CLIENT: IOI CORPORATION BERHAD

ADDRESS OF SITE:

Palm Oil Mill:
BUKIT LEELAU PALM OIL MILL

Supply Base:
1. BUKIT LEELAU ESTATE
2. LEEPANG A ESTATE
3. LAUKIN A ESTATE
4. DETAS ESTATE
5. MERCHONG ESTATE
6. MEKASSAR ESTATE

ADDRESS:
KM 75 KUANTAN-SEGAMAT HIGHWAY, MUADZAM SHAH, PAHANG, MALAYSIA.

ASSESSMENT DATE:
Stage 1: 12th APRIL 2010 DURATION: 2 AUDITOR DAYS
Stage 2: 13th – 16th APRIL 2010 DURATION: 17 AUDITOR DAYS

STANDARD: RSPO MY-NI: 2008

SCOPE OF CERTIFICATION ASSESSMENT:
BUKIT LEELAU PALM OIL MILL AND ITS SUPPLY BASE
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Abbreviations:

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AGT</td>
<td>Authorised Gas Tester</td>
</tr>
<tr>
<td>ASEAN</td>
<td>Association of Southeast Asian Nations</td>
</tr>
<tr>
<td>AMESU</td>
<td>All Malaysian Estates Staff Union</td>
</tr>
<tr>
<td>BOD</td>
<td>Biochemical Oxygen Demand</td>
</tr>
<tr>
<td>B.Sc.</td>
<td>Bachelor of Science</td>
</tr>
<tr>
<td>CA</td>
<td>Collective Agreement</td>
</tr>
<tr>
<td>CHRA</td>
<td>Chemical Health Risk Assessment</td>
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<tr>
<td>COAC</td>
<td>Centre for Orang Asli Concern</td>
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<tr>
<td>COD</td>
<td>Chemical Oxygen Demand</td>
</tr>
<tr>
<td>CPO</td>
<td>Crude Palm Oil</td>
</tr>
<tr>
<td>CUs</td>
<td>Certification Units</td>
</tr>
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<td>DID</td>
<td>Drainage and Irrigation Department, Malaysia</td>
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<td>DOE</td>
<td>Department of Environment</td>
</tr>
<tr>
<td>DOSH</td>
<td>Department of Occupational Safety and Health</td>
</tr>
<tr>
<td>EARA</td>
<td>Environmental Auditors Registration Association</td>
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<tr>
<td>EB</td>
<td>Executive Board</td>
</tr>
<tr>
<td>EFB</td>
<td>Empty Fruit Bunch</td>
</tr>
<tr>
<td>EHA</td>
<td>Estate Hospital Assistant</td>
</tr>
<tr>
<td>EIA</td>
<td>Environmental Impact Assessment</td>
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<td>EMP</td>
<td>Environmental Management Plan</td>
</tr>
<tr>
<td>EPF</td>
<td>Employees Provident Fund</td>
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<tr>
<td>EQA</td>
<td>Environmental Quality Act</td>
</tr>
<tr>
<td>ERT</td>
<td>Endangered, Rare and Threatened Species</td>
</tr>
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<td>FELDA</td>
<td>Federal Land Development Authority</td>
</tr>
<tr>
<td>FFB</td>
<td>Fresh Fruit Bunch</td>
</tr>
<tr>
<td>FSC</td>
<td>Forest Stewardship Council</td>
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<tr>
<td>GAP</td>
<td>Good Agricultural Practice</td>
</tr>
<tr>
<td>GPS</td>
<td>Global Positioning System</td>
</tr>
<tr>
<td>Abbreviation</td>
<td>Full Form</td>
</tr>
<tr>
<td>--------------</td>
<td>-----------</td>
</tr>
<tr>
<td>Ha</td>
<td>Hectares</td>
</tr>
<tr>
<td>HCV</td>
<td>High Conservation Value</td>
</tr>
<tr>
<td>HIRARC</td>
<td>Hazard Identification, Risk Assessment and Risk Control</td>
</tr>
<tr>
<td>IEMA</td>
<td>Institute for Environmental Management and Assessment</td>
</tr>
<tr>
<td>IPM</td>
<td>Integrated Pest Management</td>
</tr>
<tr>
<td>ISO</td>
<td>International Organization for Standardization</td>
</tr>
<tr>
<td>ISP</td>
<td>Incorporated Society of Planters</td>
</tr>
<tr>
<td>IRCA</td>
<td>International Register of Certificated Auditors</td>
</tr>
<tr>
<td>IUFRO</td>
<td>International Union of Forest Research Organization</td>
</tr>
<tr>
<td>JCC</td>
<td>Joint Consultative Committee</td>
</tr>
<tr>
<td>JHEOA</td>
<td>Jabatan Hal Ehwal Orang Asli</td>
</tr>
<tr>
<td>M.E</td>
<td>Master of Engineering</td>
</tr>
<tr>
<td>MSDS</td>
<td>Material Safety Data Sheet</td>
</tr>
<tr>
<td>MNS</td>
<td>Malaysian Nature Society</td>
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<tr>
<td>MOA</td>
<td>Memorandum of Alliance or Agreement</td>
</tr>
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<td>MPOA</td>
<td>Malaysian Palm Oil Association</td>
</tr>
<tr>
<td>MPOB</td>
<td>Malaysia Palm Oil Board</td>
</tr>
<tr>
<td>MYNI</td>
<td>Malaysia National Interpretation</td>
</tr>
<tr>
<td>MYNI – WG</td>
<td>Malaysia National Interpretation – Working Group</td>
</tr>
<tr>
<td>NCR</td>
<td>Non-Conformity Report</td>
</tr>
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<td>NGO</td>
<td>Non Governmental Organisation</td>
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<td>NUPW</td>
<td>National Union of Plantation Workers</td>
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<tr>
<td>OER</td>
<td>Oil Extraction Rate</td>
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<tr>
<td>OHD</td>
<td>Occupational Health Doctor</td>
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<tr>
<td>OG</td>
<td>Oil &amp; Grease</td>
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<tr>
<td>OSH</td>
<td>Occupational Safety and Health</td>
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<td>OHSAS</td>
<td>Occupational Health and Safety Assessment Series</td>
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<td>PERHILITAN</td>
<td>Department of Wildlife and Natural Park</td>
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<td>PERKESO</td>
<td>Social Security Organization</td>
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<td>PDRM</td>
<td>Polis Di-Raja Malaysia</td>
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<td>Ph.D.</td>
<td>Doctor of Philosophy</td>
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<tr>
<td>PK</td>
<td>Palm Kernel</td>
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<tr>
<td>POASM</td>
<td>Persatuan Orang Asli Semenanjung Malaysia</td>
</tr>
<tr>
<td>POM</td>
<td>Palm Oil Mill</td>
</tr>
<tr>
<td>POME</td>
<td>Palm Oil Mill Effluent</td>
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<tr>
<td>PPE</td>
<td>Personal Protective Equipment</td>
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<tr>
<td>PTW</td>
<td>Permit To Work</td>
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<td>RISDA</td>
<td>Rubber Industry Smallholders’ Development Authority (Malaysia)</td>
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<tr>
<td>RSPO</td>
<td>Roundtable on Sustainable Palm Oil</td>
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<tr>
<td>SIA</td>
<td>Social Impact Assessment</td>
</tr>
<tr>
<td>SS</td>
<td>Suspended Solid</td>
</tr>
<tr>
<td>SIOP</td>
<td>Standard Operating Procedure</td>
</tr>
<tr>
<td>USA</td>
<td>United States of America</td>
</tr>
<tr>
<td>USECHH</td>
<td>Use and Standards of Exposure of Chemicals Hazardous to Health</td>
</tr>
<tr>
<td>WWF</td>
<td>World Wide Fund for Nature</td>
</tr>
</tbody>
</table>
RSPO ASSESSMENT REPORT

1.0 INTRODUCTION

1.1 Description of the Certification Unit (Estate and Mill)

The certification unit (CU) that had been assessed was the Bukit Leelau Palm Oil Mill, which is a wholly-owned subsidiary company of IOI Corporation Berhad (IOI). The CU consists of the Bukit Leelau Palm Oil Mill, Bukit Leelau Estate, Leepang A Estate, Laukin A Estate, Detas Estate, Merchong Estate and Mekassar Estate and two smallholdings. However, the assessment did not cover the smallholdings.

Bukit Leelau Palm Oil Mill (Bukit Leelau POM) commenced its operations in 1992 with a processing capacity of thirty (30) metric tonnes of FFB per hour. The total combined land area of the six estates is 11,561.13 hectares (ha) of which 9,805 ha were planted with oil palm.

The total and composition of the workforce of Bukit Leelau POM and its supply base is shown in Table 1.

Table 1: Total and Composition of Workers in the Certification Unit

<table>
<thead>
<tr>
<th>Operating Unit</th>
<th>Local Direct employee</th>
<th>Foreign Direct employee</th>
<th>Through Contractor</th>
<th>Sub-Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bukit Leelau POM</td>
<td>62</td>
<td>39</td>
<td>0</td>
<td>101</td>
</tr>
<tr>
<td>Bukit Leelau Estate</td>
<td>15</td>
<td>181</td>
<td>44</td>
<td>240</td>
</tr>
<tr>
<td>Leepang A Estate</td>
<td>27</td>
<td>151</td>
<td>31</td>
<td>209</td>
</tr>
<tr>
<td>Laukin A Estate</td>
<td>7</td>
<td>97</td>
<td>0</td>
<td>104</td>
</tr>
<tr>
<td>Detas Estate</td>
<td>15</td>
<td>196</td>
<td>59</td>
<td>270</td>
</tr>
<tr>
<td>Merchong Estate</td>
<td>10</td>
<td>154</td>
<td>2</td>
<td>166</td>
</tr>
<tr>
<td>Mekassar Estate</td>
<td>6</td>
<td>109</td>
<td>0</td>
<td>115</td>
</tr>
<tr>
<td>Grand Total</td>
<td>142</td>
<td>1,063</td>
<td></td>
<td>1,205</td>
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</table>

Foreign workers account for about 88% of the CU’s total workforce. However, the percentage of local workers is higher in the mill, comprising of 61%. All of the local workers are direct employees and some of the foreign workers are engaged through contractors. Assessment team has verified all the workers have valid work permit.

1.2 Time Bound Plan for Other Management Units and Justification

IOI owns and operates twelve (12) oil mills (four (4) in Peninsular Malaysia and eight (8) in Sabah) with a supply base of seventy nine (79) estates scattered throughout Peninsular Malaysia, Sabah and Sarawak. IOI has established a plan to certify all its CUs by end of 2011.
For IOI’s operations in Malaysia, five (5) CUs (excluding Bukit Leelau) had been assessed, of which three had been approved for certification by RSPO Executive Board, while the remaining two are still in the process of their reports being peer reviewed. The other six (6) of the CUs will be assessed in 2010 and 2011.

IOI is committed to ensuring that all their operations are certified within the planned time frame. There have been some changes in the time bound plan for the certification of the remaining CUs. The details on the new schedule for RSPO certification in IOI estates (Peninsular Malaysia and Sabah) is as shown in Attachment 1. SIRIM QAS International Sdn. Bhd. (SIRIM QAS International) has reviewed the time frame specified in the plan and has found it to be realistic.

SIRIM QAS International was notified by the management of Bukit Leelau CU on the status of issues related to IOI’s recognition of NUPW and customary land disputes involving IOI’s management units in Malaysia and the Group’s operations in West Kalimantan, Indonesia.

Based on the relevant documentations provided by IOI and an interview held with the Senior Human Resource Manager of IOI Corporation Berhad, the current status of these issues are as follows:

i) **Land Dispute in the Middle Tinjar, Miri, Sarawak**

On 31 March 2010, the Miri High Court in Sarawak made a judgement in favour of the natives (Kayan community) in a class action suit against the State Government of Sarawak, Land Custody and Development Authority (“Pelita”) and IOI Pelita Plantation Sdn. Bhd. (IOI Pelita) on a long standing land dispute over the native customary land (NCL). The Court in its decision had inter alia awarded damages to be assessed to the natives who are occupying the lands.

However, the Court did not allow the natives’ claims for a declaratory order to cancel the leases issued for the land and for the vacant possession of the land to be delivered to the natives on the ground that the native customary rights on the land can be extinguished by paying compensation to the natives. The Court also did not grant any injunctions sought by the natives restraining IOI Pelita from remaining and continuing its operations on the lands.

All the defendants in the above suit including IOI Pelita have been advised by their solicitors that they have strong grounds to appeal and hence had filed an appeal against the said decision. IOI Pelita had also filed an application for stay of execution of the judgement.

ii) **Recognition of the National Union of Plantation Workers (NUPW) as Workers’ Representative**

On 7th January 2010, the Federal Court of Malaysia ruled that IOI Corporation Berhad (IOI) should recognise the NUPW as the representative of their workers in wages negotiations. The Court held that IOI had by conduct recognised the union as representing their employees when it was a member of the Malayan Agriculture Producers Association (MAPA). At the time the assessment was conducted, NUPW has not submitted any proposal on the new collective agreement to IOI.
iii) Report published by the NGOs *Milieudefensie* and Friends of the Earth Europe on IOI’s Operations in Ketapang District, West Kalimantan, Indonesia.

The *Milieudefensie*, the Netherlands chapter of the international NGO Friends of the Earth had in its March 2010 report entitled ‘Too Green to be True’ made several allegations including instances of potential land conflict, unauthorised plantation development on forest land, encroachment on peat land and open burning by IOI in its operations in Ketapang District, West Kalimantan, Indonesia.

On 25 March 2010, IOI had refuted these allegations in its website and had requested a face-to-face meeting to establish direct dialogue with the *Milieudefensie*. IOI had subsequently investigated all the allegations and had established that several incidents on which these allegations were based had been incorrectly reported. The investigation had, also concluded that no land conflicts had occurred, nor had any laws or RSPO regulations been violated. IOI had reasserted its commitment to its sustainability goals and its compliance with legal regulations and RSPO Principles and Criteria. So far, IOI has yet to receive a reply from the *Milieudefensie* on its responses to these allegations.

1.3 Location of Mill and Estates

The Bukit Leelau CU is scattered in three districts i.e. Pekan, Rompin and Kuantan, in Pahang, Malaysia. Bukit Leelau Palm Oil Mill, Merchong Estate and Mekassar Estate are located in the district of Pekan. The Leepang A Estate and Laukin A Estate are in the district of Rompin, while the Detas Estate is under the district of Kuantan. The distance of this CU from Kuala Lumpur is about 280 km.

The locations of Bukit Leelau POM and all the six estates are shown in the map in Attachment 2, while their respective GPS coordinates are given in Table 2. The GPS coordinate readings were taken at the respective administrative offices.

<table>
<thead>
<tr>
<th>Operating Unit</th>
<th>Latitude</th>
<th>Longitude</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bukit Leelau Palm Oil Mill</td>
<td>03°18’00” N</td>
<td>103°08’24” E</td>
</tr>
<tr>
<td>Bukit Leelau Estate</td>
<td>03°18’00” N</td>
<td>103°07’48” E</td>
</tr>
<tr>
<td>Merchong Estate</td>
<td>03°01’12” N</td>
<td>103°12’00” E</td>
</tr>
<tr>
<td>Mekassar Estate</td>
<td>02°59’24” N</td>
<td>103°10’12” E</td>
</tr>
<tr>
<td>Leepang A Estate</td>
<td>03°00’36” N</td>
<td>103°01’48” E</td>
</tr>
<tr>
<td>Laukin A Estate</td>
<td>03°01’26” N</td>
<td>103°02’33” E</td>
</tr>
<tr>
<td>Detas Estate</td>
<td>03°33’00” N</td>
<td>103°03’00” E</td>
</tr>
</tbody>
</table>

In the immediate vicinity of the mill and all the estates are few villages and other oil palm plantations. For the Bukit Leelau Estate, to the northeast is Kampung Tanjung and to its south is Kampung Runchang. For Detas Estate, Kampung Mencupu is located on its eastern side.
For Leepang Estate, Kampung Gadak is located on its northeast while Kampung Inoi is located in the southeast.

The Pekan Forest Reserve is located on the eastern side of the Bukit Leelau Estate with a buffer of 800 meter from the estate boundary. On the western and southern boundaries of Detas Estate is the Lepar Forest Reserve, which is the only forest reserve bordering this CU.

Other oil palm plantations which are neighbours to this CU are FELCRA Kemajuan Tanah Runcang and Nafas Dara Estate (Bukit Leelau Estate), Lembaga Kemajuan Pertanian Pahang (Detas Estate), Felda Keratong 10 (Leepang A Estate) and Ibam Estate (Merchong Estate).

Each of the estate and oil mill has its own living quarters to accommodate their executives, staff and workers.

1.4 Description of Supply Base

All the six estates were supplying FFB to the Bukit Leelau POM. Apart from them, there were two smallholders regularly sending their harvests to the same mill. The average annual FFB contribution from each estate for the financial year (2008/2009) is summarised in Table 3.

**Table 3: Average Annual FFB Contribution by Each Estate to Bukit Leelau POM for the Financial Year July 2008/June 2009**

<table>
<thead>
<tr>
<th>Estate</th>
<th>FFB Production</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Tonnes</td>
</tr>
<tr>
<td>Bukit Leelau Estate</td>
<td>48,999.94</td>
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<tr>
<td>Leepang A Estate</td>
<td>15,665.12</td>
</tr>
<tr>
<td>Laukin A Estate</td>
<td>7,097.18</td>
</tr>
<tr>
<td>Detas Estate</td>
<td>54,749.29</td>
</tr>
<tr>
<td>Merchong Estate</td>
<td>18,023.33</td>
</tr>
<tr>
<td>Mekassar Estate</td>
<td>11,065.00</td>
</tr>
<tr>
<td>Smallholders</td>
<td>1234.26</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>156,834.12</td>
</tr>
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</table>

Table 4 shows the details of the year of establishment of the estates, and their respective total titled land and oil palm planted areas, while Tables 5a to 5f show the percentage of planted area in each estate by year of planting and planting cycle.
Table 4: Year of Establishment and Area Planted with Oil Palm

<table>
<thead>
<tr>
<th>Operating Unit</th>
<th>Year of Establishment</th>
<th>Total Area (ha)</th>
<th>Planted Area (ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bukit Leelau Estate</td>
<td>1989</td>
<td>2,069.00</td>
<td>1,976</td>
</tr>
<tr>
<td>Leepang A Estate</td>
<td>2001</td>
<td>2,403.70</td>
<td>1,823</td>
</tr>
<tr>
<td>Laukin A Estate</td>
<td>2002</td>
<td>1,619.90</td>
<td>943</td>
</tr>
<tr>
<td>Detas Estate</td>
<td>1983</td>
<td>2,300.70</td>
<td>2,185</td>
</tr>
<tr>
<td>Merchong Estate*</td>
<td>1978</td>
<td>1,952.13</td>
<td>1,781</td>
</tr>
<tr>
<td>Mekassar Estate**</td>
<td>1978</td>
<td>1,215.70</td>
<td>1,097</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td>11,561.13</td>
<td>9,805</td>
</tr>
</tbody>
</table>

Note: * replanting initiated in 2003 and ** replanting initiated in 2004

Table 5a: Bukit Leelau Estate

<table>
<thead>
<tr>
<th>Year of Planting</th>
<th>Planting Cycle</th>
<th>Planted Area (ha)</th>
<th>Percentage of Planted Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>1989</td>
<td>1st Generation</td>
<td>611</td>
<td>30.92</td>
</tr>
<tr>
<td>1990</td>
<td>1st Generation</td>
<td>1,256</td>
<td>63.56</td>
</tr>
<tr>
<td>1992</td>
<td>1st Generation</td>
<td>16</td>
<td>0.81</td>
</tr>
<tr>
<td>1998</td>
<td>1st Generation</td>
<td>93</td>
<td>4.71</td>
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<tr>
<td><strong>Total</strong></td>
<td></td>
<td>1,976</td>
<td>100.00</td>
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</table>

Table 5b: Leepang A Estate

<table>
<thead>
<tr>
<th>Year of Planting</th>
<th>Planting Cycle</th>
<th>Planted Area (ha)</th>
<th>Percentage of Planted Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001</td>
<td>1st Generation</td>
<td>430</td>
<td>23.59</td>
</tr>
<tr>
<td>2002</td>
<td>1st Generation</td>
<td>1,393</td>
<td>76.41</td>
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<tr>
<td><strong>Total</strong></td>
<td></td>
<td>1,823</td>
<td>100.00</td>
</tr>
</tbody>
</table>

Table 5c: Laukin A Estate

<table>
<thead>
<tr>
<th>Year of Planting</th>
<th>Planting Cycle</th>
<th>Planted Area (ha)</th>
<th>Percentage of Planted Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>2002</td>
<td>1st Generation</td>
<td>943</td>
<td>100.00</td>
</tr>
</tbody>
</table>
### Table 5d: Detas Estate

<table>
<thead>
<tr>
<th>Year of Planting</th>
<th>Planting Cycle</th>
<th>Planted Area (ha)</th>
<th>Percentage of Planted Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>1983</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; Generation</td>
<td>133</td>
<td>6.09</td>
</tr>
<tr>
<td>1984</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; Generation</td>
<td>211</td>
<td>9.65</td>
</tr>
<tr>
<td>1985</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; Generation</td>
<td>526</td>
<td>24.07</td>
</tr>
<tr>
<td>1986</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; Generation</td>
<td>428</td>
<td>19.59</td>
</tr>
<tr>
<td>1987</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; Generation</td>
<td>109</td>
<td>4.99</td>
</tr>
<tr>
<td>1988</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; Generation</td>
<td>307</td>
<td>14.05</td>
</tr>
<tr>
<td>2010</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Generation</td>
<td>471</td>
<td>21.56</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>2,185</strong></td>
<td><strong>100.00</strong></td>
</tr>
</tbody>
</table>

### Table 5e: Merchong Estate

<table>
<thead>
<tr>
<th>Year of Planting</th>
<th>Planting Cycle</th>
<th>Planted Area (ha)</th>
<th>Percentage of Planted Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>2003</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Generation</td>
<td>203</td>
<td>11.40</td>
</tr>
<tr>
<td>2004</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Generation</td>
<td>291</td>
<td>16.34</td>
</tr>
<tr>
<td>2005</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Generation</td>
<td>139</td>
<td>7.80</td>
</tr>
<tr>
<td>2006</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Generation</td>
<td>359</td>
<td>20.16</td>
</tr>
<tr>
<td>2007</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Generation</td>
<td>259</td>
<td>14.54</td>
</tr>
<tr>
<td>2008</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Generation</td>
<td>146</td>
<td>8.20</td>
</tr>
<tr>
<td>2009</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Generation</td>
<td>384</td>
<td>21.56</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>1,781</strong></td>
<td><strong>100.00</strong></td>
</tr>
</tbody>
</table>

### Table 5f: Mekassar Estate

<table>
<thead>
<tr>
<th>Year of Planting</th>
<th>Planting Cycle</th>
<th>Planted Area (ha)</th>
<th>Percentage of Planted Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>2004</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Generation</td>
<td>255</td>
<td>23.25</td>
</tr>
<tr>
<td>2005</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Generation</td>
<td>291</td>
<td>26.53</td>
</tr>
<tr>
<td>2006</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Generation</td>
<td>198</td>
<td>18.05</td>
</tr>
<tr>
<td>2008</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Generation</td>
<td>102</td>
<td>9.29</td>
</tr>
<tr>
<td>2009</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Generation</td>
<td>251</td>
<td>22.88</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>1,097</strong></td>
<td><strong>100.00</strong></td>
</tr>
</tbody>
</table>

### 1.5 Other Management System Certifications Held

Both the mill and all the estates do not hold any form of third-party certification for any of the management systems.
1.6 Organizational Information/Contact Person

Name: Mr. Joshua Mathews  
Designation: Research Controller  
Address: IOI Research Centre,  
73309 Batang Melaka,  
Negeri Sembilan,  
Malaysia.  
Telephone: +606-4317323  
Fax: +606-4319101  
e-mail: joshua.mathews@ioigroup.com

1.7 Approximate Tonnages Offered for Certification (CPO and PK)

The approximate tonnage of CPO and PK produced, as well as the tonnage claimed for certification, are as shown in Table 6 as follows:

Table 6: Approximate CPO and PK tonnage Claimed for Certification

<table>
<thead>
<tr>
<th>Certification Unit</th>
<th>CPO Tonnage Claimed for Certification (MT)</th>
<th>PK Tonnage Claimed for Certification (MT)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bukit Leelau POM</td>
<td>30,823</td>
<td>9,209</td>
</tr>
</tbody>
</table>

2.0 ASSESSMENT PROCESS

2.1 Assessment Methodology (Program, Site Visits)

The assessment for certification was carried out in two stages, namely Stage 1 and Stage 2. The Stage 1 assessment was conducted to determine the adequacy of the established documentation in addressing the requirements of the RSPO MYNI. The Stage 1 assessment was conducted on 12th April 2010.

The Stage 2 assessment was conducted from the 13th to 16th April 2010. The main objective of the Stage 2 assessment was to verify the CU’s conformance to the RSPO MYNI approved on 26th April 2008. The planning for the Stage 2 assessment was guided according to the RSPO Certification Systems Document that was finalised on 26th June 2007. After studying the documents at Stage 1, it was decided that the sampling formula of 0.8√y to determine the number of estates to be audited would not be used as each supplying estate selected has its own issues of interest of activities related to RSPO MYNI to be verified (see section 1.3).

The assessment was conducted by visiting the fields, mill, HCV habitats, workers quarters, chemical and waste storage areas and other workplaces. Interviews with the CU’s and its FFB
supplying unit’s management, employees, contractors and other relevant stakeholders were conducted. In addition, related records and other documentation were inspected.

Details of the actual assessment programme are given in Attachment 3.

2.2 Date of Next Surveillance Visit

The first surveillance audit will be conducted around twelve months from the date of issuance of the certificate.

2.3 Assessment Team

<table>
<thead>
<tr>
<th>Member of the Assessment Team</th>
<th>Role/area of RSPO requirements</th>
<th>Qualifications</th>
</tr>
</thead>
</table>
| Ruzita Abd. Gani             | Assessment team leader/ mill-related environmental issues and mill and plantation-related occupational safety & health issues | • Over 700 days of auditing experience, having audited on: ISO 14001, OHSAS 18001 & RSPO.  
  • Five years experience in palm oil milling  
  • Completed RSPO Lead Assessor Course – 2008  
  • Successfully completed IRCA accredited Lead Assessor training for ISO 9001:2004  
  • Successfully completed IRCA accredited Lead Assessor training for OHSAS 18001-2005  
  • Successfully completed EARA approved Lead Assessor training for ISO 14001:2002  
  • B.Sc. (Hons) Chemical Engineering |
| Dr. Zahid Emby               | Assessor on workers, community and issues related to legal compliance | • 38 days of auditing experience in auditing for forest management certification (FMC) under the MTCS and FSC and RSPO.  
  • Peer reviewer on audit reports for FMC under the FSC scheme  
  • Attended a training on FSC P&C and MC&I for FMC in December 1999  
  • Attended a training on RSPO P&C and certification requirements in January 2008  
  • Ph.D. (Major: Cultural Anthropology; Minors: Southeast Asian Studies International Agriculture and Rural Development), Cornell University, Ithaca, New York, USA  
  • M.A. (Social Anthropology), Monash University, Melbourne, Australia  
  • B.A. Hons (Social Anthropology/Sociology), Monash University, Melbourne, Australia  
  • Lecture on sociology and social anthropology at undergraduate and graduate level at the Universiti Putra Malaysia beginning 1977  
  • Head, Department of Social Development |
| Dr. Yap Son Kheong | Dr. Yap Son Kheong is an expert in the field of human ecology and has made significant contributions to the understanding of tropical rainforests. His academic career includes the following highlights:

- Head, Department of Social and Development Science, Universiti Putra Malaysia 1998-2001
- Head, Department of Music, Universiti Putra Malaysia 2003-2006
- Currently serving as contract Senior Lecturer, Department of Social and Development Sciences, Faculty of Human Ecology, Universiti Putra Malaysia.

| Assessor on criteria related to HCV, habitats & ecology | Over 340 auditor days of auditing experience, having audited to the following: ISO 14001, MTCS and FSC forest management certification & RSPO
- Completed RSPO Lead Assessor Course - 2008
- Successfully completed EARA approved lead Assessor course for ISO 14001: 2001
- Ph. D. (Forest Biology) University of Aberdeen (Scotland) and University of Malaya Fellowship in Tropical Rain Forest Project.
- B.Sc. Hons. Second Class Upper (Botany), University of Malaya

**Memberships in Professional Organizations:**
- Member of the IUFRO Working Party on Seed Problems. Nominated as one of the candidates for the Co-Chairman of Working Party in 1986.
- Project Leader for Project 8 of the Reproductive Biology of Tropical Trees of the ASEAN-Australian Tree Improvement Programme. 1986. Given the role to develop research activities on reproductive biology within ASEAN countries with sponsorship from Australia.
- Vice Chairman of the Working Group on Seed Origin and Genetic Resources of the ASEAN Canada Forest Tree Seed Centre. 1990 to 1995. Responsible in coordinating research activities on genetic resources within the ASEAN countries.
- Project leader on Impact of Acid Precipitation on Forest working in conjunction with
<table>
<thead>
<tr>
<th>Name</th>
<th>Role</th>
<th>36 years experience in plantation management, covering rubber and oil palm</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Diploma in Agriculture, University of Malaya</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Working Experience:</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Estate Manager, Kuala Lumpur Kepong Berhad</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- External Planting Advisor, Kumpulan Guthrie Berhad</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Rubber Inspector, RISDA Pahang, Malaysia</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Involvement in professional organizations</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Associate member of Incorporated Society of Planters</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Chairman MPOA (Negeri Sembilan Branch)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Vice-Chairman MPOA (Negeri Sembilan Branch)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Vice Chairman of Pahang Planters Association</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Chairman of ISP West Pahang Branch</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name</th>
<th>Role</th>
<th>Collected 100 auditor days in auditing ISO 14001: 2004 and RSPO P&amp;C.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Nine years experience in Oil Palm Plantation management</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Successfully completed IEMA accredited Lead Assessor training for ISO 14001: 2004</td>
</tr>
<tr>
<td></td>
<td></td>
<td>B. Tech. (Hons) Industrial Technology, USM</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Diploma In Science, UiTM</td>
</tr>
</tbody>
</table>

### 2.4 Stakeholder Consultations

SIRIM QAS International Sdn Bhd (SIRIM QAS International) initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International’s websites on 5th March 2010 and in the IOI Group’s website on 11th March 2010. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organizations (NGOs). This was followed-up by telephone calls. Whenever necessary, meetings were arranged. The summary of comments received from the stakeholders and the responses by the assessment team is shown in **Attachment 4**.

Some comments from stakeholders were received prior to conducting the on-site assessment through telephone calls and in writing. SIRIM QAS International had used the comments
received from stakeholders prior to the assessment as input to the assessment planning process.

Among the stakeholders consulted during the Stage 2 assessment were employees, government agencies, non-governmental organizations, local communities, FFB suppliers, contractors and other interested parties.

The consultation with the government agency i.e. Jabatan Hal Ehwal Orang Asli (JHEOA) was carried out at Kampung Runchang on 15th April 2010. It was attended by two JHEOA officials, the officer in charge of JHEOA Pekan and the Supervisor of Kampung Runchang. The consultation lasted for about an hour mainly to discuss on subject related to Principle 6 of the RSPO MY-NI.

The consultation with the NGOs (NUPW and AMESU) took place at the NUPW office in Petaling Jaya on 9th April 2010.

The employees, FFB suppliers and contractors involved were consulted through random sampling from each group in each of the FFB supplying unit and oil mill (e.g. mill operators, harvesters, general workers and sprayers from the estates and oil mill visited). Each consultation had lasted for around an hour. The consultations which were conducted at the CU’s office had included solicitation of comments on issues relevant to principles 4, 5 and 6 of the RPSO MY-NI.

The consultations with the local communities were carried out at their premises. The sessions were carried out at times that were convenient to the stakeholders. The intention was to solicit their views on the impact of the Bukit Leelau CU’s operations on their economics and socio-cultural lives.

During the consultations, no management representatives from the CU were present. As such, the stakeholders had been able to present their views in a frank and open manner.

Following is the list of stakeholders who were consulted during various stages of the assessment process:

**Government Agencies/Service Providers/Associations**

1. Department of Environment (DOE), Kuantan, Pahang, Malaysia.
2. Department of Occupational Safety and Health (DOSH), Kuantan, Pahang, Malaysia
3. Jabatan Hal Ehwal Orang Asli (JHEOA) – Districts of Kuantan, Pekan and Rompin, Pahang, Malaysia
4. District Forest Offices Kuantan and Rompin of the Pahang State Forestry Department, Malaysia
5. Department of Irrigation and Drainage (DID) – Districts of Kuantan, Pekan and Rompin, Pahang, Malaysia
6. Malaysian Palm Oil Board (MPOB), Bandar Baru Bangi, Kajang, Selangor, Malaysia
7. Labour Department – Branch of Kuantan, and Pekan, Pahang, Malaysia
8. Fire and Rescue Department – Branch of Muadzam Shah, Pahang, Malaysia
9. Employee Providence Fund (EPF), Kuantan, Pahang, Malaysia
10. Social Security Organizations (PERKESO), Kuantan, Pahang, Malaysia
11. Land and Mineral Office, Kuantan, Pahang, Malaysia
12. District Office Rompin, Pahang, Malaysia
13. Immigration Department, Kuantan, Pahang, Malaysia
14. Department of Wildlife and National Park (PERHILITAN), Branch of Kuantan and Rompin, Pahang, Malaysia
15. Energy Commission, Kuantan, Pahang, Malaysia
16. Inland Revenue Board of Malaysia, Kuantan, Pahang, Malaysia
17. Department of Statistics, Kuantan, Pahang, Malaysia
18. Police Department (PDRM) – Branch of Paloh Hinai and Muadzam Shah, Pahang, Malaysia
19. Road Transport Department, Muadzam Shah, Pahang, Malaysia
20. Tengku Ampuan Afzan Hospital, Kuantan, Pahang, Malaysia
21. Muadzam Shah Hospital, Muadzam Shah, Pahang, Malaysia
22. Health Office Pekan, Pahang, Malaysia
23. Royal Malaysian Customs Department, Kuantan, Pahang, Malaysia
24. Malayan Railways Limited, Kuantan, Pahang, Malaysia
25. Jabatan Haiwan, Muadzam Shah, Pahang, Malaysia
26. Jabatan Bekalan Air, Branch of Rompin and Muadzam Shah, Pahang, Malaysia

Non-Governmental Organizations

1. World Wild Fund for Nature (WWF), Malaysia
2. Malaysian Nature Society (MNS)
3. Sahabat Alam Malaysia
4. Centre for Orang Asli Concerns (COAC)
5. Persatuan Orang Asli Semenanjung Malaysia (POASM)
6. Wetland International, Malaysia
7. Aidenvironment
8. Tenaganita, Malaysia
9. Sawit Watch
10. National Union of Plantation Workers (NUPW) Malaysia
11. All Malaysian Estates Staff Union (AMESU)
12. Pesticide Action Network (PAN) Asia and Pacific
13. Women Aid Organization, Malaysia
14. Malaysian Palm Oil Association (MPOA)

Local Communities

1. Kampung Runchang, Muadzam Shah, Pahang, Malaysia
2. Kampung Gadak, Muadzam Shah, Pahang, Malaysia
3. Kampung Inoi, Muadzam Shah, Pahang, Malaysia
4. Kampung Tanjung, Muadzam Shah, Pahang, Malaysia
5. Kampung Mencupu, Kuantan, Pahang, Malaysia

Other Interested Parties in Bukit Leelau CU

1. Canteen operator
2. NUPW members
3. AMESU members
4. FFB suppliers
5. Provision shop operator
6. Chemical supplier
7. FFB & EFB transporter
8. Parts supplier
9. Civil contractor

3.0 ASSESSMENT FINDINGS

The assessment findings were highlighted and discussed on-site. There were seven Non-Conformity Reports (NCRs) raised against the Bukit Leelau CU. Bukit Leelau CU had taken the necessary actions to address these non-conformities. Evidences of corrective actions taken by the CU have been submitted to the assessment team in stages. The details of the NCRs and the corrective actions taken are detailed in Attachment 5.

The detailed findings of the assessment on the CU’s compliance with the requirements of the RPSO MY-NI are as follows:

PRINCIPLE 1: COMMITMENT TO TRANSPARENCY

<table>
<thead>
<tr>
<th>Criterion 1.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oil palm growers and millers provide adequate information to other stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making</td>
</tr>
</tbody>
</table>

**Indicators:**
1.1.1 Records of requests and responses must be maintained.
     Major compliance

**Guidance:**
Growers and millers should respond constructively and promptly to requests for information from stakeholders.

**Findings:**

Through the IOI website ([www.ioigroup.com](http://www.ioigroup.com)), the public can access information such as the company’s policies as well as annual report which provides information on environmental, social and legal issues related to the CU’s operations.

It was also evident that government agencies such as DOE, DOSH, the Labour Department and MPOB had regularly requested information relating to matters under their purview and the CU had always responded to these in a comprehensive and timely manner.

It was also confirmed during the on-site assessment that Bukit Leelau CU had maintained proper records of requests for information from external stakeholders and the responses to them. However, it was observed during the assessment that the CU had not received any request for information from any stakeholder.

As for internal communication, Bukit Leelau CU had been maintaining its Green Book to record complaints, grievances and any other requests from their staff and workers. The company’s responses to these issues had also been clearly documented in the book. A sample of Green Book is as in Attachment 6. Based on random interviews held, it was confirmed that the Green Book had served as an effective means of internal communication for the management and the staff and workers of Bukit Leelau CU.

From the above records, it was evident that the CU had been committed to be transparent in its dealings with its internal and external stakeholders.
**Criterion 1.2**
Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. This concerns management documents relating to environmental, social and legal issues that are relevant to compliance with RSPO Criteria. Documents that **must** be publicly available include, but are not necessarily limited to:-

1.2.1 Land titles / user rights (C 2.2)
1.2.2 Safety and health plan (C 4.7)
1.2.3 Plans and impact assessments relating to environmental and social impacts (C 5.1, 6.1, 7.1, 7.3)
1.2.4 Pollution prevention plans (C 5.6)
1.2.5 Details of complaints and grievances (C 6.3)
1.2.6 Negotiation procedures (C 6.4)
1.2.7 Continuous improvement plan (C 8.1)

**Guidance:**
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. 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.

**Findings:**
Bukit Leelau CU has established a mechanism to ensure that management documents are publicly made available. Among the documents that were made available for public viewing at the estate and mill offices were copies of land titles, licenses issued by authorities, company policies, safety management plan, environmental impact assessment, management action and continuous improvement plans, social impact assessment plan, HCV assessment, negotiation procedures and report of complaints and grievances.

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

**Criterion 2.1**
There is compliance with all applicable local, national and ratified international laws and regulations

**Indicators:**
2.1.1 Evidence of compliance with legal requirements.
   Major compliance
2.1.2 A documented system, which includes written information on legal requirements.
   Minor compliance
2.1.3 A mechanism for ensuring that they are implemented.
   Minor compliance
2.1.4 A system for tracking any changes in the law.
   Minor compliance

**Guidance:**
1. Lists down all applicable laws including international laws and conventions ratified by the Malaysian government.
2. Identify the person(s) responsible to monitor this compliance.
3. Display applicable licenses and permits.
4. Unit responsible to monitor these will also be responsible to track and update changes.

**Findings**
Bukit Leelau CU had documented a list of all the applicable laws and regulations relevant to its operations. Among the applicable laws and regulations are Environmental Quality [(Prescribed Premises) (Crude Palm Oil)] Regulations 1977, Environmental Quality (Scheduled Wastes) Regulations 2005, Factory and Machinery (Steam Boiler and Unfired Pressure Vessel) Regulations 1970, Machinery (Noise Exposure) Regulations 1989, Employment Act 1955, Occupational Safety and Health Act, 1994.

As required by the criterion, copies of relevant licenses and permits were displayed appropriately in the mill and estate offices. Inspection by the assessors had found that all of them were still valid. Among the licenses and permits being displayed were MPOB License, Energy Commission License and permits to keep fertilizer and diesel.

Bukit Leelau CU had established a documented procedure for tracking changes in the laws. The procedure had also addressed the means to monitor compliance status and identified the person-in-charge of monitoring the CU’s compliance with all the relevant laws. The commitment to ensure the CU had complied with all the legal requirements was verified during the assessment.

It was confirmed that the mill engineer and boilermen of Bukit Leelau mill had fulfilled the requirements for competent persons in accordance to the Factories and Machinery (Person-In-Charge) Regulations 1970. It was observed that both of them had possessed the required Certificate of Competency. The Electrical Chargemen had also possessed the necessary qualifications as required by the regulations (refer to Attachment 7).

Boiler air emission i.e. dark smoke and dust particulate had been monitored in accordance with the requirements of the Department of Environment’s (DOE). The mill had continuously been monitoring dark smoke emission and during the assessment it was verified that emission readings were below Ringelmann Chart no.2 as required by the law. These records had been submitted to DOE on a monthly basis. The dark smoke monitoring equipment i.e. the smoke density meter was last calibrated on 27th January 2010 and was operational at the time the assessment was conducted.

The mill had appointed an external consultant to carry out monitoring on dust particulate a half yearly basis. The dust particulate monitoring in the second half of 2009 was conducted on 15th December 2009. The dust particulate emission level recorded at 0.250 g/Nm$^3$, was below the legal requirement of 0.40 g/Nm$^3$.

Quality of effluent discharge was tested on a weekly basis and the results were submitted to DOE accordingly. A total of seven parameters were tested consisting of pH, biochemical-oxygen demand (BOD), chemical oxygen demand (COD), Ammonical nitrogen (AN), oil & grease (OG), total solids (TS) and suspended solids (SS). Records had shown that all parameters measured had been within the limits specified in the Environmental Quality (Prescribed Premises) Regulations and within the specification of annual license issued by DOE.
The inspections by the Department of Occupational Safety & Health (DOSH) on the condition of
the mill’s’ machineries such as the pressure vessels i.e. steam boiler, sterilizer and air
compressor had indicated they were safe for operation.

Despite the above-mentioned compliance, the written documents of initial approvals from DOE
for the steam boiler and diesel generator prior to commissioning of mill in 1992 were not made
available during the assessment. It was also observed that the compliance with code of
practice for safe working in a confined space had not been fully adhered to. The mill did not
have a competent person-in-charge for authorised gas tester (AGT), authorised entrant and
stand-by person as required by the code of practise. Therefore, a non-conformity was raised
against Indicator 2.1.1.

The management of Bukit Leelau POM had taken the necessary corrective action by obtaining
copies of the original written approval of the steam boiler and diesel generator (both dated 10th
July 1991) from the DOE and Company’s old files. The copies of both documents were made
available as evidence on 21st May 2010.

The mill had also purchased a gas tester. Evidence of the purchase of gas tester was viewed in
the purchase order dated 12th May 2010 and the invoice No. 023163, dated 24th May 2010 from
Dräger. Training for AGT, authorised entrant and stand-by person was conducted on 7th & 8th
May 2010 by a DOSH authorized trainer and relevant documents were viewed.

With respect to the terms and conditions of employment, it was confirmed that Bukit Leelau CU
was in compliance with the Employment Act 1955 related to the provisions of wages, paid public
holidays, paid annual leave and sick leave.

Site visits made to the workers’ housing in Leepang A, Detas and Bukit Leelau Estates had
confirmed that the housing specifications were in accordance with the Minimum Standards of
Housing and Amenities Act 1990. The number of houses was found to be sufficient to accommodate all the workers.

It was observed that the source of water for the Detas Estates was from tube well whereas for the other estates, their water supplies were from the nearby river and the water treated before being distributed via pipeline to the individual worker’s house. The assessment has verified that there was sufficient water supply to the employees which amounted to 35 gallons per day per employee.

Water sample was sent to accredited laboratory for analysis and the assessment team had verified the report on the water analysis and found the water suitable for human consumption.

The inspection of linesites was carried out by Visiting Medical Officer and the Medical Assistants on a monthly and weekly basis respectively. Reports of these inspections were kept in the office.

There was no crèche in operation as the workers (local and foreign) did not bring their children along with them to stay in the estates.

During the site inspection it was observed that workers had been allocated with land for grazing and cultivation.

In order to comply with the National Forestry Act 1984 (Act 313), it was observed that the Bukit Leelau CU had demarcated a clear boundary with the adjacent Lepar Forest Reserve bordering the Detas Estate. In addition to the boundary demarcation, no hunting signage was placed along the boundary of the forest to prevent the estate employees from hunting in the Lepar Forest Reserve as required under the Protection of Wildlife Act 1972 (Act 76)

<table>
<thead>
<tr>
<th>Criterion 2.2</th>
</tr>
</thead>
<tbody>
<tr>
<td>The right to use the land can be demonstrated, and is not legitimately contested by local communities with demonstrable rights.</td>
</tr>
</tbody>
</table>

**Indicators:**

2.2.1 Evidence of legal ownership of the land including history of land tenure.  
Major compliance

2.2.2 Growers must show that they comply with the terms of the land title.  
[This indicator is to be read with Guidance 2]  
Major compliance

2.2.3 Evidence that boundary stones along the perimeter adjacent to state land and other reserves are being located and visibly maintained.  
Minor compliance

**Specific Guidance:**
Growers should attempt to comply with the above indicator within 15 months from date of announcement of first audit. Refer to State Land Office for examples of other reserves.

2.2.4 Where there are, or have been, disputes, proof of resolution or progress towards resolution by conflict resolution processes acceptable to all parties are implemented. Cross ref. to 2.3.3, 6.4.1 and 6.4.2.  
Minor compliance

**Guidance:**
1. For any conflict or dispute over the land, the extent of the disputed area should be mapped out in a participatory way.
2. Where there is a conflict to the condition of land use as per land title, growers must show evidence that necessary action has been taken to resolve the conflict with the relevant authorities.
3. Ensure a mechanism to solve the dispute (Refer to C 6.3 and C6.4)
4. Evidence must be demonstrated that the dispute has been resolved.
5. All operations shall cease on land planted beyond the legal boundary.

Findings:

The first cycle of oil palm planting by Bukit Leelau CU was undertaken in 1978 in the Mekassar and Merchong Estates and to the most recent in 2002 in Leepang A and Laukin A. Replanting of second generation oil palm commenced in the Mekkassar, Merchong and Detas Estates starting in 2003 (Refer Tables 5d to 5f). Land titles for all the estates and mill were verified and all the land was for the purpose of cultivating oil palm. The CU had a lease on the land granted by the Pahang State government as a legal ownership. The title numbers and lease periods are as follows:

<table>
<thead>
<tr>
<th>Estate/Mill</th>
<th>Land Title Number</th>
<th>Effective Date</th>
<th>Lease Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bukit Leelau POM</td>
<td>P.T. 764</td>
<td>03 January 1989</td>
<td>99 years</td>
</tr>
<tr>
<td>Bukit Leelau Estate</td>
<td>P.T. 764</td>
<td>03 January 1989</td>
<td>99 years</td>
</tr>
<tr>
<td>Leepang A Estate</td>
<td>H.S. (D) 4041</td>
<td>13 May 1999</td>
<td>99 years</td>
</tr>
<tr>
<td></td>
<td>(P.T.10510)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>H.S. (D) 4042</td>
<td>13 May 1999</td>
<td>99 years</td>
</tr>
<tr>
<td></td>
<td>(P.T.10511)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Laukin A Estate</td>
<td>PA 103771 Lot 16817</td>
<td>29 August 2002</td>
<td>50 years</td>
</tr>
<tr>
<td></td>
<td>PA 103772 Lot 16818</td>
<td>29 August 2002</td>
<td>50 years</td>
</tr>
<tr>
<td>Detas Estate</td>
<td>H.S.(D) 441</td>
<td>01 December 1982</td>
<td>99 years</td>
</tr>
<tr>
<td></td>
<td>Lot. No. 2157</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>H.S.(D) 442</td>
<td>01 December 1982</td>
<td>99 years</td>
</tr>
<tr>
<td></td>
<td>Lot. No. 1377</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Merchong Estate</td>
<td>P.T.P. 7-0195</td>
<td>06 May 1976</td>
<td>99 years</td>
</tr>
<tr>
<td>Mekassar Estate</td>
<td>H.S.(D) 7</td>
<td>14 October 1976</td>
<td>99 years</td>
</tr>
<tr>
<td></td>
<td>(P.T. 785)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>H.S.(D) 295</td>
<td>02 October 1976</td>
<td>99 years</td>
</tr>
<tr>
<td></td>
<td>(P.T. 566 and P.T.P. 7-0184)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Bukit Leelau CU had maps to indicate the locations of the boundary stones of all the estates. During the site assessment, it was noted that Bukit Leelau CU had managed to locate some of the boundary stones adjacent to Lepar Forest Reserves but they were still in the midst of finding the remaining boundary stones.

The assessment team had observed that where the boundary stones had yet to be located, the company had, on its own initiative, using the GPS Team, determined the boundary and had placed boundary pegs (with blue marking) to demarcate the boundary. This matter would be followed up during the surveillance to ensure that the remaining boundary stones are located within the time-frame as specified in the RSPO guidance.
Photo 2: One of the Boundary Stones (painted red) and Boundary Pegs (painted blue) located in the Leepang A Estate

**Criterion 2.3**  
Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users, without their free, prior and informed consent.

**Indicators:**

2.3.1 Where lands are encumbered by customary rights, participatory mapping should be conducted to construct maps that show the extent of these rights.  
Major compliance

2.3.2 Map of appropriate scale showing extent of claims under dispute.  
Major compliance

2.3.3 Copies of negotiated agreements detailing process of consent (C2.2, 7.5 and 7.6).  
Minor compliance

**Guidance:**
Where lands are encumbered by legal or customary rights, the grower must 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 are best established through participatory mapping exercises involving affected and neighbouring communities. 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 in appropriate forms and languages, including assessments of impacts, proposed benefit sharing and legal arrangements. Communities must be permitted to seek legal counsel if they so choose. Communities must be represented through institutions or representatives of their own choosing, operating transparently and in open communication with other community members. Adequate time must 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.

**Findings:**

Bukit Leelau CU had two cases of land encroachment. However, these encroachments had not been legally contested or related to native customary rights. One of the encroachments was
between the Leepang A Estate with another plantation company (FELDA), while the other was between Detas Estate and an individual land owner.

With regards to the first encroachment, Leepang A Estate had overplanted 132 palms on land belonging to FELDA. Leepang A Estate has returned the land and the planted palms to FELDA after joint verification by both parties.

In the case involving Detas Estate, a local individual land owner had claimed that Detas Estate had constructed a road on his land without his approval. The CU had claimed that the road had existed from the time when Detas Estate was first planted in 1983 and prior to the purchase of that land by the individual in November 2008. Moreover, this disputed road had been commonly used by the nearby Orang Asli villagers to take their produces like rubber cup lumps and lorries transporting FFB from Detas Estate. Detas Estate had finally decided to stop using the road and has constructed a new road to transport their FFB.

Both cases had been resolved without intervention from the courts. Copies of documented communication records were presented to the assessors. As such, the assessors were satisfied that these issues have been resolved amicably.

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

<table>
<thead>
<tr>
<th>Criterion 3.1</th>
<th>There is an implemented management plan that aims to achieve long-term economic and financial viability.</th>
</tr>
</thead>
</table>
| Indicators:   | 3.1.1 Annual budget with a minimum 2 years of projection  
  Major compliance |
|               | 3.1.2 Annual replanting programme projected for a minimum of 5 years with yearly review.  
  Minor compliance |
| Specific Guidance: | Annual budget may include FFB yield/ha, OER, CPO yield/ha and cost of production that is not required to be publicly available. |
| Guidance:     | Individual organization is to define its own management unit i.e. mill, estate or group as per definition on unit of certification explained in Item 4.2.3 and 4.2.4 in the RSPO Certification Systems document located at:  

**Findings:**

There was an annual budget for 2010/11 for every estate and Bukit Leelau POM. The budget generally covers the provision of allocation for operations, maintenance, training, occupational safety and health and environmental upkeep. In addition, there was a five years crop projection which would be reviewed annually. The assessors had also sighted a projected business management plan for the year 2013/14. Among the issues being addressed under this plan were environment, safety and health, and social.

A replanting programme with projection until the year 2018/19 had been established for all of the six estates. The programme would be reviewed once a year by the CU’s management. Replanting activity has started since 2003. To-date, a total of 3,349 ha has been replanted.
**PRINCIPLE 4: USE OF APPROPRIATE BEST PRACTICES BY GROWERS AND MILLERS**

<table>
<thead>
<tr>
<th>Criterion 4.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operating procedures are appropriately documented and consistently implemented and monitored.</td>
</tr>
</tbody>
</table>

**Indicators:**

4.1.1 Documented Standard Operating Procedures (SOP) for estates and mills  
   **Major compliance**

4.1.2 Records of monitoring and the actions taken are maintained and kept for a minimum of 12 months.  
   **Minor compliance**

**Findings:**

Bukit Leelau CU had established Standard Operating Procedures (referred to in the company as StOP) for both its estates and mill. The StOP for the mill was established in April 2008 whilst that for the estate had its StOP documented in December 2007.

The operations which had been included in the mill’s StOP were the boiler operations, effluent treatment plant, products analysis method, workshop activity, chemical and waste handling. In addition, Bukit Leelau mill has also established a procedure “Permit to Work” (PTW) system. The assessment team had verified that the PTW system had been implemented effectively at site. It was also observed that the simplified versions of the StOP had been displayed at all workstations in the mill for the employees to refer.

Meanwhile, the StOP for the estate operations had included activities on land development, harvesting and evacuation, field maintenance replanting and transportation. All the relevant employees had been briefed on the StOP by their respective supervisors. The simplified versions of the StOP were also made available at the muster ground notice board. Through random interviews held with the staff and workers, it was observed that the level of their understanding on the contents of the StOP was found to be satisfactory.

The assessment team had confirmed during the on-site assessment that the relevant records of monitoring on the implementation of the StOP for the estates and mill during the last twelve months were available. Among the records which had been sighted were on manuring and spraying progress, agrochemicals usage, vehicle running hours, laboratory analysis report on product losses and volume of effluent discharge.

<table>
<thead>
<tr>
<th>Criterion 4.2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</td>
</tr>
<tr>
<td>MY-NIWG recommends that the indicators in criterion 4.2 and 4.3 are linked</td>
</tr>
</tbody>
</table>

4.2.1 Monitoring of fertilizer inputs through annual fertilizer recommendations.  
   **Minor compliance**

4.2.2 Evidence of periodic tissue and soil sampling to monitor changes in nutrient status.  
   **Minor compliance**

4.2.3 Monitor the area on which EFB, POME and zero-burn replanting is applied.  
   **Minor compliance**

**Guidance:**

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Long-term fertility depends on maintaining the structure, organic matter content, nutrient status and microbiological health of the soil. Managers should ensure that best agricultural practice is followed. Nutrient efficiency must take account of the age of plantations and soil conditions.

Findings:

All the estates in the Bukit Leelau CU had been keeping tracks on the fertilizer input. The assessors had sighted records on the fertilizer movement and confirmed that they were current. The fertilizer dosage varies from one CU to another and from one field to another field in accordance to the Agronomist’s annual fertilizer recommendations.

It was noted that IOI Agronomy Team had visited every estate to conduct tissue and soil sampling as part of its annual monitoring programme on changes in nutrient status. The yearly soil sampling was conducted on 20% of the total field planted in each CU and within five years a cycle of soil sampling would have been completed for the whole oil palm planted fields in the CU. However, the annual leaf sampling would cover the whole oil palm planted fields except for the palms below the age of 2 years (immature). The most recent information from the Agronomist on the leaf and soil samplings was in March 2009.

Empty fruit bunch (EFB) was applied mainly in Bukit Leelau Estate, some to replanted areas in Detas and small fractions were transferred to Leepang A Estate’s laterite hills. Majority (90%) of the EFB was being applied in Bukit Leelau Estate as logistically it was easier to transfer it from the oil mill. The rate of application has been 40 – 50 m³/ha and applied in between the palms. The assessors had checked the records on the amount of EFB applied which was found to be in accordance with the standard practice. The gentle undulating terrain in Bukit Leelau Estate also suits for mechanisation of EFB placement.

The balance of the EFB was normally used for replants as palm circle placement immediately after planting oil palm seedlings equivalent to 20-25 tonnes per hectare as stated in the standard operating procedure. Bukit Leelau Estate has a yearly EFB application plan in their Environment Management Plan with information on the field number, month and the progress of EFB application being updated in the file accordingly.

Total EFB produced in Bukit Leelau oil mill was sufficient enough to cover about 800 hectares of the Bukit Leelau Estate. Leepang A Estate had tried a small fraction of EFB for identified laterite hills of oil palm planting as recommended by agronomists (in the letter dated 29th June 2006) in view of poor growth. However, the management felt it was difficult to transfer the EFB manually along the terraces. More over, it was not economical to transfer EFB from Bukit Leelau oil mill to Leepang A Estate for mulching of laterite soil. Hence the supply EFB had not been consistent to the Leepang A Estate.

Application of dry solid POME (after de-silting of anaerobic ponds) in the field had only been practised in the Bukit Leelau Estate with a rate of 100 kg/palm. Chipped oil palm trunks had been used to mulch the newly replanted areas, as nutrient supplement in the Merchong and Mekkassar Estates.

It was observed that there was no sign of open burning occurred at the replanting area in Detas Estate. This practice was consistent with the company’s policy and standard operating procedure on zero-burning.
**Criterion 4.3**
Practices minimise and control erosion and degradation of soils.

**Indicators:**
4.3.1 Documented evidence of practices minimizing soil erosion and degradation (including maps).
   Minor compliance

**Specific Guidance:**
Replanting on sloping land must be in compliance with MSGAP Part 2: OP (4.4.2.2)
For Sarawak, steep slopes are considered high risk erosion areas and cannot undergo replanting unless specified in the EIA report and approved by the Natural Resources and Environment Board (NREB).
For Sabah, slopes 25 degree and steeper are considered high risk erosion areas and cannot undergo replanting unless specified in the EIA report [Environment Protection (Prescribed Activities)(Environment Impact Assessment) Order 2005] and approved by the Environmental Protection Department (EPD).
Slope determination methodology (slope analysis) should be based on average slope using topographic maps or topographical surveys.

4.3.2 Avoid or minimize bare or exposed soil within estates.
   Minor compliance

**Specific Guidance:**
Appropriate conservation practices should be adopted.

4.3.3 Presence of road maintenance programme.
   Minor compliance

4.3.4 Subsidence of peat soils should be minimised through an effective and documented water management programme.
   Minor compliance

**Specific Guidance:**
Maintaining water table at a mean of 60 cm (within a range of 50-75cm) below ground surface through a network of weirs, sandbags, etc. in fields and watergates at the discharge points of main drains.

4.3.5 Best management practices should be in place for other fragile and problem soils (e.g. sandy, low organic matter and acid sulphate soils).
   Minor compliance

**Guidance:**
Techniques that minimise soil erosion are well-known and should be adopted, wherever appropriate. These may include practices such as:
1. Expediting establishment of ground cover upon completion of land preparation for new replant.
2. Maximizing palm biomass retention/ recycling.
3. Maintaining good non-competitive ground covers in mature areas.
4. Encouraging the establishment/regeneration of non-competitive vegetation to avoid bare ground.
5. Construction of conservation terraces for slopes >15°
6. Advocating proper frond heap stacking such as contour/L-shaped stacking, for straight line planting and stacking along the terrace edges for terrace planting.
7. Appropriate road design and regular maintenance.
8. Diversion of water runoff from the field roads into terraces or silt pits.
9. Construction of stop bunds to retain water within the terrace.
10. Maintaining and restoring riparian areas in order to minimize erosion of stream and river banks.

**Findings:**
IOI is practicing various methods to minimize soil erosion and degradation. Among the methods being used which were sighted on-site were the planting of leguminous cover plants and Vettiver grass on sloping areas to minimize bare or exposed soil, frond stacking at the inter-
terraces, EFB mulching and construction of terrace in the hilly terrain. The assessors had sighted topographic maps kept at the estates, which indicate among other information of slope gradients and land elevation from sea level. Besides, soil maps with agro-management plan were also available in the environmental management plans and annual agronomic reports.

From the field visit, it was found that Bukit Leelau CU had maintained soft vegetations such as grasses and ferns to avoid bare soil the matured fields of the estates. Weed spraying activities had also been carefully planned to avoid over-spray to other areas.

All of the estates have had their own annual road maintenance programme. Among the programmes which had been implemented to keep the roads in good condition were resurfacing, grading and compacting, construction and maintenance of road side drains. The implementation of these programmes had been closely monitored. On-site inspection had confirmed that most of the roads had been well maintained and passable.

There was no peat soil area as well as fragile and problem soils in the Bukit Leelau CU. Therefore, Indicators 4.3.4 and 4.3.5 are not applicable.

**Criterion 4.4**
Practices maintain the quality and availability of surface and ground water.

**Indicators:**

4.4.1 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before replanting along all natural waterways within the estate.
   Major compliance

**Specific Guidance:**
Riparian buffer zones: Reference to be made to relevant national regulations or guidelines from state authorities e.g. Department of Irrigation and Drainage (DID), whichever is more stringent.

4.4.2 No construction of bunds/weirs/dams across the main rivers or waterways passing through an estate.
   Major compliance

4.4.3 Outgoing water into main natural waterways should be monitored at a frequency that reflects the estates and mills current activities which may have negative impacts (Cross reference to C 5.1 and 8.1).
   Major compliance

4.4.4 Monitoring rainfall data for proper water management.
   Minor compliance

4.4.5 Monitoring of water usage in mills (tonnage water use/tonne FFB processed).
   Minor compliance

**Specific Guidance:**
Data trended where possible over 3 years to look into resource utilization

4.4.6 Water drainage into protected areas is avoided wherever possible.
   Appropriate mitigating measures will be implemented following consultation with relevant stakeholders.
   Minor compliance

4.4.7 Evidence of water management plans.
   Minor compliance

**Findings:**

Bukit Leelau CU had established procedures on the maintenance and management of areas identified as riparian reserves. Each of the six estates inspected had demarcated riparian
buffers along the major water ways. Painted marks on the palm trunks marking the boundary of the buffers were observed as an indication for workers not to blanket spray along buffer zones of streams.

However, it was noted that this practice can be improved as the zone close to some small streams had not been clearly marked. The absence of a clear marking has resulted in replanting of a few new palms within the riparian buffer zone in Mekassar Estate (i.e. field PR 09A). Therefore, a non conformity was raised.

Bukit Leelau CU has taken necessary action to rectify the non conformity. Verification through photograph shows a clear marking of riparian buffer zone at replanting area and future replanting areas. New palms which were planted within the riparian buffer had been removed and relocated as supply palm in the vacant points of the field.

Photo 3: Mekassar Estate: Before - New Palm Planted Close to Stream
Photo 4: Mekassar Estate: After – Palm Removed to New Location

Photo 5: Mekassar Estate: After – Palm Planted outside the Riparian Buffer Zone
During the on-site assessment, it was observed that there were no weirs/dams being constructed across the main rivers or waterways passing through the estates.

The palm oil mill in Bukit Leelau had identified the source of outgoing water from the mill, which led into natural waterways. The sources identified were run-offs of discharges from the effluent treatment plant (ETP) and monsoon drain from the mill. The monitoring of these discharges and the water quality of down streams was conducted every three months.

For each estate, water quality index (WQI) for two selected streams was monitored at the point of entrance (or inlet) to the estate, mid stream and at the point where the streams flow out (outlet) of the estate. Monitoring of streams in the estate by water sampling of the stream and analysis was carried out at a frequency of six monthly intervals. The parameters measured were pH, BOD, COD, Nitrate N, total nitrogen, oil and grease, heavy metals, total Coliform colonies and total E. coli colonies.

The water samples from the rivers were mostly within the quality index ranging from 60 to 75, which falls into slightly polluted or class III category in accordance to Interim national water quality standard 2006 (INWQS) of DOE. Copies of reports on the water sampling from each estate and the recommendations to improve the quality of river water had been presented and viewed during the assessment.
The photograph below shows one of the water sampling points visited by the assessor.

Photo 7: Water Sampling Point at Mekassar Estate with the Signage

Both the mill and estates had been monitoring the rainfall data as well as their water consumption as required by RSPO criteria & indicator.

It was observed that the Rompin River passed in between the Leepang A and Laukin A Estates. The water flows towards the Pekan Forest Reserve. The CU had taken the initiative to avoid pollutants by identifying the main streams from the estates which flow into the Rompin River.

This would then be followed by monitoring of water quality at each of the main stream based on DOE water quality index parameter. The assessors had confirmed that all the estates have their action plans and continuous improvement programs to minimize pollutant going to the protected areas as stated in the Environmental Impact Assessment report.
**Criterion 4.5**

Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

**Indicators:**

4.5.1 Documented IPM system.
   Minor compliance

4.5.2 Monitoring extent of IPM implementation for major pests.
   Minor compliance

**Specific Guidance:**

Major pests include leaf eating caterpillars, rhinoceros beetle and rats.

4.5.3 Recording areas where pesticides have been used.
   Minor compliance

4.5.4 Monitoring of pesticide usage units per hectare or per ton crop e.g. total quantity of active ingredient (a.i.) used/tonne of oil.
   Minor compliance

**Guidance:**

Growers should apply recognised IPM techniques, incorporating cultural, biological, mechanical or physical methods to minimise use of chemicals. Native species should be used in biological control wherever possible.

**Findings:**

There was a documented integrated pest management (IPM) system in the CU’s STOP and Environmental Management Plan (EMP). Among the documented pest control were on rats, bagworms and rhinoceros beetles. The IPM techniques being used include detection, census and treatment controls to be applied when pests population or crop damages has reached the threshold level. In addition, the Bukit Leelau CU had encouraged the planting of beneficial plant such as *Turnera subulata* and *Cassia cobaensis* as part of the IPM as biological control over bagworms and nettle caterpillars.

Rat was the main pest in the Bukit Leelau CU. The estates had been monitoring the damage through their daily infield FFB grading report. In addition, the mill had also been checking the damage as part of its FFB quality grading. Bukit Leelau CU had also been promoting the barn owl as one of its IPM practices to control the rat attack. The assessors had seen a number of barns owl in the field with their locations being identified on a map.

However, it was noted that the extent of monitoring on the implementation of this IPM had not been clearly presented (e.g. monitoring of the barn owl population, efficiency, plan(s) to preserve, etc.). Therefore, a non conformity is raised on this lapse. The corrective action plan was submitted to assessor where Bukit Leelau CU will monitor the effectiveness of the implementation of barn owl as part of IPM. Monitoring records will be established such as barn owl population census and plan(s) to preserve the population. The implementation of the corrective action plan will be verified in the next assessment.

It was observed that the field staff and storekeepers had been keeping records on the location, quantity and type of pesticides that have been applied in their Cost Books. These records would then be verified by the Assistant Managers to ensure consistency.

The estates had also been maintaining the records of agrochemicals being applied based on per hectare and per metric ton of CPO units since 2004. These records were prepared by the Assistant Managers and verified by the Managers.
### Criterion 4.6

Agrochemicals are used in a way that does not endanger health or the environment. There is no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. Where agrochemicals are used that are categorised as World Health Organisation Type 1A or 1B, or are listed by the Stockholm or Rotterdam Conventions, growers are actively seeking to identify alternatives, and this is documented.

**Indicators:**

| 4.6.1  | Written justification in Standard Operating Procedures (SOP) of all agrochemicals use. |
| 4.6.2  | Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). |

**Specific Guidance:**

Reference shall also be made to CHRA (Chemical Health Risk Assessment)

4.6. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations.

**Specific guidance:**

Unless participating in established recycling programmes or with expressed permission from the authorities, triple rinsed containers shall be pierced to prevent misuse. Disposal or destruction of containers shall be in accordance with the Pesticide Act 1974 (Act 149) and Environmental Quality Act 1974 (Scheduled Wastes) Regulations 2005.

4.6.4 All information regarding the chemicals and its usage, hazards, trade and generic names must be available in language understood by workers or explained carefully to them by a plantation management official at operating unit level.

4.6.5 Annual medical surveillance as per CHRA for plantation pesticide operators.

4.6.6 No work with pesticides for confirmed pregnant and breast-feeding women.

4.6.7 Documentary evidence that use of chemicals categorised as World Health Organisation Type 1A or 1B, or listed by the Stockholm or Rotterdam Conventions and paraquat, is reduced and/or eliminated. Adoption of suitable economic alternative to paraquat as suggested by the EB pending outcome of the RSPO study on IWM.

4.6.8 Documented justification of any aerial application of agrochemicals. No aerial spraying unless approved by relevant authorities.

4.6.9 Evidence of chemical residues in CPO testing, as requested and conducted by the buyers.

4.6.10 Records of pesticide use (including active ingredients used, area treated, amount applied per ha and number of applications) are maintained for either a minimum of 5 years or starting November 2007.

**Findings:**

Bukit Leelau CU had justified the usage of all agrochemicals in the StOP. This includes the specific targets and the correct dosage of agrochemicals to be used.

All agrochemicals used were those that have been registered under the Pesticides Act 1974 (Act 149). This has also been cross checked at the chemical store by the assessors during the site visit.
The chemical stores were observed to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. **All of the stores had been well ventilated and secured.** Only authorized personnel were allowed to handle the chemical stores.

The staff and workers such as the storekeepers, sprayers, fertilizer applicators and rat bait applicators whose works were being exposed to chemical had been trained and they had understood of the hazards and how to the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the MSDS training.

The Bukit Leelau CU had been implementing an annual medical surveillance as required by the CHRA to personnel who are exposed to agrochemicals. The assessment had confirmed that medical surveillance had been conducted by occupational health doctor (OHD) and the relevant records were maintained.

In addition to the annual medical surveillance by the OHD, Bukit Leelau CU had also monitored the sprayers’ health condition through a monthly medical check-up by the Medical Assistants. The records on medical check-ups had been updated in the sprayers’ Medical Check-Up Book.

All workers involved in spraying and applying fertilizer were male. Female workers were limited to rat baiting and poisoning of woodies. Pregnancy test had been conducted by the Medical Assistants to ensure that no pregnant or breast feeding females were being exposed to chemical hazards.

Although paraquat was still in use, its application was very minimal in that it was only used for spraying of Volunteer Oil Palms Seedlings and weed spraying in immaturity areas. **Signboard indicating area treated with highly toxic chemical was available (refer Attachment 8).**

The StOP on the application of paraquat was available and had been communicated to the relevant workers. First aid kits had been issued to the workers handling pesticides whether or not they are highly toxic. The record on the movement of paraquat was traceable through the store issuance record and Daily Cost Book. **The remaining paraquat solution was kept under lock and key.**

**Form II with regard to the use of highly toxic pesticide and hours worked was available and being maintained.**

**Records of occupational diseases and accidents were available in the Hospital Assistant’s record book.**

Aerial application of agrochemicals was not practised in IOI Bukit Leelau, and to-date, there has been no request from buyers to test for the presence of chemical residue in the CPO.

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**Criterion 4.7**

An occupational health and safety plan is documented, effectively communicated and implemented.

**Indicators:**

4.7.1 Evidence of documented Occupational Safety Health (OSH) plan which is in compliance with OSH Act 1994 and Factory and Machinery Act 1967 (Act139).

Major compliance

The safety and health (OSH) plan shall cover the following:
a. A safety and health policy, which is communicated and implemented.
b. All operations have been risk assessed and documented.
c. An awareness and training programme which includes the following specifics for pesticides:
   i. to ensure all workers involved have been adequately trained in a safe working practices (See also C 4.8)
   ii. all precautions attached to products should be properly observed and applied to the workers.
d. The appropriate personal protective equipment (PPE) are used for each risk assessed operation.
   i. Companies to provide the appropriate PPE at the place of work to cover all potentially hazardous
      operations such as pesticide application, land preparation, harvesting and if used, burning.
  e. The responsible person(s) should be identified.
  f. There are records of regular meetings between the responsible person(s) and workers where concerns of
     workers about health and safety are discussed.
  g. Accident and emergency procedures should exist and instructions should be clearly understood by all
     workers.
  h. Workers trained in First Aid should be present in both field and mill operations.
  i. First Aid equipment should be available at worksites.

4.7.2 Records should be kept of all accidents and periodically reviewed at quarterly intervals.
Major compliance

Specific Guidance:
Record of safety performance is monitored through Lost Time Accident (LTA) rate.

4.7.3 Workers should be covered by accident insurance.
Major compliance

Findings

The Bukit Leelau CU has adopted the IOI Group’s occupational safety and health policy. The
policy had been communicated to all employees through briefings and being displayed on the
mill and estates notice boards. A safety management plan for each operating unit had been
established.

The management plan has addressed issues related to emergency, treatment of illness/injury
during the job, compliance with regulations such as Occupational Safety and Health (Safety
Committee) Regulations, Occupational Safety and Health (notification of accident, dangerous
occurrence, occupational poisoning and occupational disease) Regulations, factory and
machinery (steam boiler and unfired pressure vessel) Regulations and Factory and Machinery
(noise exposure) Regulations.

The hazard identification, risk assessment and risk control had been carried out covering on the
activities both in the estates and mill. Among the activities identified were FFB evacuation in the
estates and transportation to the mill, chemical mixing and spraying, harvesting and potential
occurrence of fire. For the mill, the identified activities were FFB sterilization, kernel and oil
extraction, oil clarification, machine maintenance and working in confined space. Appropriate
risk control measures had been identified and a person had been assigned to monitor the
implementation of the control measures.

Evidence of implementation on the control measures was observed during the field and mill
assessments. For example, at the mill, machines which have moving parts had been well
guarded, emergency evacuation route marked.

There were fire fighting facilities at strategic locations in the mill, office and workers’ houses.
Inspection on the fire extinguisher had been carried out periodically. Inspection certificate was
found to be still valid and pasted on the fire extinguisher cylinders.
In the estate, it was noted that eye wash and shower room were made available at chemical mixing area.

Estate vehicles which were used on public road had been adequately insured and their road taxes paid. Although tractor drivers were not required to possess driving license as they were not driving on the public road, they had been well trained. The list of attendance of drivers and training certificate was made available.

The assessment had verified that all tractors had been equipped with anti roll bars. A vehicle safety checklist was used to check the condition of the estate vehicle prior to being used. During the site inspection, it was observed that signage requiring the wearing of safety belts/helmets had been posted at several strategic locations.

PPEs that had been commonly used were safety boots, helmets, goggles, ear plugs, rubber and cotton gloves, aprons and breathing masks. Those who worked with chemicals had been trained on the use of PPE, material safety data sheet (MSDS) and safe chemical handling procedures. During the site assessment, it was observed that signage (to remind workers to wear appropriate PPE) was posted at the appropriate places.

The assessment team had verified the minutes of meeting of the safety committee which was held quarterly to discuss issues pertaining to workers’ safety and health at work place. Training needs on safety and health aspects had been conducted. Among the training programmes conducted were those related to chemical handling and spraying, PPE, accident investigation and working in confined space. Attendance list on training was available and based on random interviews held with workers, it was confirmed that they had attended the training and had been aware on the safety and health issues related to their tasks.

It was observed that first aid box was provided to the field supervisors as well as made available at several strategic locations at the mill and chemical mixing areas. However, during a site visit to the chemical store at the Bukit Leelau Estate, it was noted that the first aid box had been exposed to direct heat which should not be the case as certain medicine needs to be stored at room temperature. In addition, inspections on the first aid boxes in the different estates had found inconsistency in the contents of the first aid items.

The estates of Bukit Leelau CU have provided designated vehicle fitted with safety features to transport their workers as was necessary for them to provide transportation to them.

Accident cases had been monitored and reported to the Department of Occupational Safety and Health (DOSH) by the Safety Officer. Accident case on foreign workers is also reported to Labour Department. Loss Time Accident (LTA) had been monitored and the information was displayed on the Safety Performance board located in front of the mill and estates office. The mill and estates had taken the necessary corrective actions to improve on their safety performance.

The Bukit Leelau CU had assured that all workers had been insured against accident.
Criteria 4.8
All staff, workers, smallholders and contractors are appropriately trained.

Indicator:
4.8.1 A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training for employees are kept.
Major compliance

Guidance:
Appropriate training should be given to all staff, workers and contractors by growers and millers to enable them to fulfill their jobs and responsibilities in accordance with documented procedures. All Estate Hospital Assistants (EHA) are trained on the chemicals used and related laws.

Findings
All training needs had been identified by the Safety, Health and Environmental Department and training programme established thereon. The training programme for 2009/2010 for both estates and mill were made available and the focus was mainly on safety and standard operating procedures. Budget had been allocated to conduct training related to environment, social, safety and good agricultural practice. Among the trainings which had been conducted were as follows:

- Safe operating procedure for chemical sprayers on 14th January 2010 at Detas Estate;
- PPE for chemical handling on 17th March 2010 at Detas Estate;
- Chemical handling on 10th January 2010 at Detas Estate;
- The importance of buffer zone on 18th March 2010 at Bukit Leelau Estate; and
- Briefing on working in confined space on 20th June 2009 at Bukit Leelau POM

It was observed that all training records had been properly filed. The records include information on the title of the training, name and signature of the attendees, name of the trainer, time and venue. Based on interviews held with workers from the spraying, manuring, harvesting and mulching operations, it was revealed that generally the level of their understanding on these subjects and the training efficiency had been satisfactory.

The contractors and their workers had also been trained especially on matters related to safety and environment. Interviews held with the contract workers involved in the harvesting and transportation of FFB confirmed that they had a good awareness and understanding on these subjects.

PRINCIPLE 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY

Criterion 5.1
Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.

Indicator:
5.1.1 Documented aspects and impacts risk assessment that is periodically reviewed and updated.
Major compliance
5.1.2 Environmental improvement plan to mitigate the negative impacts and promote the positive ones, is
developed, implemented and monitored.
Minor compliance

Guidance:
Non-restrictive format e.g. ISO 14001 EMS and/or EIA report incorporating elements spelt out in this criterion and raised through stakeholder consultation.

Findings

The Bukit Leelau CU had conducted an environmental aspects and impact risk assessment for each of their operating unit. Records on environmental impact assessment relating to the operations of the mill, estate, workshop, nursery, effluent treatment plant, waste generation and consumption of natural resources were sighted. The risk assessment would be reviewed annually.

Environmental improvement plans to mitigate the identified negative impacts had been developed and being progressively implemented. Among the improvement plans include identifying buffer zones, segregation of recyclable waste, oil spill control and emergency preparedness.

Implementation of the improvement plan on oil spill control was observed at Bukit Leelau Estate lubricant store, where oil trap system had been constructed at the outlet of the monsoon drain as shown in Photo 8.

![Photo 8: Oil trap at lubricant store in Bukit Leelau Estate](image)

Criterion 5.2
The status of rare, threatened or endangered species (ERTs) and high conservation value habitats, if any, that exists in the plantation or that could be affected by plantation or mill management, shall be identified and their conservation taken into account in management plans and operations.

Indicators:
5.2.1 Identification and assessment of HCV habitats and protected areas within landholdings; and attempt assessments of HCV habitats and protected areas surrounding landholdings.
Major compliance
5.2.2 Management plan for HCV habitats (including ERTs) and their conservation.  
Major compliance

5.2.3 Evidence of a commitment to discourage any illegal or inappropriate hunting fishing or collecting activities, and developing responsible measures to resolve human-wildlife conflicts.  
Minor compliance

Specific Guidance:
Identify ERTs and establish their conservation status based on national and state conservation schedules; and should provide evidence of attempts to do likewise for immediate adjacent areas. In the event that the conservation status of a species has not been assessed locally, the IUCN list should be used to determine and report conservation status. Management plans to include areas for improvement. Where appropriate, the above activities to be conducted involving relevant stakeholders

Findings

Each of the six estates had produced an HCV Assessment Report. The HCV sites had been identified in accordance to the Proforest HCV Guidelines. The reports had classified HCV into external and internal sites. External sites are areas that were outside the estates which could have high conservation values. Such sites include residual forests bordering the estates.

Internal HCV sites were mainly riparian buffers of streams flowing through the estates, flooded sites in Leepang A and Laukin A Estates and a burial ground used by the local Orang Asli in the Leepang A Estate (HCV 6).

However, it was noted that the external HCV sites identified were beyond the purview or control of the estate’s management thus should not be included as HCV site. It was also pointed out by the stakeholders (Forest Rangers of the Pahang State Forestry Department) that two of the forest areas are not forest reserves, which had been earmarked for future development and therefore could not be classified as HCV.

Only the Detas Estate had the Lepar Forest Reserve bordering its southern and western boundaries. However, it was observed during the assessment that this forest reserve had been heavily logged, and there were only few large trees remaining. Although it was reported that there were protected animals in this forest reserve, this would have to be confirmed by the Department of Wildlife and National Parks (PERHILITAN).

The Pekan Forest Reserve at the eastern boundary of the Bukit Leelau Estate had been cleared by the Orang Asli for cultivation and many drainage canals had been constructed. The remaining forested area was about a kilometre away.

A meeting with the Orang Asli communities at the periphery of the estates had indicated that they were mainly cultivators of oil palm and rubber trees, and therefore no longer dependent on the forest. The efforts of the estate’s management in erecting signage around the forest reserve of no hunting and encroachment by its workers would be assisting the State Forestry and Wildlife Departments in protecting the forest (see Photo 9).
Photo 9: Signage Erected by Estate Management at the Boundary with the Lepar Forest Reserve

It was noted that the general practice throughout Bukit Leelau CU in the management of HCV sites was found to be satisfactory. However, the process on the identification and assessment of a HCV site needs improvement as it was observed that during the HCV study not all relevant stakeholders had been involved. In addition, the attributes used in the identification of flooded vacant sites in Leepang A (see Photo 10) and Laukin A Estates as HCV sites had not been clearly determined. Therefore, a non-conformity was raised.

Photo 10: Flooded sites in Leepang A Estate

Bukit Leelau CU had taken the necessary actions where consultation sessions were held with the Forest Ranger of the Pekan District Forest Office on 5th May 2010 and with the Senior
Officer of PERHILITAN on 7th May 2010. Output from the consultations were documented and presented to the assessor. Implementation of the management plan would be verified during the next surveillance.

It was observed that the burial site used by the local Orang Asli in Leepang A Estate had been clearly mapped and demarcated on the ground.

HCV Management Action Plans and Continuous Improvement Programme for each estate were also made available during the assessment.

<table>
<thead>
<tr>
<th>Criterion 5.3</th>
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<tbody>
<tr>
<td>Waste is reduced, recycled, re-used and disposed off in an environmentally and socially responsible manner.</td>
</tr>
</tbody>
</table>

**Indicators:**

- **5.3.1** Documented identification of all waste products and sources of pollution.  
  Major compliance
- **5.3.2** Having identified wastes and pollutants, an operational plan should be developed and implemented, to avoid or reduce pollution.  
  Minor compliance

**Specific Guidance:**

Schedule waste to be disposed as per EQA 1974 (Scheduled Wastes) Regulations, 2005. Reference to be made to the national programme on recycling of used HDPE pesticide containers. Municipal waste disposal as per local authority or district council in accordance to the Ministry of Health guidelines (i.e. specifications on landfills, licensed contractors, etc) or Workers’ Minimum Standards of Housing and Amenities Act 1990 (Act 446).

- **5.3.3** Evidence that crop residues / biomass are recycled (Cross ref. C 4.2).  
  Minor compliance

**Specific Guidance:**

POME should be discharged in compliance with the Environmental Quality Act 1974 (Act 127) and Regulations. For Sabah and Sarawak, POME should be discharged according to the respective state policies.

**Findings**

The management had established a waste management system that covers the identification of wastes and plans to reduce and dispose the wastes in an environmentally and socially responsible manner. There was a program to encourage recycling of solid wastes with recycle bins provided in the office and at the labour lines as shown in Photo 11.
Among the identified wastes were general/domestic waste, scheduled waste, scrap metal, crop residue/biomass from the estates and mill and fibre, shell, EFB and POME from the mill. General domestic wastes were collected from the labour lines and disposed by burying them at designated disposal areas.

The domestic waste landfills were constructed about 3 km away from the line sites and far from any river, streams and forest reserves. Generally, the landfill was dug on higher ground, well-drained soil within oil palm planting fields measuring about 6m x 6m x 1.5m.

The domestic wastes from the houses were collected in empty fertilizer bags. The disposal and placement of domestic wastes contained in the fertilizer bags into the landfill were done systematically by laying them into the pit from one end to the other end of the pit until they reach about 1.2 m in height (see Photo 12). The pit would then be covered with soil. Each pit is maintained for about 1.5 to 2 years.
Other waste generated from the maintenance activities of equipment and machinery in the estates or mill were scrap metal and scheduled wastes such as spent lubricant oil, spent oil filter, clinical waste and empty chemical containers. The assessment team had visited the scrap metal and scheduled waste storage area.

Scheduled wastes were managed in accordance with Environmental Quality (Scheduled Wastes) Regulations 2005. It was verified that the scheduled wastes had been segregated and labelled accordingly. The scheduled wastes inventory record and waste disposal note were maintained. However, Bukit Leelau CU needs to communicate with the DOE on the generation of scheduled wastes.

An operational plan had been established to manage the wastes. During the site inspection, it was confirmed that domestic wastes had been segregated into recyclable and non-recyclables. Recyclable wastes such as plastics were collected and sold to a recycler vendor. Other than household wastes, plastic containers/bags from manuring and spraying activities had also been collected and reused.

<table>
<thead>
<tr>
<th>Criterion 5.4</th>
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<tr>
<td>Efficiency of energy use and use of renewable energy is maximized.</td>
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</table>

**Indicators:**

5.4.1 Monitoring of renewable energy use per tonne of CPO or palm product in the mill.  
Minor compliance

5.4.2 Monitoring of direct fossil fuel use per tonne of CPO or kW per tonne palm product in the mill (or FFB where the grower has no mill).  
Minor compliance
Guidance:
To establish baseline values and observe trends within appropriate time-frame. Growers and millers should assess the energy use including fuel and electricity, and energy efficiency of their operations. The feasibility of collecting and using biogas, biodiesel and biofuels should be studied if possible.

Findings

The Bukit Leelau CU was committed to use renewable energy in the mill. As such, fibre and nutshell had been used as boiler fuel to generate steam for mill process. The usage of fibre and nut shell was being monitored and records were being maintained.

Bukit Leelau CU had also been monitoring fossil fuel usage as per tonne of CPO on a monthly basis.

Criterion 5.5
Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situations, as identified in the ASEAN Guidance or other regional best practice.

Indicators:
5.5.1 No evidence of open burning. Where controlled burning occurs, it is as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003. Major compliance
5.5.2 Previous crop should be felled/mowed down, chipped/shredded, windrowed or pulverized/ ploughed and mulched. Minor compliance

Specific Guidance:
A special dispensation from the relevant authorities should be sought in areas where the previous crop or stand is highly diseased and there is a significant risk of disease spread or continuation into the next crop.

5.5.3 No evidence of burning waste (including domestic waste). Minor compliance

Findings

From site inspections, it was confirmed that the Bukit Leelau CU had not been practicing open burning (see Photo 13) in line with its policy on zero burning.

In the replanting areas, it was observed that Bukit Leelau CU had felled, chipped and windrow stacked its previous oil palm crops. The chipped trunks would later be used to mulch the newly replanted palms in that area.
Criterion 5.6
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.

Indicators:
5.6.1  Documented plans to mitigate all polluting activities (Cross ref to C 5.1).
   Major compliance
5.6.2  Plans are reviewed annually.
   Minor compliance

Specific Guidance:
Pollutants and emissions are identified and plans to reduce them are developed in conformance to national regulations and guidance.

5.6.3  Monitor and reduce peat subsidence rate through water table management. (Within ranges specified in C 4.3).
   Minor compliance

Findings
Bukit Leelau CU has established management plans to reduce pollution and emissions. The management plan is being reviewed annually. Among the planned actions are the reduction of effluent and improvement of quality of effluent discharge (cross refer to 2.1).

Another improvement plan is aimed at emissions reduction and fuel consumption reduction. For FFB evacuation system, buffalo and wheelbarrow were used instead of machinery.

Vehicle inspection was carried out daily and preventive maintenance was carried out in as per schedule.

There was no peat soil area in Bukit Leelau CU. Therefore, Indicator 5.6.3 is not applicable.
**PRINCIPLE 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES BY GROWERS AND MILLERS**

**Criterion 6.1**
Aspects of plantation and mill management, including replanting, that have social impacts 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 continuous improvement.

**Indicators:**
6.1.1 A documented social impact assessment including records of meetings.
   Major compliance

**Specific Guidance:**
Non-restrictive format incorporating elements spelt out in this criterion and raised through stakeholder consultation including local expertise.

6.1.2 Evidence that the assessment has been done with the participation of affected parties.
   Minor compliance

**Specific Guidance:**
Participation in this context means that affected parties or their official representatives or freely chosen spokespersons are able to express their views during the identification of impacts, reviewing findings and plans for mitigation, and monitoring the success of implemented plans.

6.1.3 A timetable with responsibilities for mitigation and monitoring is reviewed and updated as necessary.
   Minor compliance

**Guidance:**
Identification of social impacts may be carried out by the grower in consultation with other affected parties, including women and migrant workers as appropriate to the situation. The involvement of independent experts should be sought where this is considered necessary to ensure that all impacts (both positive and negative) are identified. Particular attention should be paid to the impacts of outgrower schemes (where the plantation includes such a scheme).

Plantation and mill management may have social impacts on factors such as:
1. Access and use rights.
2. Economic livelihoods (e.g. paid employment) and working conditions.
3. Subsistence activities.
4. Cultural and religious values.
5. Health and education facilities.
6. Other community values, resulting from changes such as improved transport /communication or arrival of substantial migrant labour force.

**Findings**
There was a documented social impact assessment (SIA). The assessment was conducted from 8th September 2009 to 8th December 2009 by IOI RSPO team with the participation of the affected stakeholders. The records of meetings held were made available. However, it was found that the assessment report had not adequately covered the following factors as required by the Guidance on Criterion 6.1:

1. Access and use rights.
2. Economic livelihoods (e.g. paid employment) and working conditions.
3. Subsistence activities.
4. Cultural and religious values.
5. Health and education facilities.
6. Other community values, resulting from changes such as improved transport /communication or arrival of substantial migrant labour force.
Therefore, a major non-compliance is raised against Indicator 6.1.1. However, Bukit Leelau CU had taken appropriate actions to address this major non-conformity. A supplementary SIA report covering all the required factors as listed under the guidance on criterion 6.1 was submitted by the CU to the assessor on 21st May 2010. The assessor was satisfied with the action taken and had therefore closed out this major non-conformity (refer to Attachment 5).

It was also observed that the consultations held had been limited to seven meetings i.e. one meeting for each operating unit involving internal and external stakeholders. In addition, the issues being discussed at these meeting were rather limited. Therefore, a minor non-conformity was raised against Indicator 6.1.2 on this lapse. The records of the supplementary SIA which was undertaken showed that this lapse had been satisfactorily addressed.

A timetable for mitigating and monitoring on the negative impacts has been established. However, this timetable was only based on the limited issues being raised at the stakeholders' meetings. Therefore a non-conformity is raised against Indicator 6.1.3.

<table>
<thead>
<tr>
<th>Criterion 6.2</th>
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<tbody>
<tr>
<td>There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.</td>
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</table>

**Indicators:**

| 6.2.1 Documented consultation and communication procedures. |
| Major compliance |
| 6.2.2 A nominated plantation management official at the operating unit responsible for these issues. |
| Minor compliance |
| 6.2.3 Maintenance of a list of stakeholders, records of all communication and records of actions taken in response to input from stakeholders. |
| Minor compliance |

**Specific Guidance:**

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.

Communication and consultation mechanisms should be designed in collaboration with local communities and other affected or interested parties. These should consider the use of 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 of women as compared to men, village leaders as compared to day workers, new versus established community groups, and different ethnic groups.

Consideration should be given to involving 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, in these communications.

**Findings**

There were documents, produced by the estates and the oil mill to show the existence of documented consultations and communication procedures. They were in the form of records of meetings and discussions involving the CU’s management and community leaders and workers’ representatives.

Community leaders, workers’ representatives, and suppliers whom were met during the assessment had confirmed that consultations had been held. (Consultations were held with
randomly selected workers of the estates and the oil mill involved in the assessment as well as contractors and suppliers. Issues related to Principle 6 and other related criteria were discussed).

A management official at the operating unit level had been nominated to be responsible on issues related to consultations and communication between growers and/or millers with local communities and affected or interested parties.

Each estate had identified and maintained a list of stakeholders consisting of, suppliers, community institutions, and local community heads and workers’ representatives.

Records of communication with stakeholders (e.g. notes and minutes of meetings and discussions) and actions taken in response to views, suggestions and requests from stakeholders were maintained. However, the list would need to be updated from time to time so as not to miss out relevant stakeholders such as neighbouring estate owners, nearby shopkeepers and restaurant owners.

<table>
<thead>
<tr>
<th>Criterion 6.3</th>
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<tbody>
<tr>
<td>There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all parties.</td>
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<tr>
<th>Indicators:</th>
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<tr>
<td>6.3.1       Documentation of the process by which a dispute was resolved and the outcome.</td>
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<tr>
<td>Major compliance</td>
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<table>
<thead>
<tr>
<th>Specific Guidance:</th>
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<tbody>
<tr>
<td>Records are to be kept for 3 years.</td>
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<table>
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<tr>
<th>Guidance:</th>
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<tbody>
<tr>
<td>Dispute resolution mechanisms should be established through open and consensual agreements with relevant affected parties.</td>
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Complaints may be dealt with by mechanisms such as Joint Consultative Committees (JCC) with gender representation. Grievances may be internal (employees) or external.

**Findings**

There was a documentation of the process by which a dispute is resolved as well as the on the outcome. There was a suggestion box placed at the office. The aggrieved parties could either fill in the complaint form or write a letter or submit the complaint verbally to anyone in the main office or to the responsible official on social issues or to the workers’ representatives or gender representatives. The system was open to everyone, local public as well estate communities. The complaints and their outcomes were recorded and filed.

It was observed that grievances and complaints had been resolved in an effective, timely and appropriate manner. This was evident from the records being kept.
There was no evidence to indicate that the system was limited to certain parties (e.g. workers) only. Aggrieved members of the neighboring communities and the any public could make use of this system for submitting any complaint or grievance against the CU and the estates.

**Criterion 6.4**
Any negotiations concerning compensation for loss of legal or customary 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.

**Indicators:**

6.4.1 Establishment of a procedure for identifying legal and customary rights and a procedure for identifying people entitled to compensation.  
Major compliance

6.4.2 A procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented. This takes into account gender differences in the power to claim rights, ownership and access to land; and long-established communities; differences in ethnic groups’ proof of legal versus communal ownership of land.  
Minor compliance

6.4.3 The process and outcome of any compensation claims is documented and made publicly available.  
Minor compliance

**Specific Guidance:**
This criterion should be considered in conjunction with Criterion 2.3.

**Findings**

There was a specific procedure in place for identifying legal and customary rights and for identifying people entitled to compensation.

The procedure for calculating and distributing fair compensation would not be carried out at the estate/mill level. This would be done at the company level. As to-date, there has been no claim for compensation made against the CU.

**Criterion 6.5**
Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.

**Indicators:**

6.5.1 Documentation of pay and conditions.  
Major compliance

6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc) are available in the language understood by the workers or explained carefully to them by a plantation management official in the operating unit.  
Minor compliance

6.5.3 Growers and millers provide adequate housing, water supplies, medical, educational and welfare amenities in accordance with Workers’ Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible (not applicable to smallholders).  
Minor compliance

**Guidance:**
Where temporary or migrant workers are employed, a special labour policy should be established. This labour policy would state the non discriminatory practices; no contract substitution of original contract, post arrival orientation program to focus especially on language, safety, labour laws, cultural practices etc; decent living conditions to be provided. Migrant workers are legalised, and a separate employment agreement should be drawn up to meet
immigration requirements for foreign workers, and international standards, if ratified.

Findings

There was an Agreement signed between the staff union (AMESU) and the Company to adopt the pay and conditions for their staff. There was also a Memorandum of Agreement (MOA) signed between NUPW and the company to adopt and implement the union agreements for estate and mill workers who are members of NUPW. However, the pay and employment conditions were laid out in the letter of offer to the workers.

Contracts of employment detailing payments and conditions of employment (e.g. working hours, overtime, deductions, sickness, holiday entitlement and maternity leave) as stated in the MOA and letter of offer were explained to the workers by the plantation management official. This was confirmed during random interviews held with the employees.

Adequate housing, water supplies, medical, educational and welfare amenities in accordance with the Workers’ Minimum Standard of Housing and Amenities Act 1990 (Act 446) had been provided by the estates and mill for all the local or foreign workers. This was confirmed through consultations with the workers as well as visits made to the line sites in the estates.

All workers had been paid similar wage rate and provided with individual contracts and pay slips. They had also been paid with decent living wages sufficient to provide absolute essentials of food, shelter and clothing as well as education for children and protection against ill health and accidents through medical benefits and SOCSO. However, there was no special provision on insurance against old age and misfortunes accept through EPF. There was also no provision of payment of school fees or free transportation for the workers’ school children.

As for medical facilities, dispensaries (staffed by trained personnel) were made available in the estates and at the nearby government hospitals for use by all sick employees and their dependants. Social community centres and recreational facilities were made available for use by all workers and their families. This was confirmed through perusal of the relevant files as well as consultations with the workers.

Criterion 6.6

The employer respects the right 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.

Indicators:

6.6.1 Documented minutes of meetings with main trade unions or workers representatives.
Major compliance

6.6.2 A published statement in local languages recognizing freedom of association.
Minor compliance

Guidance:

The right of employees and contractors to form associations and bargain collectively with their employer should be respected. Documented company policy recognizing freedom of association.

Labour laws and union agreements or in their absence, direct contracts of employment detailing payments and other conditions are available in the languages understood by the workers or explained carefully to them by a plantation management official in the operating unit.
**Findings**

An official published statement in Bahasa Melayu/Indonesia and languages understood by the workers recognizing freedom of association was available and exhibited in public places. The workers whom were consulted had confirmed that they were aware of their right to join the union.

Documented minutes of meetings between the management with workers’ representatives were also available. Interviews with employees and workers representatives revealed that they had understood the requirement of Criterion 6.6.

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**Criterion 6.7**  
Children are not employed or exploited. Work by children is acceptable on family farms, under adult supervision, and when not interfering with education programmes.  
Children are not exposed to hazardous working conditions.  

**Indicator:**  
6.7.1 Documented evidence that minimum age requirement is met.  
Major compliance  

**Guidance:**  
Growers and millers should clearly define the minimum working age, together with working hours. Only workers 16 years and older may be employed, with the stated exception of family farms. Smallholders should allow work by children only if permitted by national regulations.

The minimum age of workers should be not less than 16 years, or the minimum school leaving age, or the minimum age permitted under national regulations, where higher.

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**Findings**

There was clear evidence that the minimum age requirement had been met. There was no record of persons under the age of eighteen, the minimum working age under Malaysian Labor Laws (Am. Act A1238) hired by the company. The assessment team had also observed that no children were seen picking oil palm fruits.

This was also confirmed by the workers interviewed by the assessors and verified through employment card and copies of passports.

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**Criterion 6.8**  
Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.  

**Indicators:**  
6.8.1 A publicly available equal opportunities policy.  
Major compliance  

6.8.2 Evidence that employees and groups including migrant workers have not been discriminated against.  
Minor compliance  

**Guidance:**  
The grievance procedures detailed in 6.3 apply. Positive discrimination to provide employment and benefits to specific communities is acceptable as part of negotiated agreements.

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**Findings**

An equal opportunities policy was publicly made available in languages understood by the workers.
Job openings were made available to any qualified person regardless of his/her socio-cultural, political or gender background. This was evident by a perusal of the job advertisements taken out by the company. Sample of job advertisement was advertised in the Ministry of Human Resources website (www.jobsmalaysia.gov.my). Refer Attachment 9.

All workers (local or migrant, male or female) were covered by the same payments and conditions of employment associated with the jobs they are hired for. This was confirmed by an examination of the letter of offer to the employees and by consultations with workers.

**Criterion 6.9**

A policy to prevent sexual harassment and all other forms of violence against women and to protect their reproductive rights is developed and applied.

**Indicator:**

6.9.1 A policy on sexual harassment and violence and records of implementation.

Major compliance

6.9.2 A specific grievance mechanism is established.

Major compliance

**Guidance:**

There should be a clear policy developed in consultation with employees, contractors and other relevant stakeholders, which should be publicly available. The policy is applicable within the boundaries of the plantation/mills or while on duty outside the premises. Progress in implementing the policy should be regularly monitored and the results of monitoring activities should be recorded.

A committee specifically to address concerns of women may be required to comply with the criterion. This committee will consider matters such as; training on women’s rights, counselling for women affected by violence and child care facilities to be provided by the growers and millers. The activities of the committee should be documented.

**Findings**

There was a published policy on sexual harassment and violence made available to employees in languages they understand.

There was a specific grievance mechanism to handle on issues related to sexual harassment and violence. A gender committee whose responsibilities among others are to look into gender issues had been established in each estate/mill being assessed. This was also confirmed by information gathered during consultations held with the female employees as well as members of the gender committee.

**Criterion 6.10**

Growers and mills deal fairly and transparently with smallholders and other local businesses.

**Indicators:**

6.10.1 Pricing mechanisms for FFB and inputs/services shall be documented.

Major compliance

6.10.2 Current and past prices paid for FFB shall be publicly available.

Minor compliance

6.10.3 Evidence that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.

Minor compliance

6.10.4 Agreed payments shall be made in a timely manner.

Minor compliance

**Guidance:**
Transactions with smallholders should consider issues such as the role of middlemen, transport and storage of FFB, quality and grading.

Smallholders must 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 middlemen are involved.

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. If mills require smallholders to change practices to meet the RSPO criteria, consideration must be given to the costs of such changes, and the possibility of advance payments for FFB could be considered.

Findings

Bukit Leelau POM had received a small percentage (i.e. about 0.72%) of its FFB requirement from two smallholders namely Ladang Manna and Ladang Hj. Harun. Both smallholders had been interviewed during the assessment. The trading had been ongoing since the mill started operation in 1992.

The outcome of the interview revealed that generally, they had been happy on their FFB trading with the mill. Among the comments received were that the prices offered by the CU had followed the MPOB’s guidelines and payments were promptly made. However, both of them had commented that the CU had been very strict with sub-standard fruit. Nevertheless, they had been aware of the authority requirement on the quality of product as well as other requirements as stated in the agreements. A cross checked made against the documentation i.e. agreement showed that the pricing mechanisms for FFB had been well documented.

Apart from the FFB suppliers at the estate and mill, interviews had also been conducted with chemical and hardware suppliers, contractors and provision shop operators. Among the outcomes were that they had been aware on the contract terms and conditions of the contracts for a job awarded to them and that payments had been made to them in timely manner.

Criterion 6.11
Growers and millers contribute to local sustainable development wherever appropriate.

Indicator:
6.11.1 Demonstrable contributions to local development that are based on the results of consultation with local communities.
Minor compliance

Guidance:
Contributions to local development should be based on the results of consultation with local communities. See also Criterion 6.2. 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.

Where candidates for employment are of equal merit, preference should always be given to members of local communities in accordance to national policy. Positive discrimination should not be recognized as conflicting with Criterion 6.8.

Findings

Bukit Leelau CU had initiated consultations with the local communities as well as neighboring external communities. This was evident from the records being kept. Information obtained during the stakeholders’ consultations was used to work out a social management plan, which would help to contribute to local social development.
However as the consultations with local communities (internal and external) had only been conducted only recently and limited to only two meetings, the estates’ and mill’s contribution to local development could not be clearly demonstrated.

Regular consultations with local internal and external communities would assist the company in its efforts to contribute to local development such as providing more jobs and improved amenities.

**PRINCIPLE 8: COMMITMENT TO CONTINUOUS IMPROVEMENT IN KEY AREAS OF ACTIVITY**

<table>
<thead>
<tr>
<th>Criterion 8.1</th>
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<tr>
<td>Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations. MY NIWG commits to demonstrate progressive improvement to the following but not limited to:</td>
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<tr>
<td>8.1.1 Minimise use of certain pesticides (C4.6)</td>
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<td>Major compliance</td>
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<td>8.1.2 Environmental impacts (C5.1)</td>
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<td>Major compliance</td>
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<td>8.1.3 Maximizing recycling and minimizing waste or by-products generation.</td>
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<td>Major compliance</td>
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**Specific Guidance:**
To work towards zero-waste (C5.3)

| 8.1.4 Pollution prevention plans (C5.6) |
| Major compliance |
| 8.1.5 Social impacts (C6.1) |
| Major compliance |
| 8.1.6 A mechanism to capture the performance and expenditure in social and environmental aspects. |
| Minor compliance |

**Guidance:**
Specific minimum performance thresholds for key indicators should be established. (See also C 4.2, 4.3, 4.4, and 4.5).

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 continuous improvement.

**Findings**
Generally, Bukit Leelau CU had established a system to regularly monitor and review their key activities at the mill and estates, and then initiate action plans for continuous improvement.

Evidence sighted included the commitment to minimize the use of certain pesticides by implementing IPM. Other improvement plans include the commitment to zero waste but also using by-products such as EFB and POME in the fields.

A mechanism to capture the performance and expenditure had been well established. It was not limited to social and environmental aspects only but it also extended to Occupational Safety and Health matters. Among the improvements made was the provision of a changing room for sprayers to ensure no contamination to their family.
SIA was carried out with participation of affected parties. A management plan was established however it was noted that certain social impacts factors such as economic livelihood and working condition, health and education facilities were not addressed.

4.0 Assessment Recommendation

Based on the evidence gathered, the assessment team has raised seven non conformities on the Bukit Leelau CU against the requirements of the RSPO MYNI. The Bukit Leelau CU had taken the appropriate corrective actions to address the major nonconformities. The assessment team had verified and was satisfied with the corrective actions taken by the CU and had subsequently decided to close out the major non conformities.

With respect to the minor non conformities, the CU had been requested to submit a corrective action plan to address these non conformities. The corrective actions taken by the CU will be verified by the assessment team during the surveillance assessment.

As the major non conformities had been closed out (refer Attachment 5), the assessment team therefore recommends the Bukit Leelau Certification Unit for certification against the RSPO MYNI.

5.0 Organization’s Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings

I, the undersigned, representing SIRIM QAS International Sdn. Bhd., acknowledge and confirm the content of the assessment report and findings of assessment.

Name: Ruzita Abd Gani
Signature:
Designation: Assessment Team Leader
Date: 5/7/2010

I, the undersigned, representing Bukit Leelau Certification Unit, acknowledge and confirm the content of the assessment report and findings of assessment.

Name: Joshua Mathews
Signature:
Designation: Research Controller
Date: 5/7/10
### Schedule for RSPO Auditing in IOI Group Oil Mills and FFB Supplying Estates

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<tr>
<th>Jan ’08</th>
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<td>Sakilan Oil Mill (Covering 3 Estates)</td>
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<td>Bukit Leelau Oil Mill (Covering 6 Estates)</td>
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<td>Gomali Oil Mill (Covering 11 Estates)</td>
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<td>Baturong Oil Mill (Covering 4 Estates)</td>
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<td>Syarimo Oil Mill (Covering 9 Estates)</td>
<td>Leepang Oil Mill (Covering 7 Estates)</td>
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<td>Morisem Oil Mill (Covering 9 Estates)</td>
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Note: *** - Certified  
** - Completed the audit  
* - In preparation of the audit
1. **Objectives**

   The objectives of the assessment are as follows:
   
   (i) To evaluate the location of the organization (site-specific conditions) and the reporting line with regards to management unit/controlling holding
   
   (ii) To verify the organization’s status with regards to labour & land dispute as well as compliance in accordance to RSPO requirements
   
   (iii) To obtain information and determine stakeholders for the site to be assessed
   
   (iv) To assess the organization’s RSPO documentation
   
   (v) To determine organization conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI)
   
   (vi) To make appropriate recommendations based on the assessment findings

2. **Date of assessment** : 12th – 16th April 2010

3. **Site of assessment** : IOI Corporation Berhad
   
   Bukit Leelau Palm Oil Mill,
   Bukit Leelau Estate,
   Leepang A Estate,
   Laukin Estate,
   Detas Estate,
   Merchong Estate,
   Mekassar Estate,
   KM 75, Kuantan-Segamat Highway,
   Muadzam Shah, Pahang, Malaysia.

4. **Reference Standard**
   
   a. RSPO P&C MYNI
   
   b. Company’s audit criteria including Company’s Manual/Procedures

5. **Assessment Team**
   
   a. Lead Assessor : Ruzita Abd Gani
   
   b. Assessor : Dr. Yap Son Kheong
   
   Dr. Zahid Emby
   
   Mr. Yap Nyoke Yong, Raymond
   
   Valence Shem

*If there is any objection to the proposed audit team, the organization is required to inform the Lead Auditor/RSPO Section Manager.*
6. **Audit Method**  
Site audits including observation of practices, interviews with interested parties (employees, nearby population, etc.), documentation evaluation and evaluation of records.

7. **Confidentiality Requirements**  
SIRIM QAS International shall not disclose any information concerning the company regarding all matters arising or coming to its attention with the conduct of the programme, which is of confidential in nature other than information, which is in the public domain.

In the event that there be any legal requirements for disclosing any information concerning the organization, SIRIM QAS International shall inform the organization of the information to be disclosed.

8. **Working Language** : English and Bahasa Malaysia

9. **Reporting**
   a) Language : English  
   b) Format : Verbal and written  
   c) Expected date of issue : Thirty days after the date of assessment  
   d) Distribution list : client file

10. **Facilities Required**
   a. Room for discussion  
   b. Relevant document and record  
   c. Personnel protective equipment (PPE) if required  
   d. Photocopy facilities  
   e. A guide for each group

11. **Assessment Programme Details** : As below
## Activities / areas to be visited

### Date : 12th April 2010 (Monday)

<table>
<thead>
<tr>
<th>Time</th>
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| 9.30 am - 12.00 am | Meeting with Research Controller at IOI Research Centre, Batang Melaka, Negeri Sembilan and verification on the following  
• Management plan for other management unit & smallholder certification / Time bound plan  
• Reporting line & RSPO related issue on land/labour or noncompliance  
• Internal assessment findings  
• Documentation structure |
| 12.00 am - 3.00 pm | Travelling to Leepang A Operating Unit |
| 3.00 pm - 3.15 pm | Opening Meeting, audit team introduction and briefing on audit objectives, scope, methodology, criteria and programmes by audit team leader  
Estate and mill managers of the operating units are required to attend the opening meeting in Leepang A Estate. |
| 3.15 pm - 3.45 pm | Briefing on the implementation of RSPO at Bukit Leelau Certification Unit (including action taken to address Internal assessment findings)  
Document reviews to understand and familiarize with the management system |
| 3.45 pm | Site visit and assessment at Leepang A Estate  
• Utilities (lubricant store, chemical store etc)  
• Waste management  
• Workshop  
• Interviews with estate’s workers on issues related on occupational safety & health and environment  
Assessment on the adequacy of documentation for  
• Principle 1  
• Principle 2  
• Principle 3  
• Principle 4  
• Principle 5  
• Principle 6  
• Principle 8 |
| 5.00 pm - 5.30 pm | Audit team discussion |
| 5.30 pm | Visit Village Head of Kampung Gadak and Kampung Inoi to notify consultation session will be carried out on 14 April 2010 by Dr. Zahid Emby |

### Date : 13th April 2010 (Tuesday)

<table>
<thead>
<tr>
<th>Time</th>
<th>Auditee</th>
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| 08.30 am - 1.00 pm | Site visit and assessment at Bukit Leelau Palm Oil Mill  
• Production  
• Utilities (ETP, boiler, WTP, chemical store & etc)  
• Waste management  
Site visit and assessment at Leepang A Estate  
• Good Agricultural Practice  
• witness activities at site (weeding/spraying/other maintenance activities/ harvesting and etc) |
| 5.00 pm | Guide/PIC |

Guide/ PIC
<table>
<thead>
<tr>
<th>Time</th>
<th>Activities</th>
<th>Auditee</th>
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<tbody>
<tr>
<td>1.00 pm-2.30pm</td>
<td>Workshop</td>
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<tr>
<td>2.30 pm-4.30pm</td>
<td>Continue assessment at Bukit Leelau Palm Oil Mill</td>
<td>Guide/PIC</td>
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<tr>
<td>5.30 pm</td>
<td>Visit Village Head of Kampung Runchang and Kampung Tanjung to notify consultation session will be carried out on 15 April 2010 by Dr. Zahid Emby (if necessary)</td>
<td>Guide/ PIC</td>
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<td>7.00 pm – 9.00 pm</td>
<td>Audit team discussion</td>
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</table>

**Date: 14th April 2010 (Wednesday)**

<table>
<thead>
<tr>
<th>Activities / areas to be visited</th>
<th>Ruzita</th>
<th>Raymond Valence</th>
<th>Dr. Zahid Emby</th>
<th>Dr. Yap Son Kheong</th>
<th>Auditee</th>
</tr>
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<tbody>
<tr>
<td>8.30 – 8.45 am</td>
<td>Interim briefing; audit team introduction and update on audit programme by audit team leader</td>
<td>Committee Member</td>
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<td>8.45 – 1.00 pm</td>
<td>Continue assessment at Bukit Leelau Palm Oil Mill</td>
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<td></td>
<td>• Interviews with mill’s workers on issues related on occupational safety &amp; health, environment, RSPO P&amp;C and mill operation</td>
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<td>• Interviews with suppliers and contractors</td>
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<td>Site visit and assessment at Detas Estate:</td>
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<td>• Good Agricultural Practice witness activities at site</td>
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<td>• (harvesting/weeding/spraying / other maintenance activities/)</td>
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<td>• Workers Issues</td>
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<td>• Line site and domestic waste dumping site</td>
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<td>• EFB mulching</td>
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<td>• Plantation on hilly/swamp area (if any)</td>
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<td>• Provision shop operator</td>
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<td></td>
<td>• Interviews workers and dependents( related to GAP, safety &amp; health and environment, welfare and social)</td>
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<tr>
<td>1.00 – 2.30 pm</td>
<td>Discussion with relevant management (CSR, community affairs) and preliminary viewing of documentation relating to local community and indigenous peoples issues such as EIA, SIA and management plans.</td>
<td></td>
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<tr>
<td></td>
<td>Visit and assessment at:</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>• Leepang A Estate surrounding community</td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td>• Kampung Inoi</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>• Kampung Gadak</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td></td>
<td>Site visit and assessment at environmental area of concern at Detas Estates, Bukit Leelau Estate and Leepang A Estate</td>
<td>Guide/PIC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Area of more than 25°</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Riparian zone</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• River system including POME discharge &amp; linesite discharge</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Forested area</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td></td>
<td>• Plantation boundary</td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td>• Water bodies</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Source of water supply</td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td>Other area identified during the assessment</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

1.00 – 2.30 pm | Break

2.30 pm-4.30pm
Continue assessment at Bukit Leelau Palm Oil Mill
Continue assessment at Leepang A Estate
Guide/PIC

5.30 pm
Visit Village Head of Kampung Runchang and Kampung Tanjung to notify consultation session will be carried out on 15 April 2010 by Dr. Zahid Emby (if necessary)
Guide/ PIC

7.00 pm – 9.00 pm Audit team discussion
### Date: 15th April 2010 (Thursday)

<table>
<thead>
<tr>
<th>Time</th>
<th>Activities/areas to be visited</th>
<th>Ruzita</th>
<th>Valence</th>
<th>Raymond</th>
<th>Dr. Zahid</th>
<th>Dr. Yap Son Kheong</th>
<th>Auditee</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.30-11.00 am</td>
<td>Site visit and assessment at Detas Estate • Dispensary • Workshop • Waste management • Chemical store • Interviews with suppliers and contractors • Provision shop operator</td>
<td>Assessment at Bukit Leelau Estate • Line site and domestic waste dumping site • Interviews with suppliers and contractors</td>
<td>Continue assessment at Bukit Leelau Estate: • Good Agricultural Practice witness activities at site (weeding/spraying/other maintenance activities/harvesting) • EFB mulching • Interviews with workers and dependents (related to GAP, safety &amp; health, environment, welfare and social)</td>
<td>Discussion with relevant management (CSR, community affairs) and preliminary viewing of documentation relating to local community and indigenous peoples issues such as EIA, SIA and management plans.</td>
<td>Site visit and assessment at environmental area of concern at Merchong Estates, Mekassar Estate and Laukin A Estate • Area of more than 25° • Riparian zone • River system including linesite discharge • Forested area • Plantation boundary • Water bodies • Source of water supply</td>
<td>Other area identified during the assessment Guide/PIC</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1.00 – 2.30 pm</td>
<td>Break</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.30-5.30 pm</td>
<td>• Continue Assessment</td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

- **Attachment 3**
### Date: 16th April 2010 (Friday)

<table>
<thead>
<tr>
<th>Time</th>
<th>Activities</th>
<th>Ruzita</th>
<th>Valence</th>
<th>Raymond</th>
<th>Dr. Zahid</th>
<th>Dr. Yap Son Kheong</th>
<th>Auditee</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.30-9.00pm</td>
<td>• Audit team discussion</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.30-11.30 am</td>
<td>• Verification on all outstanding issues</td>
<td>•</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Documentation review</td>
<td>•</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Audit team discussion</td>
<td>•</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Preparation on audit findings</td>
<td>•</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11.30-12.30 pm</td>
<td>• Meeting with Senior Human Resource Manager</td>
<td>•</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Senior Human Resource Manager</td>
</tr>
<tr>
<td>12.30-2.30 pm</td>
<td>Break and Friday Prayer</td>
<td>Break and Friday Prayer</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.30-4.45pm</td>
<td>• Presentation on audit findings and closing meeting for Bukit Leelau</td>
<td>•</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>All</td>
</tr>
<tr>
<td>4.45pm</td>
<td>• End of assessment</td>
<td>•</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>All</td>
</tr>
</tbody>
</table>
## COMMENTS FROM STAKEHOLDER

<table>
<thead>
<tr>
<th>List of Stakeholders</th>
<th>Comment highlighted</th>
<th>Verification</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A: Government Agencies/Service Provider</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Department of Environment (DOE), Kuantan</td>
<td>Bukit Leelau Palm Oil Mill (POM) complied with Environmental Quality Act (EQA)</td>
<td>Verification on records confirmed that Bukit Leelau POM is in compliance with EQA.</td>
</tr>
<tr>
<td>Department of Occupational Safety and Health (DOSH), Kuantan</td>
<td>Bukit Leelau POM has received two prohibition notices on 14th March 2009.</td>
<td>Verification of documents confirmed that the prohibition notices were cancelled on 23rd March 2009 and 25th March 2009.</td>
</tr>
<tr>
<td>Jabatan Hal Ehwal Orang Asli (JHEOA) – Branch of Kuantan, Pekan and Rompin</td>
<td>JHEOA has no issue with Bukit Leelau CU.</td>
<td>Assessment has verified Bukit Leelau CU social contribution.</td>
</tr>
<tr>
<td>Forestry Department – Branch of Kuantan and Rompin</td>
<td>Forestry Department has no issue with Bukit Leelau CU.</td>
<td>Verification of Bukit Leelau CU operation showed that they are committed to ensuring relevant forestry laws are complied with.</td>
</tr>
<tr>
<td>Department of Irrigation and Drainage (DID) – Branch of Kuantan, Pekan and Rompin</td>
<td>No issue</td>
<td>Assessment has verified that Bukit Leelau CU is committed in ensuring that relevant requirements of DID are complied with.</td>
</tr>
<tr>
<td>Malaysian Palm Oil Board (MPOB)</td>
<td>No issues</td>
<td>None</td>
</tr>
<tr>
<td>Labour Department – Branch of Kuantan, and Pekan</td>
<td>Labour Department has no issue with Bukit Leelau CU as long as the Workers’ Minimum Standard of Housing and Amenities Act are being followed.</td>
<td>Assessment has verified Bukit Leelau CU is committed to ensuring legal compliance.</td>
</tr>
<tr>
<td>Fire Fighting and Rescue Department – Branch of Muadzam Shah</td>
<td>No issues</td>
<td>None</td>
</tr>
<tr>
<td>Employee Providence Fund (EPF)</td>
<td>No issues</td>
<td>None</td>
</tr>
<tr>
<td>Social Security Organizations (PERKESO)</td>
<td>No issues</td>
<td>None</td>
</tr>
<tr>
<td>Malaysian Palm Oil Board (MPOB)</td>
<td>No issues</td>
<td>None</td>
</tr>
<tr>
<td>Land &amp; Mineral Office, Kuantan and Rompin District, Pahang</td>
<td>No feedback provided</td>
<td>Invitation for comment was announced in the RSPO and SIRIM QAS websites. Apart from that, invitation letters were sent and these were followed-up with telephone calls.</td>
</tr>
<tr>
<td>Immigration Department, Kuantan</td>
<td>No issues</td>
<td>None</td>
</tr>
<tr>
<td>Department of Wildlife and Natural Park (PERHILITAN)</td>
<td>No issues</td>
<td>None</td>
</tr>
<tr>
<td>Energy Commission, Kuantan</td>
<td>No issues</td>
<td>None</td>
</tr>
<tr>
<td>Inland Revenue Board of Malaysia (LHDN), Kuantan</td>
<td>No issues</td>
<td>None</td>
</tr>
<tr>
<td>Department of Statistics, Kuantan</td>
<td>No issues</td>
<td>None</td>
</tr>
<tr>
<td>Kuantan, Pahang, Malaysia</td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------------------------</td>
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<td></td>
</tr>
<tr>
<td>Police Department (PDRM) – Branch of Paloh Hinai and Muadzam Shah</td>
<td>No issues</td>
<td>None</td>
</tr>
<tr>
<td>Jabatan Pengangkutan Jalan (JPJ), Muadzam Shah</td>
<td>All compounds issued by JPJ have been paid by the contractor transporting FFB.</td>
<td>None</td>
</tr>
<tr>
<td>Hospital at Kuantan and Muadzam Shah, Pahang</td>
<td>No issue</td>
<td>None</td>
</tr>
<tr>
<td>Royal Malaysian Customs Department, Kuantan</td>
<td>No issue</td>
<td>None</td>
</tr>
<tr>
<td>Malayan Railways Limited (KTM), Kuantan</td>
<td>No issue</td>
<td>None</td>
</tr>
<tr>
<td>Department of Veterinary Services, Muadzam Shah</td>
<td>No issue</td>
<td>None</td>
</tr>
<tr>
<td>Water Supply Department, Branch of Rompin and Muadzam Shah</td>
<td>No issue</td>
<td>None</td>
</tr>
</tbody>
</table>

**B : Non-Governmental Organizations**

| World Wildlife Fund (WWF), Petaling Jaya | No issue | None |
| Malaysian Nature Society (MNS), Kuala Lumpur | No issue | None |
| Sahabat Alam Malaysia | No issue | None |
| Centre for Orang Asli Concern (COAC), Subang Jaya | No feedback provided | Invitation for comment was announced in the RSPO and SIRIM QAS websites. Apart from that, invitation letters were sent and these were followed-up with telephone calls. |
| Persatuan Orang Asli Semenanjung Malaysia (POASM), Kuala Lumpur | No feedback provided | Invitation for comment was announced in the RSPO and SIRIM QAS websites. Apart from that, invitation letters were sent and these were followed-up with telephone calls. |
| Wetlands International, Petaling Jaya | No issue | None |
| Aidenvironment | No issue | None |
| Tenaganita | Issue of concern:  
- Land conflict in the Middle Tinjar, Miri, Sarawak.  
- Any form of discrimination based on race, national origin and gender  
- Safety and health practise | All relevant comments were verified. |
| Sawit Watch | Environmental issue and land conflict in IOI property in Indonesia | All relevant comments were verified. |
| National Union of Plantation Workers (NUPW), Petaling Jaya | Issue of concern:  
- The right of employee to join union | All relevant comments were verified. |
<table>
<thead>
<tr>
<th><strong>All Malaysian Estates Staff Union (AMESU), Subang Jaya, Selangor</strong></th>
<th>▪ The employee payment and conditions of employment.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pesticide Action Network (PAN) Asia and Pacific, Penang</td>
<td>No issue</td>
</tr>
<tr>
<td>Women Aid Organization, Petaling Jaya</td>
<td>No issue</td>
</tr>
<tr>
<td>Malaysian Palm Oil Association (MPOA)</td>
<td>No issue</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>C : Local Communities</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Kampung Runchang</td>
</tr>
<tr>
<td>Kampung Gadak</td>
</tr>
<tr>
<td>Kampung Inoi</td>
</tr>
<tr>
<td>Kampung Tanjung</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>D : Other interested parties</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Canteen operator</td>
</tr>
<tr>
<td>NUPW members</td>
</tr>
<tr>
<td>AMESU members</td>
</tr>
<tr>
<td>FFB suppliers</td>
</tr>
<tr>
<td>Provision shop operator</td>
</tr>
<tr>
<td>Chemical supplier</td>
</tr>
<tr>
<td>FFB &amp; EFB transporter</td>
</tr>
<tr>
<td>Parts supplier</td>
</tr>
<tr>
<td>Civil contractor</td>
</tr>
</tbody>
</table>

Comment was verified.
## DETAIL OF NON CONFORMITY AND CORRECTIVE ACTIONS TAKEN

<table>
<thead>
<tr>
<th>P &amp; C, Indicator</th>
<th>Classification Major/Minor</th>
<th>Detail Non-conformances</th>
<th>Corrective Action Taken</th>
<th>Verification by Assessor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Criterion 2.1</td>
<td>Major</td>
<td>Written approval for the boiler and diesel generator set were not made available during the audit at Bukit Leelau Palm Oil Mill.</td>
<td>To obtain copy of boiler and diesel generator set written approval from Department of Environment DOE.</td>
<td>Written approval documents have been obtained.</td>
</tr>
<tr>
<td>Indicator 2.1.1</td>
<td></td>
<td>The mill also does not have adequate competent Persons-In-Charge as required by Code of Practice for safe working in a confined space</td>
<td>To purchase gas tester equipment.</td>
<td>Boiler - DOE ref.: 1022/Phg/732/(T)(18), Date : 10th July 1991</td>
</tr>
</tbody>
</table>
|                  |                             | 1- Authorised Gas Tester (AGT)  
2- Authorised Entrant  
3- Stand-by Person | To conduct training provider recognised by DOSH.                                                              | Diesel generator  
   i) DOE ref.: 1022/Phg/730/T, Date : 10th July 1991  
   ii) DOE ref.: and1022/Phg/732/T, Date :10th July 1991 | The mill has issued purchased order to purchase gas tester equipment.                                       |
<p>|                  |                             |                                                                                                           | To appoint mill personnel to attend relevant training required by Code of Practice for safe working in a confined space | The Mill Manager, Assistant Manager and Technical Supervisor have attended the training as required by Code of Practice for safe working in a confined space. |
|                  |                             |                                                                                                           |                                                                                                           | Training was conducted on 7th &amp; 8th May 2010 by National Institute of Occupational Safety &amp; Health (NIOSH), a training provider recognized by Department Occupational Safety and Health (DOSH). |
|                  | Minor                       | IOI Bukit Leelau has identified and marked riparian buffer zone. However, it was noted that this practice can be improved as the zone close to some small streams had not clearly been marked. Absent of clear marking has resulted in replanting of new palms within the riparian buffer zone in | Clear and visible riparian buffer marking at all small streams were erected to alert the workers.         | Clear and visible riparian buffer marking at all small streams were erected to alert the workers.         |
|                  |                             |                                                                                                           | Mekassar Estate has identified and removed new palms at field PR09A which planted within the riparian buffer zone. | Mekassar Estate has identified and removed new palms at field PR09A which planted within the riparian buffer zone. |
|                  |                             |                                                                                                           | Verification through photograph shows clear marking of riparian buffer zone at replanting area and future replanting areas. New palms which planted within the riparian buffer were removed and relocated. | Verification through photograph shows clear marking of riparian buffer zone at replanting area and future replanting areas. New palms which planted within the riparian buffer were removed and relocated. |
|                  |                             |                                                                                                           | Refresher training was conducted on 3rd July 2010 at Mekassar estate on maintaining | Refresher training was conducted on 3rd July 2010 at Mekassar estate on maintaining |</p>
<table>
<thead>
<tr>
<th>Criterion</th>
<th>Indicator</th>
<th>Type</th>
<th>Description</th>
<th>Status</th>
<th>Non Conformity Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.5</td>
<td>4.5.2</td>
<td>Minor</td>
<td>Bukit Leelau CU is promoting the barn owl as one of their IPM practice to control major pest i.e. rat attack. However, it was noted that the monitoring extent of this IPM implementation was not clearly presented. (e.g. population monitoring and efficiency of the programme)</td>
<td>To monitor the effectiveness of the implementation of barn owl as part of IPM. Monitoring records will be established such as barn owl population census and plan(s) to preserve the population.)</td>
<td>The effectiveness of the implementation will be verified in the next assessment.</td>
</tr>
<tr>
<td>5.2</td>
<td>5.2.1</td>
<td>Minor</td>
<td>IOI Bukit Leelau CU has identified and carried out assessment of HCV sites. It is to be noted that the general practice throughout CU was found to be in compliance. However, the process needs improvement, as the following were noted: 1. Not all relevant stakeholders were involved in the identification of sites and the assessment of the conservation value of the sites .e.g. PERHILITAN 2. The identification of flooded vacant sites in Leepang A and Laukin A Estates as HCV sites although their conservation attributes had not been clearly determined.</td>
<td>1. To conduct consultation session with: • District Forest Ranger on status of forest land located at the eastern boundry of Bukit Leelau Estate. • state PERHILITAN on HCV habitats at Lepar Forest Reserve 2. To conduct study on the flooded vacant sites in Leepang A and Laukin A Estates as HVC sites on its conservation attributes of habitat for fauna especially birds.</td>
<td>1. Consultation sessions was carried as follows: • On 5th May 2010, session with Pekan Forest Ranger • On 7th May 2010, session with Senior Officer of PERHILITAN. Output from the consultations were documented and presented to the assessor. Implementation of the management plan will be verified in the next assessment. 2. HCV attributes and implementation of the management plan for flooded vacant sites in Leepang A and Laukin A Estates will be verified in the next assessment.</td>
</tr>
<tr>
<td>6.1</td>
<td>6.1.1</td>
<td>Major</td>
<td>A documented SIA was available. However, it was not evident that all factors on which plantation and mill</td>
<td>To conduct a supplementary SIA focusing in the areas specified in the Guidance to Criterion 6.1 A supplementary SIA was carried out. A review of the documents submitted confirmed that the supplementary SIA had adequately</td>
<td></td>
</tr>
<tr>
<td>Criteria</td>
<td>Indicator</td>
<td>Issue Description</td>
<td>Corrective Action</td>
<td>Status of non conformity</td>
<td></td>
</tr>
<tr>
<td>-------------------</td>
<td>-----------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------</td>
<td>--------------------------</td>
<td></td>
</tr>
<tr>
<td>6.1.1</td>
<td></td>
<td>Management may have social impact, as identified in the Guidance to Criterion 6.1, had been covered in the assessment. These factors include: access and use rights, economic livelihoods and working conditions, subsistence activities, cultural and religious values, health and education facilities, other community values, resulting from changes such as improved transport / communication or arrival of substantial migrant labour force.</td>
<td>Covered all factors required by the Guidance to Criterion 6.1.</td>
<td>Closed</td>
<td></td>
</tr>
<tr>
<td>Criterion 6.1</td>
<td>Indicator 6.1.2</td>
<td>Evidence that an SIA had been carried out was available. However, the assessment team noted from records of the consultation sessions that not all affected parties had participated in the exercise to ensure the effective identification of all relevant social impacts and the development of appropriate plans to mitigate the negative impacts and promote the positive ones.</td>
<td>To conduct a supplementary SIA ensuring the participation of all affected parties. A supplementary SIA was carried out. A review of the documents submitted confirmed that affected parties had adequately participated in the exercise.</td>
<td>Closed</td>
<td></td>
</tr>
<tr>
<td>Criterion 6.1</td>
<td>Indicator 6.1.3</td>
<td>A timetable for mitigating and monitoring on the negative impacts has been established. However, this timetable was only based on the limited issues that were raised at the stakeholders’ meetings.</td>
<td>To conduct a supplementary SIA and develop a management plan to monitor the negative impact. A supplementary SIA was carried out. However, the management plan and its implementation will be verified in the next assessment.</td>
<td>Open - to be verified in next assessment</td>
<td></td>
</tr>
</tbody>
</table>
Details of Complaint / Grievance

1. Pekan dipekerjakan, 1 unit yang bawor
2. Taros dipekerjakan, monopod, 1 unit yang sedang ada terduga kekurangan
3. Air kekurangan taros perlu dihantar seminggu seterus

Details of Action Taken

1. Bateri baru akan dibeli menggantikan bateri yang rusak
2. Taros akan dibeli. Barang sudah pan di tempat, tetapi belum diterima user
3. Air akan diteruskan seminggu, seterusnya operasional kebun air khas untuk kebun air tempat seminggu

Acknowledged by Complainant: [Signature]
Date: [Date]

Verified by Manager: [Signature]
Date: [Date]
Details of Complaint / Grievance

1. Angin bumi - bocor.
2. Ceiling pechal - bilik tiubu & tender.
3. Pump tender tek bulitung.

Details of Action Taken

1. Mancera jualan di ambil tuk grosir dan membayar ke sesaw, di atas ang tergenap.
KERAJAAN MALAYSIA
JABATAN BEKALAN ELEKTRIK
AKTA BEKALAN ELEKTRIK 1990
PERAKUAN KEKOMPETENAN PENJAGA JENTERA

NAMA PEMEGANG
MOHAMMAD AFFANDI BIN MAHMOOD
No. K/P A 0862686
TARIKH LAHIR 15 JULAI 1967

telah pun diperiksa dan didapati mempunyai kelayakan-kelayakan yang
ditetapkan oleh Peraturan-Peraturan Bekalan Elektrik 1990 yang dibuat di
bawah Akta Bekalan Elektrik 1990, maka dengan ini perakuan
kekompetenan bagi pembawa ini adalah dikeluarkan kepada dan tidak
boleh digunakan oleh mana-mana orang lain.

KATEGORI AO

TEMPAT DIKELUARKAN KUALA LUMPUR
(IKM, K. LUMPUR)

TARIKH DIKELUARKAN 3 DIS, 1992

I.R. YAAKUP BIN HACHIK, BCK
Lembaga Pemeriksa
Jabatan Bekalan Elektrik, Malaysia

Sekiranya perakuan ini berada di dalam milik mana-mana orang, selain dari orang yang
kepadanya perakuan ini dikeluarkan, ia hendaklah dikembalikan kepada Ketua Pengarah,
Jabatan Bekalan Elektrik, Malaysia.

P.—J.P.N., K.L.
## KATEGORI KEKOMPTENAN PENJAGA JENTERA

<table>
<thead>
<tr>
<th>KATEGORI</th>
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<tr>
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<tr>
<td>B4</td>
<td>Sistem Voltn Tinggi Tiada Had &amp; D0 A</td>
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## SÉKATAN TERDAHULU

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Anggota Lembaga Pemeriksa
Labatan Bekalan Elektrik
Malaysia
AKTA KILANG DAN JENTERA, 1967
PERATURAN-PERATURAN (PERAKUAN KEOBLEHAN-PEPERIKSAAN)
KILANG DAN JENTERA, 1970
PERAKUAN KEOBLEHAN
Peraturan 5 (2)

DREBAR ENJIN GREDK

No. Perakuan....PA/111/96......Bagi......ENJIN SETIM DAN DAPANG SETIM

Ini adalah memperakui bahawa


Bagi pihak Panel Pemeriksa.

*Perakuan ini diberi [(a) selepas peperiksaan
(b) di bawah Peraturan–6 (3)]


Dikeluarkan di...KAMPAN......pada......28......hari bulan...OCTOBER......1996

* Potong yang tidak berkenaan.

---

No. Sir. 018747

19-09-1956

Temerloh, Pahang

KELAYAKAN TAMBAHAN

PERUSAHAAN MEKASSAR (M) SDN. BHD

COMPANY NO: 16933-W

BUKIT LEE BOH PALM OIL MILL

MILL MANAGER

INOR ASHARI BIN A. LATHIFFI

Sesiapa jun. yang lain daripada penerima yang
mendapati Perakuan ini dalam miliknya dichekendaki
mengirimkan serta-merta kepada Kewa Pemeriksa
Kilang dan Jentera. Kementerian Buruh dan Tenaga
Rakyat, Kuala Lumpur.

P-FMHR A.T.
Notice board for area treated with pesticide.
JobsMalaysia

Your Interactive Career Gateway

Ministry Of Human Resources, Malaysia

Saturday, 22 May 2010

Vacancy Details

IOI CORPORATION BERHAD
IOI CORPORATION BERHAD
TWO IOI SQUARE,
IOI RESORT
62502
WILAYAH PERSEKUTUAN PUTRAJAYA
W.P. PUTRAJAYA

Telephone No.: 03-89478702
Fax No.: 03-89478822
E-mail Address: lloebean@ioigroup.com
Website: http://www.ioigroup.com

Vacancy Details

Position: Farming General Worker
Vacancy: We required 200 general workers &/or harvesters to work in our 9 oil palm estates in Johor and Pahang.
Description: Permanent
No. of Vacancies: 200
Place of Work: JOHOR DARUL TAKZIM

http://www.jobsmalaysia.gov.my/jcs/jobsn_employer/update/existingVacancy.faces 22/05/2010
District: SEGAMAT  
Application Closing Date: 21 July 2010  
Job Suitable For: Lain-lain  
Working Hours: Normal  
Salary Offered: RM 520.00  
Sex: Not Choosing  
Marital Status: Not Choosing

Transportation  
Facilities: Accomodation  
Medical

Contact Officer  
Officer Name 1: Lee Boan  
Telephone No.: 03-89478702  
Handphone No.:  
Officer Name 2: Lai Pui Leong  
Telephone No.: 03-89478575  
Handphone No.: 012-6982148

Academic Qualification, Specialization and Skills

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Language Proficiency

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Miscellaneous  
Age Range: Not Choosing  
Vehicle Offered by Employer:  
Driving License Type:  
Professional Accredited License: 

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http://www.jbsmartialaysia.gov.my/jcs/jobs_m_employee/update/existingVacancy.faces  22/05/2010