

SIRIM QAS INTERNATIONAL SDN. BHD.

Building 4, SIRIM Complex, No. 1, Persiaran Dato' Menteri, Section 2, 40700 Shah Alam, Selangor, Malaysia.

File Ref.: ES10170017

RSPO PUBLIC SUMMARY REPORT

CLIENT

: SIME DARBY PLANTATION SDN BHD - SOU 30 MEROTAL

PARENT COMPANY: SIME DARBY PLANTATION SDN BHD

RSPO MEMBERSHIP No.: 1-0008-04-000-00

LOCATION OF THE CERTIFICATION UNIT (MILL AND THE SUPPLY BASE): (In the case of multisite certification, list additional sites in attachments):

Continue to their	2000000	Location			
Certification Unit	Mill / Estate	Latitude	Longitude	Address	
MEROTAl Strategic Operating Unit (SOU 30)	Merotai Palm Oil Mill	4° 23'N	117° 83' E	91007, Tawau, Sabah	
	Merotal Estate	4° 23'N	117° 47' E	91007, Tawau, Sabah	
	Tiger Estate	4° 25′N	117° 50' E	91007, Tawau, Sabah	
	Table Estate	4º 22'N	117° 52' E	91007, Tawau, Sabah	
	Imam Estate	4° 20 N	117º 50' E	91007, Tawau, Sabah	

MAP: See Attachment 1 auditor days AUDIT DATE : 25 - 29 April 2017 DURATION 13.5 TYPE OF AUDIT: Annual Surveillance Audit Recertification Audit STANDARD: RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION. STANDARD 2014 SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using the Mass Balance Supply Chain Model VALIDITY OF RSPO CERTIFICATE: 13/7/2015-12/7/2020 The following attachments form part of this report: Non-conformity Report(s) List of additional site(s) Report by Audit Team Leader Acknowledgement by Client's Representative MOHD ZULFAKAR Name Name KAMARUZAMAN SIME DARBY PLANTATION (SABAH) SDN. BHD. MEROTALE Signature Signature ALI ANUAR BIN HUSSIN SAAD Date 2 August 2017 Date MANAGER

SUMMARY OF AUDITS

				Stage 2 Audit		
On-site audit date	:	15-18/12	15-18/12/14 No. of auditor day			14
Audit team	:	Valence	(LA), Hazan	i, Jagathesan		
No. of major NCR	:	3	3 Indicator: 2.1.1, 4.7.1 (g), 6.10.2			Closing date : 20/3/15
No. of minor NCR	:	2	2 Indicator : 2.1.4, 5.1.2			
Indicate the	:	Employe	es	Settlers	Villagers	Suppliers
stakeholders interviewed		Х			х	Х
during the on-site audit		Contract	workers	NGOs	Govt. agency	Independent growers
		Indigeno	us people	Contractor	Others (Please specify)	
				X		
Supply base sampled	Supply base sampled : All 4 Estates (Merotai, Table, Imam, Tiger)					1

			Annu	al Surveillance	Audit 1	
On-site audit date	:	18-21/4/	18-21/4/16 No. of auditor days :			13
Audit team		Hazani (I	_A), Razm	an, Selvasingam	า	
No. of major NCR	:	1	1 Indicator: 8.1.1			Closing date 3/6/16
No. of minor NCR	:	2	2 Indicator :5.4.1, 6.5.3			
Indicate by ticking the	:	Employe	es	Settlers	Villagers	Suppliers
stakeholders		Х			X	Х
interviewed during the on- site audit		Contract	workers	NGOs	Govt. agency	Independent growers
		Indigeno	us	Contractor	Others (Please specif	(y)
				х		
Supply base sampled	:	Merotai and Tiger Estate				
Changes since the last audit	:	Common CU.	Common rotation of managerial and middle management at operating units in the			

	Annual Surveillance Audit 2						
On-site audit date	:	25-29 Ap	25-29 April 2017		No. of auditor days :	13.5 Auditor Days	
Audit team	:	Mohd Zul	<u>fakar Kam</u>	aruzaman (LA), Ra	hayu Zulkifli, Rozaimee	Ab Rahman	
No. of major NCR	:	3	Indicator	4.4.2, 5.3.2, 6.5.3		Closing date :	
						28/06/2017	
No. of minor NCR	:	3	Indicator	:2.1.3, 4.8.2, 6.1.4			
Indicate by ticking the	:	Employee	es	Settlers	Villagers	Suppliers	
stakeholders interviewed		>	(X	X	
during the on-site audit		Contract	workers	NGOs	Govt. agency	Independent growers	
					X		
		Indigenou	ıs people	Contractor	Others (Please specif	y)	
				X			
Supply base sampled	:	Table Estate and Imam Estate					
Changes since the last	:	No Chang	No Changes				
audit							

			Annual	Surveillance Au	ıdit 3	
On-site audit date	:				No. of auditor days :	
Audit team	:					
No. of major NCR	:					Closing date :
No. of minor NCR	:					
Indicate by ticking the	:	Employee	es	Settlers	Villagers	Suppliers
stakeholders interviewed						
during the on-site audit		Contract	workers	NGOs	Govt. agency	Independent growers
		Indigenou	ıs people	Contractor	Others (Please specif	y)
Supply base sampled	:					
Changes since the last audit	:		·	·		

		Annual	Surveillance Au	udit 4	
On-site audit date	:			No. of auditor days :	
Audit team	:				
No. of major NCR	:	Indicator			Closing date :
No. of minor NCR	:	Indicator	:		
Indicate by ticking the	:	Employees	Settlers	Villagers	Suppliers
stakeholders interviewed					
during the on-site audit		Contract workers	NGOs	Govt. agency	Independent growers
		Indigenous people	Contractors	Others (Please specif	I у) I
Supply base sampled	:				
Changes since the last audit	:				

SUMMARY OF INFORMATION

TYPE OF AUDIT	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period		March 2016 – February 2017	April 2017- March 2018		
Certified Area (Ha)		11,446.69	11,446.69		
Planted Area (Ha)		10,319.49	10,431.89		
Production Area (Ha)		8,962.72	9,693.77		
HCV Area (Ha)		161.23	161.23		
Certified FFB Processed (MT)		274,468.41	242,353.75		
Production of Certified CPO (MT)		63,566.88	56,347.52		
Production of Certified PK (MT)		13,962.15	12,117.75		
REMARKS		-	-		

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1.0 AUDIT PROCESS

1.1 Certification Body

SIRIM QAS International Sdn. Bhd. is the leading certification, inspection and testing body in Malaysia. SIRIM QAS International provides a comprehensive range of certification, inspection and testing services which are carried out in accordance with internationally and nationally recognised standards. Attestation of this fact is the accreditation of the various certification and testing services by leading national and international accreditation and recognition bodies such as the Department of Standards Malaysia (STANDARDS MALAYSIA), the United Kingdom Accreditation Services (UKAS) and the International Automotive Task Force (IATF). SIRIM QAS International is a partner of IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia.

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and accredited by ASI on 27 September 2014.

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Zulfakar Kamaruzaman	Lead Auditor / Safety & Health, HCV and Supply Chain	Holds a B. Sc. In Forestry from University Putra Malaysia. He had more than 4 years of working experience in the oil palm operation.
Rahayu Zulkifli	Auditor / Social	Holds a Degree in LLB (Hon), she was a practicing lawyer before joining WWF-Malaysia and RSPO as a Dispute Settlement Facility Manager. She is now working as a freelance RSPO auditor.
Rozaimee Ab Rahman	Auditor / Good Agricultural Practices/ Environment	Holds a B. Sc. in Agriculture from University Putra Malaysia. He had more than 5 years of working experience in the oil palm operation.

1.3 Audit methodology

The audit covered the Merotai palm oil mill and two of its supply base. The sampling of the number of the supply base was using the formula of $0.8\sqrt{y}$. The two supply base covered during the audit are Imam Estate and Table Estate. The audit included on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the the SIRIM QAS International's websites. There was no comment received for this Certification Unit.

1.5 Audit plan: Refer to Attachment 2

Date of next audit: The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit.

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Merotai Certification Unit (Merotai CU) is one of the Strategic Operating Unit (SOU) of Sime Darby Plantation Sdn. Bhd. (SDPSB). Located in Tawau, Sabah, East Malaysia, the CU is also known as SOU 30. The CU was initially certified to the RSPO P&C by SIRIM QAS International Sdn Bhd in 2009 until 2014. However, since the renewal was not carried out prior to the expiry of the certificate, a new stage 2 was carried out in 2015 and was later certified again on 13 July 2015.

The Merotai CU comprises of the Merotai Palm Oil Mill (Merotai POM) and four supply base i.e. the Merotai Estate, Tiger Estate, Table Estate and Imam Estate. All the estates are owned by SDPSB. The Merotai POM has a mill capacity of 90 mt/hr.

2.2 Description of the Supply Base (including the planting profile)

The FFB sourced from company owned estates that are certified and a small propotion from third party suppliers. Details of the FFB contribution from each source to the Merotai Palm Oil Mill were as follow

Table 1: Actual FFB production by the supply base for the period from April 2016 to March 2017

Faratas	FFB Production			
Estates	Tonnes	Percentage (%)		
Merotai Estate	59,528.92	20.08		
Tiger Estate	58,661.91	19.79		
Table Estate	48,048.66	16.21		
Imam Estate	57,597.910	19.43		
Total	223,837.400	75.51		
Independent smallholders				
Chee Foo Development	149.79	0.051		
Chen Nyuk Siong	155.60	0.052		
Chew Guat Poh	37.06	0.013		
Chin Syn Fook	125.51	0.042		
Chung Ka Tze & Lim Nyuk Moi	97.14	0.033		
Hatawa (tawau) Sdn Bhd	436.23	0.147		
Hon Wun Nee	386.70	0.130		
Hoo Yun Hien	173.88	0.059		
Lee Kon Yu @Lee Kon Fook	91.47	0.031		
Majulah Harta (h) Sdn Bhd	3725.01	1.257		
Ooi choon sun	143.98	0.049		
Siah binti abang ali	84.72	0.029		
Suratmin bin Jais	421.07	0.142		
Syarikat Keeta sdn bhd	245.99	0.083		
Tang Teck Soi	488.93	0.165		
Teh Boon Heng	40.23	0.014		
Usaha Assest sdn bhd	164.54	0.056		
Wong Millenium Enterprise	64503.34	21.760		
Wong Shui Fatt	65.91	0.022		
YM Plantation	983.83	0.332		
YMF Plantation	75.35	0.025		
Total from Independent smallholders	72,596.28	24.49		
Grand total	296,433.680	100.00		

Table 2: Projected FFB production by supply base for the next reporting period (April 2017-March 2018)

	FFB Contr	ibution
CU own estates	Tonnes	Percentage (%)
Merotai Estate	70,696.16	20.96
Tiger Estate	59,245.84	17.56
Table Estate	51,210.43	15.18
Imam Estate	61,201.32	18.14
Total	242,353.75	71.84
Other Supply Base		
Third parties (non-certified)	95,000.00	28.16
Grand Total	337,353.75	100.00

Table 3: Actual FFB received and CPO & PK dispatch by Merotai POM for the last reporting period (April 2016-March 2017)

	Total (MT)
FFB Received	296,433.680
FFB Processed	296,153.630
CPO Production	66,966.077
PK Production	12,645.759
CPO delivered as Mass Balance	0
CPO delivered as non-RSPO certified	66,966.08
PK delivered as Mass Balance	0
PK delivered as non-RSPO certified	12,645.76

<u>Table 4: Projected FFB received and CPO & PK dispatch by Merotai POM of the next reporting period</u>
(April 2017-March 2018)

	Total (MT)
FFB Received	337,353.75
FFB Processed	337,353.75
CPO Production	78,434.75
PK Production	16,867.69
CPO delivered as Mass Balance	56,347.52
CPO delivered as non-RSPO certified	22,087.23
PK delivered as Mass Balance	12,117.75
PK delivered as non-RSPO certified	4,749.94

Table 5 Planted and certified area of Merotai CU

Estate	Planted (ha)	Certified (ha)
Merotai	2,686.12	3,052.66
Tiger	2,292.66	2,444.96
Table	2,071.83	2,083.78
Imam	3,381.28	3,865.29
Total	10,431.89	11,446.69

Table 6: Planting profile for Merotai Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1992	2nd	Mature	36.18	1.35
1995	1st	Mature	25.03	0.93
1995	2nd	Mature	46.23	1.72
1994	2nd	Mature	32.64	1.22
1996	1st	Mature	51.86	1.93
1998	1st	Mature	71.93	2.68
1999	2nd	Mature	155.87	5.80
2000	1st	Mature	317.16	11.81
2000	2nd	Mature	95.93	3.57
2001	2nd	Mature	234.54	8.73
2002	2nd	Mature	293.71	10.93
2004	3rd	Mature	84.67	3.15
2005	2nd	Mature	298.59	11.12
2007	2nd	Mature	303.06	11.28
2008	3rd	Mature	298.04	11.10
2009	3rd	Mature	193.68	7.21
2010	3rd	Mature	147.00	5.47
Total			2686.12	100.00

Table 7: Planting profile for Tiger Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1995	1st	Mature	74.13	3.23
1996	1st	Mature	45.89	2.00
1997	1st	Mature	503.63	21.97
1998	1 st	Mature	1,010.10	44.06
1999	1st	Mature	308.78	13.47
2007	2 nd	Mature	109.03	4.76
2010	2 nd	Mature	44.84	1.96
2016	2nd	Immature	196.26	8.55
Total	_		2,292.66	100.00

Table 8: Planting profile for Table Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1995	1st	Mature	33.55	1.63
1996	1st	Mature	3.69	0.18
1997	1st	Mature	341.45	16.48
1998	1st	Mature	1199.34	57.88
1999	1st	Mature	417.40	20.15
2015	2nd	Immature	76.40	3.68
	Total		2071.83	100.00

Table 9: Planting profile for Imam Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1995	1st	Mature	393.90	11.65
1996	1st	Mature	4.72	0.14
2000	1st	Mature	405.13	11.98
2001	2nd	Mature	14.90	0.44
2002	2nd	Mature	220.70	6.53
2004	2nd	Mature	240.60	7.12
2005	2nd	Mature	279.10	8.25
2008	2nd	Mature	230.84	6.83
2009	2nd	Mature	509.00	15.05
2010	2nd	Mature	328.00	9.70
2011	2nd	Mature	288.93	8.54
2014	2nd	Immature	112.40	3.32
2015	2nd	Immature	93.51	2.77
2017	2nd	Immature	259.55	7.68
	Total		3381.28	100.00

2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

SOU Merotai

Name	:	Ali Anuar bin Hussin Saadi
Position	:	Manager
Address	:	PO Box 135, 91007 Tawau, Sabah
Phone no.	:	+6089-902801
Fax no.	:	+6089-902843
Email	:	ldg.merotai@simedarby.com

3.0 AUDIT FINDINGS

3.1 Changes to certified products in accordance to the production of the previous year There was no changes regarding to certified products.

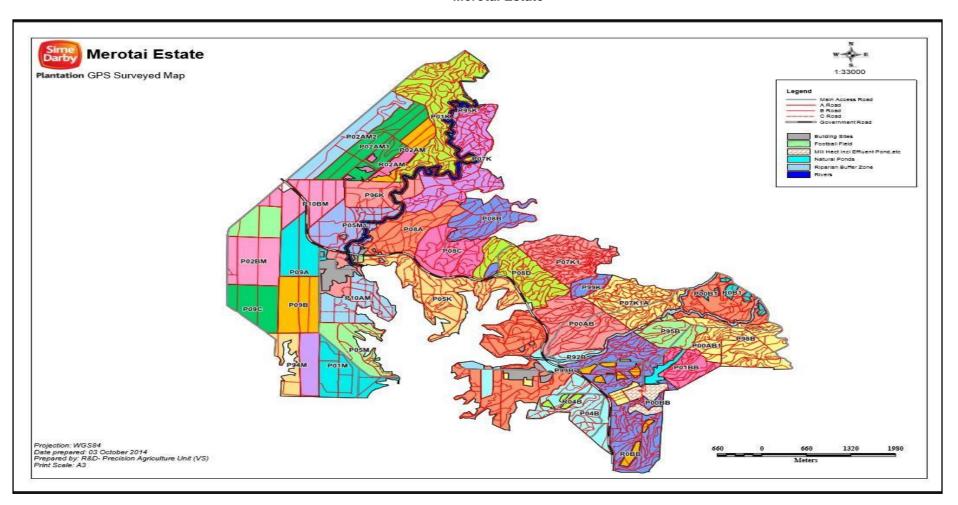
3.2	Time bound plans including chang	es and reaso Yes		-	r: ons/justifications
	- acquisitions/disposals		Х		·
	 emergence/re-emergence of land disputes 		x		
	- labour conflicts		Х		
	time bound plan for Sime Darby P ded in Attachment 7 of this report.	antation Sdi	n Bhd, which	was updated in	December 2016 is
3.3	Overall comment in terms of acce (including details of non-adherence There is no changes to the time-bo	or the cond			
3.4	All associated smallholders (includi where their fruit supply is included, within 3 years from when their fruit certification.	by the mill, a was first incl	are audited (luded in the m		No
	If no, please state reasons N/A	as there is n	o associated	smallholders su	pplying FFB to the CU.
3.5	Any new acquisition which has re HCV areas	placed prima	ary forests o	or Yes	X No
3.6	Other changes (e.g. organizational No Changes.	structure, no	ew contact pe	rson, addresses	s, etc.)
3.7	Status of previous non-conformities	s *			
	Closed X N	ot closed			
	* If not closed, minor non conformity w	vill be upgrade	ed to major non	conformity	
3.8.	Complaint received from stakehold There were some stakeholders workers, contractors and suppliers feedback on the CU.	interviewed	•		
4.0	DETAILS OF NON-CONFORMITY	REPORT			
4.1	For P&C (Details checklist refer to	Attachment	3) :		
	Total no. of minor NCR(s) (details refer to Attachment 4)	List: 3	RAR01-2017,	RAR02-2017, RZ	. 02 2017
	Total no. of major NCR(s) (details refer to Attachment 4)	List: 3	RZ 01 2017, N	MZK 01 2017, MZ	K 02 2017
4.2	For SC (Details checklist refer to A	ttachment 5)):		
	Total no. of minor NCR(s)	List: 0			
	Total no. of major NCR(s)	List: 0			

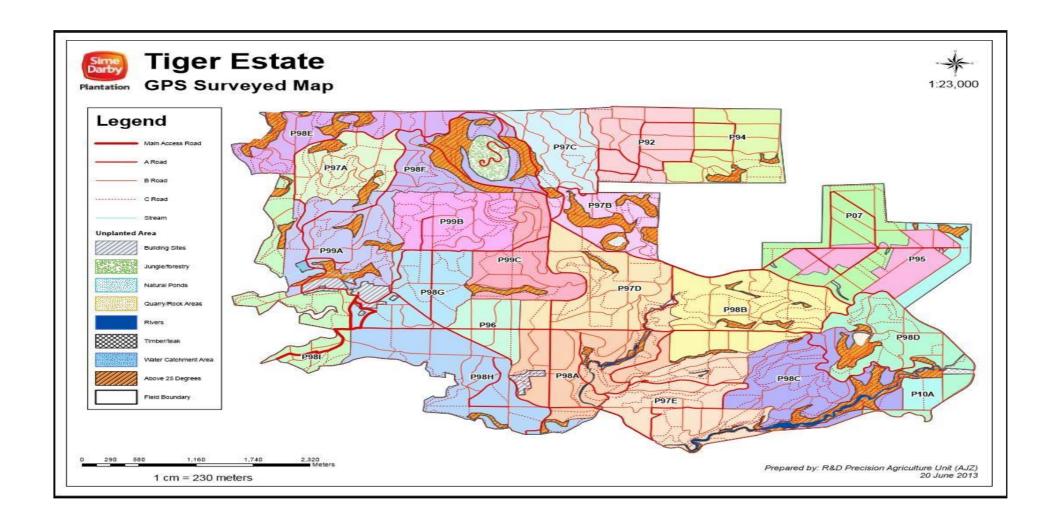
5.0	AUDIT CONCLUSION The audit team concludes that the organisation has established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to achieve agreed criterion & requirements.					
6.0	RECOM	MENDATIO	ON			
		No NCR re	ecorded. Recommended to conti	nue certification.		
Į	Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.					
	Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs.					
	Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.					
		Recommended to continue certification.				
	Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s) have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.					
	Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.					
7.	7. IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.					
Audi	t Team Le	eader :	MOHD ZULFAKAR KAMARUZAMAN	The same	28/6/2017	
	(Name) (Signature) (Date)					

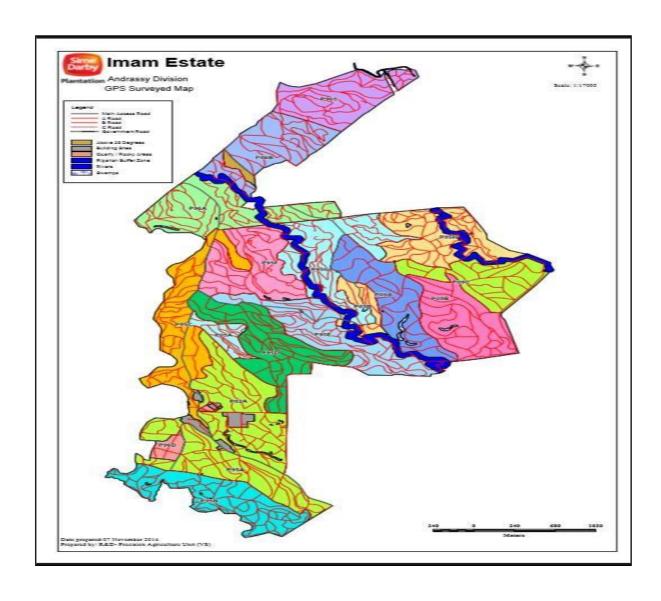
Attachment 1

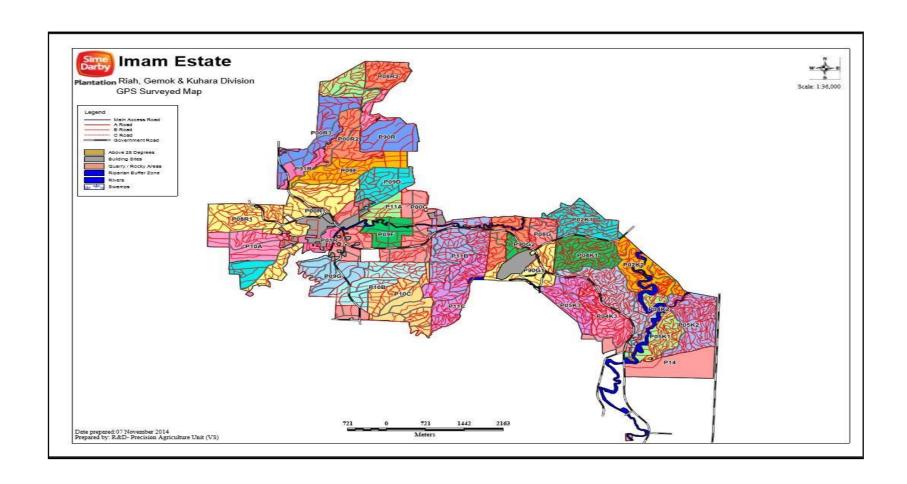
Location map of SOU 30 Merotai

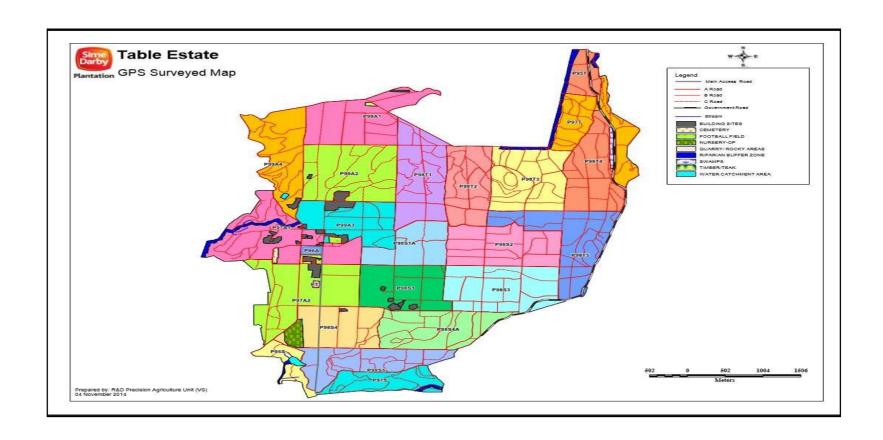
Merotai Estate











RSPO SURVEILLANCE AUDIT PLAN

1. Objectives

The objectives of the audit are as follows:

- (i) To determine Certification Unit conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI)
- (ii) To verify the effective implementation of corrective actions arising from the findings of last audit
- (iii) To make appropriate recommendations based on the audit findings

2. Date of audit : 25-29 April 2017

3. Site of audit : SOU Merotai

Merotai Palm Oil Mill

Table EstateImam Estate

4. Audit Criteria:

RSPO P&C MYNI: 2014

RSPO Supply Chain Certification Standard, 2014

• Company's audit criteria including Company's Manual/Procedures

5. Audit Team

a) Audit Team Leader : Mohd Zulfakar Kamaruzaman

b) Auditor : Rahayu Zulkifli

Rozaimee Ab Rahman

6. Audit Method

Site audits including observation of practices, interviews with interested parties (employees, nearby population, etc.), documentation evaluation and evaluation of records.

7. Audit Findings

Audit findings shall be classified as major and/or minor. Major non conformities shall be addressed within 60 days or else the certificate shall be suspended. If the major non conformities are still not addressed within another 60 days, the certificate shall be terminated. Recurrence of major non-conformities on the same issues shall be recommended for immediate suspension. Minor non-conformities shall be upgraded to major non-conformities if the corrective actions taken are not satisfactorily and effective.

For minor non conformities raised in the surveillance audit, corrective action plans shall be submitted within 60 days. Verification of implementation of corrective actions will be carried out during the next audit. If corrective action plans to address the minor non-conformity(ies) are not submitted within 60 days,

the RSPO certificate will be recommended for suspension. If corrective action plans are not submitted within a further 60 days, the RSPO certificate will be recommended for termination.

8. 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.

9. Working Language: English and Bahasa Malaysia

10. Reporting

a) Language : English

b) Format : Verbal and written

c) Expected date of issue: Tentative date of issue of report not more than 30 days after the closure of the major NCR.

d) Distribution list : Client file

11. Facilities Required

- a) Room for discussion
- b) Relevant document and record
- c) Personnel protective equipment if required
- d) Photocopy and printing facilities
- e) A guide for each auditor
- 12. Audit Programme Details: As shown below:

Time	Activities / areas to be visited					
9.00 – 9.30 am	Deening meeting at Merotai Palm Oil Mill Lead Auditor to introduce audit team member, brief on audit objectives, scope, methodology, criteria and programmes Drganization Representative to brief on the following: 1) RSPO implementation at SOU 30 Merotai (i.e. mill & supply base) including changes 2) Time bound plan for Sime Darby Plantation Sdn. Bhd. 3) Significant changes on organization activities, machinery, supply bases capacity etc.					
	Zulfakar	Rahayu	Rozaimee			
9:30 – 1:00 pm	Table Estate Coverage of assessment: P1, P2, P4, P5, P7, P8 Laws and regulations Occupational safety & health practice – witness activities at site Interview with workers , safety committee and contractors Inspection of protected sited with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use Riparian zone Training and skill development programmes Continuous improvement	Merotai POM Coverage of assessment: P1, P2, P4, P6, P7, P8 Laws and regulations Land titles user rights Riparian zone Social Impact Assessment (SIA), management plan & implementation Complaints and grievances Consultation with relevant government agencies Interview workers, GPW, local communities, stakeholders, independent smallholders and contractors Linesite inspection Training and skill development programmes Continuous improvement	Imam Estate Coverage of assessment: P1, P2, P3, P4, P5, P7, P8 Laws and regulations Commitment to long-term economic and financial viability Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Chemical store/fertilizer Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. New planting EIA (Environmental Impact Assessment) Environmental management – witness activities at site Waste & chemical management Continuous improvement	Guide(s) for each assessor		
1.00 – 2.00 pm		Break		T =		
2.00 – 5.00 pm		Continue assessment		Guide(s) for each assessor		

	Zulfakar	Rahayu	Rozaimee	
8.30 – 1.00 pm	Imam Estate Coverage of assessment: P1, P2, P4, P5, P7, P8 Laws and regulations Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Inspection of protected sited with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use Riparian zone Training and skill development programmesContinuous improvement	Table Estate Coverage of assessment: P1, P2, P4, P6, P7, P8 Laws and regulations Land titles user rights Riparian zone Social Impact Assessment (SIA), management plan & implementation Complaints and grievances Consultation with relevant government agencies Interview workers, GPW, local communities, stakeholders, independent smallholders and contractors Linesite inspection Training and skill development programmes Continuous improvement	Imam Estate Coverage of assessment: P1, P2, P3, P4, P5, P7, P8 Laws and regulations Commitment to long-term economic and financial viability Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Chemical store/fertilizer Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. New planting EIA (Environmental Impact Assessment) Environmental management – witness activities at site Waste & chemical management Continuous improvement	Guide(s) for each assessor
1.00-2.00 pm		Break		
2.00 – 5.00 pm	Continue Asses	ssment (Mr Rozaimee will be going to Table Estate af	ter the Lunch)	Guide(s) for each assesso

Day 3 : 27 April	2017 (Thursday)			
	Zulfakar	Rahayu	Rozaimee	
8.30 – 1.00 pm	Merotai POM Coverage of assessment: P1, P2, P4, P5, P7, P8 Laws and regulations Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes Continuous improvement	Table Estate Coverage of assessment: P1, P2, P4, P6, P7, P8 Laws and regulations Land titles user rights Riparian zone Social Impact Assessment (SIA), management plan & implementation Complaints and grievances Consultation with relevant government agencies Interview workers, GPW, local communities, stakeholders, independent smallholders and contractors Linesite inspection Training and skill development programmes Continuous improvement	Table Estate Coverage of assessment: P1, P2, P3, P4, P5, P7, P8 Laws and regulations Commitment to long-term economic and financial viability Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Chemical store/fertilizer Plantation on hilly/swampy area IPM implementation, training and safe use of agrochemicals. New planting EIA (Environmental Impact Assessment) Environmental management – witness activities at site Waste & chemical management	Guide(s) for each assessor

		Continuous improvement	
1.00–2.00 pm	 Break		l.
2.00 – 5.00 pm	Continue Assessment (Miss Rahayu will be going to	Imam Estate after the Lunch)	Guide(s) for
			each assessor

Day 4 : 28 April	2017 (Friday)			
	Zulfakar	Rahayu	Rozaimee	
	Merotai POM	Imam Estate	Merotai POM	
8.30 – 1.00 pm	Site visit and assessment on Supply Chain Implementation including the • Model used • General Chain of Custody System Requirements for the supply chain • Documented procedures • Purchasing and goods in • Outsourcing activity • Sales and goods out • Processing • Records keeping • Registration • Training • Claims	Coverage of assessment: P1, P2, P4, P6, P7, P8 Laws and regulations Land titles user rights Riparian zone Social Impact Assessment (SIA), management plan & implementation Complaints and grievances Consultation with relevant government agencies Interview workers, GPW, local communities, stakeholders, independent smallholders and contractors Linesite inspection Training and skill development programmes Continuous improvement	Coverage of assessment: P1, P2, P4, P5, P7, P8 Laws and regulations Commitment to long-term economic and financial viability EIA (Environmental Impact Assessment) Environmental management – witness activities at site Waste & chemical management Continuous improvement	Guide(s) for each assessor
1.00–2.00 pm		Break		
2.00 – 5.00 pm		Continue Assessment	t	Guide(s) for each assessor

Day 5: 29 April 20	17 (Saturday)			
	Zulfakar	Rozaimee	Rahayu	
8.30 – 10.30am	 Continue assessment on unfinished area Verification on outstanding issues Audit Team discussion, preparation on audit findings 	and issuance of NCR (if any)		Guide(s) for each assessor
10.30–11.00am		Break		
11.00-12.30pm	Closing meeting			Top management & Committee member

Attachment 3

RSPO P&C AUDIT CHECKLIST AND FINDINGS

Principle 1: COMMITMENT TO TRANSPARENCY

Clause		Indicators	Comply Yes/No	Findings
C 1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective	1.1.1	There shall be evidence that growers and millers provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. Major Compliance	YES	Merotai CU continued to implement their documented communication procedure. At the point of audit, there was no request for information from the stakeholders received by Merotai CU. The procedure for responding to any communication as outlined in the Standard Operation Manual of Estate Quality Management System documents. The flow chart of the procedure were made available on notice boards in the Estate's office and Muster Grounds. Both Estates continued to maintain stakeholders list for contractors, vendors/suppliers, government agencies, schools, local communities, etc. Records on requests for information and documents related to the Safety and Environment criteria were maintained accordingly. The CU also has established mechanism to channel such queries through regular meetings with workers. Various issues and complaints were heard by the management and decisions made for subsequent action.
participation in decision -making.	1.1.2	Records of requests for information and responses shall be maintained. Major Compliance	YES	Merotai POM, Stable and Imam Estate had identified personnel responsible for handling of complaints and records of communication were maintained. The internal communication was kept in the 'Buku aduan/Buku Laporan Kerosakan rumah dan lain-lain'. For, external communication records of minutes of meetings held were maintained.
C 1.2 Management	1.2.1	Land titles/user rights (Criterion 2.2);	YES	There was no change of land ownership / user right observed. Copies of land titles, which indicate use right were available. Original copies of land titles were maintained at the Head Office in KL.
documents are publicly available, except		Occupational health and safety plans (Criterion 4.7);	YES	SDPSB continued to use website for disseminating public information thru http://plantation.simedarby.com .
where this is prevented by commercial confidentiality or where disclosure of		Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)	YES	Management documents related to environmental plans and impact assessments were made available at all audited operating units. Among the documents were Environmental Aspect Identification (EAI) and Environmental Impact Evaluation (EIE) registers and Pollution Prevention Plan – FY2016/17.
information would result in negative		HCV documentation summary (Criteria 5.2 and 7.3);	YES	HCV documentation maintained available.
environmental or social outcomes.		Pollution prevention and reduction plans (Criterion 5.6);	YES	Pollution prevention and reduction plans continued made available at all assessed operating units.
		Details of complaints and grievances (Criterion 6.3);	YES	Details of complaints and grievances of the Merotai SOU were recorded in either the Grievance Log Book or Complaint book maintained at mill and estates.
		Negotiation procedures (Criterion 6.4);	YES	Negotiation procedures for the Merotai CU is as described in the "Flowchart and Procedures On Handling Land Dispute". This document reviewed by the audit team during the audit.
		Continual improvement plans (Criterion 8.1);	YES	Sime Darby Plantation Sdn. Bhd. has committed to utilise the established system to regularly monitor and review their key activities at the mill and estates. Relevant action plans were initiated for continuous improvement in key areas of operations, environmental, safety, health and welfare of the workers as well as social contribution to the community.

	Public summary of certification assessment report;	YES	Public summary for RSPO certification assessment report can be assessed at the link below: http://www.sirim-qas.com.my/sirim/core-files/uploads/2017/02/06-Sime-Darby-Plantation-Sdn-Bhd-%E2%80%93-Merotai-Palm-Oil-Mill-1st-Surveillance-2016.pdf
	Human Rights Policy (Criterion 6.13).	YES	Human Rights policy for the CU is in the Sime Darby Plantations Sdn Bhd's Social & Humanity Policy dated January 2015. This policy is available at the respective notice boards of the mill and estates.
C 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance	YES	The Merotai CU is bound by the Sime Darby Plantations Sdn Bhd's Code of Business Conduct. The policy is well documented and communicated to all levels of the workforce and operations.

Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Clause	Indicator	s	Comply Yes/No	Findings
C 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	YES	 Generally, the CU continued to comply with most of the applicable local, national and ratified international laws and regulations. Relevant licenses and permits were verified at SOU Merotai as follows. MPOB License for the POM, estates and nursery, Energy Commission License, Lesen untuk Menggaji pekerja bukan, DOSH permit for compressors, diesel permit and fire certificate. Factory and Machinery Act 1967 i) Person In Charge Regulation 1970 ii) Steam Boiler and Unfired Pressure Vessel 1970 iii) The Factories and Machinery (Notification, Certificate of Fitness and Inspection), Regulations, 1970 iv) Noise Exposure Regulations 1989 EQ (Prescribed Premise) Crude Palm Oil Regulations 1977 EQ (Scheduled Wastes) Regulations 2005 OSHA 1994, Use and Standards Of Exposure of Chemicals Hazardous to Health Regulations i) Regulation 27 (health surveillance programme) ii) Code of Practice in Confined Space 2010 (Medical Surveillance 2 years once) However, during site visit to the store at Imam Estate (Andrassy Division), lapses related to the labelling of the wastes, recording and storing of were found. Thus, Major NCR RAR 02-2017 had been raised. (Cross refer indicator 5.3.2)
	2.1.2	A documented system, which includes written information on	YES	The CU have identified and documented their legal register with written information on legal requirements which applicable to their operation. PSQM Department, at HQ is responsible to

compliance implemented. Minor Compliance Mill Quality Manager responsible to track to The following issues River water and monthly basis. I 2017. No evider During site visit measure by the At Imam Estate and traces of me Sighted also the was not adequal documents. This me was carried out on a respective SOUs. C 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights C 2.2.2 There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and	ure compliance with the identified legal has been defined in the Estate & ment System. The PSQM Department and respective operating units were ne legal requirement as well as monitoring the status of legal compliance. were noted during the audit, lysis at Sungai Merotai Kecil was monitored and submitted to DOE on was found out that the COD exceeded the limit of 25 mg/L in Feb & Mar that proper action has been taken to address this. at POM, there was evidence of boiler ash flowing to the drain. No control Management of the POM. (Andrassy Division), the water at emergency shower sump was stagnant squito larvae in the sump.
changes in the law shall be implemented. Minor Compliance C 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights C 2.2.1 Documents showing legal yes ownership or lease, history of land tenure and the actual legal use of the land shall be available. Major Compliance 2.2.2 The right to use the land shall be available. Major Compliance 2.2.2 There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and	t chemical trays at the chemical store in Imam Estate (Andrassy Division) e to control spillage. Thus, Minor NCR MZK 01 2017 was raised.
The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights ownership or lease, history of land tenure and the actual legal use of the land shall be available. Major Compliance The right to use the land is demonstrated, and is not legitimately use of the land shall be available. Major Compliance There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and	which is based in Kuala Lumpur is responsible for tracking any changes to ations. This was done through communicating with the publisher of the chanism was outlined in its procedure. The updating of the legal register periodical basis. Any change in the legal register is communicated to the
demonstrate that they have legal, customary or user rights markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and	observed at the mill and estates. There is no record of customary land ative Customary Rights land on any of the above.
reserves. Minor Compliance	is located within Merotai Estate, and its boundary is marked with fencing. tates, the boundary stones were at required areas appropriately.
disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance	
	and records available, there is no evidence of any land conflict at the Mill,

	I	I manufacture to the state of t	I	
		requirements for acceptable		
		conflict resolution processes are		
		implemented and accepted by		
		the parties involved.		
		Major Compliance		
	2.2.5	For any conflict or dispute over	YES	Based on interviews and records available, there is no evidence of any land conflict at the Mill,
		the land, the extent of the		Table and Imam Estates.
		disputed area shall be mapped		
		out in a participatory way with		
		involvement of affected parties.		
		Minor Compliance		
	2.2.6	To avoid escalation of conflict,	YES	Based on interviews and records available, there is no evidence of any land conflict at the Mill,
		there shall be no evidence that		Table and Imam Estates. Maintenance of peace carried out by respective teams of auxiliary
		oil palm operations have		police, who are responsible to guard the safety of the Mill and the estates, protection of its
		instigated violence in		employees, properties and company assets. Interview with smallholders and villagers also
		maintaining peace and order in		confirm that no violence has been committed in the mill and estate operations.
		their current and planned		· ·
		operations. Major Compliance		
C 2.3	2.3.1	Maps of an appropriate scale	YES	Based on interviews and records available, there is no evidence of any land conflict at the Mill,
Use of the land for oil		showing the extent of recognised		Table and Imam Estates.
palm does not		legal, customary or user rights		
diminish the legal,		developed through participatory		
customary or user		mapping involving affected		
rights of other users		parties. Major Compliance		
without their free,	2.3.2	Copies of negotiated	YES	Based on interviews and records available, there is no evidence of any land conflict at the Mill,
prior and informed	2.0.2	agreements detailing the	0	Table and Imam Estates.
consent.		process of FPIC shall be		Table and main Estates.
55.155.11.		available and shall include:		
		a) Evidence that a plan has been		
		developed through consultation		
		and discussion with all affected		
		groups in the communities, and		
		that information has been		
		provided to all affected groups,		
		including information on the		
		steps that shall be taken to		
		involve them in decision making;		
		b) Evidence that the company		
		has respected communities'		
		decisions to give or withhold		
		their consent to the operation at		
		the time that this decision was		

2.3.3	taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. Minor Compliance All relevant information shall be available in appropriate forms and languages, including	YES	Based on interviews and records available, there is no evidence of any land conflict at the Mill, Table and Imam Estates.
	assessments of impacts, proposed benefit sharing, and legal arrangements. Minor Compliance		
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, incl. legal counsel. Major Compliance	YES	Based on interviews and records available, there is no evidence of any land conflict at the Mill, Table and Imam Estates.

Principle 3: COMMITMENT TO LONG-TERM ECONOMIC AND FINANCIAL VIABILITY

Clause	Indica	itors	Comply Yes/No	Findings
C 3.1 There is an implemented management plan that aims to achieve long-term economic and	3.1.1	A business or management plan (min. 3y) documented that incl. where appropriate, a business case for scheme smallholders. Major Compliance	YES	Both estates continued to make commitment to long-term economic and financial viability. The annual budgets for 2016/17 and up-to 2020/21 were sighted. The budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget included projections on yield per hectare, and total cost of production per MT and per hectare.
financial viability.	3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, shall be available. Minor Compliance	YES	The replanting programmes until 2020/21 were sighted for both estates. The programme is reviewed once a year and is incorporated in their annual financial budget.

Principle 4: USE OF APPROPRIATE BEST PRACTICES BY GROWERS AND MILLERS

Clause	Indicat	ors	Comply Yes/No	Findings
C 4.1 Operating proc. are appropriately doc., consistently implemented & monitored	4.1.1	Standard Operating Procedures (SOPs) for estates and mills shall be documented. Major Compliance	YES	In the CU, the SOPs for each of the processes continued to be implemented. Brief version of the SOPs were displayed at the appropriate locations. In general, the practices in the CU had been carried out as per the Plantations / Mill Quality Management System (PQMS / MQMS) standard operating manual and procedures (SOP), Sustainable Plantation Management System (SPMS) Manual, Supply Chain Manual, ESH Management System Manual, Occupational Safety and Health Manual, Pictorial Safety Standards, Laboratory Process Control Manual and Security Guidelines. The documents include all aspects of the operation in the estates and mill, which is from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and despatch of CPO, PK and PKO as well as security of the SOU.
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	YES	The mechanism for ensuring consistent implementation of procedures is in place, for the mill and the estates. Some of the mechanisms are internal audit, RSPO internal consultative meeting, MA report, PA assessment (inter alia).
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	YES	In general all records related to milling / estate operation, environmental, safety, health & welfare, stakeholders communication, employment and social aspects were kept for a minimum of 12 months.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	All certified FFB came from CU estates and non-certified FFB from independent FFB suppliers. All delivery documents of third party FFB were verified to ensure the certified status of the FFB. Volumes of certified and non-certified FFBs received by the mill were monitored.
C 4.2 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures, are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	YES	Both estates continued to practice the maintenance of long-term soil fertility by annual application of fertilisers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and EFB in replants and in immature areas. Maintenance of soil fertility was guided by the Sime Darby Agricultural Reference Manual. Fertiliser application which is important for maintenance of soil fertility, was carried based on the recommendation made by the Agronomist. The Agronomists are from the Sime Darby Research Sdn. Bhd. Annual fertiliser recommendations were made based on annual foliar sampling and soil sampling.
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Fertiliser application program was monitored using records like program sheets, bin cards, field cost book, Fertiliser Application monitoring forms, etc. Records of programs and applications of fertilisers were reviewed by auditors.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	From the Agronomist's report it was established that both estates had carried out yearly foliar sampling for the nutrients N, P, K, Mg, CA & B and the results formed the basis for the fertiliser recommendations to maintain and to improve soil fertility.
	4.2.4	A nutrient recycling strategy shall be in place, and may	YES	Both estates had established a nutrient recycling strategy. Palm fronds were stacked in the fields following the railway track system and L-shaped for decompose and soil moisture conservation

		include use of EFB, POME and palm residues. Minor Compliance		purpose. At Imam Estate, compost application applied in matured area at the main division.
C 4.3 Practices minimise and control erosion and	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	Based on the soil maps provided, there was no fragile/marginal soils in all estates visited.
degradation of soils.	4.3.2	A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company's SOP. Minor Compliance	YES	SDPSB had a management strategy in place for planting on slopes and to minimise and control erosion and degradation of soils were specified in the Slope & River Protection Policy & Land preparation for terracing in ARM Manual. About 42% of Imam estate is flat and undulating. Hence, it has a straight line planting with the balance on terrace planting. Table Estate had about 50% of its area planted on terraces. Both estates had also implemented prevention of soil erosion measures such as construction of moisture conservation pits in steep slope areas. Cover crops were observed and the CU management had generally encouraged the establishment of soft growth.
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	YES	During the field visit, noted the road conditions were good in both estates. Accessibility was made possible by regular maintenance guided by its road maintenance programs. The program for grading, re-surfacing and road side pruning had been supported by adequate provisions in the budgets.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance	YES	There were no peat soils in both audited estates. It was confirmed through the soil analysis report by the Sime Darby Agronomist.
	4.3.5	Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance	YES	Not applicable as there were no peat soils in both estates. It was confirmed through the soil analysis report by the Sime Darby Agronomist.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	YES	Not applicable as there were no fragile and problem soils in both estates. It was confirmed through the soil analysis report by the Sime Darby Agronomist.
C 4.4 Practices maintain the quality and availability	4.4.1	An implemented water management plan shall be in place. Minor Compliance	YES	It is evident during the site audit that both estates had established and implemented their water management plans.
of surface and ground water.	4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones shall be demonstrated. Major Compliance	NO	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the Imam Estate and Table Estate. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. In some areas vetiver grass had been planted along the river banks. During visit to the Merotai POM it was found that: • traces of spraying activities was seen along the monsoon drain.

				 boiler chemical (soda ash) in chemical mixer tank at boiler no 2 was leaking to the monsoon drain. water from emergency shower was directed into a field drain instead of a sump Thus #Major NCR RAR01-2017 was raised
	4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality shall be in compliance with national reg. Minor Compliance	YES	Site visit to effluent treatment plant and interview with operator in-charge revealed that the operation was carried out in accordance with the SOP and legal requirements. No sight of effluent over flow and flow meter reading was recorded daily. The analysis of the treated effluent was carried out monthly and reported to DOE on quarterly basis.
	4.4.4	Mill water use per tonne of FFB shall be monitored. Minor Compliance	YES	Processing water obtained from the water catchment near to the mill. The water usage at the mill was monitored on monthly basis.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively	4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance	YES	Both estate had implemented the Integrated Pest Management (IPM) system. The procedure referred was the Agricultural Reference Manual (ARM) Section 15 -Plant Protection. The IPM program among others includes LCC & nephrolepis establishment, beneficial plant planting, felling, chipping and deboiling of ganoderma and death palms.
managed using appropriate IPM techniques.	4.5.2	Training of those involved in IPM implementation demonstrated. Minor Compliance	YES	Records showed that training of those involved in IPM implementation was carried in both estates. At Imam Estate training related to IPM was conducted on 07/10/2016 and 14/03/2017 and at Table Estate training on 11/01/2017 and 12/01/2017.
C 4.6 Pesticides are used in ways that do not endanger health or the environment	4.6.1	Justification of all pesticides used demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance	YES	Written justification of all agrochemical use was justified in the Agricultural Reference Manual dated 1/7/2011 and in the Safety Pictorial Book prepared by the Sime Darby Plantation Sdn Bhd. The use of selective products that are specific to the targetted pest, weed or disease were demonstrated in the Agricultural Reference Manual.
	4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. Major Compliance	YES	All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II, III & IV pesticides. No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates.
	4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice.	YES	The CU is committed to minimise the usage of agrochemicals by implementing IPM with the increased in the planting of beneficial plants such as Tunera subulata, Cassia Cobanensis, Nephrolepis bisserata and Antigonon leptopus. Blanket spraying is not practiced by this CU and soft grasses were maintained in the field. It was also the practice that insecticides and rat baits were used only after a threshold level has been exceeded as per the Manual A.R.M and that no prophylactic use of such pesticides would be permitted.

4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in industry's Best Practice. The use of such pesticides shall be minimised and/or eliminated as part of a plan, and shall only be used in exceptional circumstances. 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). Minor Compliance		All pesticides used were those officially registered under the Pesticide Act 1974, The SOU Merotai had used only class II, III & IV pesticides. No illegal agrochemicals (stated by local and international laws) in particular paraquat were used or found. The estates were committed to reduce using chemicals and now have implemented and will continue to only spray Circles (Strip) and noxious weeds.
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Major Compliance	YES	Records showed that pesticides were handled used and applied only by trained personnel and as per the MSDS/CSDS of the pesticide. As mentioned under Indicator 4.6.1 both estates had in place SOPs for safe handling of pesticides. Appropriate safety and application equipment had been provided and used as per the recommendation of the CHRA. The personnel involved in the chemical handling such as the storekeepers, sprayers, fertilizer and rat bait workers were trained in chemical handling and they understood the hazards of the chemicals and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to them through the MSDS/CSDS training. It was also noted that MSDS/CSDS were available at all sites during the audit. All personnel involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issuance and replacement records were verified by the auditors. It was also observed that most of the workers in the fields were using an appropriate PPE.
4.6.6	Storage of all pesticides shall be as best practices. All pesticide containers shall be disposed of and not used for other purposes. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 Reg. Orders, Pesticides Act 1974 and Reg. Major Compliance	YES	Pesticides were stored in accordance with the legal requirement. The chemical stores in both estates were observed to comply with the Occupational Safety and Health Act 1994 (Act 514) as well as the Pesticides Act 1974 (Act 149) and Regulations. The stores were well secured and keys held by only the storekeeper and attendant. Record of purchase, storage and used had been properly maintained. All chemicals were segregated and fertilisers were well stacked. Both stores were ventilated and only authorised personnel were allowed to handle the chemicals. Relevant MSDS/SDS were available in the stores. Empty pesticides containers were triple rinsed, holes and punched, and had been stored separately in the scheduled waste store awaiting disposal

	4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.	YES	During the audit, it was noted that the CU had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. Paraquat was not used in the estate. The Safety Procedures for pesticides application were well described in Prosedur Kerja Selamat "Penyembur Racun Rumpai/Serangga". Aerial spraying was not practiced at all the estates within the CU. There was no evidence to show that it had been carried out in both Imam Estate and Table Estate
	4.6.9	Major Compliance Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide handling demonstrated or made available. Minor Compliance	YES	The employees such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. The training records were viewed during audit.
	4.6.10		YES	Field inspection and observation confirmed chemicals applied in accordance with the product safety precautions and workers of its risks. MSDS were made available at point of use e.g. at the workshop, store, and Estate water treatment plant. Domestic wastes and recycle wastes were segregated by the workers. Only organic wastes were throw at the landfill. Recycle material such as cans, glass bottle, plastic bottle and paper were sent to recycle area.
	4.6.11		YES	Annual medical surveillance for the CU done by a registered OHD was carried out for welding workers, sprayer operator, manure operator, gen set operator and medical surveillance for workers handling and exposed to chemical. Report indicated that all workers were fit to work under chemical exposure. Both estates and mill also used the same OHD as their VMO to conduct weekly health monitoring for their workers.
	4.6.12		YES	There was no evidence of pregnant women sprayers being used at the Imam Estate and Table Estate. This was further confirmed through interviews with workers. Monthly medical check-up for women sprayer was being carried out by Medical Assistant Table Group Hospital.
C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance	YES	Both Estates continued to adopt SDPSB Occupational Safety and Health Policy. The policy was also available in Bahasa and had been communicated to all employees through briefings and displayed on the estates notice boards. A safety and health plan for 2016/2017 had been implemented accordingly

cover the following:	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be	YES	Hazard identification, risk assessment and risk control and CHRA records covered activities in the estates and mill. The HIRARC register for both estates and POM were reviewed between Dec 2016 and Feb 2017 due to accident occur at EFB press conveyor (POM), at harvesting and transporting workers (Table). The revised activities and control measure the accidents were identified clearly in the update records.
		properly observed and applied to the workers. Major Compliance		
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially haz. op. such as pesticide application, machine operations & land preparation, harvesting and, if it is used, burning. Major Compliance	YES	Training and briefings on the operations were provided to all workers to educate them on safe working practices. Training for employees was conducted from time to time based on needs. The staff and workers such as the storekeepers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involve and how the chemicals should be used in a safe manner. All workers were provided with appropriate PPE and replaced when damaged. PPE issuance and replacements records were verified by the auditors. It was also observed that PPE was used by workers working in the fields in Table Estate. Records of training were maintained at the respective offices.
	4.7.4	The responsible persons identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare discussed at these meetings, and any issues raised shall be recorded. Major Compliance	YES	Merotai CU's Safety and Health Committee organization chart with appropriate representation of workers and management was established. The committee was chaired by the Estate/Mill Manager and the QA/AM as the secretary (for estate and mill, respectively). Quarterly Safety & Health Committee was meeting held and the following agendas were discussed; passing of previous minutes and arising matters, monthly accident statistics, Health & Safety Inspection Report and Training & Safety related activities. The Quarterly Safety and Health Committee minutes of meeting between May 2016 and March 2017 were verified.
	4.7.5	Accident and emergency proc. shall exist and instructions understood by all workers. Accident proc. available in the appropriate language of the workforce. Operatives trained in 1st Aid should be present in both field and other operations, and 1st aid eq. available at worksites. Records of all accidents kept and periodically reviewed. Minor Compliance	YES	The relevant SOPs and policy were available. The CU had the policies for Fire, Flood, Chemical spillage, Strikes and Emergency and Accident Response in both English and Bahasa. The policies were displayed at the offices, Muster Ground, workshop and dispensary. Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and displayed on notice boards. Telephone numbers of the Police Station, Fire Brigade, Immigration Department and Hospital were also included. The trained First Aiders included the field staffs such as mandores, office staffs, workshop operators and security personnel. This will enable the field staff and mandores to carry out the necessary responses in case emergency happen in the field. Records of first aid boxes checking and trainings were viewed.

	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	The CU provides medical care to the estate workers with Table group Hospital established within the premises. More serious cases are referred to Tawau Hospital which is about 30 km from the the CU sites. Group insurance for all foreign workers as required under the Workmen Compensation Act 1992 was available. Sighting of records and cross check with workers showed that they were covered with valid insurance policy. Furthermore, the local workers are covered by SOCSO.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	Merotai POM - Accident statistics were being maintained and reviewed during the quarterly 'Health and Safety' committee meeting. JKKP 8 (2016) was submitted to DOSH in Jan 2017. Accidents were properly recorded and it has been viewed by the auditor accordingly. Imam & Table Estate - Accident statistics were being maintained and reviewed during the quarterly 'Health and Safety' committee meeting. JKKP 8 (2016) was submitted to DOSH in Jan 2017. More than 30 accidents were recorded but only one case resulted in more than 4 days of M/C. Internal investigation was carried out accordingly and the corrective action proposed implemented.
C 4.8 All staff, workers, smallholders and contract workers are appropriately trained.	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. Major Compliance	YES	Formal training programmes for 2016/2017 were established in July 2016 for each sites. The programmes covered all aspects of the RSPO Principles and Criteria. The training programmes were established based on the training needs identified annually. A training needs identification matrix was established with target dates for the training to be conducted.
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	NO	The CU had trained their staff, workers and records of training were kept in the RSPO training file at each respective offices. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue. The following training records were verified i.e. Safety briefing for harvesters and pruners, Sprayer Training, Manurer Training, Fire Extinguisher, Emergency Response, First Aid, HCV Training, PPE Training, Chemical Handling Training, Schedule Waste Training, HIRADC, EAI and Waste Management Project (inter alia). However, it has been noted that the process of maintaining training records was found not effective. At Imam Estate, Harvesting and HCV Training were noted as done but the records of the training were not available for review. Therefore Minor NCR MZK 02 2017 was raised during the audit.

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

Clause	Indicators			Findings
C 5.1	5.1.1	An environmental impact	YES	The CU has established its environmental aspects/impacts register associated with their
Aspects of plantation		assessment (EIA) shall be		activities. The environmental aspect and impact (EAI) covers the upstream activities such as FFB
and mill		documented. Major Compliance		reception until the downstream processes. At the mill, the identification and evaluation of
management,				environmental impact was done for all activities and processes related to the mill operation.
including replanting,				Among the significant environmental impacts are the air pollution from the boiler emissions, water
that have				pollution from the generation of the palm oil mill effluent (POME) and land contamination which

environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible persons.	YES	related to the management of scheduled wastes and domestic waste. For the estate operation, all activities from harvesting, nursery, pest and disease, upkeep programme until delivery to mill has been identified. The CU maintained its documented environmental impact assessment. The information of environmental impact assessment contained in the Environmental Aspect Identification and Environmental Impact Evaluation register. The documents included the identification and evaluation of environmental aspects covering mill and plantation operation, including replanting. Relevant environmental aspects and impacts (particularly potential soil erosion from land clearing) were identified and mitigated (planting LCC to prevent erosion). At the Merotai POM, sighted 'Pollution Prevention plan' i.e.no black smoke emission and ensure final effluent discharge within the stipulated limit was developed and implemented.
	5.1.3	Minor Compliance This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. Minor Compliance	YES	Mitigation measures to manage the significant environmental impact were defined in the mill "Pollution Prevention Plan" and "Environmental Management Programme" for the estates. The following were reviewed; water source contamination, minimizing of soil erosion, agricultural land, degradation of agricultural land, chemical reduction. Records of periodical reporting of each of the above items were evident. These were the evidence which showed that the plans been monitored. The plans were reviewed annually.
C 5.2 The status of rare, threatened or endangered species other High Conservation Value habitats, if any, that	5.2.1	Information shall be collated in a HCV assessment that includes both the planted area itself and relevant wider landscape-level considerations. Major Compliance	YES	The report of "HCV Re-Assessment for Strategic Operating Unit (SOU) Sabah Central – South Zone" prepared by the PSQM Department was available to the audit team. The report was completed in January 2014 had covered all the HCV within and adjacent to the CU. The HCV assessment had identified 4 potential HCV in the Merotai CU: natural pond and remnant forest patch ("Bukit Tiger"), natural pond (Merotai Estate) and Water Catchment (Table Estate) respectively. The CU has also identified a one big tree name Menggaris (<i>Koompassia Excelsia</i>) as a HCV area within the Table Estate.
exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.	5.2.2	Where RTE species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance There shall be a programme to	YES	There were no RTE observed to be present in the CU. The CU had a regular programmes to educate its employees pertaining to the protection of the RTE as well as the protection of buffer zone. The CU has regularly educate its employees via morning muster briefing about the need to

		regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. Minor Compliance		protect the RTE species. Appropriate disciplinary measures will be taken if found violated. Information pertaining RTE and relevant CU policies were displayed at the morning muster station. However, at Table and Imam Estate, training records for workers were not available during the audit. Therefore, Minor NCR was raised. Cross refer Minor NCR at indicator 4.8.2
	5.2.4	Where an action plan has been created there shall be ongoing monitoring: The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; Outcomes of monitoring shall be fed back into the action plan. Minor Compliance	YES	The CU had continued to monitor its HCV areas and presence of RTE. During the field audit, there was no presence of RTE in the areas found and the monitoring records also confirmed that no significant outcomes detected.
	5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. Minor Compliance	NA	There was no local communities living nearby with the CU. It was confirmed via map and GPS system So, this indicator was not applicable with this CU.
C 5.3 Waste is reduced, recycled, re-used and	5.3.1	All waste products and sources of pollution shall be identified and documented. Major Compliance	YES	All waste products and sources of pollution within the CU were identified and documented. The Pollution Prevention plans were then established to mitigate the identified waste products and waste management action plans was updated and viewed accordingly.
disposed of in an environmentally and socially responsible manner.	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	NO	The CU follows the recommendation by the Agriculture Department to rinse the chemical containers using the triple rinsing techniques. At Merotai CU, all the rinsed containers were pierced and stored prior disposing as scheduled wastes to the approved contractors. However, during the site visit, it was observed that there were lapses in the implementation of labelling, recording and storing of scheduled wastes at the Imam Estate (Andrassy Division). Major NCR RAR 02-2017 had been raised to address this issue.
	5.3.3	A waste mgmt and disposal plan to avoid or reduce pollution shall be doc. and implemented. Minor Compliance	YES	It has been confirmed that Merotai POM, Table & Imam estates has had the waste management and disposal plan and the implementation of the plan is evident.

C 5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.	5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. Minor Compliance	YES	Merotai CU has fossil fuel reduction plan. It has been monitored accordingly by respective mill and estates.
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the	5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Major Compliance	YES	SDPSB has a policy of no open burning. As advocated, both estates practiced zero burning. In replants area 2016 visited during the surveillance in both estates, it was evident that all palms were felled, shredded, windrowed and left to decompose
ASEAN guidelines or other regional best practice	5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Minor Compliance	YES	SDPSB has a policy on no open burning. Both estates practiced zero burning.
C 5.6 Preamble Growers and millers commit to reporting on operational GHG emissions. However, these significant emissions cannot be monitored or measured accurately with current knowledge and meth. It is also recognised that it is	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent.	YES	The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records covers upstream activities such as FFB reception until downstream processes. Identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the significant environmental aspects are the boiler stack emission, palm oil mill effluent (POME) discharge and land contamination which related to managing the scheduled waste and also general waste. For the estate operation, all activities from harvesting, pest and disease, upkeep programme until delivery to mill has been identified. The mill had conducted boiler stack sampling twice a year for each of the boiler stack. The audit team has verified the condition of the Continuous Emission Monitoring System at Merotai POM. The system was found to be in good condition. Effluent discharge was monitored monthly and submitted to DOE on quarterly basis. It can be confirmed that all parameters were within that stipulated in the requirement. The mill had obtained DOE approval for land irrigation. It was confirmed that the BOD results were between their legal requirement.
not always feasible or practical to reduce or minimise these emissions.	5.6.2	Significant pollutants and GHG emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	The CU had identified significant GHG (methane) emission from their effluent pond. Plan to minimise the emission was carried out through the establishment of the biogas plant. The plant is currently at the commissioning stage.
Growers and millers commit to an implementation at end of Dec 2016 for	5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from	YES	Merotai CU had used RSPO PalmGHG version 3.01 calculator as a tools to calculate the GHG emission. Sighted report send to RSPO on April 2017. The record pertaining for this calculation were kept for ease retrieval and made available at the Merotai POM and both estate during assessment.

promoting best	estate and mill operations, using	
practices in reporting	appropriate tools.	
to the RSPO, and	Minor Compliance	
thereafter to public		
reporting. Growers		
and millers make this		
commitment with the		
support of all other		
stakeholder groups of		
the RSPO.		
Plans to reduce		
pollution and		
emissions, including		
GHG, are developed,		
implemented and		
monitored.		

Principle 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES BY GROWERS AND MILLERS

Clause		Indicators	Comply Yes/No	Findings
C 6.1 Aspects of plantation and mill management that have social impacts, including	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	YES	The Social Impact Assessment (SIA) for SOU 30 Merotai was carried out in Sept 2013. The SIA covered Merotai Palm Oil Mill, Merotai Estate, Imam Estate, Table Estate and Tiger Estate. The SIA Report was entitled "Social Impact Assessment (SIA), SOU 30 Merotai". Records of meetings were documented and made available during the audit. Among the stakeholders who attended were workers, staff, workers' union, suppliers, contractors, and teachers.
replanting, are identified in a participatory way, and plans to mitigate the	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	Based on the records available, there is evidence that the assessment was done with the participation of affected parties, whose attendance was documented and sighted during the audit.
negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, incl. responsibilities for implementation. Major Compliance	YES	Each unit within the CU mitigates negative impacts and promote positive ones by calling for meetings with their respective stakeholders. Meetings with the stakeholder included the Gender Committee meetings, OSH meetings and external stakeholders meetings. Based on minutes of the meetings, the issues raised were discussed and documented. These issues were subsequently incorporated into the SIA Action Plan for each unit.
	6.1.4	The plans shall be reviewed as a	NO	At the Merotai Palm Oil Mill, Table Estate and Imam Estate, the Action Plans were being updated
		minimum once every two years		every year, or sooner, such as when issues arise.

		and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance		For both Table and Imam Estates, their SIA Action Plans updated in April 2017. Noted that some issues raised by the stakeholders not incorporated in the Action Plan, sample as follows: - At Table Estate: One issue raised was not incorporated in the SIA Action Plan dated 10 April 2017, namely: - Request for repair of rain shelter (OSH Meeting dated 24 March 2017) - At Imam Estate: 3 issues raised were not captured in the SIA Action Plan dated 3 January 2017, namely: - Broken/damaged rubbish bins at linesite (OSH Meeting 23 December 2016) - Request for fire extinguishers at some workers' houses at Desa Sri Bombalai (OSH Meeting 23 December 2016) - request for whistle for female workers working in estate (Gender Committee meeting 6 October 2016) Due to the non-incorporation of the issues into the Action Plans as mentioned above, a Minor NCR RZ 01 2017 was raised.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	NA	There is no smallholder schemes in the CU.
C 6.2 There are open and transparent methods	6.2.1	Consultation and communication procedures documented. Major Compliance	YES	Consultation and communications procedures for Merotai CU was documented in the Standard Operating Manual entitled "Procedure for External Communications". This document was sighted during the audit of the Merotai Palm Oil Mill, Table Estate and Imam Estate.
for communication and consultation between growers and/or millers, local	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	Nominations of management official responsible for these issues were carried out via letters of appointment. Each appointment was for one year. The job scope of the appointees state that among other things that they are to investigate complaints, counsel and advice on social issues, assist in carrying out programms or trainings on social issues.
communities and other affected or interested parties	6.2.3	A list of stakeholders, records of all communication, incl. confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance	YES	The updated lists of stakeholders for Merotai Palm Oil Mill, Table Estate and Imam Estate were available and sighted during the audit. The lists updated as and when there are changes. Communication is evident.
C 6.3 There is a mutually agreed and doc. system for dealing with complaints and grievances, which is	6.3.1	The system, open to affected parties, resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistle-blowers. Major Compliance	YES	The system is available. Records viz. Grievance Logbook, House Defect Book, Complaints Book, were maintained and verified accordingly. The anonymity of complainants and whistleblowers upheld. The Sime Darby Code of Business Conduct provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ.
implemented and accepted by all affected parties.	6.3.2	Doc. of a dispute was resolved and outcome is available. Major Compliance	YES	There is documentary evidence that disputes are being resolved and the outcome made available. It has been reviewed accordingly.

0.04	C 4 4	A managed up for the stiff the start of	VEO	The procedure for identifying level questioners, as well as a second sec
C 6.4	6.4.1	A procedure for identifying legal,	YES	The procedure for identifying legal, customary or user rights, and compensation process is
Any negotiations		customary or user rights, and a		incorporated in the Sustainable Plantation Management System, stipulates that workers issues
concerning		procedure for identifying people		will be handled by Employee Relations, and the land issues by the Land Management
compensation for loss		entitled to compensation, shall		Department, at Head Office. Both procedures specify the negotiation procedures, calculation and
of legal, customary or		be in place. Major Compliance		distribution of compensation to affected parties.
user rights are dealt	6.4.2	A procedure for calculating and	YES	In accordance with the Procedures for Handling Boundaries Disputes (see 6.4.1 above), the
with through a		distributing fair compensation		procedure for calculating and distributing fair compensation falls within the purview of the Land
documented system		shall be established and		Management Department of at the Sime Darby Head Office. The procedure stipulates for
that enables		implemented, monitored and		negotiation procedures to involve the respective estate management, Land Office, NGOs and the
indigenous peoples,		evaluated in a participatory way,		affected parties.
local communities		and corrective actions taken as a		
and other		result of this evaluation.		
stakeholders to		This procedure shall take into		
express their views		account: gender differences in		
through their own		the power to claim rights,		
representative		ownership and access to land;		
institutions.		differences of transmigrants and		
		long-established communities;		
		and differences in ethnic groups'		
		proof of legal versus communal		
		ownership of land.		
		Minor Compliance		
	6.4.3	The process and outcome of any	YES	As of the date of the audit, no case of negotiation and payment of compensation has been carried
	00	negotiated agreements and	0	out for verification.
		compensation claims shall be		
		documented, with evidence of		
		the participation of affected		
		parties, and made publicly		
		available. Major Compliance		
C 6.5	6.5.1	Documentation of pay and	YES	For the Merotai Palm Oil Mill, Table Estate and Imam Estate, documentation of pay is in the form
Pay and conditions	3.0.1	conditions shall be available.	0	of monthly pay slips. Conditions of pay are contained in the workers' respective employment
for employees and for		Major Compliance		contracts. Each pay slip documents the name of employee, month of pay, income, deductions,
contract workers		Major Compilarios		net salary, annual leave and medical leave taken.
always meet at least	6.5.2	Labour laws, union or direct	YES	Contracts for local and Indonesian foreign workers at the Merotai Palm Oil Mill, Table Estate and
legal or industry	0.0.2	contracts of employment	120	Imam Estate were sampled and confirmed that all workers and the management signed a dated
minimum standards		detailing payments and		contract of employment. The terms and conditions of employment are contained in the
and are sufficient to		employment shall be available in		employment contracts and include duration of employment, place of work, salary, working hours,
provide decent living		the languages understood by the		medical benefits, annual leave, sick leave, termination of service, and other benefits provided.
wages		workers or explained carefully to		inculcul benefits, annual leave, sick leave, termination of service, and other benefits provided.
wages		them by a management official.		
		Major Compliance		
	6.5.3	Growers and millers shall	NO	Adequate housing is provided by the Merotai Oil Palm Mill, Table estate and Imam Estate. Site
	0.3.3	Growers and millers shall	NO	Auequate nousing is provided by the Merotal Oil Faith Mill, Table estate and Infam Estate. Site

		provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, 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. Minor Compliance		visits were carried out at the workers' housing. All houses have constant water supply and electricity which are provided free of charge. The houses were all in good conditions. Among the facilities provided are creche, pre-school, clinic where medical treatment and facilities are provided for free, sundry shops selling daily necessities such as rice, flour, sugar, cooking oil, etc. The workers' housing areas also have a mosque, a church, a community hall, a football field, and badminton/volleyball court. Workers interviewed confirmed that the houses and amenities provided are adequate, comfortable and requests for repairs were attended to in a timely manner. However, at the housing facilities for Imam Estate and Table Estate, domestic refuse is collected and disposed of only once a week instead of daily basis. And at Imam Estate, workers' housing inspection in 2017 was carried out on 1-2 February 2017 only. No other inspection records were available. For these reasons, a Major NCR RZ 02 2017 was raised.
	6.5.4	Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food. Minor Compliance	YES	Workers' access to adequate, sufficient and affordable food is via sundry shops available near the workers' housing. Among the items sold include sugar, rice, flour, cooking oil, eggs, detergent and other daily necessities. No perishable items (such as vegetables, fish, meat) are sold at the sundry shops, but the estate allows external third party vendors to enter the estate premises to sell perishable items. Prices at the sundry shops are labelled. Interview with the Senior Assistant at Imam Estate reveal that spot check were carried out to ensure process are displayed, and that prices are competitive.
C 6.6 The employer respects the rights of all personnel to join trade unions and to bargain collectively.	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	YES	Recognition of freedom of association is available in the Sime Darby Plantation Social Policy dated January 2015. The policy states that the company respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. This Social Policy is applicable throughout all operating units and is printed and translated in Bahasa Malaysia and exhibited on notice boards.
Where the right to freedom of assoc. & collective bargaining are restricted under law, the employer facilitates the independent free assoc. and bargaining for all such personnel.	6.6.2	Minutes of meetings with main trade unions or workers representatives documented. Minor Compliance	YES	The Sabah Plantation Industrial Employee Union (SPIEU) is the union that represents workers of Merotai Palm Oil Mill, Table Estate and Imam Estate. The minutes of meeting between SPIEU members and employers sighted during the audit. Union membership is open to both local and foreign workers. Other meetings where worker representatives are present in meeting with mill and estate management are the OSH and Gender Committee meetings. All these meetings were documented.
C 6.7 Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met. Major Compliance	YES	The policy on non-employment of children is contained in the Sime Darby Social Policy dated January 2015. There was no evidence that the mill and estates employed anyone below the age of 18 years as verified in the Master Lists, or list of workers. Interviews with workers and staffs, as well as observations made during field visits show that those employed were above 18 years.
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability,	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance	YES	The equal opportunities policy is contained within the Sime Darby Social Policy dated January 2015. The policy states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was exhibited on notice boards in both Bahasa Malaysia and English.

gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance	YES	Apart from the Social Policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. Payment of wages/salaries, provision of housing and access to benefits and amenities is fair based on observation, review of pay checks, contracts of employment, and interviews of staff, local and foreign workers.
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance	YES	Based on interview with management at the Merotai Palm Oil Mill, Table Estate and Imam Estate, as well as sighting of job application forms, medical reports, and job interview notes, there was evidence that hiring selection were based on job vacancies, skills, suitability to the job, capabilities and medical fitness. Recruitments of workers were made based on vacancy, and the job availability is usually made verbally during weekly muster briefing, job advertisement placed near the security post and notice board. The interviews are conducted by Manager or Assistant Manager where an evaluation form is filled up to determine the suitability of the candidate. This form was sighted during the audit. The recruitment process (advertisement and interview) of staff is coordinated at the regional office, who would then recommend to HQ for approval.
C 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The policy to prevent sexual and other forms of violence is contained in the Sime Darby Social Policy dated January 2015. This policy is implemented and communicated to all levels of workforce. Training records were evident.
	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The policy to protect reproductive rights of women is contained in the Sime Darby Plantation Gender Policy. In addition, Gender Committees have been established at in the Merotai Palm Oil Mill, Table Estate and Imam Estate to implement and monitor the policy. The Gender Committee meetings are used as an avenue to disseminate information to its members regarding reproductive rights. This was further confirmed during interviews held with female workers which showed their understanding of their reproductive rights.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, communicated to all levels of the workforce. Minor Compliance	YES	A grievance mechanism which respects anonymity and protects complaints is in place at Merotai CU, as per the Sime Darby Gender Committee Handbook 1st Edition 2014. Employees are aware of the avenue and mechanism for lodging a complaint. This was communicated to all staff during muster briefings and training.
C 6.10 Growers and millers deal fairly and	6.10.1	Current and past prices paid for FFB shall be publicly available. Minor Compliance	YES	Current and past prices paid for FFB were displayed at the weighbridge.
transparently with smallholders and other local businesses.	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB	YES	The mill publicly displayed FFB pricing mechanism at the notice board (see 6.10.1 above). Smallholders who were mainly from the surrounding local community will refer to the notice board for the FFB price. Based on interview conducted with two smallholders, and they confirm that they understood the pricing of FFB carried out by the Mill.

		inputs/services shall be doc. Major Compliance		
	6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Minor Compliance	YES	Interviews were conducted with the transport suppliers with businesses provided for more than 5 years. They confirmed that the prices, the transactions entered with the mill and estates are fair and transparent.
	6.10.4	Agreed payments made in timely manner. Minor Compliance	YES	All the contractors interviewed confirm that all agreed payments were made in a satisfactory and timely manner, i.e. from between less than 1 month to 2 months.
C 6.11 Growers and millers contribute to local Sustainable development where	6.11.1	Contributions to local development that based on the results of consultation with local communities demonstrated. Minor Compliance	YES	Based on records, interviews and site verification, contributions to local development were made accordingly and some were based on the requests from the local communities.
appropriate.	6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance	YES	There was no smallholder scheme in the CU.
C 6.12 No forms of forced or trafficked labour are used.	6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. Major Compliance	YES	Based on interview with workers and review of the employment contracts, records of wages, overtime payment, and rest day payments, there was no evidence of any forms of forced or trafficked labour within audited sites. Further, Sime Darby Plantation Sdn Bhd also adopts the Social and Humanity Management Policy dated January 2015 which committed to safeguarding operations from employing forced labour.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	Based on interviews with foreign workers, all of them were aware of the types of work they would be doing before they arrived in Malaysia. The actual job undertaken was the same as what they were informed about while they were still in their home country in Indonesia. No contract substitution has therefore occurred.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	YES	The Merotai CU adopts the Social Policy dated January 2015. Based on observations and interviews of foreign workers, there was no evidence of contract substitution and no discriminatory practices against foreign workers. A post-arrival briefing was provided, in particular on the contents of their employment contracts. Foreign workers were accorded with the same living standards and accommodations as local workers.
C 6.13 Growers and millers respect human rights	6.13.1	A policy to respect human rights documented and communicated to all levels of the workforce and op. Major Compliance	YES	The policy to respect human rights are documented in the Sime Darby Plantation's Social and Humanity Management Policy. This Policy states among others, that it will develop its businesses with a sense of humanity, ensuring that they are socially beneficial and do not infringe on basic human rights. This Policy was displayed on notice boards of the mill and the estates.
	6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend	YES	According to their ages, the children of foreign workers at CU attend either the Humana school, or the Community Learning Centre, both of which are located at Imam Estate. The buildings were maintained by the Imam Estate, as well as costs of water and electricity. Teachers'

government school, the	accommodation are provided by Imam Estate.
plantation companies should	
engage in a process to secure	
these children access to	
education as a moral obligation.	
Minor Compliance	

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

SOU Merotai has no plan for any new planting and no new development of area was observed during the visit. Auditors has verified through www.globalforestwatch.com, GOOGLE Maps Data, Estate Maps and also through site visit that SOU Merotai has no new planting and no new development of area was observed. Thus, Principle 7 is not applicable.

Principle 8: COMMITMENT TO CONTINUOUS IMPROVEMENT IN KEY AREAS OF ACTIVITY

Clause		Indicators	Comply Yes/No	Findings
C 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.	8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to: Major Compliance		
	a)	Reduction in use of pesticides(Criterion 4.6);	YES	Merotai CU is committed to minimise the usage of agrochemicals by implementing IPM with the increased in the planting of beneficial plants such as Tunera subulata, Cassia cobanensis, Nephrolepis bisserata and Antigonon leptopus. Blanket spraying was also not practiced by this CU. Soft grasses were maintained in the field. It had also been the practice that insecticides and rat baits were used only after a threshold level has been exceeded as per the Manual A.R.M and that no prophylactic use of such pesticides would be permitted. During the visit it was observed a number of Beneficial Plants had been planted and both estates had plants ready for planting in the nurseries. During field visit in Imam Estate (Andrassy Division) the auditors witnessed planting of Tunera Subulata which was on going and for Table estate (Main Division) sighted that Antigonan leptopus and Tunera subulata has been planted at nursery and ready to plant at the estate.
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	The CU maintained to improve continually its environmental management. Environmental action plans continued reviewed and implemented. Among the improvements contained in documented:

			(a) Pollution Prevention Plan – FY2016/17. (b) Identification and Management of Wastewater – FY2016/17. (c) Environmental Improvement Plan - FY2016/17.
(c)	Waste reduction (Criterion 5.3);	YES	The CU maintained to reduce continually its waste generation. Waste Management Plans (FY2016/17) were updated annually.
d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	Pollution Identification Environmental improvement action plan' was used to identify the waste products and sources of pollution. Greenhouse gas and its potential sources were identified using the 'Carbon Inventory Calculation Methodology' and reported in the sustainability report.
e)	Social impacts (Criterion 6.1);	YES	Social impacts were constantly updated based on inputs received from stakeholder consultations/meetings. This was evidenced through the minutes of the meetings, and the updated Action Plans. These stakeholder meetings include Gender Committee meetings, OSH meetings and meetings with external stakeholders.
f)	Encourage optimising the yield of the supply base	YES	In order to optimise yields both estates were committed to implement best agricultural practices, inclusive of timely and proper fertiliser application; Improve on accessibility to maximise crop evacuation and expand in field mechanised collection of FFB. Water bodies and water conservation pits were constructed to conserve moisture.

Attachment 4

Details of Non-conformities and Corrective Actions Taken for RSPO P&C MYNI 2014

P & C Indicator	Specificatio n <i>Major/Minor</i>	Detail Non-conformances	Corrective Action Taken by the CU and Verification by Auditors
Indicator 2.1.3	Minor	#NCR No: MZK 01 2017 Finding: Mechanism for ensuring compliance was not effective at Merotai CU Objective evidence: - Water Analysis at Sungai Merotai Kecil was monitored and submitted to DOE on monthly basis. However, occasionally (i.e. during February & March 2017), the COD exceeded the limits of 25 mg/l and there were no remarks noted in the form. Noted that the results of the effluent quality were incompliance with the regulatory limit. - During site visit at the POM, there was evidence of boiler ash flowing to the drain. No control measure by the Management of Merotai POM. - Sighted during site visit at Imam Estate (Andrassy Division) water at Emergency Shower Sump was not Re-use back, also sighted the trace of Mosquito larvae in the Sump. - Sighted also the chemical tray at Chemical store in Imam Estate (Andrassy Division) was not enough.	Corrective Action: 1. Mill management will verify the analysis form and to ensure remarks to be added in the water analysis form before submit to DOE. 2. Mill management to request budget for construction of drainage at boiler ash area. 3. Estate and mill management will establish monitoring of the related work station. To include work station below in the Workplace Inspection: - Boiler (Merotai POM) — to ensure no overflowing of boiler ash to the monsoon drain. - Premix Area — to ensure Re -use of water for emergency shower sump. - Chemical store — to ensure adequacy of chemical tray at chemical store. Auditor Verification: Corrective action plan accepted Status: Open The effectiveness of the corrective action plan will be verified during next audit
Indicator 4.4.2	Major	#NCR No: RAR01-2017 Finding: Noncompliance against the requirement Indicator 4.4.2- Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated Objective evidence: During site visit at Merotai POM the following were found: traces of spraying activities along the monsoon drain. boiler chemical (soda ash) in chemical mixer tank at boiler no 2 was leaking to the monsoon drain. water from emergency shower was directed into a field drain instead of a sump.	Corrective Action: Training to all level of workers regarding on protection of water course/buffer zone will be conducted for Merotai POM. To construct bund and sump to trap any chemical leakage. To review SOP on emergency shower so that it only being used during emergency and not for body washing or hard cleaning. Thus, the chemical escape is very minimal and insignificant to have impact on water course. Auditor Verification: Auditor has received training record titled as Spraying & HCV Training dated 24/5/2017 for all spraying workers. Auditor has received a copy of the warning letter from Sime Darby to sprayer contractor, where the contract stated it should only grass cut the weeds nearing monsoon drain. Auditor has received a photo which indicated a bund and sump has been constructed at chemical mixer tank at boiler no 2 to trap any chemical leakage Auditor has received a photo which indicated a bund and sump has

			been constructed at the emergency shower.
			Status: Closed.
Indicator	Minor	#NCR No : MZK 02 2017	Corrective Action:
4.8.2	WIIITOI	Finding:	Estate management will verify each training records and ensure the records of
4.0.2		The process of maintaining training records found not effective.	HCV and training will be properly recorded in the training records file.
		Objective evidence:	Auditor Verification:
		At Imam Estate, although Harvesting Training and HCV Training were	Corrective action plan accepted
		stated to be carried out, however the records of the training were not	Status: Open. The effectiveness of the corrective action plan will be verified
		available.	during next audit
Indicator	Major	#NCR No : RAR02-2017	Corrective Action:
5.3.2	Major	Finding:	Training on scheduled waste management for SOU 30 Merotai will be
0.0.2		There were evidences that Merotai Certification Unit has not complied	conducted by SQM.
		with Environmental Quality (Scheduled Wastes) Regulations 2005	Schedule for PIC to monitor scheduled waste management at Andrassy
		Objective evidence:	Division will be established.
		Lapses in the implementation of labelling, recording and storing of	3. Scheduled waste at Imam Estate (Main Div. and Andrassy Div.) will be
		scheduled wastes were found at the Imam Estate (Andrassy Division)	disposed by DOE licensed contractor.
			4. To properly store scheduled waste and maintain inventory as per EQA
			(scheduled waste) Reg. 2005
			Auditor Verification:
			Auditor has received evidence of training, Consignment note, Labelling and
			monitoring form.
			Status: Closed .
Indicator	Minor	#NCR No : RZ 01 2017	Corrective Action:
6.1.4		Finding:	1. Estate Management will verify the minutes of meeting conducted in the
		(a) Table Estate: Issues raised at OSH meeting were not captured	estate. During the verification of minutes of meeting, estate management will
		in the Management Plan on Social Impact Assessment FY	identify and ensure social issue raised in each meeting will be included in the
		2016/2017 which was updated in 10 April 2017.	social action plan.
		(b) Imam Estate: Some issues raised by stakeholders at OSH	2. The SIA action plan will be updated when necessary (if there any related
		Meeting and Gender Committee Meeting were not captured in the Management Plan for Social Impact Assessment on 3 Jan	social issues raised in the meetings conducted in the estate which require further action by the estate management).
		2017.	Auditor Verification:
		Objective evidence:	Corrective action plan accepted
		- Table Estate: Issue raised, namely:	Status: Open
		a. Request for repair of rain shelter (OSH Meeting 24	The effectiveness of the corrective action plan will be verified during next audit
		March 2017) was not updated in the Management	The encouverious of the software action plan will be verified during next addit
		Plan on Social Impact Assessment FY 2016/2017	
		which was updated on 10 April 2017.	
		- Imam Estate: Three issues raised, namely:	
		b. broken/damaged rubbish bins at linesite (OSH	
		Meeting 23 December 2016)	
		c. request for fire extinguishers at some workers'	
		houses at Desa Sri Bombalai (OSH Meeting 23	

		December 2016) d. request for whistle for female workers working in estate (Gender Committee meeting 6 October 2016) were not updated in the Management Plan on Social Impact Assessment FY 2016/2017 which was updated on 3 January 2017. e. Action of implementation yet to evidence with regards to complaint of travelling expenses incurred by foreign employees in Mill for renewal of their passport.	
Indicator	Major	#NCR No : RZ 02 2017	Corrective Action:
6.5.3	(Recurrence)	Finding: a) Non-compliance with Section 23(1)(c) of the Workers' Minimum Standards of Housing & Amenities Act 1990 b) Non-compliance with Section 23(2) of the Workers' Minimum Standards of Housing & Amenities Act 1990 Objective evidence: a) At Table Estate and Imam Estate, domestic refuse at workers' housing is collected once a week, and not daily. b) For Imam Estate workers' housing inspection in 2017 was carried out on 1 February 2017 (Desa Seri Mawar), and on 2 February 2017 (Kg Pertama Bombalai). No other record of housing inspection was done subsequent to those dates. c) For Table Estate last Housing Inspection was carried out on 1- 2 February 2017.	 Each Estate will appoint their own PIC for Workers Housing Inspection. Estate Management will verify the workers housing inspection records to make sure done weekly as per legal requirement. Domestic Refuse at workers housing will be collected 3 times in a week at Table Estate and Imam Est ate. Records of domestic refuse collection at workers housing will be establish and verify by the estate management. Auditor Verification: Auditor has received evidence of weekly inspection of the housing and also evidence of appointment letter for PIC to conduct the Workers Housing Inspection. Auditor also receive a schedule for collection of domestic wastes at the estate. Status: Closed

Attachment 5

RSPO Supply Chain at the Merotai POM - Mass Balance Model - Module E

Item				Findings
No	Requirement NOV 2014			Standard Nov 2014
E.1	Defination	Actual (April 2016 – Ma	arch 2017)	Otalidala 1107 2017
E.1.1	To verify: a) the volume of certified and uncertified FFB entering the mill b) the volume sales of RSPO certified	a) FFB Received RSPO	223,837.40	<u>MT</u> 296, 433.68
	The claim only the volume of oil palm products produced from processing of the certified FFB as MB	Non-RSPO FFB Processed RSPO	72,596.28	296, 433.68
	processing of the sertifical FFD as MD	Non-RSPO CPO Production PK Production	72,596.28	66,966.08 12,645.76
		b) Delivery of CPO	0	66,966.08
		RSPO(MB) Non-RSPO Delivery of PK RSPO (MB)	66,966.08 0	12,645.76
		Non-RSPO	12,645.76	
E 2 E2.1	Explanation Estimate total tonnage of CPO and PK potentially produce in a year	Projection (April 2017 (1) FFB Received RSPO Non-RSPO	- March 2018) 242,353.75 95,000.00	<u>MT</u> 337,353.75
		(2) FFB Processed RSPO Non-RSPO	242,353.75 95,000.00	337,353.75
		(3) CPO Production		78,434.75
		(4) PK Production		16,867.69
		(5) Delivery of CPO RSPO(MB) Non-RSPO	56,347.52 22,087.23	78,434.75
		(6) Delivery of PK RSPO (MB) Non-RSPO	12,117.75 4,749.94	16,867.69

E. 2 E 2.2	Explanation The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organiztion (RSPO IT platform or book and claim.	Merotai POM has registered RSPO e-Trace. The member ID is RSPO_PO1000000064
E 3 E 3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements in these requirements b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the facilities procedures for the implementation of this standard.	 a) Merotai POM had revised their documented procedure title 'Standard operating procedure (SOP) for Sustainable Supply Chain and Traceability', version 2, dated Oct 2016. The procedure described the following: Clause 4.0 ~ the responsibility of for the implementation of RSPO SCC i.e. head of operating unit Clause 5.0 ~ Control of document & records such as weighbridge tickets, consignment note, training record & contracts. Record retention for 10 years. Define the critical control point (CCP): estate — weighbridge, mill — weighbridge, admin office, ramp, CPO dispatch area, CPO storage tank. Kernel silos. Clause 6.0 ~ Delivery of FFB from the estate — relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB Clause 7.0 ~ Receiving FFB at the mill — list of supply base, rules for determining diverted FFB destination, relevant record Clause 8.0 ~ process monitoring — for IP model mill need to ensure no mixing of RSPO certified and non-certified Clause 9.0 ~ CPO and PK dispatch — [Clause 9.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading & Marketing (GTM) department. [Clause 9.2] Outgoing document for CPO and PK 9e.g. contract, weighbridge ticket / dispatch note) shall specify the following information which can be either presented in single document or across a range of document Trade name / RSPO IP, RSPO certificate no. : RSPO 0027, Clause 10.0 ~ Non-conforming material / product — requirement to downgrade the RSPO Product Clause 11.0 ~ product claim — shall follow RSPO rules on market communication & claim Clause 12.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of transporter for CPO and PK. Clause 13.0 ~ Training — the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP). Clause 15.0 ~ Production volu

E.4 E.4.1	The facility shall have documented procedures for receiving and processing certified and non-certified FFBs. Purchasing and goods in The site shall verify and document the volumes of certified and non-certified FFBs received.	Merotai POM has implemented Clause 7.0 – Receiving FFB at the mill of Sime Darby Plantation, Plantation Quality Management System, "Standard operating procedure (SOP) for Sustainable Supply Chain and Traceability" dated Oct 2016 for receiving and processing certified and non-certified FFBs. All certified FFB came from Merotai CU estates and non-certified FFB come from independent FFB suppliers. All delivery documents of certified FFB were verified to ensure the certified status of the FFB. Volumes of certified and non-certified FFBs received by the mill had been properly recorded and monitored. All purchasing and sales activities to the refinery were handled by Global Trading Marketing (HQ). Merotai POM has received 223,837.40MT of RSPO FFB from own estates for their processing activities.
E 4.2	The site shall inform the CB immediately if there is a projected overproduction.	There was no overproduction of certified CSPO during the period under review (April 2016 – March 2017).
E.5 E.5.1	 Record keeping a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The site can only deliver Mass Balance sales from a positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short (i.e. product can be sold before it is in stock) 	 a) Merotai POM continued to keep record and balances all receipts of RSPO-certified FFBs and deliveries of RSPO-certified CPO and PK on a three-monthly basis in the table 'Production Data FY 16/17'. b) Accounting records were found to be tally – based on "'Production Data FY 16/17'". For the period April 2016 – March 2017. No trade of RSPO-certified (MB) CPO and 0 MT of RSPO-certified (MB) PK has been made by the Merotai POM. The POM only trade as non-certified product only. c) The Production Data FY 16/17 – Merotai POM indicated both positive balances for the certified CPO and palm kernel.
E 5.2	In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.	Not applicable – no out sources activity.

Attachment 6

Status of Non-conformities Previously Identified

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
Indicator: 8.1.1	Major	NCR #: HO 01 8.1.1: The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to: (b) environmental impacts. Finding: 1. Improvement action plan to resolve occurrence of black smoke emission exceeded limit not yet effectively implemented. 2. No evident of improvement action plan been established and implemented concerning few effluent and natural waterways analysis results out of specification. 3. Pollution control not effectively implemented. Objective evidence: 1. Recurrence of black smoke emission exceeded limit still observed (e.g. refer 2015 monitoring report of month of Mac 2016, November, August and March 2015). Until now, the target to ensure continuous run of 2 boilers and 2 turbines for resolving the black smoke issue yet to achieve. 2. No evident of action plans for continual improvement been established and implemented in Merotai POM concerning few effluent and natural waterways analysis results out of specification. E.g.: Effluent Final Discharge & Natural Waterways. 3. Oil trap not effectively constructed and soil pollution observed outside the trap behind the temporary scheduled wastes store at Merotai POM	CU's response: The actions taken and outlined improvement programmes accepted. Improved result and effective implementation shall be verified in the next audit. 1. Black smoke –actions plan: (a) reduce boiler load - operation of 2 boiler if only enough fuel and water, and both not under maintenance genset to use if load increase to add 1 unit biogas engine. (b) ensure good working condition yearly overhaul & inspection yearly maintenance & servicing of multicyclone dust trap system boiler cleaning once weekly if not operating boiler control system servicing & calibration every 6 months boiler black smoke & alarm system servicing & calibration every 6 month or if faulty. (c) operation - Reduce usage of shell. 2. Effluent & natural waterways –action plan: - run online dewatering system (decanter) to reduce solid inside anaerobic ponds increasing 2 times blowdown rate at bioreactor and clarifier tanks to reduce suspended solid in BioPolishing Plant monthly cleaning of cosmo balls and membrane to reduce suspended solid	1.Black smoke –actions - Third party was appointed by the mill to perform maintenance service for boiler control instrumentation at least twice a year. Sighted the service records conducted on 29-30/10/2016 and 26-27/04/2017sighted a schedule of smoke emission for both boiler stacks from July 2016 to March 2017. The result was satisfactory there was no evident that black smoke emission exceeded limit. 2. Effluent & natural waterways plan: Cleaning of cosmo balls and membrane to reduce suspended solid and carry over to final discharge was conducted for monthly. Record of cleaning sighted on maintenance log book. Sighted effluent analysis test report from July 2016 until March 2017. All results complied with regulatory limits for water course dischargeaction plan for monitoring natural waterways: - relocate and reassign sampling points. Additional sampling point (upstream 2, midstream 2, downstream 2). Sighted water analysis test report for 3 sampling pointmonthly inspection of furrows to

			and some over to the state of	
			and carry over to final discharge carry out desludging for Anaerobic	ensure the furrow are well maintained and will not cause
			ponds after biogas plant in operation &	any leachate escape.
			during dry season.	-sighted a process for expansion
			- relocate and reassign sampling points.	of new land irrigation furrows at
			3. Oil trap – action and plan.	field P00BB (15 Ha) to reduce
			- cleaned up the oil trap and the area.	loading to old furrow and ensure
			- installed valve and sump.	no leachate / spillage to
			- assigned Executive and Store in-	waterways.
			charge person.	3. Sighted an installation of new
			establish cleaning schedule.maintain good housekeeping.	valve and oil sump nearby the temporary scheduled waste store
			- maintain good nodsekeeping.	which was completed in June
				2016. The housekeeping for that
				area was satisfactory during
				visited. Sighted a person in
				charge for monitoring and upkeep
				Status: Closed
Indicator:	Minor	NCR #: HO 02	Planned to switch source of electricity	Both estate had a plan improving
5.4.1	Minor	Finding: The plan for improving efficiency of the use of fossil fuel only	from self generating using fossil fuel generator to SESB	efficiency of the fossil fuel plan. Among of the plans was to
3.4.1		established in Merotai POM.	electricity supply in next	regularly monitoring and
		Objective evidence:	fiscal year.	maintenance of tractor usage and
		There were no evident that Tiger estate and Merotai estate	,	Planned to switch source of
		have plan for improving efficiency of the use of fossil fuel.		electricity from diesel genset to
				SESB electricity supply in next
				fiscal year.
Indicator:	Minor	NCR #: MRS 01 2016	1 To appoint one person in charge in	Status: Closed Issues recurring at Table Estate.
6.5.3	IVIII IOI	Finding:	1. To appoint one person in-charge in each OU to carry out weekly housing	Sighted last (WPI) conduct on 18
0.0.0		Management has not conducted weekly inspection of workers'	inspection assisted and on behalf of the	and 23 January 2017. Thus,
		housing as required in the Section 23, Workers' Minimum	MA.	major NCR was issued.
		Standards of Housing and Amenities Act 1990.	2. MA to train these appointed PIC on	Status: Upgraded to Major
		Objective evidence:	what to inspect and checklist to be	NCR.
		Visited sites have conducted linesite audit monthly:	used.	
		1. Merotai POM - 22/1/2016, 19/2/2016, 18/3/2016 and	3. Weekly report shall be verified by the	
		19/4/2016 2. Tiggs estate 15/01/2016 12/2/2016 and 11/02/16	MA for reliability	
		2. Tiger estate - 15/01/2016, 12/2/2016 and 11/03/16 3. Merotai estate - 5/2/2016 and 9/3/2016		
	1	J. IVIGIOIAI ESIAIE - 3/2/2010 AND 3/3/2010		

Attachment 7

SDP - RSPO Certification Status for Malaysia Operations

	I	Tuo for malayola oper			I	
SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10		SPO 550179	
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4 Oct '21	CU-RSPO-815148, SPO 590800	
3	Elphil	Sg Siput, Perak	18 Jun '11	17 Jun '21	SPO 550180	
4	Flemington	Teluk Intan, Perak	5 Oct '11		CU-RSPO-819144, SPO 590802	
5	Seri Intan	Teluk Intan, Perak	3 Mar '11		CU-RSPO-811218, RSPO 0015	
5	Selaba	Teluk Intan, Perak	3 Mar '11	2 Mar '21	CU-RSPO-819142, RSPO 0016	
5a	Sg Samak		3 Mar '11	NA	NA	Withdrawn. Ceased Operation.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2 Mar '21	CU-RSPO-819143, RSPO 0014	
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14 Apr '21	RSPO 550181	
8	East	Carey Island, Selangor	19 May '10	18 May '20	SPO 543543	
9	West	Carey Island, Selangor	19 May '10	18 May '20	SPO 543594	
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Withdrawn. Ceased Operation.
10	Bukit Puteri	Raub, Pahang	7 Jul '16	6 Jul '21	CU-RSPO-815147, 18502206 001, 854 502 14020	
11	Kerdau	Temerloh, Pahang	7 Jul '16	6 Jul '21	CU-RSPO-819155, 18502207 001, 854 502 14019	
12	Jabor	Kuantan, Pahang	7 Jul '16	6 Jul '21	CU-RSPO-819156, RSPO 928288, 854 502 14049	
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29 Dec '16	i	Recertification of Labu POM is in progress. PalmTrace License is valid till end of March 2017 in the PalmTrace system.
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18 May '20	SPO 541905	

15	Sua Betong	Port Dickson, Negeri Sembilan	18 Feb '14	17 Feb '19	SPO 600305, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '16	6 Jul '21	CU-RSPO-819157, RSPO 928188, 824 502 16051	
17	Kempas	Jasin, Melaka	19 May '10	18 May '20	RSPO 005	
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4 Oct '21	CU-RSPO-819146, RSPO 591224	
19	Pagoh	Muar, Johor	28 Jan '14	27 Jan '19	SPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill.
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19 Oct '15	SPO 550182	Withdrawn. Ceased Operation.
20	Chaah	Chaah, Johor	18 Nov '10	17 Nov '20	RSPO 548299	
21	Gunung Mas	Kluang, Johor	19 May '10	18 May '20	RSPO 901888	
22	Bukit Benut	Kluang, Johor	5 Oct '11	4 Oct '21	CU-RSPO-819147, RSPO 591229	
23	Ulu Remis	Layang-layang, Johor	11 Apr '16	10 Apr '21	SGS-RSPO/PM-00722, 824 502 16042	
24	Hadapan	Layang-layang, Johor	29 Mar '11	28 Mar '21	824 502 16040	
25	Segaliud	Sandakan, Sabah	20 May '10	19 May '15	SPO 547123	Withdrawn. Ceased operation.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30 Sep '18	SPO 537872	
27	Melalap	Tenom, Sabah	21 Jan '11	20 Jan '21	SPO 547124	
28	Binuang	Kunak, Sabah	16 Jan '09	12 Jul '20	RSPO 001	
29	Giram	Kunak Sabah	16 Jan '09	12 Jul '20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12 Jul '20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24 May '10		NA	Withdrawn. Ceased operation.
30b	Mostyn	Kunak Sabah	16 Jan '09		NA	Withdrawn. Ceased operation.
31	Lavang	Bintulu, Sarawak	30 Dec '11	29 Dec '21	CU-RSPO-819166, MUTURSPO/053	
32	Rajawali	Bintulu, Sarawak	30 Dec '16	29 Dec '21	CU-RSPO-819167, RSPO 0020	
33	Derawan	Bintulu, Sarawak	30 Dec '11	29 Dec ['] 21	CU-RSPO-819169, RSPO 0019	
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29 Dec '21	CU-RSPO-815150, MUTURSPO/054	

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16 Jan '12	16 Jan '17	MUTU-RSPO/011	
2	PT SAJANG HEULANG		Sebamban, Indonesia	6 Jul '11	6 Jul '16	MUTU-RSPO/006b	Mill closed down.
3	PT SAJANG HEULANG	MUSTIKA OIL MILL		3 Jul'13	3 Jul '18	MUTU-RSPO/027	
1 1	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9 Nov '16	8 Nov '21	MUTU-RSPO/006a	
	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16 Mar '12	16 Mar '17	MUTU-RSPO/014	
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2 Sept '16	1 Sept '21	MUTU-RSPO/003	
	PT BAHARI GEMBIRA RIA		Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9 Jul '12	9 Jul '17	MUTU-RSPO/019	
	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25 Nov '10	24 Nov '20	MUTU-RSPO/002	
ı u	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/016	
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	5-Jul-11	5-Jul-16	MUTU-RSPO/005	
1 11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16 Mar '12	16 Mar '17	MUTU-RSPO/017	

12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30 Dec '11	30 Dec '16	MUTU-RSPO/009	Recertification of Rantau POM is in progress. PalmTrace License is valid till end of Feb 2017 in the PalmTrace system.
13		BETUNG OIL MILL		1 Apr '14	1 Apr '19	MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23 Nov '10	22 Nov '20	MUTU-RSPO/001	
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16 Mar '12	16 Mar '17	MUTU-RSPO/015	
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11 Sep '12	11 Sep '17	MUTU-RSPO/020	
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9 Sept '16	8 Sept '21	MUTU-RSPO/004	
18		TELUK BAKAU	Pelangiran, Sg.Guntung, Indragiri Ilir, Riau	1 Dec '16	30 Nov '21	MUTU-RSPO/008	
	PT BHUMIREKSA NUSA SEJATI	MANDAH OIL MILL	IIII, Klau	1 Apr '14	1 Apr '19	MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8 Dec '16	7 Dec '21	MUTU-RSPO/007	
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10 Jul '12	10 Jul '17	MUTU-RSPO/018	
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18 Jul '16	17 Jul '21	MUTU-RSPO/088	
	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3 May '13	3 May '18	MUTU-RSPO/026	

24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3 Jul '14	2 Jul '19	MUTU-RSPO/044	
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA		Pending certification by RSPO EB.