assessment tool for new plantings will be available to identify and estimate the carbon stocks. It is acknowledged that there are other tools and methodologies currently in use; the RSPO working group will not exclude these, and will include these in the review process.</i></p> <p><i>The RSPO PalmGHG tool or an RSPO-endorsed equivalent will be used to estimate future GHG emissions from new developments using, amongst others, the data from the RSPO carbon assessment tool for new plantings.</i></p> <p><i>Parties seeking to use an alternative tool for new plantings will have to demonstrate its equivalence to the RSPO for endorsement.</i></p>		

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>a. Is there an assessment conducted to identify and estimate the carbon stock in the proposed development area and major potential sources of emissions that may result directly from the development?</p> <p>b. What are the tools and methodologies used to identify and estimate the carbon stock and potential sources of emission?</p> <p>c. Has the results of the carbon stock assessment been submitted and reported to RSPO according to RSPO procedures and timeline?</p>	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Lestari Permai, 2012".</li> <li>- Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017</li> <li>- Public consultation with stakeholders on 13 July 2017</li> <li>- Field observation</li> </ul>	<p>There was no new planting since November 2005.</p>	<p>NA</p>
<p>7.8.2</p>	<p>Records of a plan to minimize net GHG emissions shall be available.</p> <p><b>Specific Guidance:</b>  <b>For 7.8.2:</b> Growers are strongly encouraged to establish new plantings on mineral soils, in low carbon stock areas, and cultivated areas, which the current users are willing to develop into oil palm. Millers are encouraged to adopt low-emission management practices (e.g. better management of palm oil mill effluent (POME), efficient boilers etc.) in new developments.</p> <p>Growers and millers should plan to implement RSPO best management practices for the minimization of emissions during the development of new plantations            Some efforts to minimise net GHG emissions, but not limited to:</p> <ul style="list-style-type: none"> <li>a. Avoiding high carbon stock area</li> <li>b. Enriching HCV</li> <li>c. Improving carbon sequestration</li> <li>d. Minimising use of fossil fuel</li> <li>e. Implementing zero burning</li> </ul>			
	<p>a. Is there a plan to minimise net GHG emissions from new development?</p> <p>b. Does this plan take into account avoidance of land areas with high carbon stocks,</p>	<ul style="list-style-type: none"> <li>- Social Impact Assessment - PT Bumi Permai Lestari, 2014.</li> <li>- Report of the identification and analysis of the existence of high conservation value (HCV)</li> </ul>	<p>There was no new planting since November 2005.</p>	<p>NA</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	sequestration options and low-emission management practices?	area at PT Bumi Lestari Permai, 2012". - Area statement at PT. Bumi Permai Lestari (Bukit Perak Estate and Bukit Permata Estate) in 2017 - Public consultation with stakeholders on 13 July 2017 - Field observation		



**PRINCIPLES 8: COMMITMENT TO CONTINUAL IMPROVEMENT IN KEY AREAS OF ACTIVITY**

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
8.1	<p>Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.</p> <p><b>Guidance:</b>  <i>Growers should have a system to improve practices in line with new information and techniques, and a mechanism for disseminating this information throughout the workforce. For smallholders, there should be systematic guidance and training for continual improvement.</i></p> <p><i>The minimum specific performance for key indicators is based upon the existing regulations and best plantation practices (Criteria 4.2, 4.3, 4.4, and 4.5). Several standards related to Criteria 4.2, 4.3, 4.4, and 4.5:</i></p> <ul style="list-style-type: none"> <li>• <i>Leaf analysis at least on yearly basis.</i></li> <li>• <i>Soil analysis should be done periodically based on company's consideration</i></li> <li>• <i>Plantable slope &lt; 40%.</i></li> <li>• <i>BOD of effluent used for Land Application is maximum 5000 ppm, and for discharging to the water body is maximum 100 ppm</i></li> <li>• <i>For planting on peat, the water table should be maintained at an average of at least 50 cm (40 – 60 cm) below ground surface measured with groundwater piezometer readings, or an average of 60 cm (between 50 – 70 cm) below ground surface as measured in water collection drains as per the Manual Best Management Practices for existing oil palm cultivation on peat, June 2012 or as per existing regulation if equal or shallower measured through a network of appropriate water control structures e.g. weirs, sandbags, etc. in fields, and watergates at the discharge points of main drains (Criteria 4.4 and 7.4).</i></li> </ul> <p><i>Regulations regarding water table on peat may refer, but not limited, to:</i></p> <ol style="list-style-type: none"> <li>1. <i>Government Regulation No. 71 year 2014 regarding Protection and Management of Peat Ecosystem</i></li> <li>2. <i>Regulation of the Minister of Agriculture No. 14 year 2009 regarding Guideline of Oil Palm Cultivation on Peat</i></li> <li>3. <i>Regulation of the Minister of Agriculture No. 11 year 2015 regarding Guideline of Indonesia Sustainable Palm Oil Plantation (ISPO)</i></li> </ol>			
8.1.1				<p>(M) The action plan for monitoring shall be available, based on a consideration of the social and environmental impacts and routine evaluation of the plantation and mill operations. As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of certain chemicals (Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);</li> <li>• Optimising the yield of FFB production (Criterion 4.2)</li> </ul>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<p>a. Is there an action plan for continual improvement?</p> <p>b. Describe the main components of the plan.</p> <p>c. Has the action plan been implemented?</p> <p>d. Provide examples of continual improvements that have been implemented.</p> <p>e. Are history records available to develop the action plan?</p> <p>f. Are records of implementation of the action plan available?</p> <p>g. Does the action plan include strategies for:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides (Criterion 4.6)? Is IPM widely implemented?</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2)?</li> <li>• Waste reduction (Criterion 5.3)?</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8)?</li> <li>• Social impacts (Criterion 6.1)?</li> <li>• Optimising the yield of the supply base?</li> </ul> <p>h. Do growers have a system to improve practices in line with new information and techniques, and a mechanism for disseminating this information throughout the workforce?</p>	<ul style="list-style-type: none"> <li>- Social impact management and monitoring</li> <li>- Field observation at mill and estates</li> <li>- Internal audit ISPO/RSPO report on 2 – 6 January 2017</li> <li>- PROPER evaluation by BLH Bangka Belitung Province and BLH Bangka Barat Regent on 3 – 4 May 2016</li> </ul>	<p><u>Social</u></p> <p>The company has developed social procedure and policy regarding social, worker, manpower. Social impact was monitored every year with participation of stakeholder. All procedure and policy regarding stakeholder and workers has been socialized. To handle complaints and grievance from external stakeholder, company has appointed one of its staff in each site as PIC Social (Social Officer). SIA documents reviewed every 2 year to see the conformity between impacts and actual condition.</p> <p><u>Environment</u></p> <p>Action Plan for continual improvement has been established. Continual improvement plans have been raised also as corrective actions plan from internal audit of ISPO, RSPO, and PROPER evaluation. The most recent ISPO RSPO Internal Audit was performed on 2 – 6 January 2017. There were 15 findings that have been closed and completed with evidence. Based on PROPER evaluation on 3 – 4 May 2016 PT BPL was get “BLUE” rank.</p> <p>Action plan for continual improvement regarding environmental aspect has been observed during audit and include:</p> <ul style="list-style-type: none"> <li>• Environmental impact (conduct air quality, surface water quality, clean water quality, waste water quality measurement, management of mill effluents, conduct environmental inspection)</li> <li>• Waste reduction (manage domestic waste with separated organic and inorganic waste, manage hazardous waste through licenced vendors, zero burning policy)</li> </ul> <p>Pollution and greenhouse gas emission (reused fibre and shell as boiler feed, reused water from pesticide and PPE cleansing to next spraying, used EFB as organic fertilizer to reduce chemical fertilizer)</p> <p><u>Agronomy BMP</u></p> <p>Several continual improvement programme has been developed,</p>	<p>YES</p>

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<p>such as:</p> <ul style="list-style-type: none"> <li>- Did not use the pesticides for the handling of pest and disease. And also there was no paraquat and Pesticide Class 1A and 1B WHO. The IPM implementation refer to 4.6.</li> <li>- Modify spinner disk FS on emdek fertilizer to press maintenance cost and down time unit</li> <li>- Modify "gupon" (house of <i>Tyto alba</i>) with fibre material to cost efficiency and easy to assemble.</li> <li>- Optimising the yield of the supply base through grading before being processed.</li> </ul> <p>The company have a system to improve practices in line with new information and techniques, and a mechanism for disseminating this information throughout the workforce.</p>	

**3.3.2 Mill Supply Chain Requirements**

**PART A COMPANY DETAIL**

Company Name (covered by certification): PT. Bumi Permai Lestari – Bukit Perak Mill		
RSPO member name: Golden Agri Resources	RSPO member number: 1-0096-11-000-00	
RSPO IT Platform Registration number: RSPO_ PO1000001761		
Site Address: Dendang Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia		
Management Representative: Abdul Khaliq (Mill Manager)		
Site type: Palm Oil Mill		
Site capacity: 60 MT FFB/hour		
Certified palm product sold: There was no CSPO selling. There was selling CSPK of 2,300 MT.		
Certified palm product used: 63,075.65 MT FFB		
App/Cert No: FMS40038	Audit Type: ASA2	
SAI Global Auditor/Team: R. Yosi Zainal Muhammad	Audit Date: 13/07/2017	Activity/Audit No: WI-856154
<p><b>Audit objectives</b></p> <p>To verify the volume of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers, and the implementation of any processing controls</p>		
<b>Supply Chain Model:</b>	Mass Balance	
Pertinent record period:	July 2017 to June 2018	

Estimated tonnage of certified palm product produced:	26,558.35 MT CPO and 6,793.99 MT PK
Estimated of tonnage of non-certified palm product produced	18,795. 83 MT CPO and 4,808.26 MT PK
String description:	Palm Oil Mill
Outsource activity(ies) (if any):	None
Independent third party(ies) performing outsource activity(ies): name, address and Capability	Name : PT. Satrindo Jaya Agropalma Address : Jakarta Pusat Capability : CPO transportation to Bulking Station

**PART B SUPPLY CHAIN CERTIFICATION STANDARD**

REQUIREMENT	AUDIT FINDINGS / OBJECTIVE EVIDENCE	STATUS ( NC / AOC / C )
<b>CPO MILLS (MB) MASS BALANCE SUPPLY CHAIN MODELS – MODULAR REQUIREMENTS</b>		
<b>E.1 Definition</b>		
E.1.1. Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.		
<b>E.2 Explanation</b>		
E.2.1. The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is <b>allowed to deliver in a year</b> . The actual tonnage produced should then be recorded in each subsequent annual surveillance report.		
a. Has the estimated tonnage of CPO and PK products (that could	Yes it has. The estimated tonnage of CPO and PK products has been	C

<p>potentially be produced by the certified mill) been recorded by the certification body (CB) in the public summary of the P&amp;C certification report?</p>	<p>recorded by the certification body (CB) in the public summary of the P&amp;C certification report, e.g.:</p> <p><u>Certification audit – ASA1</u>                  Estimated CPO : 26.996,09 MT                  Estimated PK : 6.299,09 MT</p> <p><u>ASA1 – ASA2</u>                  Estimated CPO : 27,119.61 MT                  Estimated PK : 6,629.25 MT</p> <p><u>ASA2 – ASA3</u>                  Estimated CPO : 26,558.35 MT                  Estimated PK : 6,793.99 MT</p>	
<p>b. Does the figure represent the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year?</p>	<p>Yes, the figure does represent the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year.</p>	<p>C</p>
<p>c. Does the actual tonnage produced have to then be recorded in each subsequent annual surveillance report?</p>	<p>The actual tonnage produced has been recorded in each subsequent annual surveillance report, i.e:</p> <p><u>Certification audit – ASA1</u>                  Actual CPO : 14,128.13 MT                  Actual PK : 3,699.82 MT</p> <p><u>ASA1 – ASA2</u>                  Actual CPO : 12,254.97 MT                  Actual PK : 3,327.66 MT</p>	<p>C</p>
<p>E.2.2. The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>		

<p>a. The mill must also meet all registration requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim)?</p>	<p>The mill is under Golden Agri Resources (GAR) which is registered as RSPO member, with membership number 1-0096-11-000-00. The mill has also been registered in RSPO IT Platform, with register number RSPO_PO1000001761.</p>	<p>C</p>
<p>b. The mill must also meet all reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim)?</p>	<p>The mill has met all reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p>	<p>C</p>
<p><b>E.3 Documented Procedure</b></p>		
<p>E.3.1. The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a. Complete and up to date procedures covering the implementation of all the elements in these requirements;</li> <li>b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</li> </ul>		
<p>a. Does the site have written procedures and/or work instructions in place to ensure the implementation of all elements specified in these requirements?</p>	<p>The site has written procedure and work instruction in place to ensure the implementation of all elements specified in these requirements.</p> <p>The procedure are as follows:</p> <ul style="list-style-type: none"> <li>- PT.BPL-BPRM/SOP/17 (Reporting of RSPO Certified Product) Rev.00, dated May 18<sup>th</sup>, 2016. As a guidance for making report of RSPO product in Mill, KCP and Bulking compliance to RSPO requirement. Scope of the procedure is FFB receiving as raw material until delivery of product from palm oil mill.</li> <li>- PT.BPL-BPRM/SOP/01 (Traceability) Rev 00 dated May 18<sup>th</sup>, 2016. The Procedure was established to ensure that the product produced by palm oil mill was sourced from traceable raw material (Fresh Fruit Bunch) and can be ensured that the related sources are implementing sustainable principal and criteria. Scopes of the procedure are FFB receiving as raw material until delivery of product from palm oil mill. Supply Chain system implemented based on principles of Mass Balance.</li> </ul>	<p>C</p>

<p>b. Are procedures / work instructions completely covering the implementation of all the elements in these requirements?</p>	<p>The procedures were up to date covering all the element of RSPO SCC requirement, including purchasing and goods in, recording and mass balancing, and sales goods out. As evidence the procedures were updated in May 18<sup>th</sup>, 2016. The implementation was appropriate with existing procedure.</p>	<p>C</p>
<p>c. Have the site had the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements?</p>	<p>Personnel who having overall responsibility and authority over the implementation of these requirements and compliance with all applicable requirements is Factory Manager (Mr. Abdul Khaliq) based on Appointment letter from Production Controller of Bangka Belitung #001/PC-BABEL/VI/2016 dated June 5<sup>th</sup>, 2016.  Factory Manager of Bukit Perak Mill then appointed KTU (Mr. Rahmad Boidi) as Traceability Officer based on decree #003/FM-BPRM/VI/2016 dated June 5<sup>th</sup>, 2016.</p>	<p>C</p>
<p>d. Is the person able to demonstrate awareness of the site's procedures for the implementation of this standard?</p>	<p>The personnel were having awareness and knowledge of RSPO SCC standard since he already have trained on June 13<sup>th</sup>, 2016. The person is able to demonstrate awareness of the site's procedures for the implementation of RSPO supply chain standard.</p>	<p>C</p>
<p>E.3.2. The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>		
<p>a. Has the site had documented procedures for receiving certified FFBs?</p>	<p>The procedure PT. BPL-BPRM/SOP/01 (Traceability) has defined procedures for receiving certified FFBs.</p>	<p>C</p>
<p>b. Has the site had documented procedures for receiving non-certified FFBs?</p>	<p>The procedure PT. BPL-BPRM/SOP/01 (Traceability) has defined procedures for receiving non certified FFBs.</p>	<p>C</p>
<p>c. Has the site had documented procedures for processing certified FFBs?</p>	<p>The procedure PT. BPL-BPRM/SOP/01 (Traceability) has defined procedures for processing certified FFBs.</p>	<p>C</p>
<p>d. Has the site had documented procedures for processing non-certified FFBs?</p>	<p>The procedure PT. BPL-BPRM/SOP/01 (Traceability) has defined procedures for processing non certified FFBs.</p>	<p>C</p>
<p><b>E.4 Purchasing and Goods In</b></p>		
<p>E.4.1. The site shall verify and document the volumes of certified and non-certified FFBs received.</p>		



<p>a. Does the site verify and document the volumes of certified FFBs received?</p>	<p>KTU of Bukit Perak Mill as Traceability Officer has verified and documented the volumes of certified FFB received. FFB documentation from certified estate is “<i>Surat Pengantar Buah</i>” (FFB Delivery Note), which contain number of bunches, location, vehicle identity, etc. FFB received are daily recorded in “<i>Laporan Penerimaan TBS</i>” (FFB Receiving Record) and recapitulated monthly in “<i>Laporan Harian Penerimaan dan Produksi</i>” (Daily Report of Receiving and Production).</p>	<p>C</p>
<p>b. Does the site shall verify and document the volumes of non-certified FFBs received?</p>	<p>KTU of Bukit Perak Mill as Traceability Officer has verified and documented the volumes of non-certified FFB received. FFB documentation from certified estate is “<i>Surat Pengantar Buah</i>” (FFB Delivery Note), which contain number of bunches, location, vehicle identity, etc. FFB received are daily recorded in “<i>Laporan Penerimaan TBS</i>” (FFB Receiving Record) and recapitulated monthly in “<i>Laporan Harian Penerimaan dan Produksi</i>” (Daily Report of Receiving and Production).</p>	<p>C</p>
<p>E.4.2. The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>		
<p>a. Does the site inform the CB immediately if there is a projected overproduction of certified tonnage?</p>	<p>Based on procedure PT.BPL-BPRM/SOP/17 (Reporting of RSPO Certified Product) chapter 6.2 page 6, the site will inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>C</p>
<p><b>E.5 Records Keeping</b></p>		
<p><b>E.5.1.</b> The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. 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. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.) For further details refer to Module C.</p>		
<p>a. Does the site record and balance all receipts of RSPO certified FFB on a three-monthly basis ?</p>	<p>The site recorded daily FFB received, CPO and PK produced and delivered in “<i>Laporan Harian Penerimaan dan Produksi</i>” (Daily Report of Receiving and Production), recapitulated it in monthly basis and balance it in three monthly basis in document “<i>Laporan Mass Balance CPO and PK</i>” (Mass Balance Report of CPO and PK. Observed document shown that the record is balance.</p>	<p>C</p>

<p>b. The site shall record and balance all deliveries of RSPO certified CPO and PK on a three-monthly basis ?</p>	<p>The site recorded daily CPO and PK delivery in “<i>Laporan Harian Penerimaan dan Produksi</i>” (Daily Report of Receiving and Production), recapitulated it in monthly basis and balance it in three monthly basis in document “<i>Laporan Mass Balance CPO and PK</i>” (Mass Balance Report of CPO and PK. Observed document shown that the record is balance.</p>	<p>C</p>
<p>c. Are all volumes of palm oil and palm kernel oil that are delivered being deducted from the material accounting system according to conversion ratios stated by RSPO ?</p>	<p>All volumes of palm oil and palm kernel that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. There is no over deliveries of certified product neither negative stock of certified product.</p>	<p>C</p>
<p>d. Is the site only able to deliver Mass Balance sales from a positive stock ?</p> <p>Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)</p>	<p>The site is only deliver Mass Balance sales from a positive stock, there is no over deliveries of certified product neither negative stock of certified product. The procedure PT.BPL-BPRM/SOP/17 (Reporting of RSPO Certified Product) chapter 6.2 page 5 has described the mechanism of “sell short”, however for safety reason the site has never practiced it.</p> <p>The mill delivered CPO to Bangka Bulking Station, PT. Bumi Permai Lestari (Pangkal Pinang). The Bulking Station is already certified for RSPO Supply Chain by SAI Global with certificate number SQUAL40135 valid until March 31<sup>st</sup>, 2020.</p>	<p>C</p>
<p>E.5.2. In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.</p>		
<p>a. Does the mill outsource activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified ?</p>	<p>The mill does not outsourcing activity of KCP. The mill delivered PK to independent KCP based on sales document e.g. Shipping Instruction No. 012/IP/2650/02/2017 dated 10 February 2017 (500 MT). Palm Kernel is delivered to PT. Sumber Indah Perkasa, Jetty Tarahan, Teluk Betung, Lampung.</p>	<p>C</p>
<p>b. Does the mill have to ensure that the crush is covered through a signed and enforceable agreement ?</p>	<p>The mill has no responsibility to the PK processed by PT. Sumber Indah Perkasa.</p>	<p>C</p>

**3.3.2.2 Supply Chain Certification System**

<b>Supply Chain Certification System</b>		<b>Status ( Yes / No )</b>
<b>5.3.1</b>	Has the client been made aware with necessary information concerning the RSPO Supply Chain Certification and the RSPO Rules on Communication and Claims Has the client been made aware with necessary information concerning the RSPO Supply Chain Certification and the RSPO Rules on Communication and Claims? If potential clients have any further questions concerning the RSPO these shall be directed to the RSPO secretariat.	Yes
<b>5.3.2</b>	Has the client been made aware of the contractual agreement for certification services against the RSPO Supply Chain Standard and maintain a record of any agreement?	Yes
<b>5.3.6</b>	Has the organization been informed about the following items?	Yes
a.	Certification process	Yes
b.	Agree logistics for the assessment and time of exit (closing) meeting.	Yes
c.	Confirm access to all relevant documents, field sites and personnel	Yes
d.	Explain confidentiality and conflict of interest	Yes
<b>5.3.7</b>	Have the management documentation of the organization fully met to the requirements of the RSPO Supply Chain Certification Standard?	Yes
<b>5.3.7</b>	Have any issues or areas of concern been clarified to the organization?	N/A
<b>5.3.7</b>	Have the internal audits against RSPO supply chain standard been fully planned and underway before certification is awarded?	Yes
<b>5.3.8</b>	Have the organization sufficiently and adequately implemented the organizational systems, the management systems and the operational systems, including any documented policies and procedures, to meet the intent and requirements of the RSPO Supply Chain Certification Standard?	Yes
<b>5.3.8</b>	Have the client made aware that when there is outsourcing process to the third party after certification is granted therefor SAI Global shall be informed and SAI Global decides whether an interim visit is required for the next audit?	Yes
<b>5.3.9</b>	Has certification audit reviewed pertinent RSPO Supply Chain records relating to the receipt, processing and supply of certified oil palm products?	Yes
<b>5.3.10</b>	Have all activities conducted by subcontractors complied with the intent and requirements of the RSPO Supply Chain Certification Standard	N/A
<b>5.3.11</b>	Have the client made aware that until they receive written confirmation of their RSPO Supply Chain certification registration and its expiry date that	Yes

<b>Supply Chain Certification System</b>		<b>Status ( Yes / No )</b>
	they are not certified and cannot make any claims concerning registration?	
<b>5.3.11</b>	Have a detail records have been compiled of the entry (opening) meeting including a list of the participants in the meeting?	Yes
<b>5.3.11</b>	Have the client made aware of the findings of the audit team including any deficiencies which may result in a negative certification decisions or which may require further actions to be completed before a certification decision can be taken?	Yes
<b>5.3.11</b>	Have the client made aware that the findings of the audit team are tentative pending review and decision making by the duly designated representatives of the certification body?	Yes

### 3.4 Recommendation

The recommendation from this audit is that PT. Bumi Permai Lestari - Bukit Permai Mill can continue as a producer of RSPO Certified Sustainable Palm Oil and Palm Kernel, Model: Mass Balance.

Audit recommendations are always subject to ratification by RSPO.

This report was prepared by: R. Yosi Zainal Muhammad, Daniel Sitompul, Fitria Rahmayanti, and Eko PReasetio Ramadhan.


### 3.5 Environmental and social risk for this scope of certification for planning of the surveillance audit

- Environmental risk: compliance with regulations, hazardous waste management, RKL RPL reporting
- Social risk: compliance with regulations (includes labour)
- OHS: prevention of hazard and risk
- BMP: Integrated Pest Management
- HCV: Assessment and management and monitoring plan.

### 3.6 Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings

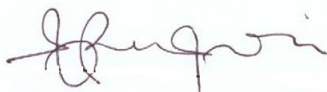
Please sign below to acknowledge receipt of the assessment visit described in this report and confirm the acceptance of the assessment report contents including assessment findings.

Signed for and on behalf of PT. Bumi Permail Lestari – Bukit Permai Mill



Imu Zulfikar  
Management Representative  
Date 11 September 2017

Signed for and on behalf of PT. SAI Global Indonesia



Inge Triwulandari  
Technical Manager  
Date 11 September 2017

## Appendix "A" – Audit Record

**Audit Team Leader:** R. Yosi Zainal Muhammad

**Auditors:** Daniel Sitompul, Fitria Rahmayanti, and Eko Preasetio Ramadhan

**Observer:** -

Date	Auditor	Audit meetings plus functions/ processes/ areas/ *shifts audited:	# Shifts*	Times* From – To
10/07/2017		<b>Day 1 – Monday</b>		
	All	Travelling Jakarta – Pangkal Pinang (GA 138) – Site		15.05 – 16.25
11/07/2017		<b>Day 2 – Tuesday</b>		
		Opening Meeting		08.00
		<b>Bukit Perak Estate</b>		
	Yosi	<u>Agronomy BMP and Legality</u> RSPO <ul style="list-style-type: none"> <li>• Criteria: 2.2.1, 2.2.2</li> <li>• Criteria: 3.1 (all indicator)</li> <li>• Criteria: 4.1.1, 4.1.2 and 4.1.3 for estate, 4.1.4</li> <li>• Criteria: 4.2. 4.3, 4.5 all indicators</li> <li>• Criteria: 4.6.1, 4.6.2, 4.6.3, 4.6.4, 4.6.5, 4.6.7, 4.6.8, 4.6.9</li> <li>• Criteria: 6.10</li> <li>• Criteria: 7 (all indicators)</li> <li>• Criteria: 8.1</li> </ul> ISPO <ul style="list-style-type: none"> <li>• Kriteria: 1.1, 1.2, 1.3, 1.4, 1.6, 1.7, 1.9</li> <li>• Kriteria: 2.1.1, 2.1.3, 2.1.5, 2.3, 2.4</li> <li>• Kriteria: 3</li> <li>• Kriteria: 2.2.1.1, 2.2.1.2, 2.2.1.3, 2.2.1.4, 2.2.1.5, 2.2.1.6.1, 2.2.1.6.3, 2.2.1.7, 2.2.2.1</li> <li>• Kriteria: 7</li> </ul>		08.30 – 17.00
	Pras	<u>Social and HCV / Protection Area</u> RSPO <ul style="list-style-type: none"> <li>• Criteria: 1.1; 1.2; 1.3 all indicators</li> <li>• Criteria: 2.1.1 for social aspect</li> <li>• Criteria: 2.2.3; 2.2.4; 2.2.5; 2.2.6; 2.3 all indicator</li> <li>• Indicator: 4.4.2</li> <li>• Criteria: 4.6.12</li> <li>• Criteria: 5.2 (all indicators)</li> <li>• Criteria: 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 6.9, 6.11, 6.12, 6.13</li> <li>• Criteria: 8.1</li> </ul> ISPO <ul style="list-style-type: none"> <li>• Kriteria: 1.5, 1.8</li> <li>• Kriteria: 2.1.2, 2.1.4, 2.5</li> <li>• Kriteria: 5.2, 5.3, 5.4, 5.5</li> <li>• Kriteria: 6.1, 6.2, 6.3</li> <li>• Kriteria: 7</li> </ul> Interview with employee, gender committee, and labour union.		08.30 – 17.00
	Fitria	<u>Environment</u> RSPO <ul style="list-style-type: none"> <li>• Criteria: 2.1 all indicators for environmental aspects</li> <li>• Indicators: 4.4.1, 4.4.3, 4.4.4</li> </ul>		

## Audit Report

Date	Auditor	Audit meetings plus functions/ processes/ areas/ *shifts audited:	# Shifts*	Times* From – To
		<ul style="list-style-type: none"> <li>• Criteria: 4.6.6, 4.6.10</li> <li>• Criteria: 5.1, 5.3, 5.4, 5.5 and 5.6 all indicators</li> <li>• Criteria: 8.1</li> </ul> <p>ISPO</p> <ul style="list-style-type: none"> <li>• Kriteria: 2.2.1.6.2, 2.2.2.4, 2.2.2.5</li> <li>• Kriteria: 4.1, 4.2, 4.3, 4.4, 4.7, 4.10</li> <li>• Kriteria: 7</li> </ul>		
	Daniel	<p><u>Health and Safety</u></p> <p>RSPO</p> <ul style="list-style-type: none"> <li>• Criteria: 2.1 all indicators for OHS aspects</li> <li>• Criteria: 4.6.11</li> <li>• Criteria: 4.7 all indicators</li> <li>• Criteria: 4.8 all indicators</li> <li>• Criteria: 8.1</li> </ul> <p>ISPO</p> <ul style="list-style-type: none"> <li>• Kriteria: 4.5, 5.1</li> <li>• Kriteria: 7</li> </ul>		08.30 – 17.00
<b>12/07/2017</b>		<b>Day 3 – Wednesday</b>		
		<b>Bukit Permata Estate</b>		
	Yosi	<p><u>Agronomy BMP and Legality</u></p> <p>RSPO</p> <ul style="list-style-type: none"> <li>• Criteria: 2.2.1, 2.2.2</li> <li>• Criteria: 3.1 (all indicator)</li> <li>• Criteria: 4.1.1, 4.1.2 and 4.1.3 for estate, 4.1.4</li> <li>• Criteria: 4.2, 4.3, 4.5 all indicators</li> <li>• Criteria: 4.6.1, 4.6.2, 4.6.3, 4.6.4, 4.6.5, 4.6.7, 4.6.8, 4.6.9</li> <li>• Criteria: 6.10</li> <li>• Criteria: 7 (all indicators)</li> <li>• Criteria: 8.1</li> </ul> <p>ISPO</p> <ul style="list-style-type: none"> <li>• Kriteria: 1.1, 1.2, 1.3, 1.4, 1.6, 1.7, 1.9</li> <li>• Kriteria: 2.1.1, 2.1.3, 2.1.5, 2.3, 2.4</li> <li>• Kriteria: 3</li> <li>• Kriteria: 2.2.1.1, 2.2.1.2, 2.2.1.3, 2.2.1.4, 2.2.1.5, 2.2.1.6.1, 2.2.1.6.3, 2.2.1.7, 2.2.2.1</li> <li>• Kriteria: 7</li> </ul>		08.00 – 17.00
	Pras	<p><u>Social and HCV / Protection Area</u></p> <p>RSPO</p> <ul style="list-style-type: none"> <li>• Criteria: 1.1; 1.2; 1.3 all indicators</li> <li>• Criteria: 2.1.1 for social aspect</li> <li>• Criteria: 2.2.3; 2.2.4; 2.2.5; 2.2.6; 2.3 all indicator</li> <li>• Indicator: 4.4.2</li> <li>• Criteria: 4.6.12</li> <li>• Criteria: 5.2 (all indicators)</li> <li>• Criteria: 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 6.9, 6.11, 6.12, 6.13</li> <li>• Criteria: 8.1</li> </ul> <p>ISPO</p> <ul style="list-style-type: none"> <li>• Kriteria: 1.5, 1.8</li> <li>• Kriteria: 2.1.2, 2.1.4, 2.5</li> </ul>		08.00 – 17.00

## Audit Report

Date	Auditor	Audit meetings plus functions/ processes/ areas/ *shifts audited:	# Shifts*	Times* From – To
		<ul style="list-style-type: none"> <li>• Kriteria: 5.2, 5.3, 5.4, 5.5</li> <li>• Kriteria: 6.1, 6.2, 6.3</li> <li>• Kriteria: 7</li> </ul> <p>Interview with employee, gender committee, and labour union.</p>		
	Fitria	<u>Environment</u> RSPO <ul style="list-style-type: none"> <li>• Criteria: 2.1 all indicators for environmental aspects</li> <li>• Indicators: 4.4.1, 4.4.3, 4.4.4</li> <li>• Criteria: 4.6.6, 4.6.10</li> <li>• Criteria: 5.1, 5.3, 5.4, 5.5 and 5.6 all indicators</li> <li>• Criteria: 8.1</li> </ul> ISPO <ul style="list-style-type: none"> <li>• Kriteria: 2.2.1.6.2, 2.2.2.4, 2.2.2.5</li> <li>• Kriteria: 4.1, 4.2, 4.3, 4.4, 4.7, 4.10</li> <li>• Kriteria: 7</li> </ul>		08.00 – 17.00
	Daniel	<u>Health and Safety</u> RSPO <ul style="list-style-type: none"> <li>• Criteria: 2.1 all indicators for OHS aspects</li> <li>• Criteria: 4.6.11</li> <li>• Criteria: 4.7 all indicators</li> <li>• Criteria: 4.8 all indicators</li> <li>• Criteria: 8.1</li> </ul> ISPO <ul style="list-style-type: none"> <li>• Kriteria: 4.5, 5.1</li> <li>• Kriteria: 7</li> </ul>		08.30 – 17.00
<b>13/07/2017</b>		<b>Day 4 – Thursday</b>		
		<b>Bukit Perak Mill</b>		
	Yosi	<u>Supply Chain (Mass Balance – Module E) &amp; RSPO Certification System 4.2.4</u>  RSPO <ul style="list-style-type: none"> <li>• Criteria: 2.2.1, 2.2.2</li> <li>• Criteria: 3.1 (all indicator)</li> </ul>		08.00 – 17.00
	Pras	<u>Social</u> RSPO <ul style="list-style-type: none"> <li>• Criteria: 1.1; 1.2; 1.3 all indicators</li> <li>• Criteria: 2.1.1 for social aspect</li> <li>• Criteria: 2.2.3; 2.2.4; 2.2.5; 2.2.6; 2.3 all indicator</li> <li>• Criteria: 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 6.9, 6.11, 6.12, 6.13</li> <li>• Criteria: 8.1</li> <li>• Certification System 4.2.4</li> </ul> ISPO <ul style="list-style-type: none"> <li>• Kriteria: 1.5, 1.8</li> <li>• Kriteria: 2.1.2, 2.1.4, 2.5</li> <li>• Kriteria: 5.2, 5.3, 5.4, 5.5</li> <li>• Kriteria: 6.1, 6.2, 6.3</li> <li>• Kriteria: 7</li> </ul>		08.00 – 17.00



## Audit Report

Date	Auditor	Audit meetings plus functions/ processes/ areas/ *shifts audited:	# Shifts*	Times* From – To
		Interview with employee, gender committee, and labour union.		
		Consultation public with external stakeholders		09.00 – 10.00
	Fitria	<u>Environment</u> RSPO <ul style="list-style-type: none"> <li>• Criteria: 2.1 all indicators for environmental aspects</li> <li>• Indicators: 4.4.1, 4.4.3, 4.4.4</li> <li>• Criteria: 5.1, 5.3, 5.4, 5.5 and 5.6 all indicators</li> <li>• Criteria: 8.1</li> </ul> ISPO <ul style="list-style-type: none"> <li>• Kriteria: 2.2.1.6.2, 2.2.2.4, 2.2.2.5</li> <li>• Kriteria: 4.1, 4.2, 4.3, 4.4, 4.7, 4.10</li> <li>• Kriteria: 7</li> </ul>		08.00 – 17.00
	Daniel	<u>Processing BMP and Health and Safety</u> RSPO <ul style="list-style-type: none"> <li>• Criteria: 2.1 all indicators for OHS aspects</li> <li>• Criteria: 4.1.1, 4.1.2, and 4.1.3 for mill</li> <li>• Criteria: 4.7 all indicators</li> <li>• Criteria: 4.8 all indicators</li> <li>• Criteria: 6.10</li> <li>• Criteria: 8.1</li> </ul> ISPO <ul style="list-style-type: none"> <li>• Kriteria: 2.2.2.2, 2.2.2.3</li> <li>• Kriteria: 4.5, 5.1</li> <li>• Kriteria: 7</li> </ul>		08.00 – 17.00
<b>14/07/2017</b>		<b>Day 5 – Friday</b>		
	All	Closing meeting		07.30 – 08.30
	All	Travelling Site – Pangkal Pinang – Jakarta (GA 137)		12.10 – 13.20

## Appendix “B” – Previous Nonconformities and Opportunity for Improvement Summary

### RSPO Principe and Criteria, Indonesian National Interpretation

No	RSPO Criterion	Details	Corrective Action	Completion Date	PIC	Status
<b>Initial Certification</b>						
- None						
<b>1st Annual Surveillance Audit</b>						
1	2.1.1 (Major)	Based on work attendace in behalf of Laila Period 26 April – 25 July 2016, showed that she have worked more or same as 21 days for 3 month consecutively. It did not comply with Kepmenaker No 100 Year 2004 about <i>Ketentuan PKWT</i> section 10 article 3.	The organisation conducted meeting with SPSI (Chairman and the other SPSI representative) to discuss the settlement of BHL status inline with regulations.	13/12/2016	Estate Manager	Closed
2	4.7.2 (Major)	There is found substandard scaffolding (loose platform, no base plate, no toe board and hand rail, rotten/corroded parts, etc.) at BPRM mill boiler service activities conducted by contractor (PT Maxiterm Boiler /MBI).	To consistent conducted contractor working permit and periodically monitored the contractor activities include the equipment (e.g. scaffolding, etc.)	15/11/2016	Mill Manager	Closed
3	6.5.2 (Major)	Based on interview with BHL at field and focus group discussion, they did not understand know and understand about their contract although it was observed that working contract was available.	During making new contractual agreement with BHL, perfomed dissemination regarding content of contractual agreement including rights and obligations.	24/11/2016	Estate Manager	Closed
<b>Special Audit</b>						
1	5.2.1 (Major)	HCV Assessment Report has not covered consultation with relevant stakeholder, e.g. relevant government departments, research institutes and interested NGOs.	Send Executive Summary of HCV Assessment PT Bumi Sawit Permai to related stakeholder, e.g. University, related government, NGOs.	13/04/2017	SPO Officer	Closed
2	6.1.1 (Major) and 6.1.2 (Major)	It was not clear that participatory assessment has been conducted with all affected parties such as internal stakeholder	SIA document and SIA monitoring document was developed in accordance with requirements in General P&C RSPO 2013 and INA NI P&C RSPO 2016.	17/04/2017	SPO Officer	Closed
3	6.5.1 (Major)	<p>a. The company was not able to demonstrate that there is mechanism in place to ensure that BHB workers achieve minimum wages as determined by authorities.</p> <p>b. Working hours and hectare worked for workers with BHB contract are not recorded</p>	<p>This NCR was not accepted by the company. The following are explanation from the company:</p> <p>a. The organisation has issued Circular letter Dept. Agro. PSM II/SE/007/III/ 2016 dated 29 February 2016, revision 17 March 2016. The</p>	17/04/2017	-	This NCR was not accepted by the company. Clarification was accepted

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No	RSPO Criterion	Details	Corrective Action	Completion Date	PIC	Status
		(and not included in the pay-slips).	<p>circular letter mention that during low crop season, loose fruit picker get salary equivalent to 1 manday salary even if the loose fruit picked is not fulfil the target, with condition all loose fruit in area 6 Ha are picked and no loose fruit left. There is Decree letter of Governor of Kepulauan Bangka Belitung #188.44/1106/TK.T/2016 regarding minimum wage of Kepulauan Bangka Belitung Province in 2017, mentioning that minimum wage f is IDR 2.534.672 per month. Example of BHB wages in February 2017 for worker number S0531 was Rp 3.460.765. Since circular letter issued, there was no low crop in PT Bumi Permai Lestari.</p> <p>b. Working hour of BHB was recorded at absence machine (finger print) as used by SKU. Every day BHB has to confirm the attendance in finger print and record in checkroll system. Absence system is used as evidence that the workers are registers at the organisation and not used as salary calculation. Basic of salary calculation is unit resulted</p>			by SAI Global

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### Mill Supply Chain Certification System

No	RSPO SCCS	Details	Corrective Action	Completion Date	PIC	Status
<b>Initial Certification</b>						
- None						
<b>1st Annual Surveillance Audit</b>						
- None						
<b>Special Audit</b>						
- None						

### Opportunity for Improvement – RSPO PC

None

### Opportunity for Improvement – Supply Chain Certification System

None

**AUDIT REPORT**  
**Appendix “C” – Nonconformities and Opportunity for Improvement Summary**

**RSPO Principe and Criteria, Indonesian National Interpretation**

<b>Organisation Name:</b>		PT. Bumi Permai Lestari Bukit Permai Mill and Its Supply Bases		<b>Location:</b>		Dendang Village, Kelapa Sub-District, Bangka Barat Regency, Kepulauan Bangka Belitung Province, Indonesia	
<b>Date:</b>	11/07/2017	<b>Audit team leader:</b>	R. Yosi Zainal M.	<b>Activity/Report ID:</b>	WI-856154	<b>License/Certificate No.:</b>	FMS40038
<b>Organisation’s acknowledgement of receipt of NCR</b>			<b>Employee Name:</b>	Aprilianto		<b>Date NCR Accepted:</b>	14/07/2017

Section 1				Section 2		Section 3	Section 4	
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
2017-01	RSPO PC INANI 2016 indicator 2.2.2	minor	<p><b>Non-conforming situation:</b> Maintenance of the HGU pegs was not conducted overall.</p> <p><b>Objective evidence:</b> <u>Bukit Permata Estate</u> It was not found / seen HGU pegs of No. 130 in the river area.</p>	<p><b>Due Date:</b> <b>Next audit</b></p> <p><b>SAI Follow up Method:</b> <b>on-site audit</b></p>	<p>Installed the help peg and changing of its size the HGU peg No. 130 (Block G25, Division 02) date on 13 July 2017, so it can be seen.</p>	<p><b>Root Cause:</b> There was no the follow up of HGU monitoring result, especially for pegs located in the river area.</p> <p><b>Corrective Action:</b> To increase the size of HGU pegs located in the river area, so it can be seen.</p>	<p><b>Response:</b> <b>Acceptable (please see section 4 for details)</b></p> <p><b>Reviewer:</b> R. Yosi Zainal M. <b>Date:</b> 28/08/2017</p>	<p><b>Verification of Effectiveness:</b></p> <ul style="list-style-type: none"> <li>Correction evidence has been submitted and implemented. It was effectively conducted.</li> <li>This minor NCR can be closed at the time of the next audit (onsite) by reviewing the effectiveness of corrective action.</li> </ul> <p><b>Name:</b> R. Yosi Zainal M. <b>Date:</b> 28/08/2017</p>

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Section 1					Section 2		Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
2017-02	RSPO PC INANI 2016 indicator 4.7.2	Major	<p><b>Non-conforming situation:</b> An unsafety condition was found during audit.</p> <p><b>Objective evidence:</b> Electrical panel in Bukit Perak mill workshop was found in open condition without any protection and warning sign at it.</p>	<p><b>Due Date:</b> <b>14/09/2017</b></p> <p><b>SAI Follow up Method: Evidence submitted to</b> Team Leader via email to <a href="mailto:yosi.zainal@aiglobal.com">yosi.zainal@aiglobal.com</a></p>	<p>Closing and locking on the electrical panel date on 28 July 2017 also dissemination to employee in the mill workshop with 5R system (<i>ringkas, rapi, resik, rawat, dan rajin</i>).</p>	<p><b>Root Cause:</b> Lack of controlling from Safety Officer after finishing work in the mill workshop.</p> <p><b>Corrective Action:</b> Increased frequency of the electrical panel inspection after the work is finished by related PIC station in workshop 1, workshop 2, loading ramp, sterilizer, press line A, press line B, clarify station, nut &amp; kernel, power house, boiler, despatch oil, WTP, and waste pumping room. Other than that, it was monitored by Safety Officer twice a week for the implementation. The first monitoring has been conducted in August 2017.</p>	<p><b>Response:</b> <b>Acceptable (please see section 4 for details)</b></p> <p><b>Reviewer:</b> R. Yosi Zainal M. <b>Date:</b> 28/08/2017</p>	<p><b>Verification of Effectiveness:</b> The site has conducted revision to inspection period in the several locations / stations by Safety Officer and related PIC. It has been implemented effectively started in August 2017.</p> <p><b>NCR closed</b> <b>Name:</b> R. Yosi Zainal M. <b>Date:</b> 28/08/2017</p>
2017-03	RSPO PC INANI 2016 indicator 4.7.5	minor	<p><b>Non-conforming situation:</b> MSDS at working area was not available</p> <p><b>Objective evidence:</b> There was no MSDS available at working area in the spraying operation Bukit Perak Estate.</p>	<p><b>Due Date:</b> <b>Next audit</b></p> <p><b>SAI Follow up Method: on-site audit</b></p>	<p>Dissemination of to spraying supervisor (Mandor) date on 01 August 2017 (BPRE) and 28 July 2017 (BPTE) to always bring MSDS to the field.</p>	<p><b>Root Cause:</b> MSDS book size is too large, so it cannot in the mandor's bag.</p> <p><b>Corrective Action:</b> Designing the MSDS book for the Spraying Mandor that adjusted with the bag size.  Monthly monitoring of the mandor's MSDS book by Safety Officer.</p>	<p><b>Response:</b> <b>Acceptable (please see section 4 for details)</b></p> <p><b>Reviewer:</b> R. Yosi Zainal M. <b>Date:</b> 28/08/2017</p>	<p><b>Verification of Effectiveness:</b></p> <ul style="list-style-type: none"> <li>• Correction evidence has been submitted and implemented. It was effectively conducted.</li> <li>• This minor NCR can be closed at the time of the next audit (onsite) by reviewing the effectiveness of corrective action.</li> </ul> <p><b>Name:</b> R. Yosi Zainal M. <b>Date:</b> 28/08/2017</p>

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Section 1				Section 2		Section 3	Section 4	
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
2017-04	RSPO PC INANI 2016 indicator 5.1.3	minor	<p><b>Non-conforming situation:</b></p> <p>Environment monitoring report was not in accordance with RKL RPL matrix</p> <p><b>Objective evidence:</b></p> <p>It was observed that monitoring surface water quality (river quality) was done every 6 months, it was not in accordance with RKL RPL matrix that river quality must be monitor every 3 months.</p>	<p><b>Due Date:</b></p> <p><b>Next audit</b></p> <p><b>SAI Follow up Method:</b> <b>on-site audit</b></p>	<p>Sent the report of monitoring surface water quality to <i>UPTD (Unit Pelaksana Teknis Daerah) Laboratorium Lingkungan</i>, Dinas Lingkungan Hidup dan Pertanahan, South Sumatera dated on 12 July 2017.</p>	<p><b>Root Cause:</b></p> <p>Environment PIC has not been understood the monitoring period of surface water quality.</p> <p><b>Corrective Action:</b></p> <p>RKL RPL internal training date on 04 Auguts 2017. And also planned the RKL RPL external training in September 2017.</p> <p>Revision on environment programme in 2017, includes changing time for the monitoring period of surface water quality (every 6 month to 3 month), date on 12 July 2017.</p>	<p><b>Response:</b></p> <p><b>Acceptable (please see section 4 for details)</b></p> <p><b>Reviewer:</b> R. Yosi Zainal M. <b>Date:</b> 28/08/2017</p>	<p><b>Verification of Effectiveness:</b></p> <ul style="list-style-type: none"> <li>• Correction evidence has been submitted and implemented. It was effectively conducted.</li> <li>• This minor NCR can be closed at the time of the next audit (onsite) by reviewing the effectiveness of corrective action.</li> </ul> <p><b>Name:</b> R. Yosi Zainal M. <b>Date:</b> 28/08/2017</p>

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Section 1				Section 2		Section 3	Section 4	
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
2017-05	RSPO PC INANI 2016 indicator 5.3.3	minor	<p><b>Non-conforming situation:</b></p> <p>Inconsistencies in reporting hazardous waste report to the relevant bodies</p> <p><b>Objective evidence:</b></p> <p>Evidence of hazardous waste report to PPE Sumatra period July – September, October – December 2016, January – March, April – June 2017 cannot be shown during audit.</p>	<p><b>Due Date:</b></p> <p><b>Next audit</b></p> <p><b>SAI Follow up Method:</b> <b>on-site audit</b></p>	<ul style="list-style-type: none"> <li>- Sent the quarterly report of hazardous waste to <i>Pusat Pengelolaan Ekoregional</i> in South Sumatera, date on 14 July 2017 (Triwulan IV 2016 and Triwulan I 2017) and date on 07 July 2017 (Triwulan II 2017).</li> <li>- Provided the receiving of report date on 17 October 2016 (Triwulan III 2016).</li> </ul>	<p><b>Root Cause:</b></p> <p>Lack of understand from SPO Officer regarding reporting period of hazardous waste and its receipt.</p> <p><b>Corrective Action:</b></p> <ul style="list-style-type: none"> <li>- Dissemination to SPO Officer regarding the reporting period of hazardous waste and its receipt date on 27 July 2017.</li> <li>- Arrange the receipt report monitoring of environment implementation, date on 24 July 2017.</li> </ul>	<p><b>Response:</b></p> <p><b>Acceptable (please see section 4 for details)</b></p> <p><b>Reviewer:</b> R. Yosi Zainal M. <b>Date:</b> 28/08/2017</p>	<p><b>Verification of Effectiveness:</b></p> <ul style="list-style-type: none"> <li>• All correction evidences have been submitted and implemented. It was effectively conducted.</li> <li>• This minor NCR can be closed at the time of the next audit (onsite) by reviewing the effectiveness of corrective action.</li> </ul> <p><b>Name:</b> R. Yosi Zainal M. <b>Date:</b> 28/08/2017</p>



## AUDIT REPORT

### **Opportunities for improvement – RSPO**

None

### **Opportunities for improvement – Mill Supply Chain Requirements**

None

## Appendix “D” – Stakeholder’s issues and comment

Date and Time : 11 – 13 July 2017  
 Location : PT Bumi Permai Lestari – Bukit Perak Mill  
 Interviewee : Workers, labour union, gender committee, and external stakeholder (village representative, chief of village, etc.)

### Information gathered during consultation

Date	Stakeholder	Feedback and or request	PT BPL response and action to be taken	SAI Global audit observation	Relevant documentation
13 July 2017	Gender committee	<ul style="list-style-type: none"> <li>- Committee gender activities are socialization about sexual harassment</li> <li>- Each unit have its own Committee Gender</li> <li>- Until now, there is no case or complaint from women workers regarding sexual harassment</li> <li>- Women workers in nursing condition is prohibited worked in high risk job (fertilizer, sprayer and etc)</li> </ul>	-	Gender committee was established by the organisation since 2013. The committee has representatives from all areas of work. The committee consider matters such as; trainings on women’s rights, counselling for women affected by violence, women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks, and women to be given specific break times to enable effective breastfeeding	-
11 – 13 July 2017	Workers (harvester, sprayer, process operator of Mill, Maintenance operator, etc.)	<ol style="list-style-type: none"> <li>1. Salary comply to national law (decent living wages)</li> <li>2. SKU workers get payment slip, meanwhile PKWT workers signed the wage payment ledger</li> <li>3. SKU workers get payment cut for social insurance, health insurance, workers union contribution and tax</li> <li>4. Facilities provided by company are housing complex, water, electricity, school bus and etc.</li> <li>5. Electricity in some of BPRE</li> </ol>	-	<p>All records and document related to manpower was kept and documented, this include personal files such personal identity, application letter, diploma certificate, medical test, acceptance letter and etc.</p> <p>Policy about riparian area and HCV was reviewed, include its program and implementation.</p>	-

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Date	Stakeholder	Feedback and or request	PT BPL response and action to be taken	SAI Global audit observation	Relevant documentation
		Emplacement is using PLN. 6. MCU held every 6 month, last one was held on January 2017 7. Domestic waste transported every Friday 8. Zero burning 9. Riparian buffer zone is prohibited for chemical treatment 10. Hunting protected wildlife is prohibited 11. Workers tell their complaints directly to their supervisor 12. PPE will be change if the old ones is damaged 13. Worker's house will be repaired upon request to Supervisor. If the material is ready in the storage then it will repaired as soon as possible.			
13 July 2017	Workers Union	1. Company has a new PKB for period 2016 -2018 2. Workers discharged is comply to national law 3. Union and company have a good relationship and communication 4. Since January 2017, there are no PHL workers anymore	-	Payment to all workers is complied with national law and local regulation. Because of the decreased in production, there are no overtime bonus for worker. All worker work in daily basis (7-8 hours per day) without overtime.	-

### AUDIT REPORT

Date	Stakeholder	Feedback and or request	PT BPL response and action to be taken	SAI Global audit observation	Relevant documentation
13 July 2017	Stakeholder (Head of Village, Public figure, etc.)	<ol style="list-style-type: none"> <li>1. The resolution of issues from previous audit is not known to public</li> <li>2. Local communities wants to get copy of audit report</li> <li>3. Many of head villages not come to this public consultation because of point 1 above</li> </ol>	<ol style="list-style-type: none"> <li>1. Resolution of issues can be seen in audit report. Audit report is one of information that can be access by public but must go through procedures owned by the company which is SOP <i>Komunikasi dan Konsultasi</i> SOP/SMART/UMUM/SADV/I/004 dated 1 July 2014. All requests for information must be in a written request and then company will respond it. From logbook Record of information request and responses, there are no the written request from stakeholder regarding audit report.</li> <li>2. Procedures have been socialized to stakeholder every year. Last one was on 28 November 2016.</li> </ol>		<ol style="list-style-type: none"> <li>1. SOP <i>Komunikasi dan Konsultasi</i> SOP/SMART/UMUM/SADV/I/004 dated 1 July 2014</li> <li>2. Logbook Record of information request and responses</li> <li>3. Evidences of socialization to stakeholder</li> </ol>
13 July 2017	Government of West Bangka Regency.	<p>Based on Letter Number of 140/4.1.8.1/2017, date on 13 July 2017 regarding:</p> <ol style="list-style-type: none"> <li>1. Requesting of the area enclave for being issued. These areas are school building of SKMN 1 Kelapa Dendang, SDN 25 Kelapa (Lagok Kacung), and SDN 26 Kelapa (Terentang).The information has been requested before, nevertheless there was no feedback from the company.</li> </ol>	<ol style="list-style-type: none"> <li>1. Schools land is owned and located within the HGU of the company. The company allows the land to be used for school buildings, but remains within the company's HGU.</li> <li>2. The audit report can be accessed openly in RSPO website (<a href="http://www.rsपो.org">www.rsपो.org</a>)</li> <li>3. SAI Global has been verified HGU through document</li> </ol>	<ol style="list-style-type: none"> <li>1. The company has completed its licenses documents, include HGU permit. The school was built by the village on the company's HGU land. During audit, there was no recording of the information requesting from its government in the company's logbook, so the company cannot follow up any further.</li> </ol>	<ul style="list-style-type: none"> <li>- HGU permit</li> <li>- Logbook of Requesting and Response Information.</li> </ul>

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		2. Audit result in PT BPL can be directly distributed to Heads of Village. 3. SAI Global can be verified HGU area in the PT. BPL	review and field observation, during this audit.	2. The audit report can be accessed openly in RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ) and include HGU permit verification. 3. HGU area verification through document review and field observation at the several of HGU point. <u>Issues closed</u>	

## **Appendix “E” – Definition of, and action required with respect to audit findings:**

**Major Nonconformities** occur when system is failing to meet a relevant compulsory indicator.

Action required: This category of findings requires SAI Global to issue a formal NCR; to receive and approve client’s proposed correction and corrective action plans; and formally verify the effective implementation of planned corrections and corrective action. Correction and corrective action plan must be submitted to SAI Global for approval within 14 days of the audit. Follow-up action by SAI Global must ‘close out’ the NCR or reduce it to a lesser category within 90 days or less where specified. Certificate of conformance to the RSPO Criteria cannot be issued while any major nonconformity is outstanding. Major nonconformities raised during surveillance audit shall be addressed within 60 days, or the certificate will be suspended. Major nonconformities not addressed within a further 60 days will result in the certificate being withdrawn.

**Minor Nonconformities** occur when system is failing to meet other indicators.

Action required: This category of findings requires SAI Global to issue a formal NCR; to receive and approve client’s proposed correction and corrective action plans; and formally verify the effective implementation of planned corrections and corrective action. In this instance, a certificate may still be awarded providing the root cause of the problem is identified and an acceptable plan is put in place to achieve the outstanding requirements in an agreed time frame. Verification will be made at subsequent surveillance audits. Minor nonconformities will be raised to major if they are not addressed by the following surveillance audit.

**Opportunity for Improvement** is a documented statement, which may identify areas for improvement, but shall not make specific recommendation(s). Client may develop and implement solutions in order to add value to operations and management systems. SAI Global is not required to follow-up on this category of audit finding.

## AUDIT REPORT

### Appendix “F” – Definition of, and action required with respect to audit findings for Supply Chain Certification System:

**Major Nonconformities** occur when system is failing to implement and/or maintain requirements of Supply Chain Certification System.

Action required: This category of findings requires SAI Global to issue a formal NCR; to receive and approve client’s proposed correction and corrective action plans; and formally verify the effective implementation of planned corrections and corrective action.

When non-conformances rose after the certification, RSPO shall be informed of these non-conformances within 7 days since non-conformance rose. A maximum of one month is given to the certified client to satisfactorily address the non-conformances. The effectiveness of the action taken for the non-conformances shall be assessed before closing o ut the non-conformances. Should the non-conformances not be addressed within the one month maximum time frame, a suspension or withdrawal of the certificate and a full re-audit may be necessary.

Where objective evidence indicates that there has been a demonstrable breakdown in the supply chain caused by the certified client’s action or inactions, and that palm oil product that has been or is about to be shipped is falsely identified as RSPO certified product immediate action needs to be taken by SAI Global, and the RSPO Supply Chain certification shall be suspended until such time that it has been addressed. The RSPO shall be notified within 24 hours of this occurrence and further impacts on relevant supply chain certifications.

**Opportunity for Improvement** is a documented statement, which may identify areas for improvement, but shall not make specific recommendation(s). Client may develop and implement solutions in order to add value to operations and management systems. SAI Global is not required to follow-up on this category of audit finding.